



Corporation  
for Public  
Broadcasting

## Office of the Inspector General

**AUDIT OF COMMUNITY SERVICE AND OTHER GRANTS  
AWARDED TO WCMU-TV and WCMU-FM,  
LICENSED TO CENTRAL MICHIGAN UNIVERSITY,  
MOUNT PLEASANT, MICHIGAN  
FOR THE PERIOD JULY 1, 2021 THROUGH JUNE 30, 2023**

**REPORT NO. ASJ2411-2503**

**March 28, 2025**



# Report in Brief

*Audit of Community Service and Other Grants Awarded to WCMU-TV and WCMU-FM,  
Licensed to Central Michigan University, Mount Pleasant, Michigan  
for the Period July 1, 2021 through June 30, 2023*

## What We Found

We found that WCMU complied with Act and CSG General Provisions and Eligibility Criteria except for the following requirements to:

- post WCMU's annual financial statements (AFS) and Annual Financial Reports (AFR) to the station's website;
- provide advance notice of open meetings;
- document reasons for closed meetings; and
- ensure station interns completed harassment prevention training.

In response to our draft report, WCMU management agreed with all our findings and provided details of corrective actions in its policies and procedures that are being implemented to address each of our recommendations. CPB management will make the final determination regarding our findings and recommendations.

## What We Recommend

We recommend that CPB management require WCMU to:

- fully comply with Act requirements for open and closed meetings and open financial records;
- fully comply with General Provisions requirements for annual harassment and bias prevention training; and
- identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for Act and General Provisions compliance.

## Why We Performed This Audit

We performed this audit based on our annual audit plan.

Our objectives were to determine whether WCMU: a) claimed Non-Federal Financial Support on its Annual Financial Reports in accordance with CPB's Financial Reporting Guidelines; b) complied with the Communications Act and CPB's certification requirements; and c) expended CPB grant funds in accordance with grant requirements.

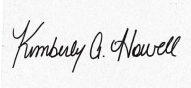
This report contains the conclusions of the Office of the Inspector General. CPB will make the final decision on our findings and recommendations.



Office of the Inspector General

Date: March 28, 2025

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

From: Kimberly A. Howell, Inspector General  Digitally signed by  
Kimberly Howell  
Date: 2025.03.28  
10:39:48 -04'00'

Subject: Audit of Community Service and other Grants Awarded to WCMU-TV and  
WCMU-FM, Licensed to Central Michigan University, Mount Pleasant, Michigan  
for the Period July 1, 2021 through June 30, 2023, Report No. ASJ2411-2503

Enclosed please find our final report which contains our findings and recommendations. The Corporation for Public Broadcasting (CPB) officials must make a final management decision on the findings and recommendations in accordance with established audit resolution procedures.

Accordingly, we request that you provide us with a draft written response to our findings and recommendations within 90 days of the final report. We will review your proposed actions and provide our feedback before you issue a final management decision to the grantee, which is due within 180 days of the final report. For corrective actions planned but not completed by the response date, please provide specific milestone dates so that we can track the implementation of corrective actions needed to close the audit recommendations.

We will post this report to the Office of the Inspector General's website and [Oversight.gov](https://www.oversight.gov) and distribute it to the appropriate Congressional committees as required by the Inspector General Act of 1978, as amended. Please refer any public inquiries about this report to our website or our office.

Enclosure

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

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## **EXECUTIVE SUMMARY**

We have completed an audit of the Corporation for Public Broadcasting (CPB) grants awarded to the Central Michigan University Broadcasting Network, which includes WCMU-TV and WCMU-FM (WCMU), Mount Pleasant, Michigan.<sup>1</sup> The grants reviewed included Television and Radio Community Service grants (CSG), Interconnection, Universal Service Support, Distance Service, Coronavirus Aid, Relief, and Economic Security (CARES) Act, and the American Rescue Plan Act grants for the period July 1, 2021 through June 30, 2023. We performed this audit based on OIG's annual plan objective to audit multiple television and radio stations.

Our objectives were to determine whether WCMU: a) claimed Non-Federal Financial Support (NFFS) on its Annual Financial Reports (AFRs) in accordance with CPB's Financial Reporting Guidelines (Guidelines); b) complied with the Communications Act of 1934, as amended, (Act) and CPB's certification requirements; and c) expended CPB grant funds in accordance Television and Radio CSG General Provisions and Eligibility Criteria (General Provisions) and other grant requirements.

We found that WCMU complied with Act and General Provisions except for the following requirements to:

- post WCMU's audited financial statements (AFS) and Audited Financial Reports (AFR) to the station's website;
- provide advance notice of open meetings;
- document reasons for closed meetings; and
- ensure station interns completed harassment prevention training.

We recommend that CPB management require the Central Michigan Public Broadcasting Network to:

- fully comply with Act requirements for open and closed meetings and open financial records;
- fully comply with General Provisions requirements for annual harassment and bias prevention training; and
- identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for Act and General Provisions compliance.

In response to the draft report, WCMU management agreed with our findings and recommendations and provided details of implemented or planned corrective actions to its policies and procedures to demonstrate its commitments to transparency and compliance with the improvements made during the audit.

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<sup>1</sup> This audit included an examination of CSG grants that WCMU-FM shared with WUCX-FM, Bay City, Michigan, which is operated jointly by Central Michigan University (CMU) and Delta College, Bay City.

Based on WCMU management's response to our draft audit report, we consider recommendations two and three resolved but open pending CPB's final management decisions resolving our audit findings and recommendations. We consider recommendation one unresolved and open regarding actions taken to provide the reasons for closed audit subcommittee meetings that discuss the station's audit status within 10 days of the closed meeting.

This report presents the conclusions of the Office of the Inspector General (OIG) and the findings do not necessarily represent CPB's final position on the issues. While we have made recommendations that are appropriate to resolve the findings, CPB officials will make final determinations on our findings and recommendations in accordance with established CPB audit resolution procedures.

## **BACKGROUND**

According to the WCMU Public Media website, as one of Central Michigan University's principal public service commitments, WCMU has provided television and radio programming and other outreach activities for over 50 years to residents of 42 counties in Michigan and portions of Ontario. With four television and eight radio stations, WCMU reaches over 2 million people. WCMU's mission is to educate, inform, entertain and engage the communities it serves through programming and partnerships. WCMU's goal is to improve the quality of life in its service areas, promote cultural understanding and facilitate civil discourse on issues of public interest and importance.

Central Michigan University (the "University") operates the not-for-profit Network through the Department of Public Broadcasting under licenses granted to the board of trustees of the University. The stations in the Network are identified by the following call letters:

WCMU-DT (WCMU-TV) and  
WCMU-FM, Mount Pleasant  
WCMV-DT, Cadillac  
WCMW-DT, Manistee  
WCML-DT and WCML-FM  
Alpena  
WCMV-FM, Leland

WUCX-FM, Bay City  
WCMW-FM, Harbor Springs  
WCMB-FM, Oscoda  
WCMZ-FM, Sault Sainte Marie  
WWCM-FM, Standish  
W236BU-FM, Traverse City

WUCX-FM, Bay City, is licensed to the University and is operated jointly by the University and Delta College through an operating agreement.<sup>2</sup> The financial statements of Delta College WUCX-FM are audited separately and are then combined with the Network in consolidated financial statements.

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<sup>2</sup> This operating agreement between WCMU-FM and WUCX-FM requires WUCX-FM to submit audited financial statements and a CPB Annual Financial Report to CMU. CMU then consolidates the financial information for both stations in WCMU's Annual Financial Report to CPB. The formula for sharing funding is based upon WUCX-FM's NFFS as a percentage of the total NFFS for WUCX-FM and WCMU-FM combined.

### ***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. After funds are designated as either TV or radio funds, the funds are placed in the appropriate CSG grant pool for distribution to eligible stations.

Each year CPB awards CSG grants to public TV and radio stations based in part on the amount of NFFS claimed by all stations on their AFRs. The CSG calculation process starts with separate amounts appropriated for the TV and radio CSG pools, adjusted by base grants and supplemental grants. The funds that remain are called the Incentive Grant Pools; one is for TV and the other is for radio.

The Incentive Rate of Return (IRR) is separately calculated for television and radio grantees. This is done by dividing the Incentive Grant Pools by the total adjusted NFFS claimed by all television grantees for the television IRR and by all radio grantees for the radio IRR. The IRR is then multiplied by each grantee's adjusted NFFS in various tiers to calculate the incentive award amount of its total CSG. There is a two-year lag between the reported NFFS and CPB's calculation of the fiscal year's (FYs) CSG amount. For example, CPB used the NFFS reported by the station on their FY 2021 AFR to determine the amount of the TV CSG funds the station was awarded for FY 2023.

As shown in Exhibit A, WCMU-TV received CSG, Interconnection, Universal Service Support, and other grant funds from CPB totaling \$2,342,285 for FYs 2022 and 2023. WCMU-FM received CSG and Rural Support grant funds from CPB totaling \$551,452 for FYs 2022 and 2023. WCMU-TV and WCMU-FM reported NFFS of \$5,422,249 and \$5,481,675, respectively, for FYs 2022 and 2023, as shown in Exhibit D. WCMU-FM shares a proportional amount of NFFS funds with WUCX-FM, Delta College, as WUCX-FM does not receive CSG or other grant funds from CPB. The audited financial statements for the stations reported total consolidated operating revenue of \$7,226,606 and \$7,294,878, respectively, for FYs 2022 and 2023. These amounts include combined operating revenue of \$443,598 and \$444,185, respectively, for FYs 2022 and 2023 for WUCX-FM. The stations' fiscal year for WCMU Public Media and WUCX-FM begins on July 1 and ends on June 30.

## **RESULTS OF AUDIT**

In our opinion, WCMU complied with CPB requirements below for the FY 2022 and FY 2023 grant reporting periods as summarized in Exhibits B, C, and D, except for the specific requirements summarized below.

We examined the stations' assertions of compliance with CPB grant requirements: a) CSG Certification of Eligibility; b) CSG Legal Agreement; and c) AFR Signature Page. The CSG Certification of Eligibility includes the stations' certification of compliance with AFR/NFFS reporting in accordance with CPB's Guidelines; Communications Act requirements for open meetings, open financial records, Equal Employment Opportunity (EEO) reporting and donor



lists; use of CPB funds; and discrete accounting requirements. Station management is responsible for their assertions of compliance. Our responsibility is to express an opinion on management's assertions about the station's compliance based on our examination.

Based on our audit, we found that the stations complied with Communications Act and CPB grant eligibility requirements, except for the following:

- did not fully comply with Act and General Provisions for:
  - public's access to financial information
  - advance notice of open meetings;
  - documenting reasons for closed meetings and making documentation available to the public within 10 days; and
  - annual harassment and bias prevention training.

