



# Community Service Grant Requirements and Resources

September 7, 2023

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Tim Bawcombe

Director, TV CSG Policy & Review

Andrew Charnik

Director, Radio CSG Policy & Administration

# Today's Objectives

- Understand General Provisions and Eligibility Criteria
- Improve reporting and compliance
- Understand grantee accountability
- Learn how to access training and other resources

# Get Ready to Accept the FY 2024 CSG

Certification of Eligibility

General Provisions


Training

Reporting

# Certification of Eligibility

<https://isis.cpb.org>

- Annually certify compliance
- CSG offer expires June 30
- COE training presentation date
- Grants Administrator role is critical

| Financial Reporting   | Grantee Profile | Legal Forms | Grant Payments   |
|---|-----------------|-------------|--|
| <a href="#">Legal Forms</a> \ Radio Community Service Grant Agreement   |                 |             | Current Grantee View:  |
| <b>2022 Radio Community Service Grant Agreement and Certification of Eligibility</b>  |                 |             |  <a href="#">PRINT: Radio CSG Agreement</a> |
| <p>For inquiries, please send an email to <a href="mailto:csg@cpb.org">csg@cpb.org</a>.</p>   |                 |             |  |
| <p>By this agreement (the Agreement), dated October 1, 2021, by and between the Corporation for Public Broadcasting (CPB) and the Licensee and Grantee named in Section I below (collectively Grantee), CPB and Grantee, in consideration of the mutual covenants herein and for other good and valuable consideration, the sufficiency and receipt of which are hereby acknowledged, hereby agree as follows:</p>  |                 |             |  |
| <b>I. Licensee/Grantee Information</b>  |                 |             |  |
| ID  |                 |             |  |
| Grantee Name  |                 |             |  |
| City  |                 |             |  |
| State   |                 |             |  |
| Licensee Name   |                 |             |  |
| Licensee Type   |                 |             |  |
| <b>II. Grant Offer, Acceptance and Conditions</b>   |                 |             |  |
| <p><b>A. Grant Offer and Acceptance:</b> CPB offers and Grantee accepts the grants (Grant(s)) set forth in Section III below, subject to all the terms and conditions herein and subject to Grantee's certification that it complies with requirements described in Sections IV and V below. CPB has calculated and offered the Grants in reliance and contingent upon the accuracy of the following:</p>   |                 |             |  |
| <ol style="list-style-type: none"><li>1. The representations and warranties made by Grantee to qualify for and receive the Grants.</li><li>2. Grantee's FY 2020 audited financial statements (or unaudited if permitted by CPB) and its Annual Financial Report (AFR) or Annual Financial Summary Report (FSR), whichever is applicable.</li></ol>  |                 |             |  |
| <p><b>B. Conditions:</b> In addition to the terms and conditions stated herein, this Agreement incorporates by reference and Grantee must fully comply with the Communications Act of 1934, 47 U.S.C. § 396, et seq. (<a href="#">Communications Act or Act</a>); CPB's Radio Community Service Grant General Provisions and Eligibility Criteria (<a href="#">General Provisions</a>), the Financial Reporting Guidelines and the Application of Principles of Accounting and Financial Reporting Applicable to Public Telecommunications Entities. These documents are incorporated herein by reference as if fully set forth herein.</p> |                 |             |  |

# General Provisions & Eligibility Criteria

- Provide the terms and conditions of CSG awards

# CSG General Provisions

cpb.org

The screenshot shows the CPB website homepage. At the top left is the CPB logo: "cpb Corporation for Public Broadcasting" with the tagline "A Private Corporation Funded by the American People". To the right are links for "Jobline", "Station Finder", and "Press Room", along with social media icons for email, LinkedIn, and Facebook. A search bar is located below these icons. A navigation menu includes "About CPB", "About Public Media", "Programs and Initiatives", "Grants", "Press Room", "COVID-19", and "I want to...".

The main banner features the text "America Amplified 3.0 FROM WFYI PUBLIC MEDIA" with a speech bubble icon and a bar chart. Below the banner is a blue bar with the text "CPB Awards \$1.5M to America Amplified Public Media Initiative Ahead of 2024 Elections".

