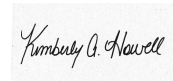




September 17, 2025

To: Donna Joe, Vice President and Deputy General Counsel
Kathy Merritt, Senior Vice President, Radio, Journalism and CSG Services

From: Kimberly A. Howell, Inspector General

 Digitally signed by
Kimberly Howell
Date: 2025.09.17
12:35:23 -04'00'

Subject: Evaluation of KUNC-FM, Licensed to Community Radio for Northern Colorado, Greeley, Colorado, Compliance with Selected Communications Act and General Provisions Transparency Requirements, Final Report No. ECR2511-2515

We have completed an unannounced evaluation of compliance with selected requirements of the 2025 Corporation for Public Broadcasting (CPB) Community Service Grant (CSG) awarded to KUNC-FM, licensed to Community Radio for Northern Colorado, Greeley, Colorado. Our specific objectives were to verify compliance with 11 requirements of the Communications Act of 1934, as amended (Act) for open and closed meetings and open financial records, as well as the 2025 Radio CSG General Provisions and Eligibility Criteria (General Provisions) for transparency as presented in Exhibit A. Background information on the station and CSG program can be found in Exhibit B.

Based on our review of the KUNC-FM website on April 22, 2025, and subsequent information provided by station management, we found the station was compliant with eight of the eleven applicable requirements reviewed. The station was not compliant with three requirements.

Specifically, we found that KUNC-FM was not compliant with:

- posting its most recent Annual Financial Report (AFR) on its website; and
- posting its most recent audited financial statement; and
- making closed meeting documentation available within 10 days of the closed meeting.

In response to our Preliminary Observations, KUNC-FM management stated that they were unaware that the financial reports on the website had not been updated, and also unaware of the requirement to provide closed meeting information within ten days of the closed meeting. After receiving our Preliminary Observations, the station moved quickly to add its most recent annual financial report and audited financial statement to their website and they also added documentation for closed sessions held by KUNC-FM since the beginning of 2024.

Further, in response to the draft report station officials acknowledged the errors identified in the report, took these findings seriously, and recognized that maintaining full compliance is not only

a regulatory obligation but also central to its role as a steward of public trust. Additionally, they will implement corrective actions that include:

- reviewing and strengthening internal compliance procedures;
- providing additional training for staff responsible for reporting and transparency; and
- establishing ongoing monitoring systems to ensure sustained adherence to CPB requirements.

The station said its actions will make the station's processes more open, its reporting more accessible, and its commitment to accountability more visible to the communities it serves. The station's response to the draft report is presented in Exhibit D.

KUNC is currently compliant with the three requirements, and based on the actions taken and corrective actions outlined above, we do not have any recommendations.

We initiated this evaluation to address station accountability as identified in our Annual Plan. We conducted our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*. Our scope and methodology are discussed in Exhibit C.

cc: Ruby Calvert, Chair, CPB Board of Directors
Elizabeth Sembler, Vice Chair, CPB Board of Directors
U.S. Senate Committee on Homeland Security and Governmental Affairs
U.S. House of Representatives Committee on Oversight and Accountability
U.S. Senate Committee on Commerce, Science and Transportation
U.S. House of 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

FINDINGS

ACT AND GENERAL PROVISIONS COMPLIANCE

Open Financial Records

Our review of the station's website on April 22, 2025, found that neither the most recent FY 2024 audited financial statement (AFS) nor the FY 2024 AFR were posted on the website. The FY 2024 audited financial statements were submitted to CPB on February 20, 2025. The FY 2024 AFR was submitted to CPB on February 20, 2025, and was approved by CPB on April 14, 2025.

Our follow-up review of the station website on June 3, 2025, found that the FY 2024 AFS and AFR were not posted on its website.

CPB requires every grantee to make the most recent AFS and AFR 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 Radio CSG General Provisions 2025, Section 2. Communications 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).

The Act, 47 U.S.C. § 396 (k)(5).

After receiving our Preliminary Observations dated June 18, 2025, station management took immediate action and posted the most recent FY 2024 AFS and FY 2024 AFR which we subsequently verified. Station management said that the delays in posting were unintentional oversights.

KUNC-FM is currently compliant with financial information requirements and given CPB's Community Service Grants guidance issued to all CSG recipients on August 25, 2025, no further financial information reporting is required beyond FY 2024. As a result, we do not have any recommendations.

Making Closed Session Documentation Available Within 10 Days

The station's Board held four closed meetings between March 23, 2024, and March 29, 2025. However, the information documenting these closed sessions was not publicly available prior to the station receiving our Preliminary Observations on June 18, 2025. After they received the Preliminary Observations, they added the closed session information. However, since the information was not added until June 2025, it did not meet the requirement for making the closed session documentation available within 10 days.

CPB requirements establish a reasonable time for making information regarding closed meetings available to the public.

A. **Closed Meetings:** Grantee must document why any meetings of its governing body, its committees, and CAB were closed and make available to the public a written statement of the reason(s) within a reasonable time after the closed meeting (47 U.S.C. § 396(k)(4)). CPB also requires that the written statement be made available for inspection, either at Grantee's central office or on its station website, within 10 days after each closed meeting.

CPB 2025 Radio CSG General Provisions and Eligibility Criteria, Section 2. Communications Act Requirements.

