



CORPORATION FOR PUBLIC BROADCASTING (CPB) and FEDERAL COMMUNICATIONS COMMISSION

WUCF is a public service of the University of Central Florida (the “University”), licensed by the Federal Communications Commission to the Board of Trustees of the University of Central Florida, is committed to compliance with the Corporation for Public Broadcasting (“CPB”) requirement for TV and Radio Community Service Grants (“CSG”) eligibility. These policies are designed to demonstrate the Station’s compliance with the CSG eligibility requirements.

Open Financial Records: WUCF will comply with the open financial records requirements, as set forth in section 396(k)(5) of the Communications Act.

1. The Law

Section 396(k)(5) of the Communications Act provides that:

“Funds may not be distributed pursuant to this subsection to any public telecommunications entity that does not maintain for public examination copies of the annual financial and audit reports, or other information regarding finances, submitted to the Corporation pursuant to subsection (l)(3)(B).”

Section 396(l)(3)(B) of the Act requires that each public telecommunications entity receiving funds from CPB shall be required:

- i. to keep its books, records, and accounts in such form as may be required by the Corporation;
- ii. (I) to undergo a biennial audit by independent certified public accountants or independent licensed public accountants certified or licensed by a regulatory authority of a State, which shall be in accordance with auditing standards developed by the Corporation, in consultation with the Comptroller General; or
(II) to submit a financial statement in lieu of the audit required by subclause (I) if the Corporation determines that the cost of such audit on such entity is excessive in light of the financial condition of such entity; and
- iii. to furnish biennially to the Corporation a copy of the audit report required pursuant to clause (ii) as well as such other information regarding finances (including an annual financial report) as the Corporation may require.

2. Station Policy, WUCF will make the following types of record available for public inspection:
 - a. Annual Financial Reports filed with CPB;
 - b. Audited statements or other financial statements filed with CPB. These include the reports from CPB required audits conducted by independent certified public accountants or state-certified independent public accountants, according to the CPB adopted audit standards, and the financial statements which CPB may permit to be submitted in lieu of such audit reports under circumstances; and
 - c. Other information regarding finances submitted to CPB related to any funding agreement with CPB that requires a financial report.

Open Meeting/Closed Meeting Requirements: WUCF will comply with the open meetings requirements, as set forth in section 396(k)(4) of the Communications Act.

1. The Law

Section 396(k)(4) of the Communications Act provides that:

“Funds may not be distributed pursuant to this subsection to the Public Broadcasting Service or National Public Radio (or any successor organization), or to the licensee or permittee of any public broadcast station, unless the governing body of any such organization, any committee of such governing body, or any advisory body of any such organization, holds open meetings preceded by reasonable notice to the public. All persons shall be permitted to attend any meeting of the board, or any such committee or body, and no person shall be required, as a condition to attendance at any such meeting, to register such person’s name or to provide any other information.”

“Nothing contained in this paragraph shall be construed to prevent any such board, committee, or body from holding closed sessions to consider matters relating to individual employees, proprietary information, litigation and other matters requiring the confidential advice of counsel, commercial or financial information obtained from a person on a privileged or confidential basis, or the purchase of property or services whenever the premature exposure of such purchase would compromise the business interests of any such organization. If any such meeting is closed pursuant to the provisions of this paragraph, the organization involved shall thereafter (within a reasonable period of time) make available to the public a written statement containing an explanation of the reasons for closing the meeting.”

Section 397(5) of the Communications Act provides that:

“The term ‘meeting’ means the deliberations of at least the number of members of a governing or advisory body, or any committee thereof, required to take action on behalf of such body or committee where such deliberations determine or result in the joint conduct or disposition of the governing or advisory body’s business, or the committee’s business, as the case may be, but only to the extent that such deliberations relate to public broadcasting.”

2. Station Policy, WUCF will do the following:
 - a. Open the meetings of its governing body and any committee of its governing body to the public;
 - b. Open the meetings of its community advisory board (if any) or any advisory body of the governing board to the public;
 - c. Give reasonable notice to the public of the fact, time and place of an open meeting at least one week (7 days) in advance of the scheduled date of an open meeting;
 - d. Allow all persons to attend any open meeting of the board, committee or advisory board, without requiring, as a condition of attendance, that the person register or provide such person’s name or any other information, except as would be reasonably required to maintain a safe meeting environment; and
 - e. If a meeting is closed pursuant to the exceptions recognized by the law, make available to the public, within a reasonable period of time after the closed meeting, a written statement containing an explanation of the reason(s) for closing the meeting.

