



Corporation
for Public
Broadcasting

Office of the Inspector General

May 7, 2024

To: Jackie J. Livesay, Deputy General Counsel and Vice President, Compliance
Kathy Merritt, Senior Vice President, Radio, Journalism and CSG Services

From: Kimberly A. Howell, Inspector General

Digitally signed by
Kimberly Howell
Date: 2024.05.07
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Subject: Evaluation of KGOU-FM, The University of Oklahoma, Compliance with Selected
Communications Act and General Provisions Transparency Requirements, Report No.
ECR2406-2408

We have completed an unannounced evaluation of compliance with selected requirements of the 2024 Corporation for Public Broadcasting (CPB) Community Service Grant (CSG) awarded to KGOU-FM Public Radio, licensed to The University of Oklahoma, Norman, Oklahoma. Our specific objectives were to verify compliance with 11 requirements of the Communications Act of 1934, as amended (Act) for open and closed meetings and open financial records, as well as the 2024 Radio CSG General Provisions and Eligibility Criteria (General Provisions) for transparency as presented in Exhibit A. Background information on the station and CSG program can be found in Exhibit B.

Based on our review of the KGOU-FM website on February 28, 2024, we found the station was compliant with seven of the seven applicable requirements reviewed. The remaining four requirements were not applicable. The station's response to the draft report is presented in Exhibit D.

We initiated this evaluation to address station accountability as identified in our Annual Plan. We conducted our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*. Our scope and methodology are discussed in Exhibit C.

cc: Laura Ross, Chair, CPB Board of Directors
Elizabeth Sembler, CPB Board of Directors, Audit and Finance Committee
U.S. Senate Committee on Homeland Security and Governmental Affairs
U.S. House of Representatives Committee on Oversight and Accountability
U.S. Senate Committee on Commerce, Science and Transportation
U.S. House of Representatives Energy and Commerce Committee
U.S. Senate Committee on Appropriations
U.S. Senate Labor-HHS-Education Appropriations Subcommittee
U.S. House of Representatives Committee on Appropriations
U.S. House of Representatives Labor-HHS-Education Appropriations
Subcommittee

**Summary of KGOU-FM Website Review
as of February 28, 2024**

Requirements	Met	Not Met
1) Seven-day advance notice of governing body meeting:		
a) available on website	X	
b) available by other means		
2) Seven-day advance notice of board committee meetings:		
a) available on website	X	
b) available by other means		
3) Seven-day advance notice of CAB meetings:	N/A	
a) available on website		
b) available by other means		
4) If closed meetings were held, was documentation prepared explaining the basis for closing meeting in accordance with the Act:	N/A	
a) available on website		
b) available at central office		
5) If closed meeting documentation was prepared, was it available within 10-days of the closed meeting	N/A	
6) Most recent Annual Financial Report or Financial Summary Report available on website	X	
7) Most recent audited financial statements on website	X	
8) Senior/executive management information on website	X	
9) Governing body members on website	X	
10) CAB members on website	N/A	
11) Grantee's annual report on local content and services included in the grantee's current 2023 SAS on its content and services that serve local needs; and analysis about the reach and impact of the local services in its community.		
a) available on website	X	
b) available at central office		

Background

KGOU-FM is a full service non-commercial public radio station, licensed to The University of Oklahoma and operated by the University of Oklahoma Outreach. The station's governing body is The University of Oklahoma Board of Regents. The station services the greater Oklahoma City metropolitan area, cities in Pontotoc, Seminole, Pottawatomie, and Grady counties, and much of western and northwestern Oklahoma. Its format is primarily news/talk on weekdays, with jazz, blues, funk and groove, and world music programs on weekends. The station's mission is "delivering thoughtful storytelling that informs, reflects, connects, and serves communities."

CPB's Community Service Grant Program

The Act provides that specific percentages of the appropriated funds CPB receives annually from the United States Treasury must be allocated and distributed to licensees and permittees of public TV and radio stations. CPB distributes these funds through its CSG program. Grant award amounts are based in part on the amount of Non-Federal Financial Support (revenues) claimed by all stations on their Annual Financial Report (AFR) and Financial Summary Report (FSR) submitted to CPB.

In addition to the annual filing of a station's AFR or FSR for radio and/or television, the chief executive of the station and a licensee official annually certify to CPB the station's compliance with Act requirements and selected General Provisions requirements in the legal agreement awarding the station CSG funds.

These certifications specifically address open and closed meetings, open financial records, Community Advisory Board, CPB Employment Statistical Report, and donor information requirements under Section IV Communications Act Compliance of the agreement. Station officials responsible for closed meetings and the CPB Employment Statistical Report requirements are identified in the grant agreement. The certification also includes website postings required under Section V. Selected General Provisions Requirements of the agreement.

Scope and Methodology

We performed an evaluation of KGOU-FM's compliance with selected provisions of the Act and grant certification requirements. Our specific objectives were to verify compliance with selected Act requirements for open and closed meetings and open financial records, as well as 2024 Radio Community Service Grants General Provisions and Eligibility Criteria for transparency. The scope of the evaluation included reviews of the information posted on the station's website as of February 28, 2024, as well as information provided in response to our Preliminary Observations issued on March 6, 2024.

We reviewed documents supporting the station's compliance with the Act requirements to provide advance notice of public meetings, notice of closed meeting reasons, and make financial information available to the public. We also reviewed the station's website and processes to determine its compliance with CPB's transparency requirements for eligibility. We informed station management of our evaluation on March 6, 2024, and we requested additional information to support the station's compliance, including, as applicable, transparency information maintained at its central office for documents that was required to be made available to the public at its central office if not posted on its website.

We also reviewed CPB's Integrated Station Information System (ISIS) to determine if the evaluated information made available to the public was the most recent information submitted to CPB. In addition, we verified with station management that board and management listings posted to its website were current.

We conducted our fieldwork from February 28 through March 7, 2024 and performed our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*.



YOUR
NPR
SOURCE

Exhibit D

KGOU Radio
University of Oklahoma
860 Van Vleet Oval
Norman, OK 73019-2053

(405) 325-3388 • kgou.org

April 23, 2024

William J. Richardson III
Deputy Inspector General
Office of Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

RE: Evaluation of KGOU-FM, The University of Oklahoma, Compliance with Selected Communications Act and General Provisions Transparency Requirements, Draft Report No. ECR2406-XXXX

Dear Mr. Richardson:

Thank you for this opportunity to respond to the Office of Inspector General's Draft Evaluation Report in the above referenced matter. We are grateful for the effort your staff put into your evaluation of KGOU-FM's compliance with the transparency requirements contained in the Corporation for Public Broadcasting's 2024 Radio Community Service Grant General Provisions and Eligibility Criteria and the public broadcasting provisions of the Communications Act of 1934, as amended.

Our station takes transparency and compliance with legal requirements very seriously and are both gratified and proud the Draft Evaluation Report found KGOU-FM complied with all applicable requirements, and therefore contained no recommendations regarding our organization. Of course, we will continue our work to ensure KGOU-FM complies with all CPB requirements.

On our website, we state KGOU-FM's mission is to deliver thoughtful storytelling that informs, reflects, connects, and serves communities. Part of this service is a commitment to transparency in our operations for our listeners and the communities we serve. We believe the Draft Evaluation Report's results are reflective of our hard work and commitment.

Sincerely,

Dick Pryor
General Manager
KGOU Radio