Today’s Objectives

• Understand General Provisions and Eligibility Criteria
• Improve reporting and compliance
• Understand grantee accountability
• Learn how to access training and other resources
General Provisions & Eligibility Criteria

• Provide the terms and conditions of CSG awards
CSG General Provisions

cpb.org
CSG General Provisions

cpb.org/stations

Community Service Grants
CPB distributes community service grants (CSGs) to noncommercial public television and radio stations that provide significant public service programming to their communities. CSGs help stations expand the quality and scope of their work, whether in educational, news, public affairs or other programming—all of which represent an immeasurable value to the American people. Applicant and current recipient stations must each year meet a variety of legal, managerial, staffing and operational criteria for CSG funding.

- Television CSG General Provisions
- Radio CSG General Provisions

Compliance
- Harassment Prevention Training Program
- CSG Non-Compliance Policy
- Communications Act Compliance
- Compliance Hotline: (202) 879-9655
- Compliance Checklist 2021 350KB PDF
- Compliance Alerts:
  - 2018
  - 2017
  - 2016
  - 2015

Integrated Station Information System
The CSG legal forms as well as reporting tools (AFR, FSR, SABS, and SAS) can be found on the integrated station information system.

Training
CPB provides pre-recorded and live training sessions on financial reporting, completing forms and CSG compliance. To view or sign up for training, visit our training site.
CSG General Provisions

Eligibility Criteria
Communications Act Requirements
Recordkeeping Requirements
Reporting Requirements
Operational Requirements
Diversity Statement
Transparency
Training
Use of CSG Funds
Eligibility Criteria

Eligible:

• operate 1+ broadcast stations and
• at least one meets the CSG eligibility criteria
• TV: full-power UHF or VHF station
Eligibility Criteria

Ineligible:

• closed-circuit
• student
• training or
• licensed to political organizations
Grantees may not receive funding unless they comply with applicable provisions of the Communications Act.

Non-compliance policy
Communications Act

1. Open meetings
2. Closed meetings
3. Open financial records
4. Community advisory board
5. Employment statistical report
6. Donor information
Communications Act

cpb.org/stations

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Communications Act

cpb.org/stations/certification

Communications Act Compliance

This document explains important provisions of the Communications Act of 1934, 47 U.S.C. §396, et seq. (Communications Act or Act) that apply to public broadcasting stations receiving a Community Service Grant (CSG) from the Corporation for Public Broadcasting (CPB). It also references related requirements established by CPB’s General Provisions and Eligibility Criteria (the General Provisions). It does not supersede other provisions of the Act, specific terms of CPG grants, or other laws and regulations applicable to grantees. CSG recipients should consult their legal counsel for guidance in complying with specific provisions of the Act and other legal requirements.

In their annual CSG Agreement and Certification of Eligibility, Grantees must certify that they comply with the Communications Act, the General Provisions, CPB’s Financial Reporting Guidelines and the Application of Principles of Accounting and Financial Reporting Applicable to Public Telecommunications Entities. This annual certification must be signed by two individuals: the head of the grantees and the Licensee official. The head of the licensee is the highest ranking representative of the station’s management responsible for station operations, such as its president and chief executive officer. Licensee official means the chair of the stations licensee’s governing board, or a designated senior level representative of the licensee who is not a member of the station’s management and who has the authority to enter into binding contracts and agreements on behalf of the licensee.

To ensure compliance, the Act enables CPB and its representatives, including the Inspector General, to audit grantees, including the right of access to their “books, documents, papers and records” (§396(b) (3)-(D)). Stations may therefore find it helpful to develop procedures for documenting their compliance with each requirement. Such procedures would support consistency in a station’s compliance, the accuracy of its annual certification to CPB, and evidence that may be useful to demonstrate compliance in the event of a station audit.

Download the Requirements
- Communications Act Compliance 2021 1.3MB PDF
- Compliance Checklist 2021 350KB PDF

General Provisions
- Television
- Radio
The Communications Act mandates recordkeeping and auditing and gives CPB access to all CSG records.

Grantees must keep records to facilitate an effective audit.