After receiving our Preliminary Observations dated June 18, 2025, station management took immediate action and posted documentation for closed sessions meetings held in FY 2024 and FY 2025, which we subsequently verified. Station management indicated that they were unaware of the closed meeting documentation requirement.

KUNC-FM is currently compliant with closed meeting requirements to provide the basis for closing a meeting to the public and given the corrective actions being taken by the station, we do not have any recommendations.

Exhibit A

**Summary of KUNC-FM Website Review
as of April 22, 2025**

Requirements	Met	Not Met
1) Seven-day advance notice of governing body meeting:		
a) available on website	X	
b) available by other means		
2) Seven-day advance notice of board committee meetings:	X	
a) available on website		
b) available by other means		
3) Seven-day advance notice of CAB meetings:	X	
a) available on website		
b) available by other means		
4) If closed meetings were held, was documentation prepared explaining the basis for closing meeting in accordance with the Act:	X	
a) available on website		
b) available at central office		
5) If closed meeting documentation was prepared, was it available within 10-days of the closed meeting		X
6) Most recent AFR or FSR available on website		X
7) Most recent audited financial statements on website		X
8) Senior/executive management information on website	X	
9) Governing body members on website	X	
10) CAB members on website	X	
11) Grantee's annual report on local content and services included in the grantee's current 2024 SAS on its content and services that serve local needs; and analysis about the reach and impact of the local services in its community.		
a) available on website	X	
b) available at central office		

BACKGROUND

KUNC-FM is licensed to Community Radio for Northern Colorado in Greeley, Colorado and began broadcasting in 1967. As stated on the station's website, KUNC-FM's mission is to serve the diverse communities of Northern Colorado by delivering independent, insightful, and inclusive journalism. Further, they state that they are committed to producing content that reflects the voices and experiences of their region.

CPB's Community Service Grant Program

The Communications Act of 1934 (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. Each year CPB awards CSG grants to public TV and radio stations based in part on the amount of Non-Federal Financial Support (revenues) claimed by all stations on their Annual Financial Report (AFR) or Financial Summary Report (FSR) submitted to CPB. 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 Incentive Grant Pools; one is for TV and the other for radio.

In addition to the annual filing of the station's AFR or FSR for radio, the chief executive of the station and a licensee official certify to CPB the station's compliance with Act requirements and selected General Provisions requirements in the legal agreement awarding the station CSG funds. These certifications specifically address open and closed meetings; open financial records; CPB Employment Statistical Report; and donor information requirements under Section IV Communications Act Compliance of the agreement. Station officials responsible for closed meetings and the CPB Employment Statistical Report requirements are identified in the grant agreement. Additionally, the certification also addresses Website Postings Required under Section V. Selected General Provisions Requirements of the agreement.

SCOPE AND METHODOLOGY

We performed an evaluation of KUNC-FM's compliance with selected provisions of the Act and grant certification requirements. Our specific objectives were to verify compliance with selected Act requirements for open and closed meetings and open financial records, as well as 2025 Radio Community Service Grants General Provisions and Eligibility Criteria for Transparency. The scope of the evaluation included reviews of the information posted on the station's website as of April 22, 2025, as well as information provided in response to our Preliminary Observations issued on June 18, 2025.

We reviewed documents supporting the station's compliance with the Act requirements to provide advance notice of public meetings, notice of closed meeting reasons, and make financial information available to the public. We also reviewed the station's website and processes to determine its compliance with CPB's transparency requirements for eligibility. We informed station management of our evaluation on June 18, 2025, and we requested additional information to support the station's compliance, including as applicable transparency information maintained at its central office for documents that was required to be made available to the public at its central office if not posted on its website.

We also reviewed CPB's Integrated Station Information System (ISIS) to determine if the evaluated information made available to the public was the most recent information submitted to CPB. In addition, we verified with station management that board and management listings posted to its website were current.

We conducted our fieldwork from April 22 through June 23, 2025 and performed our evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency *Quality Standards for Inspection and Evaluation*.



August 21st, 2025

Dear Mr. Richardson,

On behalf of KUNC-FM, I want to thank you and your team for your thorough evaluation and for the opportunity to respond to the draft report regarding our compliance with the Communications Act and CPB's transparency requirements.

We acknowledge the errors and shortcomings identified in the report. As President and CEO, I take these findings seriously and recognize that maintaining full compliance is not only a regulatory obligation but also central to our role as a steward of public trust. Our community relies on us to provide accurate, accessible, and transparent information, and we are committed to meeting that expectation without exception.

KUNC has already begun addressing the areas noted in the draft report. We are implementing corrective actions that include:

- Reviewing and strengthening our internal compliance procedures.
- Providing additional training for staff responsible for reporting and transparency; and
- Establishing ongoing monitoring systems to ensure sustained adherence to CPB requirements.

We also recognize that transparency extends beyond compliance as it reflects our accountability to the American people whose investment in public media has made much of our service possible. As such, we will make our processes more open, our reporting more accessible, and our commitment to accountability more visible to the communities we serve.

We appreciate the guidance your office has provided throughout this process and view this evaluation as an important opportunity to strengthen our governance and accountability. We look forward to the formal exit conference with CPB and its Office of Inspector General.

Sincerely,

A handwritten signature in black ink that reads 'Tammy Terwelp'.

Tammy Terwelp
President & CEO