Our audit was conducted in accordance with the *Government Auditing Standards* for attestation examination engagements and accordingly included examining, on a test basis, evidence about the stations' compliance with CPB's requirements, and performing other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. However, it does not provide a legal determination on the stations' compliance with specified requirements.

## **FINDINGS AND RECOMMENDATIONS**

### **ACT AND CPB GENERAL PROVISIONS COMPLIANCE**

During our audit testing, we found that WCMU did not fully comply with Act or CSG grant requirements for the following:

- public's access to financial information
- advance notice of open meetings;
- documenting reasons for closed meetings and making documentation available to the public within 10 days; and
- annual harassment and bias prevention training.

#### **Public's Access to Financial Information**

WCMU was not fully compliant with Act and CPB grant requirements for public access to financial records because the stations did not post their most current AFRs and AFSs on their website. Neither the FY 2023 AFS nor the FY 2022 TV and FM AFRs were posted to the station's website on the date of our review, April 17, 2024. The FY 2023 audited financial statements were issued on January 26, 2024. WCMU's most recent AFRs were for FY 2022, and were approved by CPB on April 3, 2023, but were not posted to the station's website. The



FY 2023 TV and FM AFRs were not available to be posted to the website because they were not approved by CPB at the time of our review.

After being notified of its noncompliance on April 17, 2024, WCMU took immediate action and posted its most current AFS and AFRs. When we checked the website, we found that the AFS and AFRs for FY 2023 were posted as of April 24, 2024. However, the FY 2023 AFRs that were posted were not yet approved by CPB. On February 14, 2025, we verified that WCMU is now in compliance for posting its most current FY 2024 AFS and FY 2023 approved AFRs to its website.

CPB requires grantees to make the audited financial statements and AFRs available for public inspection on the station website.

**C. Open Financial Records:** The Act requires stations to make available to the public their annual financial and audit reports and related financial information they are required to provide to CPB (47 U.S.C. § 396(k)(5) and § 396(1)(3)(b)). CPB also requires that Grantee post the following documents on its station website:

1. its most recent audited financial statement, or unaudited financial statement if permitted; and
2. its most recent AFR or FSR (whichever is applicable).

CPB 2024 TV and Radio CSG General Provisions and Eligibility Criteria, Part 1, Section 2. Communications Act (Act) Requirements.

The Act also provides:

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) of this section.

The Act, 47 U.S.C. § 396 (k)(5), Financing Restrictions

During the audit, WCMU indicated that not posting the most current financial reports was an oversight. The departure of the previous general manager and the accountants responsible for the financial and overall compliance contributed to the condition. Also, WCMU lacks detailed policies and procedures for complying with the open financial records requirements of the Act and CPB's CSG General Provisions and Eligibility Criteria.

While WCMU is currently compliant, WCMU was not fully compliant with Act and CPB requirements during our audit period and may be subject to penalties under CPB's CSG Non-compliance policy.

### **Advance Notice of Public Meetings**

WCMU did not fully comply with the Act and General Provisions open meeting requirements because it did not provide seven-days advance notice for the Board of Trustee's Audit Committee meetings. A Central Michigan University (CMU) Board and WCMU licensing official stated that all Audit Committee meetings are closed "because of the sensitive and confidential nature of items discussed." The dates and times for Board meetings are announced at least 12 months in advance and most committees meet the day before the Board meeting. Further, the Audit Committee, and most other committees, presented reports at the Board meetings and the topics discussed were included in the Board's agenda and minutes. During the review of the agenda and meeting minutes, we found that the Audit Committee discussed station business, including financial statement audits and retaining auditors, which appeared to be information that should be available to the public under CPB requirements.

A CMU Board official disagreed that the Audit Committee meetings should be open stating that "station business is not addressed in any closed committee meeting." The official also stated "During an Audit Committee meeting, the Board is occasionally updated on the status of the Public Broadcasting audit but they do not discuss the substance of any WCMU matters that result in action taken by the Board regarding WCMU."

The Act requires permittees of public broadcasting stations to hold open meetings of its governing board, any committee or such governing body or any advisory body preceded by reasonable notice to the public.

The Act further defines the term meeting:

The term 'meeting' means the deliberations of at least the number of members of the governing or advisory body, or committee thereof, required to take action on behalf of such body or committee where such deliberations determine or result in 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.

The Act, 47 U.S.C. § 397(5).

CPB provides additional guidance:

**C. Prerequisites for a "Meeting":** In order for a gathering of board, committee, or CAB members to constitute a meeting under the Act, the following is necessary:

1. The presence of a quorum; and
2. Deliberations that determine or result in joint conduct or disposition of business relating to public broadcasting.

Note that deliberations do not require any formal action or vote. Any discussion of public broadcasting issues that may influence the opinion of members makes it a meeting.

CPB's Communications Act Compliance Guidance, 1. Open Meetings, C. Prerequisites for a Meeting. (June 2021).

The Act, 47 U.S.C. §396 (k)(4), requires that stations provide the public with reasonable advance notice of open meetings. Specifically:

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.

Further, CPB requires that stations provide the public with reasonable advance notice and defines reasonable notice as seven days advance notice, as follows.

- A. Open Meetings: Meetings of Grantee's governing body, its committees and CAB must be open to the public (47 U.S.C. § 396(k)(4)). In addition, CPB requires Grantee to give at least seven days advance notice of meetings, including the time and place, by:
  - 1. posting notice on its station website;
  - 2. broadcasting notice on-air between 6 a.m. and 11 p.m., as shown by the station's log;
  - 3. placing notice in the "Legal Notices" section of a local newspaper in general circulation in the station's primary coverage area; or
  - 4. giving notice through a recorded announcement accessible on the station's phone system.

CPB's Communications Act Compliance guidance, 1. Open Meetings, E. Notice of Open Meetings (June 2021). CPB Television and Radio CSG General Provisions 2022 and 2023, Section 2.A. Open Meetings contains the same four options for advance notice of meetings.

A CMU Board official indicated that it is acceptable not to announce committee meetings because committee information is too confidential and further indicated that the audit committee meetings did not meet the intent of a meeting within the meaning of the Act because the Board did not include substantive discussions that resulted in actions being taken. However, the Board official did not explain how the Board knew that substantive matters would not be discussed that could result in Board action or information that should be open to the public, as Board meetings are posted before each year begins. Further, CMU and WCMU officials were unaware of the guidance in CPB's compliance booklet which states that deliberations do not require formal action and that any discussion of public broadcasting issues makes it a meeting and subject to CPB's requirements related to Act compliance.

The station was not fully compliant with CSG General Provisions for open meeting requirements at the time of our review and may be subject to penalties under CPB's Non-Compliance Policy.

**Documenting Reasons for Closed Meetings and Making Documentation Available to the Public Within 10 Days**

WCMU neither documented the reasons for closed Audit Committee meetings nor provided the public with reasons for closing Audit Committee meetings either on its website or at its central office within ten days, for two of ten Audit Committee meetings reviewed. WCMU matters were not discussed at the other eight Audit Committee meetings. We found that the annual audits, including the annual audits of WCMU's financial statement audits, were discussed at one Audit Committee for each fiscal year 2022 and 2023.

A CMU Board official disagreed that WCMU was required to notify the public of the closed meetings because WCMU business was not discussed and because the Board took no actions regarding the matters discussed. The official stated, "Because the Audit and Enterprise Risk Committee meetings did not discuss WCMU's business or other activities regarding public broadcasting, they were not conducting "meetings" as that term is defined in 47 USC § 397(5)."

The Act and CPB's Communications Act Compliance guidance identify when stations may close a meeting:

When may a meeting be closed? The Act allows stations to hold Closed Meetings, or to close an Open Meeting, when discussing any of the following:

1. matters concerning individual employees;
2. proprietary information;
3. litigation and other matters requiring confidential advice of counsel;
4. commercial or financial information obtained from a person on a privileged or confidential basis; or
5. the purchase of property or services, if the premature disclosure of the transaction would compromise the station's business interests. §396(k)

CPB's Communications Act Compliance guidance 2. Governing Legislation, B. When may a meeting be closed? (June 2021). Act at 47 U.S.C. § 396(k)(4).

The Act requires that stations document the reason(s) for closed meetings and make the reason(s) available to the public within a reasonable time after the closed meeting. CPB's Communications Act Compliance guidance and General Provisions require that these reasons be made available to the public within 10 days of the closed meeting.

C. Closed Meeting Documentation: The Act requires stations to document and make available to the public the specific reason(s) for closing a meeting within a reasonable time after the meeting. CPB also requires that the written statement be made available for inspection, either at the CSG recipient's central office or posted on its station website, within 10 days after each closed meeting.

CPB's Communications Act Compliance guidance, 2. Governing Legislation, C. Closed Meeting Documentation (June 2021). CPB 2022 and 2023 Television and Radio CSG General Provisions, Part I Section 2.B. Closed Meetings includes this same requirement.

Prior station management accepted the CMU Board's established practice of closing Audit Committee meetings. WCMU did not have established procedures (internal controls) for reviewing to determine whether the reasons for closing meetings were justified and for providing the public with the reasons for closed meetings within the 10 days of the closed meeting as required by CPB's compliance requirements.

WCMU was not fully compliant with Act and CPB requirements during our audit period and may be subject to penalties under CPB's CSG Non-compliance policy.

### **Anti-Harassment and Bias Prevention Training**

The station generally complied with CPB CSG General Provisions requirements for annual harassment and bias prevention training for managers and staff; however, not all interns completed the training. We found that all regular staff completed training in 2022 and 2023. However, twenty-four interns and two volunteer hosts did not take the required training in 2022. Additionally, although nine interns completed training for FY 2023, WCMU did not account for the remainder of the interns at the station for FY 2023 to ensure that they received some type of training.

In their response to the preliminary observations, WCMU referred to training available for twenty-nine interns; stating, "Of those 29 students, only seven...were actively working at WCMU through the training deadline." Accordingly, all but seven interns completed their internships and left WCMU before the end of the training deadline. However, we note that CPB requires that each intern must complete some kind of harassment and bias prevention training, including interns that leave before the end of the training period. Additionally, none of the seven interns that worked through the training deadline for FY 2022 completed the training.

According to WCMU management, WCMU implemented procedures in FY 2024 and now accounts for training for all staff, including interns.

The CSG General Provisions and CPB website provides the requirements and guidance for completing annual Harassment Prevention Training.