Discrete accounting required
Discrete Accounting

• The use of unique accounting codes by CSG recipients to identify CSG funds – both revenues and expenses, restricted and unrestricted

• Not required to segregate CSG funds in separate bank accounts

• Cannot use the CSG accounting codes for non-CSG funds
Reporting Requirements

cpb.org/stations/frg/

Financial Reporting Guidelines

The Financial Reporting Guidelines have been updated. The only major revision was to present new instructions for filing Indirect Administrative Support using the new Standard Method.

Grantees awarded a Community Service Grant (CSG) by CPB must complete either an Annual Financial Report (AFR) or an annual Financial Summary Report (FSR), as detailed in the applicable year General Provisions and Eligibility Criteria. The Financial Reporting Guidelines (Guidelines) for fiscal year 2020 explain how to complete these reports.

- 2020 Financial Reporting Guidelines
- 2019 Financial Reporting Guidelines
- 2018 Financial Reporting Guidelines
Reporting Requirements

**Reporting required:**
AFR/FSR and financial statements within 5 months after close of grantee fiscal year; and submit by Feb. 15:
- Station Activities Survey (SAS)
- Local Content & Services Report (LCSR)
- Station Activities Benchmarking Survey (SABS)

**Grant offers:** Must be accepted by June 30
Operational Requirements

- FCC operating requirements
- Operating power
- Broadcast schedule
- Policy changes
- Staffing requirement
- Minimum NFFS
- Channel sharing agreement (TV)
- Audience service criteria (Radio)
Operational Requirements

FCC Requirements and Operating Power

- Comply with FCC requirements for a noncommercial educational TV or radio station
  - TV: operate at full-power
  - Radio
    - FM: 100 Watts
    - AM: 250 Watts
Operational Requirements

Broadcast Schedule:

CPB Qualified Programming

**TV**: 7 days/week, 52 weeks/year, at least 3,000 hours or 58 hours/week

**Radio**: at least 18 consecutive hours/day, 7 days/week, for 52 weeks/year
CSG Policy

- Radio categories
- Minimum NFFS
- Base and incentive grants
### Radio Organized by Coverage Area Population (CAP)

#### Level Description

<table>
<thead>
<tr>
<th>Level</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Description</td>
<td>Sole Service</td>
<td>Smaller</td>
<td>Larger Rural</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Larger</td>
</tr>
</tbody>
</table>

#### Category

<table>
<thead>
<tr>
<th>Category</th>
<th>CAP 1</th>
<th>CAP 2</th>
<th>CAP 3</th>
<th>CAP 4</th>
<th>CAP 5</th>
<th>CAP 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAP</td>
<td>0-20K</td>
<td>20-100K</td>
<td>100K-300K</td>
<td>300K-1M</td>
<td>1M-3M</td>
<td>3M+</td>
</tr>
</tbody>
</table>
Operational Requirements

**Staffing Requirement:**

**TV:** an executive with primary responsibility to oversee operations

**Radio:** varies by category

- **1-3:** 2 FT employees
- **4:** 3 (min. 2 FT) employees
- **5-6:** 4 (min. 2 FT) employees
Non-Federal Financial Support (NFFS)

Revenue raised from sources other than the federal government and public broadcasting entities

- Memberships
- State appropriations
- Foundation grants
- Underwriting
- Other
### Operational Requirements

**Minimum NFFS**

**TV:** $800,000
- Current NFFS
- 3-year average

**Radio:**

<table>
<thead>
<tr>
<th>Categories</th>
<th>CAP 1 0-20K</th>
<th>CAP 2 20-100K</th>
<th>CAP 3 100K-300K</th>
<th>CAP 4 300K-1M</th>
<th>CAP 5 1M-3M</th>
<th>CAP 6 3M+</th>
</tr>
</thead>
<tbody>
<tr>
<td>NFFS Minimum</td>
<td>$250,000</td>
<td>$275,000</td>
<td>$300,000</td>
<td>$300,000</td>
<td>$400,000</td>
<td>$500,000</td>
</tr>
<tr>
<td>NFFS Minimum (Minority or Rural)</td>
<td>$250,000</td>
<td>$250,000</td>
<td>$275,000</td>
<td>$275,000</td>
<td>$300,000</td>
<td>$400,000</td>
</tr>
<tr>
<td>NFFS Minimum (Minority + Rural)</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
</tr>
</tbody>
</table>

