



2233 Wisconsin Ave., NW, Ste. 226  
Washington, DC 20007

**Barry S. Persh**

(202) 776-2458

bpersh@graymillerpersh.com

May 2, 2024

*Submitted via Online Public Inspection File*

EEO Staff  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter  
Board of Trustees of Southern Illinois University  
Station WSEC(TV), Jacksonville, IL (Facility ID 70536)

Dear EEO Staff:

On behalf of Board of Trustees of Southern Illinois University, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station WSEC(TV), Jacksonville, Illinois.

Should any questions arise concerning this response, kindly contact the undersigned individual.

Very truly yours,

*Barry Persh*

Barry S. Persh  
*bpersh@graymillerpersh.com*  
Counsel for Board of Trustees of  
Southern Illinois University

Enclosure



Southern Illinois University System  
ONE SYSTEM | MANY LOCATIONS | STATEWIDE IMPACT

May 1, 2024

EEO Staff  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**  
Board of Trustees of Southern Illinois University  
Station WSEC(TV), Jacksonville, IL (Facility ID 70536)

EEO Staff:

Board of Trustees of Southern Illinois University (“SIU” or SIUC”) hereby responds to an FCC audit letter dated March 22, 2024 requesting information concerning the EEO program of noncommercial educational television WSEC(TV), Jacksonville, Illinois. The WSEC employment unit (the “Unit”) employs more than five full-time employees, and SIU therefore provides the following information in response to the audit request.

**Item # 2(b)(i).** SIU encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) August 1, 2021 to July 31, 2022, and (ii) August 1, 2022 to July 31, 2023 as Attachment 1.

**Item # 2(b)(ii).** The station web site is available at: <https://www.wsiu.org/> . The annual EEO public file report is posted at: <https://www.wsiu.org/reports> (under EEO Report).

**Item # 2(b)(iii).** The dates of hire for the positions filled during the periods covered by the 2021-2022 and 2022-2023 annual EEO public file reports are as follows:

Job Title	Date of Hire
Executive Director	12/6/2021
Television Director-Producer	10/17/2022
TV Master Control Room Supervisor	7/3/2023

Office of the President  
Stone Center • Mail Code 6801 • 1400 Douglas Drive • Carbondale, Illinois 62901  
Phone: 618/536-3331 • Fax: 618/536-3404

SIU encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions filled during the period covered by the two annual EEO public file reports noted above (for the 2021-2022 and 2022-2023 annual reporting periods). Note that the SIU HR Website receives notifications of all station job openings.

**Item # 2(b)(iv).** The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2021-2022 and 2022-2023 reports are as follows:

Job Title	Total # of Interviews	# of Interviewees by Referral Source
Executive Director	4	Public Media Jobs/Current.org 2 HigherEdJobs 1 Corporation for Public Broadcasting 1 SIU HR Website WSIU Website NABJ Career Center NAB IL Broadcasters Assoc
Television Director-Producer	2	SIU-Human Resources 2 Corporation for Public Broadcasting WSIU Website
TV Master Control Room Supervisor	1	SIU-Human Resources 1 Corporation for Public Broadcasting WSIU Website Indeed

**Item # 2(b)(v).** SIU encloses documentation of recruitment initiatives performed during the periods covered by the 2021-2022 and 2022-2023 public file reports as Attachment 3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the WSEC Unit is 22. The market for the Unit has a population of fewer than 250,000 persons. Based on these factors, SIU is required to perform two (2) initiatives within a two-year period. Documentation is provided for the first two initiatives listed below: **job fairs** by station personnel who have substantial responsibility in making hiring decisions; and **training to management level personnel** on methods of ensuring equal employment opportunity and prevent discrimination.

During the periods covered by the 2021-2022 and 2022-2023 reports, SIU completed the following initiatives, involving station personnel as indicated:

Hosted/Participated in at least 4 **job fairs** by station personnel who have substantial responsibility in making hiring decisions:

1. The Greater Springfield Chamber Job Fair 2021, Crowne Plaza Springfield Convention Center, August 3, 2021. Administrative Assistant participated on behalf of the stations.
2. SIU Fall 2021 Saluki Student Job Fair/ Career Fair, August 18, 2021. Administrative Assistant participated on behalf of the stations.