**A. Annual Harassment and Bias Prevention Training:** To ensure that CPB-supported public media stations train their personnel to recognize, avoid and report workplace discrimination, including harassment and bias, CPB requires annual harassment and bias prevention training for all officers, employees, and interns of each station as a condition of Grantee's CSG eligibility. Grantee may satisfy this requirement through either of the following training options:

1. An interactive online harassment and bias prevention training service, available free of charge through CPB, that instructs your personnel, individually on the following topics:
  - What constitutes acceptable and unacceptable workplace behavior;
  - How to recognize harassment and bias when it occurs; and
  - How to report and respond to violations.
2. A comparable harassment and bias prevention training program of Grantee's choice. The program will be considered "comparable" if it instructs Grantee's personnel individually, either in person or online, on the three topics above.

2021-2023 CPB TV and Radio General Provisions, Part I., CSG Program, Sections 8 and 10, Training Requirements, A. Annual Harassment and Bias Prevention Training.

Further CPB's website for CSG grantees offers additional guidance on this requirement and states:

CPB requires annual harassment and bias prevention training for all officers (examples: President and CEO, Vice President, COO, CFO and General Manager), employees (full-time and part-time who are paid a salary or hourly wage), and interns (paid and unpaid) as a condition of the Grantee's eligibility for a radio or television Community Service Grant (CSG).

The station used the CPB licensed training program described in the criteria above to provide the training to its employees. However, WCMU was unaware that CPB also requires that all interns must complete training. Additionally, WCMU lacked follow-up procedures to account for interns and ensure that they complete required training. Finally, a WCMU official stated that station employees and interns experienced problems during FY 2023 with CPB's training module and provided documentation from two staff stating the difficulties being encountered. The official stated that the difficulties may also have occurred during FY 2022 under the prior WCMU management team.

WCMU was not fully compliant with CPB's CSG annual requirements for harassment and bias prevention training and could be subject to penalties under CPB's CSG Non-compliance policy.

### ***Recommendations***

We recommend that CPB management require WCMU to:

1. fully comply with Act requirements for open and closed meetings and open financial records;
2. fully comply with General Provision's requirements for annual harassment prevention training; and
3. identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for Act and General Provisions compliance.

### ***WCMU Management Response***

In response to the draft report, WCMU stated that it will continue to demonstrate its commitments to transparency and compliance with the improvements made during the audit and has implemented corrections in its policies and procedures . Specifically, WCMU posted its current FY 2024 Annual Financial Statements on its website and indicated that Annual Financial Reports will be posted once approved by CPB. WCMU stated that they earnestly believe that they did not violate the spirit of the law requiring transparency of its governance in regards to the station audit status update discussed at a closed audit subcommittee meeting. WCMU apologized for the confusion and stated that in the interest of transparency, it will ensure that any status updates regarding public broadcasting will not be brought before the governing body outside of an open meeting or without properly closing a meeting to the public. Further, to address the reported harassment prevention recommendation, WCMU indicated that interns will be required to complete training during their onboarding process.

### ***OIG Review and Comment***

Based on WCMU management's response to our draft audit report, we consider recommendations two and three resolved but open pending CPB's final management decisions resolving our audit findings and recommendations.

Regarding open and closed meetings, WCMU's response addressed corrective actions for announcing open meetings of the governing body when it gets a station audit status update, however we are unclear whether the closed audit subcommittee meeting will document the reason for closed meeting and provide that information to the public within 10 days of the closed meeting. As a result, we consider recommendation one unresolved and open pending CPB's final management decisions resolving this audit finding and recommendation.



**EXHIBIT A**

**CPB Payments to WCMU-TV and WCMU-FM  
For the Fiscal Years Ending June 30, 2022 and 2023**

<b>CPB Grants</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>Totals</b>
<b>Community Service Grants &amp; Supplemental Grants</b>			
<b><i>TV CSG:</i></b>			
Community Service	\$980,818	\$998,931	\$1,979,749
Interconnection	\$18,025	\$17,974	\$35,999
Universal Service Support	119,716	\$122,221	\$241,937
Distance Service	41,850	\$42,750	\$84,600
<b><i>Total TV CSG</i></b>	<b><i>\$1,160,409</i></b>	<b><i>\$1,181,876</i></b>	<b><i>\$2,342,285</i></b>
<b><i>Radio CSG:</i></b>			
Restricted	\$61,913	\$70,568	\$132,481
Unrestricted	\$170,754	\$198,877	\$369,631
Rural Support Grant	\$24,670	\$24,670	\$49,340
<b><i>Total Radio CSG</i></b>	<b><i>\$257,337</i></b>	<b><i>\$294,115</i></b>	<b><i>\$551,452</i></b>
<b>Total All Grants</b>	<b>\$1,417,746</b>	<b>\$1,475,991</b>	<b>\$2,893,737</b>

**WCMU-TV Annual Financial Report**  
**For the Fiscal Years Ending June 30, 2022 and 2023**

Schedule A  
WCMU-TV (1791)  
Mt. Pleasant, MI

**NFFS Excluded?**

If you have an NFFS Exclusion, please click the "NFFS X" button, and enter your NFFS data.



**Source of Income**

	2022 data	2023 data
1. Amounts provided directly and indirectly by federal government agencies	\$17,724	\$18,174
A. Grants for facilities and other capital purposes	\$0	\$0
B. Department of Education	\$0	\$0
C. Department of Health and Human Services	\$0	\$0
D. National Endowment for the Arts and Humanities	\$0	\$0
E. National Science Foundation	\$0	\$0
F. Other Federal Funds (specify)	\$17,724	\$18,174
Description Tower rent FBI, NOAA	Amount \$18,174	
2. Amounts provided by Public Broadcasting Entities	\$1,248,031	\$1,250,217
A. CPB - Community Service Grants	\$980,818	\$998,931
B. CPB - all other funds from CPB	\$179,591	\$182,945
C. PBS - all payments except copyright royalties and other pass-through payments. See Guidelines for details.	\$0	\$0
D. NPR - all payments except pass-through payments. See Guidelines for details.	\$0	\$0
E. Public broadcasting stations - all payments	\$0	\$0
F. Other PBE funds (specify)	\$87,622	\$68,341
Description Michigan Learning Channel	Amount \$68,341	
3. Local boards and departments of education or other local government or agency sources	\$0	\$0
3.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
3.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
4. State boards and departments of education or other state government or agency sources	\$0	\$0
4.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0

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—	B. Grants and contributions other than underwriting	\$0	\$0
—	C. Appropriations from the licensee	\$0	\$0
—	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
—	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
—	F. Other income eligible as NFFS (specify)	\$0	\$0
—	4.2 NFFS Ineligible	\$0	\$0
—	A. Rental income	\$0	\$0
—	B. Fees for services	\$0	\$0
—	C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
—	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
—	E. Other income ineligible for NFFS inclusion	\$0	\$0
—	5. State colleges and universities	\$873,044	\$782,228
—	5.1 NFFS Eligible	\$872,494	\$781,728
—	A. Program and production underwriting	\$6,748	\$11,637
—	Variance greater than 25%.		
—	B. Grants and contributions other than underwriting	\$0	\$0
—	C. Appropriations from the licensee	\$865,746	\$770,091
—	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
—	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
—	F. Other income eligible as NFFS (specify)	\$0	\$0
—	5.2 NFFS Ineligible	\$550	\$500
—	A. Rental income	\$0	\$0
—	B. Fees for services	\$550	\$500
—	C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
—	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
—	E. Other income ineligible for NFFS inclusion	\$0	\$0
—	6. Other state-supported colleges and universities	\$0	\$0
—	6.1 NFFS Eligible	\$0	\$0
—	A. Program and production underwriting	\$0	\$0
—	B. Grants and contributions other than underwriting	\$0	\$0
—	C. Appropriations from the licensee	\$0	\$0
—	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
—	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
—	F. Other income eligible as NFFS (specify)	\$0	\$0
—	6.2 NFFS Ineligible	\$0	\$0

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— A. Rental income	\$0	\$0
— B. Fees for services	\$0	\$0
— C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
— D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
— E. Other income ineligible for NFFS inclusion	\$0	\$0
7. Private colleges and universities	\$0	\$0
— 7.1 NFFS Eligible	\$0	\$0
— A. Program and production underwriting	\$0	\$0
— B. Grants and contributions other than underwriting	\$0	\$0
— C. Appropriations from the licensee	\$0	\$0
— D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
— E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
— F. Other income eligible as NFFS (specify)	\$0	\$0
— 7.2 NFFS Ineligible	\$0	\$0
— A. Rental income	\$0	\$0
— B. Fees for services	\$0	\$0
— C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
— D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
— E. Other income ineligible for NFFS inclusion	\$0	\$0
8. Foundations and nonprofit associations	\$50,728	\$76,198
— 8.1 NFFS Eligible	\$31,148	\$56,778
Variance greater than 25%.		
— A. Program and production underwriting	\$31,148	\$54,904
Variance greater than 25%.		
— B. Grants and contributions other than underwriting	\$0	\$1,874
— C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
— D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
— E. Other income eligible as NFFS (specify)	\$0	\$0
— 8.2 NFFS Ineligible	\$19,580	\$19,420
— A. Rental income	\$16,620	\$19,420
— B. Fees for services	\$2,960	\$0
Variance greater than 25%.		
— C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
— D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0

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E. Other income ineligible for NFFS inclusion	\$0	\$0
9. Business and Industry	\$293,479	\$298,374
9.1 NFFS Eligible	\$50,292	\$47,616
A. Program and production underwriting	\$50,292	\$47,616
B. Grants and contributions other than underwriting	\$0	\$0
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
E. Other income eligible as NFFS (specify)	\$0	\$0
9.2 NFFS Ineligible	\$243,187	\$250,758
A. Rental income	\$238,066	\$245,879
B. Fees for services	\$5,121	\$4,879
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
10. Memberships and subscriptions (net of membership bad debt expense)	\$1,278,820	\$1,175,940
10.1 NFFS Exclusion – Fair market value of premiums that are not of insubstantial value	\$175,154	\$111,572
Variance greater than 25%.		
10.2 NFFS Exclusion – All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (unless netted elsewhere in Schedule A)	\$0	\$0
	2022 data	2023 data
10.3 Total number of contributors.	11,594	14,583
11. Revenue from Friends groups less any revenue included on line 10	\$0	\$0
	2022 data	2023 data
11.1 Total number of Friends contributors.	0	0
12. Subsidiaries and other activities unrelated to public broadcasting (See instructions)	\$0	\$0
A. Nonprofit subsidiaries involved in telecommunications activities	\$0	\$0
B. NFFS Ineligible – Nonprofit subsidiaries not involved in telecommunications activities	\$0	\$0
C. NFFS Ineligible – For-profit subsidiaries regardless of the nature of its activities	\$0	\$0
D. NFFS Ineligible – Other activities unrelated to public broadcasting	\$0	\$0
<b>Form of Revenue</b>	2022 data	2023 data
13. Auction revenue (see instructions for Line 13)	\$0	\$0
A. Gross auction revenue	\$0	\$0
B. Direct auction expenses	\$0	\$0
14. Special fundraising activities (see instructions for Line 14)	\$0	\$0
A. Gross special fundraising revenues	\$0	\$0
B. Direct special fundraising expenses	\$0	\$0
15. Passive income	\$380	\$132