Sole Service grantees have no minimum NFFS requirement.
Operational Requirements

Channel Sharing Agreement

**TV:**

- Two grantees
- Grantee and commercial station
Audience Service Criteria (ASC)

Radio:

- Financial and listening goals
- Goals depend on
  - Coverage Area Population
  - Station format
  - Minority designation
- Removal path
Diversity Statement

To support service to diverse audiences

• Diversity Statement
• Annual review
• Annual Initiative
• Recruiting
Transparency

To ensure transparency and public confidence in the use of CPB funds

<table>
<thead>
<tr>
<th><strong>Website:</strong></th>
<th><strong>Public Inspection:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Station Management</td>
<td>Diversity Statement</td>
</tr>
<tr>
<td>Board of Directors</td>
<td>Local Content and Service Report</td>
</tr>
<tr>
<td>CAB Members</td>
<td></td>
</tr>
<tr>
<td>Financial Records</td>
<td></td>
</tr>
</tbody>
</table>
Harassment & Bias Prevention Training

• Annual requirement for Grantee’s officers, employees, interns (paid and unpaid)

• Options for training
  ▪ EVERFI – online program provided at no cost by CPB
  ▪ Training of Grantee’s choosing
Harassment & Bias Prevention Training

Topics must include:

• What constitutes acceptable and unacceptable workplace behavior;
• How to recognize harassment when it occurs; and
• How to report and respond to violations.
Compliance Training

Annual
Grantees must complete at least one CSG compliance training provided by CPB
- In-person
- Live webinars
# Use of CSG Funds

<table>
<thead>
<tr>
<th>CSG Funds</th>
<th>Radio</th>
<th>TV</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unrestricted Funds</strong></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>7 Spending Categories</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Restricted Funds</strong></td>
<td>✓</td>
<td>N/A</td>
</tr>
<tr>
<td>For National Programming</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Use of CSG Funds

Unrestricted (Radio & TV)
1) programming, production and service
2) broadcasting, transmission, and distribution
3) program information and promotion
4) fundraising and membership development
5) underwriting and grant solicitation
6) management and general
7) purchase, rehabilitation or improvement of capital assets

Restricted (Radio only)
1) production
2) program and content acquisition
3) distribution
4) promotion
Use of CSG Funds

**Spending period:** Funds must be used within 2-year spending period.

**Documenting expenses:** three years with some exceptions

**Return of funds:** conditions requiring grantees to return funds
Questions?
TV & Radio CSG Formulas
CSG Grant Elements

- **Base grant**
  - Fixed amount

- **Supplemental grant**
  - Eligible grantees

- **Incentive grant**
  - Based on NFFS
**CSG Grant Elements**

**FY 2021 TV CSG**
- **Base Grant**
  - 0.12% of total CPB appropriation
  - $558,000

**Supplemental Grants**
- Rural
- Distance service

**Incentive Grant**
Based on a grantee’s tiered NFFS

**FY 2021 Radio CSG**
- **Base Grant determined by category**
  - 1: 0 – 20K: $94,045
  - 2: 20K – 100k: $88,820
  - 3: 100K – 300K: $78,371
  - 4: 300K – 1M: $62,697
  - 5: 1M – 3M: $52,247
  - 6: 3M +: $36,573

**Supplemental Grant**
- Rural Support Grant = $23,643 in 2020
- Designations: Rural Minority
- (+ multipliers on NFFS, base grants, and RSG)

**Incentive Grant**
Based on a grantee’s tiered NFFS
TV: Tiered NFFS for Incentive Grant

<table>
<thead>
<tr>
<th>Tier</th>
<th>Apply CPB Match to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>100% of NFFS up to $3 million</td>
</tr>
<tr>
<td>2</td>
<td>92.5% of NFFS over $3M but less than $20M</td>
</tr>
<tr>
<td>3</td>
<td>95% of NFFS $20M and over</td>
</tr>
</tbody>
</table>
## Radio: Tiered NFFS for Incentive Grant