Below the banner are three blue buttons: "Jobline" (with a briefcase icon), "Stations" (with a radio tower icon), and "Programs & Projects" (with a document icon).

The right sidebar contains several sections:

- About CPB**: Includes a sub-section "About CPB" with the text "Steward of the U.S. government's investment in public media". Below this are two cards: "Subscribe to CPB" (Stay up-to-date on grants announcements, press releases and more) and "Corporate Officers and Senior Staff" (Learn about the people on CPB's leadership team).
- Resources**: Includes a "Jobline" card (Jobs in public broadcasting) and a "Community Service Grants" card (CSG General Provisions, station guidelines and resources). The latter is highlighted with a red dashed border. Below it is a card for "Open Grants and RFPs" (Prepare and submit an application, learn about terms and conditions).
- Initiatives**: Includes a card titled "Coming Home: Connecting to Community" (Celebrating the people, culture and...).

# CSG General Provisions

cpb.org/stations

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾ I want to... ▾

Home / Grants / Community Service Grants

## Community Service Grants

CPB distributes community service grants (CSGs) to noncommercial public television and radio stations that provide significant public service programming to their communities. CSGs help stations expand the quality and scope of their work, whether in educational, news, public affairs or other programming—all of which represent an immeasurable value to the American people. Applicant and current recipient stations must each year meet a variety of legal, managerial, staffing and operational criteria for CSG funding.

- Television CSG General Provisions
- Radio CSG General Provisions

## Compliance

- Harassment and Bias Prevention Training Program
- CSG Non-Compliance Policy
- Communications Act Compliance
- Compliance Hotline: (202) 879-9655
-  Compliance Checklist 2021 350KB PDF
- **Compliance Alerts:**

2018

2017

2016

## Integrated Station Information System

The CSG legal forms as well as reporting tools (AFR, FSR, SABS, and SAS) can be found on the integrated station information system.

## Training

CPB provides pre-recorded and live training sessions on financial reporting, completing forms and CSG compliance. To view or sign up for training, visit our training site.

# CSG General Provisions

Eligibility Criteria

Communications Act Requirements

Recordkeeping Requirements

Reporting Requirements

Operational Requirements

Diversity Statement

Transparency

Training

Use of CSG Funds



# Eligibility Criteria

## Eligible:

- Operate 1+ broadcast stations and
- At least one meets the CSG eligibility criteria
- TV: full-power UHF or VHF station

# Eligibility Criteria


## Ineligible:

- Closed-circuit
- Student
- Training or
- Licensed to political organizations

# Communications Act

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

## Non-compliance policy



### CSG Non-compliance Policy

January 2016

The Corporation for Public Broadcasting (CPB) has established this CSG Non-compliance Policy to encourage stations receiving a Community Service Grant (CSG) to comply with applicable provisions of the Communications Act of 1934, 47 U.S.C. §396, et seq. (Communications Act or Act) and CPB's General Provisions and Eligibility Criteria (General Provisions). This policy replaces and supersedes CPB's 2013 Grantee Non-compliance Policy.

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

**I. Compliance with the Communications Act**

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

- A. Open Meetings, including meetings of the recipient's board, community advisory board, and their committees, documenting the reasons for closing those meetings, and making that documentation available to the public (47 U.S.C. § 396(k)(4));
- B. Open Financial Records (47 U.S.C. § 396(k)(5));
- C. Community Advisory Board (47 U.S.C. § 396(k)(8));
- D. Employment Statistical Report (47 U.S.C. § 396(k)(11)); and
- E. Donor Information (47 U.S.C. § 396(k)(12)).