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—	A. Interest and dividends (other than on endowment funds)	\$0	\$0	
—	B. Royalties	\$0	\$0	
—	C. PBS or NPR pass-through copyright royalties	\$380	\$132	
	Variance greater than 25%.			
—	16. Gains and losses on investments, charitable trusts and gift annuities and sale of other assets (other than endowment funds)	\$40,188	\$-442,269	
—	A. Gains from sales of property and equipment (do not report losses)	\$40,489	\$-442,556	
	Variance greater than 25%.			
—	B. Realized gains/losses on investments (other than endowment funds)	\$225	\$93	
	Variance greater than 25%.			
—	C. Unrealized gains/losses on investments and actuarial gains/losses on charitable trusts and gift annuities (other than endowment funds)	\$-526	\$194	
	Variance greater than 25%.			
—	17. Endowment revenue	\$-179,255	\$194,548	
—	A. Contributions to endowment principal	\$25,100	\$90	
	Variance greater than 25%.			
—	B. Interest and dividends on endowment funds	\$0	\$0	
—	C. Realized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$152,358	\$63,000	
	Variance greater than 25%.			
—	D. Unrealized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$-356,713	\$131,458	
	Variance greater than 25%.			
—	18. Capital fund contributions from individuals (see instructions)	\$0	\$0	
—	A. Facilities and equipment (except funds received from federal or public broadcasting sources)	\$0	\$0	
—	B. Other	\$0	\$0	
—	19. Gifts and bequests from major individual donors	\$226,369	\$376,875	
	19.1 Total number of major individual donors	2022 data 72	2023 data 62	
	Variance greater than 25%.			
	20. Other Direct Revenue	\$74,507	\$32,070	
	Description Amount			
	Salvage Sales \$1,745			
	Exclusion Description Amount			
	Other UBI (including the sale of advertising in publications and other media) \$1,745			
	DVD Sales \$47			
	Exclusion Description Amount			
	Sale of premiums \$47			
	GASB 87 Adjustments \$64,516			

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Description	Amount	
Exclusion Description Other UBI (including the sale of advertising in publications and other media)	Amount	
	\$64,516	
Transfer to/from Licensee		\$-34,238
Exclusion Description Other UBI (including the sale of advertising in publications and other media)	Amount	
	\$-34,238	
Line 21. Proceeds from the FCC Spectrum Incentive Auction, interest and dividends earned on these funds, channel sharing revenues, and spectrum leases	\$-19,081	\$118,303
A. Proceeds from sale in spectrum auction	\$0	\$0
B. Interest and dividends earned on spectrum auction related revenue	\$-66,656	\$63,038
Variance greater than 25%.		
C. Payments from spectrum auction speculators	\$0	\$0
D. Channel sharing and spectrum leases revenues	\$0	\$0
E. Spectrum repacking funds	\$47,575	\$55,265
22. Total Revenue (Sum of lines 1 through 12, 13.A, 14.A, and 15 through 21)	\$3,904,934	\$3,880,790
<a href="#">Click here to view all NFFS Eligible revenue on Lines 3 through 9.</a>		
<a href="#">Click here to view all NFFS Ineligible revenue on Lines 3 through 9.</a>		
<b>Adjustments to Revenue</b>	<b>2022 data</b>	<b>2023 data</b>
23. Federal revenue from line 1.	\$17,724	\$18,174
24. Public broadcasting revenue from line 2.	\$1,248,031	\$1,250,217
25. Capital funds exclusion—TV (3.2D, 4.2D, 5.2D, 6.2D, 7.2D, 8.2D, 9.2D, 18A)	\$0	\$0
26. Revenue on line 20 not meeting the source, form, purpose, or recipient criteria	\$74,507	\$32,070
Variance greater than 25%.		
27. Other automatic subtractions from total revenue	\$255,223	\$252,742
A. Auction expenses – limited to the lesser of lines 13a or 13b	\$0	\$0
B. Special fundraising event expenses – limited to the lesser of lines 14a or 14b	\$0	\$0
C. Gains from sales of property and equipment – line 16a	\$40,489	\$-442,556
Variance greater than 25%.		
D. Realized gains/losses on investments (other than endowment funds) – line 16b	\$225	\$93
Variance greater than 25%.		
E. Unrealized investment and actuarial gains/losses (other than endowment funds) – line 16c	\$-526	\$194
Variance greater than 25%.		
F. Realized and unrealized net investment gains/losses on endowment funds – line 17c, line 17d	\$-204,355	\$194,458
Variance greater than 25%.		



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—	G. Rental income (3.2A, 4.2A, 5.2A, 6.2A, 7.2A, 8.2A, 9.2A)	\$254,686	\$265,299
—	H. Fees for services (3.2B, 4.2B, 5.2B, 6.2B, 7.2B, 8.2B, 9.2B)	\$8,631	\$5,379
	Variance greater than 25%.		
—	I. Licensing Fees (3.2C, 4.2C, 5.2C, 6.2C, 7.2C, 8.2C, 9.2C)	\$0	\$0
—	J. Other revenue ineligible as NFFS (3.2E, 4.2E, 5.2E, 6.2E, 7.2E, 8.2E, 9.2E)	\$0	\$0
—	K. FMV of high-end premiums (Line 10.1)	\$175,154	\$111,572
	Variance greater than 25%.		
—	L. All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (Line 10.2)	\$0	\$0
—	M. Revenue from subsidiaries and other activities ineligible as NFFS (12.B, 12.C, 12.D)	\$0	\$0
—	N. Proceeds from spectrum auction and related revenues from line 21.	\$-19,081	\$118,303
	Variance greater than 25%.		
—	28. Total Direct Nonfederal Financial Support (Line 22 less Lines 23 through 27). (Forwards to line 1 of the Summary of Nonfederal Financial Support)	\$2,309,449	\$2,327,587

**Comments**

Comment	Name	Date	Status
Schedule B WorkSheet			
WCMU-TV (1791)			
Mt. Pleasant, MI			

2022

2023

**Step 1 - Compute the Rate -  
Licensee Indirect Costs/Licensee  
Direct Costs**

Institutional Support (Enter this amount here only if station benefits from Institutional Support.)	\$32,233,827	\$38,632,127
AFS page or "n/a"	n/a	n/a
Physical Plant Support (Enter this amount here only if station benefits from Physical Plant Support.)	\$31,648,505	\$30,959,322
AFS page or "n/a"	n/a	n/a
<b>Licensee Indirect Costs</b>	\$63,882,332	\$69,591,449
<b>Licensee Direct Costs</b>		
Total Operating expenses	\$419,711,987	\$448,284,975
AFS page or "n/a"	n/a	n/a
Less: Institutional Support (Enter this amount whether or not the station benefits from Institutional Support.)	\$32,233,827	\$38,632,127
AFS page or "n/a"	n/a	n/a
Less: Physical Plant Support (Enter this amount whether or not the station benefits from Physical Plant Support.)	\$31,648,505	\$30,959,322
AFS page or "n/a"	n/a	n/a
Licensee's Direct Costs (= Total operating expenses minus both Institutional Support and Physical Plant Support)	\$355,829,655	\$378,693,526
Indirect Cost Rate = (Licensee's Indirect Costs/Licensee's Direct Costs)	%17.953066	%18.376720

**Step 2 - Identify the Base (Station's  
Net Direct Expenses)**

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	2022	2023
Station's Total Operating Expenses (from Schedule E, Line 8)	\$4,132,054	\$5,003,357
Less: Depreciation and Amortization - from station's AFS (if applicable)	\$681,739	\$672,955
AFS page or "n/a"	51	43
In-kind contributions and donated property and equipment reported as expenses per AFS (if applicable)	\$53,365	\$56,397
AFS page or "n/a"	51	43
Indirect Administrative Support (if included in station's total expenses) - per AFS	\$517,033	\$663,493
Variance greater than 25%.		
AFS page or "n/a"	n/a	n/a
Expenses for non-broadcast activities and UBIT-per AFS (if applicable)	\$0	\$0
AFS page or "n/a"	n/a	n/a
Expenses not supported by licensee - per AFS (Example: expenses of consolidated entities like Friends Groups, foundations, and component units (if applicable))	\$0	\$0
AFS page or "n/a"	n/a	n/a
Station's Net Direct Expenses	\$2,879,917	\$3,610,511
Variance greater than 25%.		
<b>Step 3: Apply the Rate to the Base (= total support activity benefiting the station)</b>	\$517,033	\$663,493
Variance greater than 25%.		
Upload the licensee's audited financial statement only. [NOTE: Only PDF files are allowed for upload.]	<a href="#">View Document</a>	1791_WCMU_BWA_fy23.pdf
<b>Comments</b>		
Comment	Name	Date
Occupancy List WCMU-TV (1791) Mt. Pleasant, MI		
Type of Occupancy Location		Value
Schedule B Totals WCMU-TV (1791) Mt. Pleasant, MI		
	2022 data	2023 data
1. Total support activity benefiting station	\$517,033	\$663,493
Variance greater than 25%.		
2. Occupancy value	0	\$0
3. Deductions: Fees paid to the licensee for overhead recovery, assessment, etc.	\$0	\$0
4. Deductions: Support shown on lines 1 and 2 in excess of revenue reported in financial statements.	\$0	\$0
5. Total Indirect Administrative Support (Forwards to Line 2 of the Summary of Nonfederal Financial Support)	\$517,033	\$663,493
Variance greater than 25%.		
6. Please enter an institutional type code for your licensee.	SU	SU
<b>Comments</b>		
Comment	Name	Date
Status		

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Schedule C  
WCMU-TV (1791)  
Mt. Pleasant, MI

