

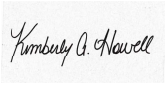


Corporation
for Public
Broadcasting

Office of the Inspector General

September 26, 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: 2024.09.26
09:02:35 -04'00'

Subject: Evaluation of KISU-FM, Compliance with Selected Communications Act and
General Provisions Transparency Requirements, Report No. ECR2414-2417

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 KISU-FM, licensed to Idaho State University, Pocatello, Idaho. 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 CSG General Provisions and Eligibility Criteria (General Provisions) for transparency, as presented in Exhibit A. Background information about the station and the CSG program can be found in Exhibit B.

Based on our review of KISU-FM's website on July 15, 2024, and the station's response to our preliminary observations, we found the station was compliant with all five of the applicable requirements. The remaining six requirements were not applicable because there were no open or closed meetings of the governing board or board committees during the past twelve months that involved public broadcasting business. As a division of a governmental entity, the station was not required to have a Community Advisory Board. We issued a draft report with no findings on August 23, 2024. 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, Chair, Audit and Finance Committee, CPB Board of Directors
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 Representative Energy and Commerce Committee
U.S. Senate Committee on Appropriations
U.S. Senate Committee on Labor-HHS-Education Subcommittee
U.S. House of Representatives Committee on Appropriations
U.S. House of Representative Labor-HHS-Education Appropriations Subcommittee

**Summary of KISU-FM-FM Website Review
as of July 15, 2024**

Requirements	Met	Not Met
1) Seven-day advance notice of governing body meeting:	N/A	
a) available on website		
b) available by other means		
2) Seven-day advance notice of board committee meetings:	N/A	
a) available on website		
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 AFR 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.		
i. on website		
ii. at central office	X	

Background

KISU-FM is operated by the Idaho University System, which is controlled by the Idaho State Board of Education. According to KISU-FM's website, the station broadcasts widely in eastern Idaho. Its locally produced shows and news complement national programming from U.S. and British public media producers. It is also the source for athletic broadcasts at Idaho State University (ISU) as well as a promoter of local cultural and public affairs events through partnerships with ISU and other local civic and cultural organizations.

KISU-FM's goal is to provide quality public radio for the ISU campus and surrounding communities by carrying a diverse selection of talk, music, and news programs to enrich their listening audience. They also aim to provide real-world broadcasting experience for interested students attending ISU. The station is supported financially by student fees, its listeners, local businesses and non-profits and its CPB community service grant.

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 AFRs and Financial Summary Reports (FSR) submitted to CPB.

In addition to the annual filing of a station's AFR(s) or FSR(s) 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 KISU-FM's compliance with selected CSG provisions of the Act, grant certification, and General Provisions 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 General Provisions for transparency. The scope of the evaluation included review of the information posted on the station's website as of July 15, 2024, as well as information provided in response to our Preliminary Observations issued on July 30, 2024 and information retained at the station's central office.

We reviewed corporate policies, records, and documents supporting the station's compliance with the Act requirements to provide advance notice of public meetings, closed meeting disclosures, and make financial information available to the public. We reviewed the station's website and policies to determine its compliance with CPB's transparency requirements. 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.

Our fieldwork was conducted from July 15, 2024, through August 1, 2024 and our evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*.



Exhibit D

September 18, 2024

William J. Richardson, III
Deputy Inspector General
Counsel to the Inspector General and Assistant Inspector
General for Investigations, Office of Inspector General
Corporation for Public Broadcasting

Response to draft report of Evaluation of KISU-FM,
Compliance with Selected Communications
Act and General Provisions Transparency Requirements,
Draft Report No. ECR2414-XXXX
Office of Inspector General, Corporation for Public
Broadcasting

KISU accepts and agrees with the findings of the evaluation initiated by the Office of Inspector General (CPB) on July 8, 2024, regarding KISU-FM compliance with CPB grant requirements. As the primary point of contact and compliance for KISU, I found the process both fair and professionally conducted. I appreciate the clarity provided by Helen Mollick to help broaden my understanding of requirements and how to formally respond to reports. I appreciate the opportunity to better understand the finer details both requirements and exemptions.

Jamon Anderson

Jamon Anderson
KISU-FM General Manager

jamonanderson@isu.edu
(208) 282-2688

ROAR