**II. Compliance with the General Provisions**

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

# Communications Act

1. Open meetings
2. Closed meetings
3. Open financial records
4. Community advisory board
5. Employment statistical report
6. Donor information

# Communications Act

## cpb.org/stations

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾ I want to... ▾

Home / Grants / Community Service Grants

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- [Television CSG General Provisions](#)
- [Radio CSG General Provisions](#)

## Compliance

- [Harassment and Bias Prevention Training Program](#)
- [CSG Non-Compliance Policy](#)
- [Communications Act Compliance](#)
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# Communications Act

cpb.org/stations/certification

About CPB ▾ About Public Media ▾ Programs and Initiatives ▾ Grants ▾ Press Room COVID-19 ▾ I want to... ▾

Home / Grants / Community Service Grants / Communications Act Compliance

[1. Open Meetings](#)

[2. Closed Meetings](#)

[3. Open Financial Records](#)

[4. Community Advisory Board](#)

[5. CPB Employment Statistical Report](#)

[6. Donor Information](#)

## Communications Act Compliance

This document explains important provisions of the Communications Act of 1934, 47 U.S.C. §396, et seq. (Communications Act or Act) that apply to public broadcasting stations receiving a Community Service Grant (CSG) from the Corporation for Public Broadcasting (CPB). It also references related requirements established by CPB's General Provisions and Eligibility Criteria (the General Provisions). It does not supersede other provisions of the Act, specific terms of CPB grants, or other laws and regulations applicable to grantees. CSG recipients should consult their legal counsel for guidance in complying with specific provisions of the Act and other legal requirements.

In their annual CSG Agreement and Certification of Eligibility, Grantees must certify that they comply with the Communications Act, the General Provisions, CPB's Financial Reporting Guidelines and the Application of Principles of Accounting and Financial Reporting Applicable to Public Telecommunications Entities. This annual certification must be signed by two individuals: the head of the grantee and the licensee official. The head of the grantee is the highest ranking representative of the station's management responsible for station operations, such as its president and chief executive officer. Licensee official means the chair of the stations licensee's governing board, or a designated senior level representative of the licensee who is not a member of the station's management and who has the authority to enter into binding contracts and agreements on behalf of the licensee.

To ensure compliance, the Act enables CPB and its representatives, including the Inspector General, to audit grantees, including the right of access to their "books, documents, papers and records" (§396(l) (3) (D)). Stations may therefore find it helpful to develop procedures for documenting their compliance with each requirement. Such procedures would support consistency in a station's compliance, the accuracy of its annual certification to CPB, and evidence that may be useful to demonstrate compliance in the event of a station audit.

### Download the Requirements

- [Communications Act Compliance 2021 1.3MB PDF](#)
- [Compliance Checklist 2021 350KB PDF](#)

### General Provisions

- Television
- Radio



# Recordkeeping

The Communications Act mandates recordkeeping and auditing and gives CPB access to all CSG records.

Grantees must keep records to facilitate an effective audit.

**Discrete accounting required**

# Discrete Accounting

- The use of unique accounting codes by CSG recipients to identify CSG funds – both revenues and expenses, restricted and unrestricted
- Not required to segregate CSG funds in separate bank accounts
- Cannot use the CSG accounting codes for non-CSG funds



# Reporting Requirements

[cpb.org/stations/frg/](https://cpb.org/stations/frg/)

[About CPB](#) ▾ [About Public Media](#) ▾ [Programs and Initiatives](#) ▾ [Grants](#) ▾ [Press Room](#) [COVID-19](#) ▾ [I want to...](#) ▾

[Home](#) / [Grants](#) / [Community Service Grants](#) / [Financial Reporting Guidelines](#)

## Financial Reporting Guidelines

The Financial Reporting Guidelines have been updated. No major revisions have been made to this year's version compared to last year's, but please note the addition of two Public Broadcasting Entities listed within V. NFFS Excluded Revenues on pages 11-12.

Grantees awarded a Community Service Grant (CSG) by CPB must complete either an Annual Financial Report (AFR) or an annual Financial Summary Report (FSR), as detailed in the applicable year General Provisions and Eligibility Criteria. The Financial Reporting Guidelines (Guidelines) for [fiscal year 2022](#) explain how to complete these reports.