	2022 data	Donor Code	2023 data
1. PROFESSIONAL SERVICES (must be eligible as NFFS)	\$0		\$0
A. Legal	\$0		\$0
B. Accounting and/or auditing	\$0		\$0
C. Engineering	\$0		\$0
D. Other professionals (see specific line item instructions in Guidelines before completing)	\$0		\$0
2. GENERAL OPERATIONAL SERVICES (must be eligible as NFFS)	\$0		\$0
A. Annual rental value of space (studios, offices, or tower facilities)	\$0		\$0
B. Annual value of land used for locating a station-owned transmission tower	\$0		\$0
C. Station operating expenses	\$0		\$0
D. Other (see specific line item instructions in Guidelines before completing)	\$0		\$0
3. OTHER SERVICES (must be eligible as NFFS)	\$0		\$0
A. ITV or educational radio	\$0		\$0
B. State public broadcasting agencies	\$0		\$0
C. Local advertising	\$0		\$0
D. National advertising	\$0		\$0
4. Total in-kind contributions - services and other assets eligible as NFFS (sum of lines 1 through 3), forwards to Line 3a. of the Summary of Nonfederal Financial Support	\$0		\$0
5. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$51,286		\$56,397
A. Compact discs, records, tapes and cassettes	\$0		\$0
B. Exchange transactions	BS \$8,718	BS	\$19,238
C. Federal or public broadcasting sources	\$0		\$0
D. Fundraising related activities	\$0		\$0
E. ITV or educational radio outside the allowable scope of approved activities	\$0		\$0
F. Local productions	\$0		\$0
G. Program supplements	\$0		\$0
H. Programs that are nationally distributed	\$0		\$0
I. Promotional items	\$0		\$0
J. Regional organization allocations of program services	\$0		\$0
K. State PB agency allocations other than those allowed on line 3(b)	\$0		\$0
L. Services that would not need to be purchased if not donated	\$0		\$0
M. Other	SG \$42,568	SG	\$37,159
Description	Amount		
UW DNR	\$28,031		
UW Non-profits	\$9,128		
6. Total in-kind contributions - services and other assets (line 4 plus line 5), forwards to Schedule F, line 1c. Must agree with in-kind contributions recognized as revenue in the AFS.	\$51,286		\$56,397

**Comments**

Comment                      Name                      Date                      Status

Schedule D  
WCMU-TV (1791)  
Mt. Pleasant, MI

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	2022 data	Donor Code	2023 data
1. Land (must be eligible as NFFS)	\$0		\$0
2. Building (must be eligible as NFFS)	\$0		\$0
3. Equipment (must be eligible as NFFS)	\$0		\$0
4. Vehicle(s) (must be eligible as NFFS)	\$0		\$0
5. Other (specify) (must be eligible as NFFS)	\$0		\$0
6. Total in-kind contributions - property and equipment eligible as NFFS (sum of lines 1 through 5), forwards to Line 3b. of the Summary of Nonfederal Financial Support	\$0		\$0
7. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$2,080		\$0
a) Exchange transactions	\$0		\$0
b) Federal or public broadcasting sources	PB \$2,080		\$0
Variance greater than 25%.			
c) TV only—property and equipment that includes new facilities (land and structures), expansion of existing facilities and acquisition of new equipment	\$0		\$0
d) Other (specify)	\$0		\$0
8. Total in-kind contributions - property and equipment (line 6 plus line 7), forwards to Schedule F, line 1d. Must agree with in-kind contributions recognized as revenue in the AFS.	\$2,080		\$0
Variance greater than 25%.			

## Comments

Comment	Name	Date	Status
Schedule E WCMU-TV (1791) Mt. Pleasant, MI			

## EXPENSES

(Operating and non-operating)

## PROGRAM SERVICES

	2022 data	2023 data
1. Programming and production	\$1,529,687	\$1,614,802
A. TV CSG	\$980,818	\$838,372
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$223,735
D. All non-CPB Funds	\$548,869	\$552,695
2. Broadcasting and engineering	\$236,430	\$1,184,593
A. TV CSG	\$161,566	\$128,370
B. TV Interconnection	\$18,025	\$17,974
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$56,839	\$1,038,249
3. Program information and promotion	\$391,212	\$344,285
A. TV CSG	\$0	\$50,821
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$391,212	\$293,464

## SUPPORT SERVICES

	2022 data	2023 data
4. Management and general	\$422,271	\$413,661
A. TV CSG	\$0	\$0

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<b>PROGRAM SERVICES</b>				2022 data	2023 data
	B. TV Interconnection			\$0	\$0
	C. Other CPB Funds			\$0	\$34,383
	D. All non-CPB Funds			\$422,271	\$379,278
5.	Fund raising and membership development			\$870,715	\$773,061
	A. TV CSG			\$0	\$146,340
	B. TV Interconnection			\$0	\$0
	C. Other CPB Funds			\$0	\$0
	D. All non-CPB Funds			\$870,715	\$626,721
6.	Underwriting and grant solicitation			\$0	\$0
	A. TV CSG			\$0	\$0
	B. TV Interconnection			\$0	\$0
	C. Other CPB Funds			\$0	\$0
	D. All non-CPB Funds			\$0	\$0
7.	Depreciation and amortization (if not allocated to functional categories in lines 1 through 6)			\$681,739	\$672,955
	A. TV CSG			\$0	\$0
	B. TV Interconnection			\$0	\$0
	C. Other CPB Funds			\$0	\$0
	D. All non-CPB Funds			\$681,739	\$672,955
8.	<b>Total Expenses (sum of lines 1 to 7) must agree with audited financial statements</b>			\$4,132,054	\$5,003,357
	A. Total TV CSG (sum of Lines 1.A, 2.A, 3.A, 4.A, 5.A, 6.A, 7.A)			\$1,142,384	\$1,163,903
	B. Total TV Interconnection (sum of Lines 1.B, 2.B, 3.B, 4.B, 5.B, 6.B, 7.B)			\$18,025	\$17,974
	C. Total Other CPB Funds (sum of Lines 1.C, 2.C, 3.C, 4.C, 5.C, 6.C, 7.C)			\$0	\$258,118
	D. Total All non-CPB Funds (sum of Lines 1.D, 2.D, 3.D, 4.D, 5.D, 6.D, 7.D)			\$2,971,645	\$3,563,362
<b>INVESTMENT IN CAPITAL ASSETS</b>					
Cost of capital assets purchased or donated					
	9. Total capital assets purchased or donated			\$562,502	\$103,932
	9a. Land and buildings			\$0	\$0
	9b. Equipment			\$562,502	\$103,932
	9c. All other			\$0	\$0
	10. Total expenses and investment in capital assets (Sum of lines 8 and 9)			\$4,694,556	\$5,107,289
<b>Additional Information</b>					
(Lines 11 + 12 must equal line 8 and Lines 13 + 14 must equal line 9)					
	11. Total expenses (direct only)			\$3,563,736	\$4,283,467
	12. Total expenses (indirect and in-kind)			\$568,318	\$719,890
	13. Investment in capital assets (direct only)			\$560,422	\$103,932
	14. Investment in capital assets (indirect and in-kind)			\$2,080	\$0
<b>Comments</b>					
Comment	Name	Date	Status		
Schedule F					
WCMU-TV (1791)					
Mt. Pleasant, MI					

## WCMU-TV Annual Financial Report For the Fiscal Years Ending June 30, 2022 and 2023

**Note:**This grantee is joined with [WCMU-FM](#)

2023 data

**1. Data from AFR**

a. Schedule A, Line 22	\$6,363,738
b. Schedule B, Line 5	\$1,060,401
c. Schedule C, Line 6	\$99,986
d. Schedule D, Line 8	\$0
e. Total from AFR	\$7,524,125

**Choose Reporting Model**

You **must** choose one of the three reporting models in order to complete Schedule F. After making your selection, click the "Choose" button below, which will display your reporting model. When changing to a different reporting model all data entered in the current reporting model will be lost.

- ☐ FASB
 ☒ GASB Model A proprietary enterprise-fund financial statements with business-type activities only
 ☐ GASB Model B public broadcasting entity-wide statements with mixed governmental and business-type activities

2023 data

**2. GASB Model A proprietary enterprise-fund financial statements with business-type activities only**

a. Operating revenues	\$7,294,878
b. Non-operating revenues	\$224,050
c. Other revenue	\$60,189
d. Capital grants, gifts and appropriations (if not included above)	\$0
e. Total From AFS, lines 2a-2d	\$7,579,117

**Reconciliation**

2023 data

3. Difference (line 1 minus line 2)	\$-54,992
4. If the amount on line 3 is not equal to \$0, click the "Add" button and list the reconciling items.	\$-54,992

Description	Amount
Delta College Indirect Admin	\$-54,993
Rounding	\$1

**Comments**

Comment	Name	Date	Status
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## WCMU-FM Annual Financial Report For the Fiscal Years Ending June 30, 2022 and 2023

Schedule A  
WCMU-FM (1454)  
Mount Pleasant, MI

### NFFS Excluded?

If you have an NFFS Exclusion, please click the "NFFS X" button, and enter your NFFS data.



### Source of Income

	2022 data	2023 data
1. Amounts provided directly and indirectly by federal government agencies	\$0	\$0
A. Grants for facilities and other capital purposes	\$0	\$0
B. Department of Education	\$0	\$0
C. Department of Health and Human Services	\$0	\$0
D. National Endowment for the Arts and Humanities	\$0	\$0
E. National Science Foundation	\$0	\$0
F. Other Federal Funds (specify)	\$0	\$0
2. Amounts provided by Public Broadcasting Entities	\$257,337	\$294,644
A. CPB - Community Service Grants	\$257,337	\$294,644
B. CPB - all other funds from CPB	\$0	\$0
C. PBS - all payments except copyright royalties and other pass-through payments. See Guidelines for details.	\$0	\$0
D. NPR - all payments except pass-through payments. See Guidelines for details.	\$0	\$0
E. Public broadcasting stations - all payments	\$0	\$0
F. Other PBE funds (specify)	\$0	\$0
3. Local boards and departments of education or other local government or agency sources	\$1,308	\$1,046
3.1 NFFS Eligible	\$1,308	\$1,046
A. Program and production underwriting	\$1,308	\$1,046
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
3.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
4. State boards and departments of education or other state government or agency sources	\$0	\$0
4.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0



**WCMU-FM Annual Financial Report**  
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	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
	F. Other income eligible as NFFS (specify)	\$0	\$0
	4.2 NFFS Ineligible	\$0	\$0
	A. Rental income	\$0	\$0
	B. Fees for services	\$0	\$0
	C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
	E. Other income ineligible for NFFS inclusion	\$0	\$0
	5. State colleges and universities	\$603,766	\$536,747
	5.1 NFFS Eligible	\$603,216	\$536,747
	A. Program and production underwriting	\$11,237	\$14,651
	Variance greater than 25%.		
	B. Grants and contributions other than underwriting	\$0	\$0
	C. Appropriations from the licensee	\$591,979	\$522,096
	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
	F. Other income eligible as NFFS (specify)	\$0	\$0
	5.2 NFFS Ineligible	\$550	\$0
	Variance greater than 25%.		
	A. Rental income	\$0	\$0
	B. Fees for services	\$550	\$0
	Variance greater than 25%.		
	C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
	E. Other income ineligible for NFFS inclusion	\$0	\$0
	6. Other state-supported colleges and universities	\$192,952	\$163,739
	6.1 NFFS Eligible	\$192,035	\$210,222
	A. Program and production underwriting	\$2,180	\$1,906
	B. Grants and contributions other than underwriting	\$0	\$0
	C. Appropriations from the licensee	\$189,855	\$208,316
	D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
	E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
	F. Other income eligible as NFFS (specify)	\$0	\$0

**WCMU-FM Annual Financial Report  
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6.2 NFFS Ineligible	\$917	\$-46,483
Variance greater than 25%.		
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$917	\$-46,483
Description Other income ineligible for NFFS	Amount \$-46,483	
Variance greater than 25%.		
7. Private colleges and universities	\$0	\$0
7.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
7.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
8. Foundations and nonprofit associations	\$179,389	\$185,285
8.1 NFFS Eligible	\$161,851	\$161,265
A. Program and production underwriting	\$159,918	\$143,003
B. Grants and contributions other than underwriting	\$1,933	\$18,262
Variance greater than 25%.		
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
E. Other income eligible as NFFS (specify)	\$0	\$0
8.2 NFFS Ineligible	\$17,538	\$24,020
Variance greater than 25%.		
A. Rental income	\$9,488	\$12,220

**WCMU-FM Annual Financial Report  
For the Fiscal Years Ending June 30, 2022 and 2023**

Variance greater than 25%.