WUCF may conduct meetings of the governing body, its committees or advisory groups that are not open to the public as long as they deal with matters considered to be exceptions to the open meeting requirement.

Minimum compliance for “reasonable” requires that:

1. Posting notice on the station’s website;
2. Broadcasting notice on-air between 6 a.m. and 11 p.m., as shown by the station’s log;
3. Placing notice in the “Legal Notices” section of a local newspaper in general circulation in the station’s primary coverage area; or
4. Giving notice through a recorded announcement accessible on the station’s phone system.

For a station to satisfy the requirement that a written explanation be offered after a meeting is closed to the public.

- a. The Act requires stations to document and make available to the public the specific reason(s) for closing a meeting within a reasonable time after the meeting.
- b. CPB requires that the written statement be made available for inspection, either at the CSG recipient's central office or posted on its station website, within 10 days after each closed meeting,

EEO Requirements: WUCF will comply with the EEO requirements, as set forth in section 396(k)(11) of the Communications Act.

1. The Law

Section 396(k)(11) of the Communications Act provides that:

“(A) Funds may not be distributed pursuant to this subsection for any fiscal year to the licensee or permittee of any public broadcast station if such licensee or permittee—”

“(i) fails to certify to the Corporation that such licensee or permittee complies with the Commission's regulations concerning equal employment opportunity as published under section 73.2080 of title 47, Code of Federal Regulations, or any successor regulations thereto; or”

“(ii) fails to submit to the Corporation the report required by subparagraph (B) for the preceding calendar year.”

“(B) A licensee or permittee of any public broadcast station with more than five full-time employees is required to file annually with the Corporation a statistical report, consistent with reports requirements by Commission regulation, identifying by race and sex the number of employees in each of the following full-time and part-time job categories:

“(i) Officials and managers.

“(ii) Professionals.

“(iii) Technicians.

“(iv) Semiskilled operatives.

“(v) Skilled craft persons.

“(vi) Clerical and office personnel.

“(vii) Unskilled operatives.

“(viii) Service workers.

“(C) In addition, such report shall state the number of job openings occurring during the course of the year. Where the job openings were filled in accordance with the regulations described in subparagraph (A) (i), the report shall so certify, and where the job openings were not filled in accordance with such regulations, the report shall contain a statement providing reasons therefor. The statistical report shall be available to the public at the central office and at every location where more than five full-time employees are regularly assigned to work.”

2. Station Policy, WUCF will comply with the above FCC regulations concerning equal employment.

If Station employs six or more full-time employees, Station will:

- a. Require stations with six or more full-time employees to annually report to CPB the race and sex of the number of employees in the full- and part-time categories below. CPB requires all stations to provide this information annually in their Employment Statistical Report
- b. Certify annually to CPB that it filled all job openings in accordance with FCC regulations, or to provide CPB with a statement explaining the reasons for each noncompliance. Stations are required to provide this certification and related information in their Employment Statistical Report.
- c. Require that stations make their Employment Statistical Report available for review by the general public at their central offices and at every location with six or more employees.

Donor Lists: WUCF will comply with the donor lists requirements as set forth in Section 396(k)(12) of the Communications Act.

1. The Law.

Section 396(k)(12) of the Communications act provides that:

“(12) Funds may not be distributed under this subsection to any public broadcasting entity that directly or indirectly “

“(A) rents contributor or donor names (or other personally identifiable information) to or from, or exchanges such names or information with, any Federal, State, or local candidate, political party, or political committee; or”

“(B) discloses contributor or donor names, or other personally identifiable information to any nonaffiliated third party unless “

“(i) such entity clearly and conspicuously discloses to the contributor or donor that such information may be disclosed to such third party;”

“(ii) the contributor or donor is given the opportunity before the time that such information is initially disclosed, to direct that such information not be disclosed to such third party; and”

“(iii) the contributor or donor is given an explanation of how the contributor or donor may exercise that nondisclosure option.”

Governing Advisory Board: WUCF is owned and operated by a state university (a state governmental entity) and, therefore, WUCF is not required to have a Community advisory Board pursuant to section 396(k)(8) of the Communications Act.

Discreet Accounting Requirements: WUCF shall comply with CPB’s discrete accounting requirements.

Discrete accounting requires a unique code that identifies CSG funds — both revenues and expenses, restricted and unrestricted — so that both the grantor and the auditor can discretely track those funds within the accounting system. There is no requirement to segregate CSG funds in separate bank accounts. Co-mingling funds is allowable as long as the accounting system can easily identify transactions associated with a major activity (i.e., department, grant, contract or other project).