



---

**CORPORATION FOR PUBLIC BROADCASTING (CPB)  
COMPLIANCE POLICIES**

Station WUCF-TV, licensed to the University of Central Florida ("UCF"), is committed to compliance with the Corporation for Public Broadcasting ("CPB") requirements for TV Community Service Grant ("CSG") eligibility. These policies are designed to demonstrate the Station's compliance with the CSG eligibility requirements.

**Open Financial Records.** Station WUCF-TV 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 audit 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. Station WUCF-TV will make the following types of records available for public inspection:

- a. Annual financial reports filed with CPB;

## (CPB) COMPLIANCE POLICIES

- 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 certain circumstances; and
- c. Other information regarding finances submitted to CPB related to any funding agreement with CPB that requires a financial report.

**Open Meetings Requirements.** Station WUCF-TV 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 of 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 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."*

## (CPB) COMPLIANCE POLICIES

2. Station Policy. WUCF-TV 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.

Station WUCF-TV 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 notice" requires that:

- a. Notice is placed in the "Legal Notices" or the radio and television schedules section of a local newspaper in general circulation in the station's coverage area; or, notice is available through a recorded announcement that is accessible on the station's phone system; or, notice is available through an announcement that is accessible on the station's Web page; and
- b. Notice is communicated by letter, e-mail, fax, phone, or in person to any individuals who have specifically requested to be notified; and
- c. The station makes on-air announcements on at least three consecutive days once during each calendar quarter that explain the station's open meeting policy and provide information about how the public can obtain information regarding specific dates, times, and locations.

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

## (CPB) COMPLIANCE POLICIES

- a. The explanation of the reasons for a closed meeting should be distributed in the same manner as the notice of an open meeting, made available to the public at the station's offices, posted on the station's Web site, or by offering to mail a copy of the explanation to any person who requests one. If applicable, a reasonable charge for this service, or the requirement of a self-addressed, stamped envelope, may be considered.
- b. In the case of regularly scheduled meetings that are usually open to the public, the station should give advance notice of the fact that such a meeting will be closed when the occasion arises. The notice that such a normally open meeting will be closed should be disseminated in the same manner as the notice of an open meeting. Meetings that are not regularly scheduled would not need an advance notice of closing.

**EEO Requirements.** Station WUCF-TV will comply with the EEO requirements, as set forth in Section 396(k)(11) of the Communications Act.

### 1. The Law.

A. 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 required 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.*

## (CPB) COMPLIANCE POLICIES

*"(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 for noncompliance. 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-TV will comply with the above-referenced FCC regulations concerning equal employment.

If Station WUCF-TV employs more than five full-time employees, Station WUCF-TV will:

- a. file annually with CPB the statistical report described above (although not required by law for stations with five or fewer employees, CPB requires that all station grant recipients file such statistical information with CPB annually);
- b. certify that the job openings identified in the statistical report were filled in accordance with FCC regulations or provide a statement of the reasons for not filling the positions in accordance with such regulations; and
- c. make this statistical information available to the public at the central office of the station and at every location where more than five full-time employees are regularly assigned to work.

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

1. The Law.

A. 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;*

## (CPB) COMPLIANCE POLICIES

*"(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."*

2. Station Policy. Station WUCF-TV will do the following:
  - a. Annually certify to CPB their continued compliance with the laws and regulations of the Internal Revenue Service, and with all other applicable Federal law or regulations governing political activity and lobbying in effect at the time of certification;
  - b. Not sell, rent, lease, loan, trade, give, donate, transfer or exchange their membership or donor names to, with or from any candidate for Federal, State or local office, political committees, or political parties for any purpose whatsoever, except as otherwise required by law or judicial process;
  - c. Maintain active control of their contributor and donor lists, and take all appropriate measures to ensure against unauthorized use of such lists including requiring any third party, including but not limited to list brokers, mail-list management organizations, Friends organizations, fundraising organizations, or advertising or public relations agencies, to abide by a grantees' compliance requirements, except as otherwise required by law or judicial process;
  - d. Refrain from disclosing contributor or donor names or other personally identifiable information to any nonaffiliated third party unless, before the time that such information is initially disclosed, they clearly and conspicuously disclose to contributors and donors that such personal information may be disclosed to a nonaffiliated third party. If such disclosure is not required by law or judicial process, the grantee shall give the contributor or donor the opportunity to direct that such information not be disclosed to a nonaffiliated third party, and give the contributor or donor an explanation of how to exercise that nondisclosure option; and
  - e. Periodically remind contributors or donors of any potential for sale, rental, lease, loan, trade, gift, donation, transfer, or exchange of their names and personally identifiable information, and offer a means by which the names and other personally identifiable information may be suppressed upon request; and suppress the names as requested, except as required by law or judicial process.
  - f. The Station will maintain complete, accurate, and secure records of all uses of membership and donor lists for fundraising purposes, and furnish such records to CPB on request.

**(CPB) COMPLIANCE POLICIES**

**Community Advisory Board.** Station WUCF-TV is owned and operated by a state university (a state governmental entity) and, therefore, the Station is not required to have a Community Advisory Board pursuant to Section 396(k)(8) of the Communications Act.

**Discrete Accounting Requirements.** Station WUCF-TV 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).

**Reviewed and Approved:**



\_\_\_\_\_  
**Alfred G. Harms, Jr., Vice President**  
**Strategy, Marketing, Communications & Admissions**

Date: 12/10/2012