Radio Community Service Grants
Revised Policies and CSG Requirements
Today’s Objectives

• Review CSG program basics and policy changes
• Understand General Provisions and Eligibility Criteria
• Improve reporting and compliance
• Learn how to access training and other resources
• Questions
Authorized by the Public Broadcasting Act of 1967

Financial foundation for the public media system

Grants to eligible public radio and TV stations

Largest amount of money that CPB administers
• 394 Radio CSG Grantees (79 joint licensees)
• 1,195 Stations
• **36** Native CSG Grantees
  (1 joint licensee)
• **65** Stations
CSG Policy Changes

- Radio level reorganization
- Minimum NFFS
- Base grants
- Incentive grants
- Indirect administrative support
Radio Organized by Coverage Area Population (CAP)

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

<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>
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
## Minimum NFFS

<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></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$100,000</td>
</tr>
</tbody>
</table>

Sole Service grantees have no minimum NFFS requirement
CSG Grant Elements

- **Base grant**
  - Fixed amount

- **Supplemental grant**
  - Eligible grantees

- **Incentive grant**
  - Based on NFFS
## FY 2023 Radio CSG

### Base Grant determined by category

<table>
<thead>
<tr>
<th>Tier</th>
<th>Range</th>
<th>Grant Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0 – 20K</td>
<td>$96,067</td>
</tr>
<tr>
<td>2</td>
<td>20K – 100K</td>
<td>$90,730</td>
</tr>
<tr>
<td>3</td>
<td>100K – 300K</td>
<td>$80,056</td>
</tr>
<tr>
<td>4</td>
<td>300K – 1M</td>
<td>$64,045</td>
</tr>
<tr>
<td>5</td>
<td>1M – 3M</td>
<td>$53,371</td>
</tr>
<tr>
<td>6</td>
<td>3M +</td>
<td>$37,360</td>
</tr>
</tbody>
</table>

### Supplemental Grant

- **Rural Support Grant** = $24,670 in 2022
- Designations:
  - Rural
  - Minority
- (+ multipliers on NFFS, base grants, and RSG)

### Incentive Grant

- Based on a grantee’s tiered NFFS
## 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>80% of NFFS $15M and over</td>
</tr>
</tbody>
</table>
Estimating FY 2023 Radio CSGs

**Base**
- Varies by category
- If MASS = 1.5 x
- If MASS & Sole Service = 1.75 x

**Incentive**
- All categories
- 0.05 IRR*
- MASS or RASS = 1.25 \times \text{NFFS}
- MASS + RASS = 1.75 \times \text{NFFS}
- Tiered 2021 NFFS

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

<table>
<thead>
<tr>
<th>Category</th>
<th>CAP Range</th>
<th>Base Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0 – 20K</td>
<td>$96,067</td>
</tr>
<tr>
<td>2</td>
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<td>6</td>
<td>3M +</td>
<td>$37,360</td>
</tr>
</tbody>
</table>

Simplify the Calculation of IAS

• Allow one method
  – Derive a rate by dividing the licensee’s indirect costs by its direct costs;
  – Apply the rate to a base amount consisting of the station’s net direct expenses.
<table>
<thead>
<tr>
<th>Exhibit C</th>
<th>Calculation Document</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CAP Category</strong></td>
<td>1</td>
</tr>
<tr>
<td><strong>CAP Range</strong></td>
<td>&lt; 20,000</td>
</tr>
<tr>
<td><strong>Minimum Number of Employees</strong></td>
<td>2</td>
</tr>
<tr>
<td><strong>Minimum Full-time Employees</strong></td>
<td>2</td>
</tr>
<tr>
<td><strong>Minimum NFFS</strong></td>
<td>$250,000</td>
</tr>
<tr>
<td>MASS or RASS</td>
<td>$250,000</td>
</tr>
<tr>
<td>Both MASS and RASS</td>
<td>$100,000</td>
</tr>
<tr>
<td><strong>Minimum Direct NFFS</strong></td>
<td>$500,000</td>
</tr>
<tr>
<td><strong>ASC</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Base Grant</strong></td>
<td>$94,045</td>
</tr>
<tr>
<td>Sole Service</td>
<td>x 1.25</td>
</tr>
<tr>
<td>MASS</td>
<td>x 1.5</td>
</tr>
<tr>
<td><strong>Incentive Grant</strong></td>
<td>Tiered NFFS x IRR</td>
</tr>
<tr>
<td>MASS</td>
<td>x 1.25</td>
</tr>
<tr>
<td>Both MASS and RASS</td>
<td>x 1.25</td>
</tr>
<tr>
<td><strong>Rural Support Grant</strong></td>
<td>RSG x 1.5</td>
</tr>
<tr>
<td>Both MASS and RASS</td>
<td></td>
</tr>
</tbody>
</table>

1. MASS Grantees may meet the Staffing Requirement with Full-time Equivalent Employees.
2. Stations that must have a minimum NFFS of $100,000 include Minority Audience Service Stations (MASS) with a minority audience composition of at least 75% and stations that meet the criteria for both MASS and RASS.
3. Sole Service grants do not have to meet the ASC requirement.
4. All grantees will receive an incentive match on Tiered NFFS which is a portion of total NFFS: 90% of NFFS less than $300,000, 100% of NFFS from $300,000 to less than $15 million, and 90% of NFFS of $15 million and greater.
5. FY 2023 Radio Incentive Rate of Return (IRR) is estimated at 4.8% for every dollar of Tiered NFFS (Non-Federal Financial Support).
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.

Compliance

- Television CSG General Provisions
- Radio CSG General Provisions

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.