- [2022 Financial Reporting Guidelines](#)
- [2021 Financial Reporting Guidelines](#)
- [2020 Financial Reporting Guidelines](#)



### **Financial Reporting Guidelines**

Fiscal Year 2022

# Reporting Requirements

## **Reporting required:**

AFR/FSR and financial statements within 5 months after close of grantee fiscal year; and submit by Feb. 15:

- Station Activities Survey (SAS)
- Local Content & Services Report (LCSR)
- Station Activities Benchmarking Survey (SABS)

**Grant offers:** Must be accepted by June 30

# Operational Requirements

- FCC operating requirements
- Operating power
- Broadcast schedule
- Policy changes
- Staffing requirement
- Minimum NFFS
- Channel sharing agreement (TV)
- Audience service criteria (Radio)

# Operational Requirements

## FCC Requirements and Operating Power

- Comply with FCC requirements for a noncommercial educational TV or radio station
  - TV: operate at full-power
  - Radio
    - FM: 100 Watts
    - AM: 250 Watts

# Operational Requirements

## Broadcast Schedule:

CPB Qualified Programming

**TV:** 7 days/week, 52 weeks/year, at least 3,000 hours or 58 hours/week

**Radio:** at least 18 consecutive hours/day, 7 days/week, for 52 weeks/year

Questions?

# CSG Policy

- Radio categories
- Minimum NFFS
- Base and incentive grants

# Radio Organized by Coverage Area Population (CAP)

| Level       | A            | B       | C            | D      |
|-------------|--------------|---------|--------------|--------|
| Description | Sole Service | Smaller | Larger Rural | Larger |

| Category | CAP 1 | CAP 2   | CAP 3     | CAP 4   | CAP 5 | CAP 6 |
|----------|-------|---------|-----------|---------|-------|-------|
| CAP      | 0-20K | 20-100K | 100K-300K | 300K-1M | 1M-3M | 3M+   |



# Operational Requirements

## Staffing Requirement:

**TV:** an executive with primary responsibility to oversee operations

**Radio:** varies by category

- 1-3: 2 FT employees
- 4: 3 (min. 2 FT) employees
- 5-6: 4 (min. 2FT) employees

# Non-Federal Financial Support (NFFS)

Revenue raised from sources other than the federal government and public broadcasting entities

- Memberships
- State appropriations
- Foundation grants
- Underwriting
- Other

# Operational Requirements

## Minimum NFFS

**TV:** \$800,000

- Current NFFS
- 3-year average

# Operational Requirements

## Minimum NFFS

### Radio:

| Categories                          | CAP 1<br>0-20K   | CAP 2<br>20-100K | CAP 3<br>100K-300K | CAP 4<br>300K-1M | CAP 5<br>1M-3M   | CAP 6<br>3M+     |
|-------------------------------------|------------------|------------------|--------------------|------------------|------------------|------------------|
| <b>NFFS Minimum</b>                 | <b>\$250,000</b> | <b>\$275,000</b> | <b>\$300,000</b>   | <b>\$300,000</b> | <b>\$400,000</b> | <b>\$500,000</b> |
| NFFS Minimum<br>(Minority or Rural) | \$250,000        | \$250,000        | \$275,000          | \$275,000        | \$300,000        | \$400,000        |
| NFFS Minimum<br>(Minority + Rural)  | \$100,000        | \$100,000        | \$100,000          | \$100,000        | \$100,000        | \$100,000        |

Sole Service grantees have no minimum NFFS requirement

# Operational Requirements

## Channel Sharing Agreement

### TV:

- Two grantees
- Grantee and commercial station

# Operational Requirements

## Audience Service Criteria (ASC)

### Radio:

- Financial and listening goals
- Goals depend on
  - Coverage Area Population
  - Station format
  - Minority designation
- Removal path

# Diversity Statement

To support service to diverse audiences

- Diversity Statement
- Annual Review
- Annual Initiative
- Recruiting

# Transparency

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

## **Website**

Station Management

Board of Directors

CAB Members

Financial Records

## **Public Inspection**

Diversity Statement

Local Content and Service Report



# Harassment & Bias Prevention Training

- Annual requirement for Grantee's officers, employees, interns (paid and unpaid)
- Options for training
  - EVERFI – online program provided at no cost by CPB
  - Training of Grantee's choosing

# Harassment & Bias Prevention Training

Topics must include:

- What constitutes acceptable and unacceptable workplace behavior;
- How to recognize harassment and bias when it occurs; and
- How to report and respond to violations.