3. SIU Volunteer/ Student Involvement Fair 2021, Faner Plaza SIU Campus, August 19, 2021. Director of Radio participated on behalf of the stations.
4. SIU Spring 2023 Saluki Student Job & Internship Fair, February 21, 2023. Susan Coloni participated on behalf of the stations.
5. SIU Volunteer/ Student Involvement Fair August 2022, Faner Plaza SIU Campus. Abby Asher participated on behalf of the stations.

*Provided training to management level personnel on methods of ensuring equal employment opportunity and prevent discrimination.*

1. All people serving on Faculty or A/P hiring committees must complete the following training annually, prior to reviewing any applications for a vacancy. Reducing bias and increasing diversity: Inclusive Hiring Practices for SIU Carbondale.
2. All employees are required to participate in annual training, “Preventing Harassment and Discrimination”. This training combines the federal Title IX/VAWA requirements with the State of Illinois Harassment and Discrimination Prevention requirements. All employees are assigned the supervisor training in order to meet the content requirements of federal and state mandates regardless of supervisory responsibilities.

Although only required to complete and document the two items listed above, SIU also took part in several other initiatives during the two year period such as: *Participated in scholarship programs designed to assist students interested in pursuing a career in broadcasting; Established training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions; Participated in events or programs sponsored by educational institutions relating to career opportunities in broadcasting; Sponsored events in the community designed to inform and educate the public as to employment opportunities in broadcasting; and Participated in job banks, internet programs and other programs designed to promote outreach generally.*

**Item # 2(b)(vi).** There were no complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or gender filed during the current license term before any body having competent jurisdiction under applicable law.

**Item # 2(b)(vii).** Responsibilities of each level of Unit management responsible for implementing the Unit’s EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

All aspects of the University hiring process, candidate list, salary offered, position advertisement, recruitment sources, etc. are reviewed and approved by SIUC Human Resources.

The responsibility for implementation of and commitment to the university’s affirmative action policies is required at all levels of the university administration. The Chancellor of SIUC is ultimately responsible for ensuring equal opportunity for all applicants and for implementing the university’s affirmative action policies. Unresolved complaints regarding the administration of these hiring procedures by the vice chancellor and/or the Affirmative Action Officer may be

brought to the chancellor for review and redress. Affirmative action is a continuous activity that takes place within each unit, college, department, and division of the university.

In the academic departments and other administrative units, it is the responsibility of departmental faculty and of the chair or the unit supervisor to ensure proper compliance with the policy. The vice chancellors and the deans/directors are responsible for review of the department/unit activities which concern appointments, reappointments, promotions and other personnel actions relating to faculty and staff in order to assure that academic and administrative policies and procedures are followed.

In other administrative units, it is the responsibility of the vice chancellors to review and approve actions, such as recommendations for appointments, and to ensure that the appointments are consistent with all university policies and procedures, including those related to affirmative action.

The responsibility for coordinating and monitoring compliance with the University's equal employment opportunity/affirmative action policies is assigned to the University Affirmative Action Officer. Implementing and assuring compliance with these policies is the responsibility of the Associate Chancellor for Institutional Diversity and each Vice Chancellor. In addition, each Dean, Director, or other staff member involved in the recruitment and hiring process must ensure compliance with the spirit as well as letter of the policies and procedures. All administrative levels, and especially Deans, Directors, Chairs, faculty and all hiring administrators, are responsible for fostering and enhancing institutional diversity. The initiating hiring officer has the primary responsibility for maintaining the integrity of these affirmative action policies and procedures and is ultimately accountable for attaining diversity within his or her staff.

