Community Service Grant
Requirements and Resources
September 7, 2023

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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

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

https://isis.cpb.org
General Provisions & Eligibility Criteria

- Provide the terms and conditions of CSG awards
CSG General Provisions
cpb.org
CSG General Provisions

cpb.org/stations

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

Non-compliance policy

The Corporation for Public Broadcasting (CPB) has established this CSG Non-compliance Policy to encourage grantees receiving a Community Service Grant (CSG) to comply with applicable provisions of the Communications Act of 1934, 47 U.S.C. §§306 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 violation:

A. Open Meetings. Grantees shall hold public 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. § 390(c)(4));
B. Open Financial Records (47 U.S.C. § 390(c)(5));
C. Community Advisory Board (47 U.S.C. § 390(c)(6));
D. Employment Statistical Report (47 U.S.C. § 390(c)(11)); and
E. Donor Information (47 U.S.C. § 390(c)(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 reports for the prior two years and

Communications Act
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
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(j)(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
1. Communications Act Compliance 2021 1.3MB PDF
2. Compliance Checklist 2021 350KB PDF

General Provisions
- Television
- Radio
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
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
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)

<table>
<thead>
<tr>
<th>Level</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Description</td>
<td>Sole Service</td>
<td>Smaller</td>
<td>Larger Rural</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Category</th>
<th>CAP 1</th>
<th>CAP 2</th>
<th>CAP 3</th>
<th>CAP 4</th>
<th>CAP 5</th>
<th>CAP 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAP</td>
<td>0-20K</td>
<td>20-100K</td>
<td>100K-300K</td>
<td>300K-1M</td>
<td>1M-3M</td>
<td>3M+</td>
</tr>
</tbody>
</table>
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
Minimum NFFS

**TV:** $800,000

- Current NFFS
- 3-year average
## Operational Requirements

### Minimum NFFS

**Radio:**

<table>
<thead>
<tr>
<th>Categories</th>
<th>CAP 1 0-20K</th>
<th>CAP 2 20-100K</th>
<th>CAP 3 100K-300K</th>
<th>CAP 4 300K-1M</th>
<th>CAP 5 1M-3M</th>
<th>CAP 6 3M+</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NFFS Minimum</strong></td>
<td>$250,000</td>
<td>$275,000</td>
<td>$300,000</td>
<td>$300,000</td>
<td>$400,000</td>
<td>$500,000</td>
</tr>
<tr>
<td><strong>NFFS Minimum (Minority or Rural)</strong></td>
<td>$250,000</td>
<td>$250,000</td>
<td>$275,000</td>
<td>$275,000</td>
<td>$300,000</td>
<td>$400,000</td>
</tr>
<tr>
<td><strong>NFFS Minimum (Minority + Rural)</strong></td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
<td>$100,000</td>
</tr>
</tbody>
</table>

Sole Service grantees have no minimum NFFS requirement
Operational Requirements

Channel Sharing Agreement

TV:

- Two grantees
- Grantee and commercial station
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

<table>
<thead>
<tr>
<th>Website</th>
<th>Public Inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Station Management</td>
<td>Diversity Statement</td>
</tr>
<tr>
<td>Board of Directors</td>
<td>Local Content and Service Report</td>
</tr>
<tr>
<td>CAB Members</td>
<td></td>
</tr>
<tr>
<td>Financial Records</td>
<td></td>
</tr>
</tbody>
</table>
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
Compliance Training

Annual
Grantees must complete at least one CSG compliance training provided by CPB
- In-person
- Live webinars
# Use of CSG Funds

<table>
<thead>
<tr>
<th>CSG Funds</th>
<th>Radio</th>
<th>TV</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unrestricted Funds</strong></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>7 Spending Categories</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Restricted Funds</strong></td>
<td>✓</td>
<td>N/A</td>
</tr>
<tr>
<td>For National Programming</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

N/A indicates not applicable.
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