[trainingCSG@cpb.org](mailto:trainingCSG@cpb.org)

# Compliance Training

## Annual

Grantees must complete at least one CSG compliance training provided by CPB

- In-person
- Live webinars

# Use of CSG Funds

| CSG Funds   | Radio | TV  |
|---|-------|-----|
| <b>Unrestricted Funds</b><br>7 Spending Categories  | ✓     | ✓   |
| <b>Restricted Funds</b><br>For National Programming | ✓     | N/A |

# Use of CSG Funds

## Unrestricted (Radio & TV)

- 1) programming, production and service
- 2) broadcasting, transmission, and distribution
- 3) program information and promotion
- 4) fundraising and membership development
- 5) underwriting and grant solicitation
- 6) management and general
- 7) purchase, rehabilitation or improvement of capital assets

## Restricted (Radio only – for national content)

- 1) production
- 2) program and content acquisition
- 3) distribution
- 4) promotion

# Use of CSG Funds

**Spending period:** Funds must be used within 2-year spending period.

**Documenting revenues & expenses:** three years with some exceptions

**Return of funds:** conditions requiring grantees to return funds

Questions?

# TV & Radio CSG Formulas



# CSG Grant Elements

**Base grant**

- Fixed amount

**Supplemental  
grant**

- Eligible grantees

**Incentive grant**

- Based on NFFS

# CSG Grant Elements

FY 2024

Television

Radio

**Base  
Grant**

**0.12% of total CPB  
appropriation**

**Determined by coverage area  
population category**

**Supplemental  
Grants**

- **Rural & small urban**
- **Distance service**

**Rural Support Grant**

**Incentive  
Grant**

**Based on a grantee's tiered  
NFFS**

**Based on a grantee's tiered  
NFFS**

# TV CSG Grant Elements

FY 2024

Television

**Base  
Grant**

**\$630,000**

- 0.12% of total CPB appropriation
- \$570,000 in FY 2023
- Multi-provider markets

**Supplemental  
Grants**

- Rural & small urban
- Distance service

- Universal Service Support Grant (USSG)
- Distance Service Grant (DSG)

**Incentive  
Grant**

**Based on a grantee's  
adjusted tiered NFFS**

- Based on Non-federal financial support (NFFS)
- Revenue from sources other than the federal government and public broadcasting entities

# Radio CSG Grant Elements

FY 2024

**Base Grant**

**Determined by coverage area population category**

| Category | CAP Range   | Base Grant |
|----------|-------------|------------|
| 1        | 0 – 20K     | \$106,180  |
| 2        | 20K – 100k  | \$100,281  |
| 3        | 100K – 300K | \$88,483   |
| 4        | 300K – 1M   | \$70,787   |
| 5        | 1M – 3M     | \$58,989   |
| 6        | 3M +        | \$41,292   |

## Designations

**Rural  
Minority**  
(+ multipliers on NFFS, base grants, and RSG)

- Based on Non-federal financial support (NFFS)
- Revenue from sources other than the federal government and public broadcasting entities

**Supplemental Grants**

**Rural Support Grant  
\$25,199 in 2023**

**Incentive Grant**

**Based on a grantee's adjusted tiered NFFS**

# TV: Tiered NFFS for Incentive Grant

| Tier | Apply CPB Match to:                         |
|------|---|
| 1    | 100% of NFFS up to \$3 million              |
| 2    | 92.5% of NFFS over \$3M but less than \$20M |
| 3    | 95% of NFFS \$20M and over                  |

# Radio: Tiered NFFS for Incentive Grant

| Tier | Apply CPB Match to:                         |
|------|---|
| 1    | 90% of NFFS up to \$300 thousand            |
| 2    | 100% of NFFS from \$300K to less than \$15M |
| 3    | 80% of NFFS \$15M and over                  |

# CPB's Incentive Match

Available Incentive Grant Pool

---

Total Adjusted Tiered NFFS

=

IRR

(Incentive Rate of Return)

