



Office of the Inspector General

December 19, 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: 2024.12.19  
10:04:21 -05'00'

Subject: Evaluation of KMFA-FM, Capitol Broadcasting Association Inc., Compliance with  
Selected Communications Act and General Provisions Transparency Requirements,  
Report No. ECR2416-2502

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 KMFA-FM, licensed to Capitol Broadcasting Association Inc., Austin, Texas. 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 on the station and CSG program can be found in Exhibit B.

Based on our review of KMFA-FM's website on July 29, 2024, and the station's response to our preliminary observations, we found the station was compliant with nine of the nine applicable requirements. The remaining two requirements were not applicable because there were no closed meetings of the governing board or board committees during the past 12 months involving public broadcasting business. 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: Ruby Calvert, 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 KMFA-FM Website Review  
as of July 29, 2024**

<b>Requirements</b>	<b>Met</b>	<b>Not Met</b>
1) Seven-day advance notice of governing body meeting:	<b>X</b>	
a) available on website		
b) available by other means		
2) Seven-day advance notice of board committee meetings:	<b>X</b>	
a) available on website		
b) available by other means		
3) Seven-day advance notice of CAB meetings:	<b>X</b>	
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:	<b>N/A</b>	
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	<b>N/A</b>	
6) Most recent AFR or FSR available on website	<b>X</b>	
7) Most recent audited financial statements on website	<b>X</b>	
8) Senior/executive management information on website	<b>X</b>	
9) Governing body members on website	<b>X</b>	
10) CAB members on website	<b>X</b>	
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	<b>X</b>	
b) available at central office		

## **Background**

KMFA-FM is an independent public classic radio station operated by Capitol Broadcasting Association Inc. According to KMFA-FM's website, the station broadcasts in Austin, Texas. Its locally produced shows and news complement national programming from various national organizations. KMFA supports many regional arts organizations in the Austin metropolitan area with on-air and online promotions, co-sponsorships, and interviews with KMFA hosts.

KMFA-FM's mission is to uplift, entertain, and educate Central Texas by providing the best in classical music and cultural programming. Currently KMFA provides live concerts, live broadcasts, social occasions, youth camps, K-12 tours, and art exhibits at their community-funded facility that was built in 2020. Alongside thousands of listener-contributors, businesses, foundations, and arts partners, KMFA is supported in part by awards from local, state, and national organizations, as well as the Corporation for Public Broadcasting.

### ***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) submitted to CPB.

In addition to the annual filing of a station's AFR 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 KMFA-FM's compliance with selected CSG provisions of the Act, grant certification, and General Provisions transparency requirements. Our specific objectives were to verify compliance with selected Communications Act requirements for open meetings and open financial records, as well as 2024 Radio Community Service Grants General Provisions and Eligibility Criteria for transparency. The scope of the examination included reviews of the information posted on the station's website as of July 29, 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 28, 2024, through August 27, 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*.



November 25, 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 KMFA-FM, Capitol Broadcasting Association, Inc.,  
Compliance with Selected Communications Act and General Provisions Transparency Requirements,  
Draft Report No. ECR2414-XXXX

Dear Mr. Richardson:

We at KMFA are grateful to receive the Office of the Inspector General's Draft Evaluation Report of KMFA'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.

KMFA is committed to maintaining high standards of transparency and compliance with all CPB regulations and guidelines, and we appreciate the thorough review process and affirmation of our efforts. We will continue to uphold these standards.

We would welcome any guidance for further improvement in our efforts to meet CPB compliance requirements, and I look forward to the formal exit conference as an opportunity to receive additional feedback.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Preston".

George Preston  
CEO  
KMFA-FM