Base Grant

Television

0.12% of total CPB appropriation

Supplemental Grants

• Rural & small urban
• Distance service

Incentive Grant

Based on a grantee’s tiered NFFS

Radio

Determined by coverage area population category

Rural Support Grant

Based on a grantee’s tiered NFFS
TV CSG Grant Elements

**Base Grant**
- **Funding:** $630,000

**Supplemental Grants**
- **Categories:**
  - Rural & small urban
  - Distance service

**Incentive Grant**
- Based on a grantee’s adjusted tiered NFFS

**Television**
- 0.12% of total CPB appropriation
- $570,000 in FY 2023
- Multi-provider markets
- Universal Service Support Grant (USSG)
- Distance Service Grant (DSG)
- Based on Non-federal financial support (NFFS)
- Revenue from sources other than the federal government and public broadcasting entities
Radio CSG Grant Elements

**Base Grant**
- Determined by coverage area population category

**Supplemental Grants**
- Rural Support Grant $25,199 in 2023

**Incentive Grant**
- Based on a grantee's adjusted tiered NFFS

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

**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 |

- Based on Non-federal financial support (NFFS)
- Revenue from sources other than the federal government and public broadcasting entities
## TV: Tiered NFFS for Incentive Grant

<table>
<thead>
<tr>
<th>Tier</th>
<th>Apply CPB Match to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>100% of NFFS up to $3 million</td>
</tr>
<tr>
<td>2</td>
<td>92.5% of NFFS over $3M but less than $20M</td>
</tr>
<tr>
<td>3</td>
<td>95% of NFFS $20M and over</td>
</tr>
</tbody>
</table>
**Radio: Tiered NFFS for Incentive Grant**

<table>
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<tr>
<th>Tier</th>
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<tr>
<td>1</td>
<td>90% of NFFS up to $300 thousand</td>
</tr>
<tr>
<td>2</td>
<td>100% of NFFS from $300K to less than $15M</td>
</tr>
<tr>
<td>3</td>
<td>80% of NFFS $15M and over</td>
</tr>
</tbody>
</table>
CPB’s Incentive Match

\[
\frac{\text{Available Incentive Grant Pool}}{\text{Total Adjusted Tiered NFFS}} = \text{IRR}
\]

(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**

<table>
<thead>
<tr>
<th>Transmitters</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
</tr>
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<tbody>
<tr>
<td>% Base Grant</td>
<td>5%</td>
<td>7.5%</td>
<td>10%</td>
<td>20%</td>
<td>30%</td>
<td>40%</td>
<td>50%</td>
<td>60%</td>
<td>70%</td>
<td>80%</td>
</tr>
</tbody>
</table>
Estimating FY 2024 Radio CSGs

Base
- Varies by category
- If MASS = 1.5 x

Incentive
- All categories
- 0.05 estimated IRR
- Use tiered 2022 NFFS

RSG
- For Rural Audience Service Stations
- If MASS = 1.5 x

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Questions?
CSG Resources

Help Desk
Email: CSG@cpb.org & 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/
Online webinars: cpb.org/station-resource/csg-and-isis-training-opportunities
CSG General Provisions

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CSG Training

cpb.org/station-resource/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 2 PM 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 and SAS@cpb.org, respectively. For all other inquiries, please email 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.
## CSG Training

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSG Requirements &amp; Resources</td>
<td>Thursday, September 7, 2023</td>
</tr>
<tr>
<td>Completing the CSG Certification of Eligibility</td>
<td>Wednesday, September 13, 2023</td>
</tr>
<tr>
<td>Intro to Financial Reporting</td>
<td>Wednesday, September 27, 2023</td>
</tr>
<tr>
<td>What is NFFS?</td>
<td>Wednesday, October 4, 2023</td>
</tr>
<tr>
<td>Completing the FSR</td>
<td>Wednesday, October 11, 2023</td>
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Requirements and Resources

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