<table>
<thead>
<tr>
<th>Tier</th>
<th>Apply CPB Match to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>90% of NFFS up to $300 thousand</td>
</tr>
<tr>
<td>2</td>
<td>100% of NFFS from $300K to less than $15M</td>
</tr>
<tr>
<td>3</td>
<td>90% (2022); 80% (2023) of NFFS $15M and over</td>
</tr>
</tbody>
</table>
**Estimating** FY 2022 TV CSGs

**Base**
- 0.12% of appropriation
- $558,000
- MPM grantees share one

**Incentive**
- 12 cents*
- Use 2020 tiered NFFS

**USSG, IC & DSG**
- Similar to 2021 CSG
- Transmitter changes affect DSG

### DSG Calculation

<table>
<thead>
<tr>
<th>Transmitters</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
</tr>
</thead>
<tbody>
<tr>
<td>% Base Grant</td>
<td>5%</td>
<td>7.5%</td>
<td>10%</td>
<td>20%</td>
<td>30%</td>
<td>40%</td>
<td>50%</td>
<td>60%</td>
<td>70%</td>
<td>80%</td>
</tr>
</tbody>
</table>
**Estimating FY 2022 Radio CSGs**

**Base**
- Varies by category
- If MASS = 1.5 x

**Incentive**
- All categories
- 0.048 IRR
- Use tiered 2020 NFFS

**RSG**
- For Rural Audience Service Stations
- If MASS = 1.5 x

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<table>
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<tr>
<th>Category</th>
<th>CAP Range</th>
<th>Base Grant</th>
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Questions?
CSG Resources

CPB Office of Grants Administration
Kate Arno, VP, CSG and Station Initiatives
Tim Bawcombe, Director, TV CSG Policy and Review
Andrew Charnik, Director, Radio CSG Policy and Administration
Forrest Lillibridge, Director, Grants Administration
Sharon Simmons, Manager, Grants Administration
Ken Goulet, Senior Financial Review Specialist
Brittany Lee, Project Coordinator

Help Desk
Email: csg@cpb.org
Phone: (866) 635-4747

cpb.org
CSG information page: cpb.org/stations/
Online webinars: cpb.org/station-resource/csg-and-isis-training-opportunities
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CSG and ISIS Training Opportunities

Next Live Online Webinars

- CSG Requirements & Resources: Sept. 9, 2021 at 2:00 pm ET
- How to Accept Your Station's Community Service Grant Award Offer: Sept. 16, 2021 at 2:00 pm ET
- Intro to Financial Reporting: Sept. 29, 2021 at 2:00 pm ET
- What is NFFS?: October 6, 2021 at 2:00 pm ET
- Completing the FSR: October 13, 2021 at 2:00 pm ET

We strongly encourage all station/licensee staff assigned to ISIS security groups to sign up for as many webinars and face-to-face workshops as needed to understand the use of ISIS, CSG compliance and certification, as well as how to complete CSG legal, financial, survey and other reporting forms. Inquiries related to SABS and SAS should be sent to SABS@cpb.org and SAS@cpb.org, respectively. For all other inquiries, please email CSG@cpb.org.

Pre-Recorded Web-Based Training

Pre-Recorded Harassment and Bias Prevention Training Requirement

This pre-recorded session reviews CPB’s annual requirement for harassment and bias prevention training for CSG recipients and the long term objectives of this training requirement. It also gives a brief overview of the new, no cost option provided by CPB to complete this training and information on how CSG recipients can access it.
CSG Training

- **Thursday, Sept. 16, 2021**
  - How to Accept Your Station’s Community Service Grant Award Offer

- **Wednesday, Sept. 29, 2021**
  - Intro To Financial Reporting

- **Wednesday, Oct. 6, 2021**
  - What is NFFS?

- **Wednesday, Oct. 13, 2021**
  - Completing the FSR
Community Service Grant
Requirements and Resources

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