Compliance Alerts:

- 2018
- 2017
- 2016
- 2015
CSG General Provisions

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

Eligible
• operate 1+ broadcast stations and
• at least one meets the CSG eligibility criteria

Ineligible
• closed-circuit
• student
• training or
• licensed to political organizations
Communications Act

Grantees may not receive funding unless they comply with applicable provisions of the Communications Act.

Non-compliance policy

The Corporation for Public Broadcasting (CPB) has established this CSG Non-compliance Policy to encourage stations receiving a Community Service Grant (CSG) to comply with applicable provisions of the Communications Act of 1934, 47 U.S.C. §316, et seq. (Communications Act or Act) and CPB’s General Provisions and Eligibility Criteria (General Provisions). This policy replaces and supersedes CPB’s 2013 Grantee Non-compliance Policy.

The General Provisions require CSG recipients to certify annually that they comply with applicable provisions of the Communications Act and the General Provisions. Stations that certify their compliance but are subsequently found to be non-compliant will be subject to the following penalties, in addition to any repayment of CSG funds as required by the General Provisions.

I. Compliance with the Communications Act

Failure to comply with the following Communications Act requirements will subject the recipient to a penalty of $5,000 per instance:

A. Open Meetings, including meetings of the recipient’s board, community advisory board, and their committees, documenting the reasons for closing these meetings, and making minutes documentation available to the public (47 U.S.C. § 396(c)(4));
B. Open Financial Records (47 U.S.C. § 396(b)(3));
C. Community Advisory Board (47 U.S.C. § 396(k)(3));
E. Donor Information (47 U.S.C. § 399(x)(12)).

II. Compliance with the General Provisions

Failure to comply with requirements of the General Provisions which results in overpayment of the recipient’s CSG will subject the recipient to a penalty of ten percent of the amount of the overpayment, in addition to refunding the overpayment. In such cases, CPB may require the recipient to review its records for the prior two years and...
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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- Television CSG General Provisions
- Radio CSG General Provisions

Compliance

- Harassment Prevention Training Program
- Communications Act Compliance
- Compliance Checklist 2021 350KB PDF
- Compliance Alerts:
  - 2018
  - 2017
  - 2016
  - 2015

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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. §331 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 CSG 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 grantee and the licensee. The head of the grantee 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 licensees’ governing board, or a designated senior level representative of the licensee who is 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” (§331(b) (2)). 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.
Recordkeeping

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. No major revisions have been made to this year’s version compared to last year’s, but please note the addition of two clarifying footnotes, numbered 20 and 21 on page 12.

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 2021 explain how to complete these reports:

- 2021 Financial Reporting Guidelines
- 2020 Financial Reporting Guidelines
- 2019 Financial Reporting Guidelines
Reporting Requirements

**Reporting**
- **AFR/FSR** and financial statements within 5 months after close of grantee fiscal year

- Station Activity Survey (SAS) by Feb. 15

**Grant Offers**
Must be accepted by June 30
Operational Requirements

- FCC operating requirements
- Operating power
- Broadcast schedule
- Policy changes
- Staffing requirement
- Audience service criteria
FCC Requirements and Operating Power

• Comply with FCC requirements for a noncommercial educational radio station
  ▪ FM: 100 Watts
  ▪ AM: 250 Watts
Operational Requirements

Broadcast Schedule

CPB-Qualified Programming

At least 18 consecutive hours/day,
7 days/week, for 52 weeks/year
Operational Requirements

Staffing Requirement

Varies by category

- 1-3: 2 FT employees
- 4: 3 (min. 2 FT) employees
- 5-6: 4 (min. 2FT) employees
Audience Service Criteria (ASC)

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

<table>
<thead>
<tr>
<th>Website</th>
<th>Public Inspection</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>
Grantees must meet all applicable federal and state laws and regulations regarding donor privacy and data security.
Harassment and 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 and Bias Prevention Training

Topics must include:

• What constitutes acceptable and unacceptable workplace behavior;

• How to recognize harassment and bias 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 CPB-ISIS

- Financial reporting & SAS
  - AFR, FSR, SAS

- Annual Certification of Eligibility
  - Certify and accept

- CPB-ISIS Training Webinar
  - New in 2021
  - How to Accept Your Station's CSG Award Offer
CPB-ISIS Security Groups

- Head of Grantee
- Licensee Official
- Grants Administrator
- Independent Accountant
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
Use of CSG Funds

Unrestricted
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
1) production
2) program and content acquisition
3) distribution
4) promotion
Where to Find Resources – cpb.org
CSG Resources

cpb.org/stations
  CSG General Provisions and Eligibility Criteria
  Communications Act Compliance
  Online webinars – live and pre-recorded

Help Desk
  Email: CSG@cpb.org
  Phone: (866) 635-4747
CSG General Provisions

cpb.org/stations

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CSG Training

cpb.org/station-resource/csg-and-isis-training-opportunities

CSG and ISIS Training Opportunities

Next Live Online Webinars

Check here in August for details on our Fall 2022 live webinars.

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 SARS and SAS should be sent to SARS@cpb.org and SAS@cpb.org, respectively. For all other inquiries, please email CSG@cpb.org.

Pre-Recorded Web-Based Training

Pre-Recorded Completing the FSR
CPB staff will discuss the financial reports requirements that are unique to Financial Summary Report (FSR) filers and guide attendees through detailed instructions on completing the FSR.

Pre-Recorded What is NFSS?
Non-federal financial support (NFSS) is an eligibility criterion for the CSG program as well as a key component in calculating CSGs. This is the principal reason for submitting an Annual Financial Report (AFR) to CPB. This webinar will explain the concept of NFSS and provide simple methods for determining the NFSS eligibility of direct and in-kind revenue. This session is recommended for AFR filers, regardless of experience level.
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