B. Fees for services	\$8,050	\$11,800
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Variance greater than 25%.

C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
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D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
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E. Other income ineligible for NFFS inclusion	\$0	\$0
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9. Business and Industry	\$137,959	\$188,052
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9.1 NFFS Eligible	\$137,959	\$142,122
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A. Program and production underwriting	\$137,959	\$142,122
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B. Grants and contributions other than underwriting	\$0	\$0
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C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
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D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
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E. Other income eligible as NFFS (specify)	\$0	\$0
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9.2 NFFS Ineligible	\$0	\$45,930
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A. Rental income	\$0	\$45,930
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B. Fees for services	\$0	\$0
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C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
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D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
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E. Other income ineligible for NFFS inclusion	\$0	\$0
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10. Memberships and subscriptions (net of membership bad debt expense)	\$913,543	\$770,038
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10.1 NFFS Exclusion – Fair market value of premiums that are not of insubstantial value	\$11,491	\$68,667
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Variance greater than 25%.

10.2 NFFS Exclusion – All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (unless netted elsewhere in Schedule A)	\$0	\$0
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	<u>2022 data</u>	<u>2023 data</u>	
10.3 Total number of contributors.	4,406	15,611	

11. Revenue from Friends groups less any revenue included on line 10	\$0	\$0
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	<u>2022 data</u>	<u>2023 data</u>	
11.1 Total number of Friends contributors.	0	0	

12. Subsidiaries and other activities unrelated to public broadcasting (See instructions)	\$0	\$0
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A. Nonprofit subsidiaries involved in telecommunications activities	\$0	\$0
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B. NFFS Ineligible – Nonprofit subsidiaries not involved in telecommunications activities	\$0	\$0
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C. NFFS Ineligible – For-profit subsidiaries regardless of the nature of its activities	\$0	\$0
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D. NFFS Ineligible – Other activities unrelated to public broadcasting	\$0	\$0
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**Form of Revenue**

2022 data

2023 data

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13. Auction revenue (see instructions for Line 13)	\$0	\$0
A. Gross auction revenue	\$0	\$0
B. Direct auction expenses	\$0	\$0
14. Special fundraising activities (see instructions for Line 14)	\$0	\$0
A. Gross special fundraising revenues	\$0	\$0
B. Direct special fundraising expenses	\$0	\$0
15. Passive income	\$77	\$9,659
A. Interest and dividends (other than on endowment funds)	\$77	\$9,659
Variance greater than 25%.		
B. Royalties	\$0	\$0
C. PBS or NPR pass-through copyright royalties	\$0	\$0
16. Gains and losses on investments, charitable trusts and gift annuities and sale of other assets (other than endowment funds)	\$0	\$0
A. Gains from sales of property and equipment (do not report losses)	\$0	\$0
B. Realized gains/losses on investments (other than endowment funds)	\$0	\$0
C. Unrealized gains/losses on investments and actuarial gains/losses on charitable trusts and gift annuities (other than endowment funds)	\$0	\$0
17. Endowment revenue	\$-39,057	\$40,754
A. Contributions to endowment principal	\$15,100	\$4,835
Variance greater than 25%.		
B. Interest and dividends on endowment funds	\$654	\$1,091
Variance greater than 25%.		
C. Realized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$24,367	\$8,190
Variance greater than 25%.		
D. Unrealized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$-79,178	\$26,638
Variance greater than 25%.		
18. Capital fund contributions from individuals (see instructions)	\$0	\$0
A. Facilities and equipment (except funds received from federal or public broadcasting sources)	\$0	\$0
B. Other	\$0	\$0
19. Gifts and bequests from major individual donors	\$145,395	\$225,343
19.1 Total number of major individual donors	67	58
Variance greater than 25%.		
20. Other Direct Revenue	\$1,364	\$4,603
Description	Amount	
Salvage Sales	\$940	
Exclusion Description	Amount	
Other UBI (including the sale of advertising in	\$940	

**WCMU-FM Annual Financial Report  
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Description	Amount	
Exclusion Description publications and other media)	Amount	
GASB 87 Adjustments	\$-30,575	
Exclusion Description Other UBI (including the sale of advertising in publications and other media)	\$-30,575	
Transfers to/from the Licensee	\$34,238	
Exclusion Description Other UBI (including the sale of advertising in publications and other media)	\$34,238	
Line 21. Proceeds from the FCC Spectrum Incentive Auction, interest and dividends earned on these funds, channel sharing revenues, and spectrum leases	\$-66,656	\$63,038
A. Proceeds from sale in spectrum auction	\$0	\$0
B. Interest and dividends earned on spectrum auction related revenue	\$-66,656	\$63,038
Variance greater than 25%.		
C. Payments from spectrum auction speculators	\$0	\$0
D. Channel sharing and spectrum leases revenues	\$0	\$0
E. Spectrum repacking funds	\$0	\$0
22. Total Revenue (Sum of lines 1 through 12, 13.A, 14.A, and 15 through 21)	\$2,327,377	\$2,482,948
<b>Adjustments to Revenue</b>	2022 data	2023 data
23. Federal revenue from line 1.	\$0	\$0
24. Public broadcasting revenue from line 2.	\$257,337	\$294,644
25. Capital funds exclusion—TV (3.2D, 4.2D, 5.2D, 6.2D, 7.2D, 8.2D, 9.2D, 18A)	\$0	\$0
26. Revenue on line 20 not meeting the source, form, purpose, or recipient criteria	\$1,364	\$4,603
Variance greater than 25%.		
27. Other automatic subtractions from total revenue	\$-90,971	\$190,000
A. Auction expenses – limited to the lesser of lines 13a or 13b	\$0	\$0
B. Special fundraising event expenses – limited to the lesser of lines 14a or 14b	\$0	\$0
C. Gains from sales of property and equipment – line 16a	\$0	\$0
D. Realized gains/losses on investments (other than endowment funds) – line 16b	\$0	\$0
E. Unrealized investment and actuarial gains/losses (other than endowment funds) – line 16c	\$0	\$0
F. Realized and unrealized net investment gains/losses on endowment funds – line 17c, line 17d	\$-54,811	\$34,828
Variance greater than 25%.		
G. Rental income (3.2A, 4.2A, 5.2A, 6.2A, 7.2A, 8.2A, 9.2A)	\$9,488	\$58,150
Variance greater than 25%.		

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H, Fees for services (3.2B, 4.2B, 5.2B, 6.2B, 7.2B, 8.2B, 9.2B)	\$8,600	\$11,800
Variance greater than 25%.		
I. Licensing Fees (3.2C, 4.2C, 5.2C, 6.2C, 7.2C, 8.2C, 9.2C)	\$0	\$0
J. Other revenue ineligible as NFFS (3.2E, 4.2E, 5.2E, 6.2E, 7.2E, 8.2E, 9.2E)	\$917	\$-46,483
Variance greater than 25%.		
K. FMV of high-end premiums (Line 10.1)	\$11,491	\$68,667
Variance greater than 25%.		
L. All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (Line 10.2)	\$0	\$0
M. Revenue from subsidiaries and other activities ineligible as NFFS (12.B, 12.C, 12.D)	\$0	\$0
N. Proceeds from spectrum auction and related revenues from line 21.	\$-66,656	\$63,038
Variance greater than 25%.		
28. Total Direct Nonfederal Financial Support (Line 22 less Lines 23 through 27). (Forwards to line 1 of the Summary of Nonfederal Financial Support)	\$2,159,647	\$1,993,701

**Comments**

Comment	Name	Date	Status
Schedule B WorkSheet WCMU-FM (1454) Mount Pleasant, MI			
		2022	2023
<b>Step 1 - Compute the Rate - Licensee Indirect Costs/Licensee Direct Costs</b>			
Institutional Support (Enter this amount here only if station benefits from Institutional Support.)		\$32,233,827	\$38,632,127
AFS page or "n/a"		n/a	n/a
Physical Plant Support (Enter this amount here only if station benefits from Physical Plant Support.)		\$31,648,505	\$30,959,322
AFS page or "n/a"		n/a	n/a
<b>Licensee Indirect Costs</b>		\$63,882,332	\$69,591,449
<b>Licensee Direct Costs</b>			
Total Operating expenses		\$419,711,987	\$448,284,975
AFS page or "n/a"		n/a	n/a
Less: Institutional Support (Enter this amount whether or not the station benefits from Institutional Support.)		\$32,233,827	\$38,632,127
AFS page or "n/a"		n/a	n/a
Less: Physical Plant Support (Enter this amount whether or not the station benefits from Physical Plant Support.)		\$31,648,505	\$30,959,322
AFS page or "n/a"		n/a	n/a
Licensee's Direct Costs (= Total operating expenses minus both Institutional Support and Physical Plant Support)		\$355,829,655	\$378,693,526
Indirect Cost Rate = (Licensee's Indirect Costs/Licensee's Direct Costs)		%17.953066	%18.376720