# Estimating FY 2024 TV CSGs

Base

- 0.12% of appropriation
- \$630,000
- MPM grantees share one

Incentive

- 0.12 estimated IRR
- Use 2022 tiered NFFS

USSG, IC  
& DSG

- Similar to 2023 CSG
- Transmitter changes affect DSG

DSG Calculation

| Transmitters | 3  | 4    | 5   | 6   | 7   | 8   | 9   | 10  | 11  | 12  |
|--------------|----|------|-----|-----|-----|-----|-----|-----|-----|-----|
| % Base Grant | 5% | 7.5% | 10% | 20% | 30% | 40% | 50% | 60% | 70% | 80% |



# Estimating FY 2024 Radio CSGs

|           | Category | CAP Range   | Base Grant |
|-----------|----------|-------------|------------|
| Base      | 1        | 0 – 20K     | \$106,180  |
|           | 2        | 20K – 100k  | \$100,281  |
| Incentive | 3        | 100K – 300K | \$88,483   |
|           | 4        | 300K – 1M   | \$70,787   |
|           | 5        | 1M – 3M     | \$58,989   |
| RSG       | 6        | 3M +        | \$41,292   |

- Varies by category
- If MASS =1.5 x
- All categories
- 0.05 estimated IRR
- Use tiered 2022 NFFS
- For Rural Audience Service Stations
- If MASS =1.5 x

Questions?

# CSG Resources

## Help Desk

Email: [CSG@cpb.org](mailto:CSG@cpb.org) & [trainingCSG@cpb.org](mailto:trainingCSG@cpb.org)

Phone: (866) 635-4747

## CPB Office of Grants Administration

Kate Arno, VP, CSG and Station Initiatives

Tim Bawcombe, Director, TV CSG Policy and Review

Andrew Charnik, Director, Radio CSG Policy and Administration

Forrest Lillibridge, Director, Grants Administration

Sharon Simmons, Manager, Grants Administration

Ken Goulet, Senior Financial Review Specialist

Imad Khalid, Senior Financial Review Specialist

Sarah Downs, Project Coordinator

## cpb.org

CSG information page: [cpb.org/stations/](http://cpb.org/stations/)

Online webinars: [cpb.org/station-resource/csg-and-isis-training-opportunities](http://cpb.org/station-resource/csg-and-isis-training-opportunities)

# CSG General Provisions

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/ [CSG and ISIS Training Opportunities](#)

## CSG and ISIS Training Opportunities

### Next Live Online Webinars

- [CSG Requirements and Resources: September 7, 2023, at 2 PM EST](#)
  - [Completing the CSG Agreement and Certification of Eligibility: September 13, 2023, at 2PM EST](#)
  - [Intro to Financial Reporting: September 27, 2023, at 2 PM EST](#)
- [View all future training sessions.](#)

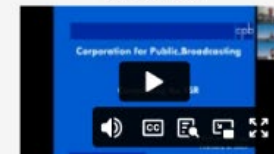
We strongly encourage all station/licensee staff assigned to ISIS security groups to sign up for as many webinars and face-to-face workshops as needed to understand the use of ISIS, CSG compliance and certification, as well as how to complete CSG legal, financial, survey and other reporting forms. Inquiries related to SABS and SAS should be sent to [SABS@cpb.org](mailto:SABS@cpb.org) and [SAS@cpb.org](mailto:SAS@cpb.org), respectively. For all other inquires, please email [CSG@cpb.org](mailto:CSG@cpb.org).

## Pre-Recorded Web-Based Training

### Pre-Recorded Completing the FSR

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

February 2023



# CSG Training

| Description  | Date                          |
|--|-------------------------------|
| <b>CSG Requirements &amp; Resources</b>                | Thursday, September 7, 2023   |
| <b>Completing the CSG Certification of Eligibility</b> | Wednesday, September 13, 2023 |
| <b>Intro to Financial Reporting</b>                    | Wednesday, September 27, 2023 |
| <b>What is NFFS?</b>                                   | Wednesday, October 4, 2023    |
| <b>Completing the FSR</b>                              | Wednesday, October 11, 2023   |

Questions?



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Director, TV CSG Policy & Review

Andrew Charnik

Director, Radio CSG Policy & Administration