**WCMU-FM Annual Financial Report**  
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	2022	2023
<b>Step 2 - Identify the Base (Station's Net Direct Expenses)</b>		
Station's Total Operating Expenses (from Schedule E, Line 8)	\$2,645,674	\$3,033,477
Less: Depreciation and Amortization - from station's AFS (if applicable)	\$111,752	\$111,753
AFS page or "n/a"	51	43
In-kind contributions and donated property and equipment reported as expenses per AFS (if applicable)	\$66,548	\$43,589
Variance greater than 25%.		
AFS page or "n/a"	51	43
Indirect Administrative Support (if included in station's total expenses) - per AFS	\$316,205	\$396,908
Variance greater than 25%.		
AFS page or "n/a"	51	43
Expenses for non-broadcast activities and UBIT-per AFS (if applicable)	\$389,879	\$0
Variance greater than 25%.		
AFS page or "n/a"	n/a	n/a
Expenses not supported by licensee - per AFS (Example: expenses of consolidated entities like Friends Groups, foundations, and component units (if applicable))	\$0	\$321,385
AFS page or "n/a"	n/a	n/a
Station's Net Direct Expenses	\$1,761,290	\$2,159,842
<b>Step 3: Apply the Rate to the Base (= total support activity benefiting the station)</b>	\$316,206	\$396,908
Variance greater than 25%.		
Upload the licensee's audited financial statement only. [NOTE: Only PDF files are allowed for upload.]	<a href="#">View Document</a>	1454_WCMU_BWA_fy23.pdf
<b>Comments</b>		
Comment	Name	Date
Occupancy List WCMU-FM (1454) Mount Pleasant, MI		
	Type of Occupancy Location	Value
Schedule B Totals WCMU-FM (1454) Mount Pleasant, MI		
	2022 data	2023 data
1. Total support activity benefiting station	\$316,206	\$396,908
Variance greater than 25%.		
2. Occupancy value	0	\$0
3. Deductions: Fees paid to the licensee for overhead recovery, assessment, etc.	\$0	\$0
4. Deductions: Support shown on lines 1 and 2 in excess of revenue reported in financial statements.	\$0	\$0
5. Total Indirect Administrative Support (Forwards to Line 2 of the Summary of Nonfederal Financial Support)	\$316,206	\$396,908



**WCMU-FM Annual Financial Report  
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		2022 data	2023 data
Variance greater than 25%.			
6. Please enter an institutional type code for your licensee.		SU	SU
<div> <div>Comments</div> <div> <div>Comment</div> <div>Name</div> <div>Date</div> <div>Status</div> </div> </div>			
<div> <div>Schedule C</div> <div>WCMU-FM (1454)</div> <div>Mount Pleasant, MI</div> </div>			
		2022 data	2023 data
	Donor Code		
1. PROFESSIONAL SERVICES (must be eligible as NFFS)		\$0	\$0
A. Legal		\$0	\$0
B. Accounting and/or auditing		\$0	\$0
C. Engineering		\$0	\$0
D. Other professionals (see specific line item instructions in Guidelines before completing)		\$0	\$0
2. GENERAL OPERATIONAL SERVICES (must be eligible as NFFS)		\$0	\$0
A. Annual rental value of space (studios, offices, or tower facilities)		\$0	\$0
B. Annual value of land used for locating a station-owned transmission tower		\$0	\$0
C. Station operating expenses		\$0	\$0
D. Other (see specific line item instructions in Guidelines before completing)		\$0	\$0
3. OTHER SERVICES (must be eligible as NFFS)		\$0	\$0
A. ITV or educational radio		\$0	\$0
B. State public broadcasting agencies		\$0	\$0
C. Local advertising		\$0	\$0
D. National advertising		\$0	\$0
4. Total in-kind contributions - services and other assets eligible as NFFS (sum of lines 1 through 3), forwards to Line 3a, of the Summary of Nonfederal Financial Support		\$0	\$0
5. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS		\$66,548	\$43,589
A. Compact discs, records, tapes and cassettes		\$0	\$0
B. Exchange transactions	BS	\$5,156	BS
C. Federal or public broadcasting sources		\$0	\$0
D. Fundraising related activities		\$0	\$0
E. ITV or educational radio outside the allowable scope of approved activities		\$0	\$0
F. Local productions		\$0	\$0
G. Program supplements		\$0	\$0
H. Programs that are nationally distributed		\$0	\$0
I. Promotional items		\$0	\$0
J. Regional organization allocations of program services		\$0	\$0
K. State PB agency allocations other than those allowed on line 3(b)		\$0	\$0
L. Services that would not need to be purchased if not donated		\$0	\$0
M. Other	SG	\$61,392	SG
			\$43,189
	Description	Amount	
	UW DNR	\$28,031	
	UW Non-Profits	\$15,158	
6. Total in-kind contributions - services and other assets (line 4 plus line 5), forwards to Schedule F, line 1c. Must agree with in-kind contributions recognized as revenue in the AFS.		\$66,548	\$43,589

**WCMU-FM Annual Financial Report  
For the Fiscal Years Ending June 30, 2022 and 2023**

2022 data      Donor Code      2023 data

Variance greater than 25%.

**Comments**

Comment	Name	Date	Status
Schedule D			
WCMU-FM (1454)			
Mount Pleasant, MI			

	2022 data	Donor Code	2023 data
1. Land (must be eligible as NFFS)	\$		\$0
2. Building (must be eligible as NFFS)	\$		\$0
3. Equipment (must be eligible as NFFS)	\$		\$0
4. Vehicle(s) (must be eligible as NFFS)	\$		\$0
5. Other (specify) (must be eligible as NFFS)	\$		\$0
6. Total in-kind contributions - property and equipment eligible as NFFS (sum of lines 1 through 5), forwards to Line 3b. of the Summary of Nonfederal Financial Support	\$		\$0
7. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$		\$0
a) Exchange transactions	\$		\$0
b) Federal or public broadcasting sources	\$		\$0
c) TV only—property and equipment that includes new facilities (land and structures), expansion of existing facilities and acquisition of new equipment	\$		\$0
d) Other (specify)	\$		\$0
8. Total in-kind contributions - property and equipment (line 6 plus line 7), forwards to Schedule F, line 1d. Must agree with in-kind contributions recognized as revenue in the AFS.	\$		\$0

**Comments**

Comment	Name	Date	Status
Schedule E			
WCMU-FM (1454)			
Mount Pleasant, MI			

**EXPENSES**

(Operating and non-operating)

**PROGRAM SERVICES**

	2022 data	2023 data
1. Programming and production	\$1,189,060	\$1,159,386
A. Restricted Radio CSG	\$70,568	\$70,568
B. Unrestricted Radio CSG	\$186,769	\$138,779
C. Other CPB Funds	\$19,508	\$100,000
D. All non-CPB Funds	\$912,215	\$850,039
2. Broadcasting and engineering	\$259,588	\$761,488
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$67,272
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$259,588	\$694,216
3. Program information and promotion	\$149,523	\$165,969
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$149,523	\$165,969

**SUPPORT SERVICES**

	2022 data	2023 data
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**WCMU-FM Annual Financial Report  
For the Fiscal Years Ending June 30, 2022 and 2023**

	2022 data	2023 data
4. Management and general	\$373,751	\$398,345
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$18,025
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$373,751	\$380,320
5. Fund raising and membership development	\$554,560	\$429,097
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$554,560	\$429,097
6. Underwriting and grant solicitation	\$0	\$0
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$0	\$0
7. Depreciation and amortization (if not allocated to functional categories in lines 1 through 6)	\$119,192	\$119,192
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$119,192	\$119,192
<b>8. Total Expenses (sum of lines 1 to 7) must agree with audited financial statements</b>	<b>\$2,645,674</b>	<b>\$3,033,477</b>
A. Total Restricted Radio CSG (sum of Lines 1.A, 2.A, 3.A, 4.A, 5.A, 6.A, 7.A)	\$70,568	\$70,568
B. Total Unrestricted Radio CSG (sum of Lines 1.B, 2.B, 3.B, 4.B, 5.B, 6.B, 7.B)	\$186,769	\$224,076
C. Total Other CPB Funds (sum of Lines 1.C, 2.C, 3.C, 4.C, 5.C, 6.C, 7.C)	\$19,508	\$100,000
D. Total All non-CPB Funds (sum of Lines 1.D, 2.D, 3.D, 4.D, 5.D, 6.D, 7.D)	\$2,368,829	\$2,638,833

**INVESTMENT IN CAPITAL ASSETS**

Cost of capital assets purchased or donated

	2022 data	2023 data
9. Total capital assets purchased or donated	\$0	\$0
9a. Land and buildings	\$0	\$0
9b. Equipment	\$0	\$0
9c. All other	\$0	\$0
<b>10. Total expenses and investment in capital assets (Sum of lines 8 and 9)</b>	<b>\$2,645,674</b>	<b>\$3,033,477</b>

**Additional Information**

(Lines 11 + 12 must equal line 8 and Lines 13 + 14 must equal line 9)

	2022 data	2023 data
11. Total expenses (direct only)	\$2,262,921	\$2,592,980
12. Total expenses (indirect and in-kind)	\$382,753	\$440,497
13. Investment in capital assets (direct only)	\$0	\$0
14. Investment in capital assets (indirect and in-kind)	\$0	\$0

Comments

Comment

Name

Date

Status

## WCMU-FM Annual Financial Report For the Fiscal Years Ending June 30, 2022 and 2023

Schedule F  
WCMU-FM (1454)  
Mount Pleasant, MI

**Note:**

This grantee is joined with [WCMU-TV](#)

2023 data

**1. Data from AFR**

a. Schedule A, Line 22	\$6,363,738
b. Schedule B, Line 5	\$1,060,401
c. Schedule C, Line 6	\$99,986
d. Schedule D, Line 8	\$0
e. Total from AFR	\$7,524,125

**Choose Reporting Model**

You **must** choose one of the three reporting models in order to complete Schedule F. After making your selection, click the "Choose" button below, which will display your reporting model. When changing to a different reporting model all data entered in the current reporting model will be lost.

- ☐ FASB
 ☒ GASB Model A proprietary enterprise-fund financial statements with business-type activities only
 ☐ GASB Model B public broadcasting entity-wide statements with mixed governmental and business-type activities

2023 data

**2. GASB Model A proprietary enterprise-fund financial statements with business-type activities only**

a. Operating revenues	\$7,294,878
b. Non-operating revenues	\$224,050
c. Other revenue	\$60,189
d. Capital grants, gifts and appropriations (if not included above)	\$0
e. Total From AFS, lines 2a-2d	\$7,579,117

**Reconciliation**

2023 data

3. Difference (line 1 minus line 2)	\$-54,992
4. If the amount on line 3 is not equal to \$0, click the "Add" button and list the reconciling items.	\$-54,992

Description	Amount
Delta College Indirect Admin	\$-54,993
Rounding	\$1

**Comments**

Comment	Name	Date	Status

**Summary of Non-Federal Financial Support**  
**For the Years Ending June 30, 2022 and 2023**  
**Certified by Head of the Grantee and Independent Accountant's Report**

	<b>WCMU-TV Description</b>	<b>FY 2022</b>	<b>FY2023</b>	<b>Total</b>
<b>Line</b>	<b>Summary of Non-Federal Financial Support</b>			
<b>1</b>	Direct Revenue (Schedule A)	\$2,309,449	\$2,327,587	\$4,637,036
<b>2</b>	Indirect Administrative Support (Schedule B)	\$517,033	\$663,493	\$1,180,526
<b>3</b>	In-Kind Contributions			
	Services and Other Assets (Schedule C)	\$51,286	\$56,397	\$107,683
	Property and Equipment (Schedule D)	\$2,080	\$0	\$2,080
	<b>Total Non-Federal Financial Support</b>	<b>\$2,879,848</b>	<b>\$3,047,477</b>	<b>\$5,927,325</b>

	<b>WCMU-FM Description</b>	<b>FY 2022</b>	<b>FY2023</b>	<b>Total</b>
<b>Line</b>	<b>Summary of Non-Federal Financial Support</b>			
<b>1</b>	Direct Revenue (Schedule A)	\$2,159,647	\$1,993,701	\$4,153,348
<b>2</b>	Indirect Administrative Support (Schedule B)	\$316,206	\$396,908	\$713,114
<b>3</b>	In-Kind Contributions			
	Services and Other Assets (Schedule C)	\$66,548	\$43,589	\$110,137
	Property and Equipment (Schedule D)	\$0	\$0	\$0
	<b>Total Non-Federal Financial Support</b>	<b>\$2,542,401</b>	<b>\$2,434,198</b>	<b>\$4,976,599</b>

**Scope and Methodology**

We performed an attestation examination to determine WCMU-TV's and WCMU-FM's compliance with CPB Financial Reporting Guidelines, provisions of the Communications Act, grant certification requirements, and other grant provisions. The scope of the audit included reviews and tests of the information reported by the grantee on its AFRs that we reconciled to audited financial statements for the fiscal years ending June 30, 2022 and 2023, and grant certifications of compliance with Act requirements; and certifications on its financial reports submitted to CPB.

We tested the allowability of the NFFS claimed on the stations' AFRs by performing financial reconciliations and comparisons to underlying accounting records (general ledger) and the audited financial statements. We reviewed underwriting contracts, grant agreements, membership donations, major donor contributions and other documentation supporting revenues reported. We reviewed NFFS revenue transactions reported by both stations totaling \$1,067,517 of the \$4,469,096 (24 percent) reported in FY 2022 and \$1,172,530 of the \$4,321,288 (27 percent) reported in FY 2023. The tested amounts include WUCX-FM claimed NFFS of \$34,075 and \$26,439 for FY 2022 and FY 2023, respectively.

We reviewed the allowability of expenses the station charged to the CSGs received from CPB during FYs 2022 and 2023. To determine whether the station incurred CSG expenditures in accordance with grant terms, we reviewed \$1,428,888 of the \$3,271,893 in CPB grant expenses incurred by the stations during our audit period. For all the grant expenses reviewed, we examined supporting documentation, including invoices, proof of payments, and other documentation for judgmentally selected transactions. We also performed analytical review procedures of indirect administrative support of \$833,239 and \$1,060,401 for FY 2022 and FY 2023, respectively.

We reviewed policies, records, and documents supporting the stations' compliance with the Act's requirements to provide advance notice of public meetings, make financial and EEO information available to the public, and safeguard donor lists. We also reviewed the station's website to determine their compliance with CPB's transparency requirements. Our procedures included interviewing station management, staff, and a governing board representative.

We gained an understanding of internal controls over the preparation of AFRs, cash receipts, and cash disbursements. We also gained an understanding of the station's policies and procedures for compliance with certification of eligibility requirements, Communications Act, and CPB grant agreement terms for allowable costs. We used this information to assess risks and plan the nature and extent of our testing to conclude on our objectives.

We conducted fieldwork from April 2024 through February 2025. We performed our audit in accordance with the *Government Auditing Standards* for attestation examinations.



Our mission is to educate, inform, entertain and engage the communities we serve through programming and partnerships.

March 24, 2025

WCMU Public Media  
1999 East Campus Dr.  
Mount Pleasant, MI 48859

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

**RE: Draft Executive Summary - Audit of Community Service and Other Grants Awarded to WCMU-TV and WCMU-FM, Licensed to Central Michigan University, Mount Pleasant, Michigan for the Period July 1, 2021 Through June 30, 2023. Draft Report No. ASJ2411-XXXX**

Dear Mr. Richardson:

Thank you for the opportunity to review and respond to the Draft Executive Summary of the WCMU audit. WCMU appreciates having been able to work with your office throughout the process. Our staff has thoroughly reviewed the Draft Executive Summary and already taken steps to address the findings therein.

WCMU is committed to the principles of transparency for the general public and compliance with all CPB regulations and guidelines. Over these past several months, our staff has diligently worked to address issues and update processes in the interest of continuing to provide our local community with quality programming. We are confident that WCMU will continue to demonstrate its commitments to transparency and compliance with the improvements made during this audit.

Specifically, WCMU reviewed and has implemented corrections in our policies and procedures for the findings included in the Draft Executive Summary. The OIG provided recommendations for the following requirements under the Act:

- WCMU must post Annual Financial Statements and Annual Financial Reports to the station's website;
- WCMU must provide advance notice of open meetings and document the reasons for closed meetings; and
- WCMU must ensure station interns complete harassment prevention training.

Each of these findings, and WCMU's corresponding corrective action, are detailed below.

**A. Annual Financial Statements and Annual Financial Reports**

As a result of discussions with the OIG, WCMU has already corrected this issue. The FY 24



Annual Financial Statement is currently posted on WCMU's website at the following link: <https://www.wcmu.org/cpb-csg-compliance/>. The FY24 Annual Financial Report will be posted once the reports are approved by the Corporation for Public Broadcasting. WCMU apologizes for this honest lapse, and it has implemented changes in practice to ensure that it does not happen in future years.

WCMU has addressed this draft finding and is committed to compliance moving forward. WCMU's website will be updated with annual financial information in compliance with the law.

#### **B. Open and Closed Meeting Policies**

For background, WCMU's governing body is not required to conduct all meetings open to the public, unless, as required by the Act:

- There is a quorum of the governing body;
- Deliberations take place; and
- The deliberations result in the joint conduct or disposition of the governing body, but only to the extent that such deliberations relate to public broadcasting. (see 47 USC § 396(k)(4)).

Therefore, meetings of the governing body of WCMU, the Central Michigan University Board of Trustees, are not required to be open under the Act *unless* a quorum deliberates relating to public broadcasting. WCMU interpreted this requirement to mean gatherings of the governing body that do not discuss WCMU operations do not meet the definition of a "meeting" under the Act. (see § 397(5)).

WCMU can provide more information regarding this finding. During the course of this audit, WCMU voluntarily provided information indicating that a status update of an independent audit of WCMU came up during a closed audit subcommittee meeting of the governing body of WCMU. These audit subcommittee meetings, which cover many topics that do not relate to public broadcasting, are typically closed to the public to discuss confidential information unrelated to WCMU.

In this case, the governing body simply received a status update regarding the progress of an independent audit. WCMU's governing body did not deliberate, nor did the status update of the independent audit result in joint conduct or a disposition of the governing body regarding public broadcasting. The status update was not presented at a closed meeting to conceal public broadcasting information. The audit subcommittee meeting was closed only to protect confidential information unrelated to public broadcasting. WCMU apologizes for the appearance of presenting information deserving of public scrutiny in a closed meeting. Our staff has had internal discussions to determine how to ensure this mistake does not happen again.

In the interest of transparency and to avoid confusion, WCMU will ensure that information regarding public broadcasting brought before its governing body will be shared in appropriately noticed open meetings in accordance with the Act. WCMU provides timely notice of open meetings regarding public broadcasting leases, governance, and other matters where the Act is intended to provide transparency. WCMU complies with the requirements for open meetings by timely posting links on its website to the schedule and agendas of matters brought before its governing body. WCMU apologizes for the confusion in this matter and, in the interest of transparency, it will ensure that such status updates are not brought before the governing body outside of an open meeting or without properly closing a meeting to the public. WCMU earnestly believes that it did not violate the spirit of the law requiring transparency of its governance.



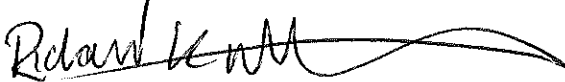
**C. Harassment Prevention Training**

WCMU is committed to workplace training in compliance with the Act for all employees. Interns of WCMU will be required to complete training during their onboarding process. Further, it was revealed that WCMU had not removed employees from its rolls who no longer worked for the station and therefore did not have to complete training. WCMU became aware of this issue under new leadership at the start of FY24, and that matter has been resolved.

WCMU apologizes for this mistake, and it has worked diligently to correct this matter. WCMU is confident that providing harassment prevention training during onboarding will prevent this error from happening again.

WCMU thanks the OIG for the opportunity to provide its response to the Draft Executive Summary. Our station is committed to the principles of transparency and accountability. The corrections made during the course of this audit will ensure that we fully comply with the law.

Respectfully,

A handwritten signature in black ink, appearing to read 'Richard R. Westover', with a long, sweeping horizontal flourish extending to the right.

Richard R. Westover  
General Manager  
WCMU Public Media

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## Contact CPB OIG

If you have information about fraud, waste, or abuse involving CPB funds, initiatives, or operations, please call, write, or e-mail the Office of the Inspector General or file a complaint through our website. Your report may be made anonymously.

Call: Inspector General Hotline  
202-879-9728 or  
800-599-2170

Email: [oigemail@cpb.org](mailto:oigemail@cpb.org)

Write: Inspector General Hotline  
Office of the Inspector General  
Corporation for Public Broadcasting  
401 Ninth Street, NW  
Washington, DC 20004-2129

Website: <https://cpboig.oversight.gov/hotline>



On October 1, 2017, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) announced the official launch of [Oversight.gov](https://oversight.gov). This new website provides a “one stop shop” to follow the ongoing oversight work of all Inspectors General that publicly post reports.

The Corporation for Public Broadcasting, like the other OIGs, will continue to post reports to its own website. But with the launch of Oversight.gov, users can now sort, search, and filter the site’s database of public reports from all of CIGIE’s member OIGs to find reports of interest. In addition, the site features a user-friendly map to find reports based on geographic location, and contact information for each OIG’s whistleblower hotline. Users can receive notifications when new reports are added to the site by following CIGIE’s new Twitter account, [@OversightGov](https://twitter.com/OversightGov).