Through the SIU Policies and Procedures page, one may access *Personnel Policies*, *Policies (Other than Personnel)*, and the *Employees Handbook*. EEO Policies are also posted on bulletin boards at the station. See also <https://policies.siu.edu/personnel-policies/chapter2/ch2-all/affirmative-action.php>

**Item # 2(b)(viii).** Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

The University Affirmative Action Office (UAAO) is responsible for developing, coordinating, and monitoring the university's affirmative action employment program. The implementation of this program is ultimately the responsibility of the chancellor, the vice chancellors, deans, and all administrators who have responsibility for personnel actions. A function of the UAAO is to develop and implement and update procedures and policies to maintain ongoing compliance with all new and existing federal and state affirmative action/equal employment opportunity guidelines and regulations.

In this respect, the responsibilities of the Affirmative Action Office are broad. The office works closely with the Associate Chancellor for Institutional Diversity, vice chancellors, colleges, schools, deans, directors, and other administrative offices in order to develop and supplement the university's affirmative action policies in general and employment program in particular. The office is also responsible for providing information both inside and outside the university. With the assistance of the University General Counsel and Associate Chancellor for Institutional Diversity, the office attempts to keep the university community informed of changes in equal opportunity and affirmative action laws and regulations, and to promote the concepts and efficacy of affirmative action programs. *See also* <https://policies.siu.edu/personnel-policies/chapter2/ch2-all/affirmative-action.php>

**Item # 2(b)(ix).** Efforts to periodically analyze measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect:

The job performance of administrative/professional staff members is evaluated through either a formal or informal process, or a combination thereof and informal evaluation and feedback is intended to be an ongoing activity by supervisors and employees. The evaluation process seeks to make clear the employee's duties and responsibilities as stated in the position description; to give the employee an understanding of job performance; to provide for regular communication about performance of duties and responsibilities; and to enable the employee to improve job performance and to develop professionally.

Administration of salary is dependent on job classification. Certain range classes have established minimum and maximum salary values and are normally adjusted annually. The specific salary range for each classification is based on an evaluation of data obtained through local, state, and national salary surveys and on an analysis of the rates in effect at other universities in the state. Rates of pay for negotiated classes are determined by periodic negotiations between university officials and representatives with jurisdiction over the class concerned. The salaries of employees in prevailing classes are established in accordance with the terms of the contract between the given craft and the area multi-employer association. All SIUC employees in the group are hired and receive increases in accordance with terms of the contract. Employees in established classifications receive a salary which is set in a direct relationship to the rate for another class. When there is a change in the rate for the classifications to which the established classification is tied, employees in the established category receive a proportionate increase. Salary ranges are determined on the basis of a) comparative job content, for internal equity, and b) compensation levels of like employees in other organizations, for external competitiveness.

New employees must meet at least the minimum qualifications for a position and are paid at least the minimum rate of the applicable salary range. Certain considerations may be used for salary increases for an employee: across the board increase, merit raise, market-based adjustment, and/or within range salary adjustment. Promotions are accompanied by an increase

to provide not less than the salary which would be paid to an equivalent employee hired from outside the university.

In accordance with the laws of the State of Illinois and the United States, the Board of Trustees of Southern Illinois University is committed to a policy of equal opportunity for all persons and is committed to taking affirmative steps aimed at overcoming historical patterns of discrimination in society. The Board of Trustees directs that all elements of Southern Illinois University adhere to procedures which promote this policy in all phases of university activities including employment, educational programs, choice of contractors and relationships with employee organizations.

It is the policy of Southern Illinois University Carbondale to provide equal employment and educational opportunities for all qualified persons without regard to race, color, religion, sex, national origin, age, disability, status as a protected veteran, sexual orientation, gender identity, pregnancy, or marital status. The university is committed to the principles of equal employment opportunity and affirmative action and will continue to conduct all personnel actions in accordance with the letter and spirit of applicable state and federal statutes and regulations. Personnel actions include, but are not limited to, recruitment, hiring, position assignments, compensation, training, promotion, tenure consideration and award, retention, lay-off, termination, and benefits.

The university recognizes that the barriers of race, color, religion, sex, national origin, age, disability, status as a protected veteran, sexual orientation, gender identity, pregnancy, or marital status of some individuals have resulted in their denial of full participation in all societal functions and is, therefore, committed to taking affirmative steps aimed at overcoming such historical patterns of discrimination in society. The University's Affirmative Action Program identifies special actions intended to bring such groups into full participation in all aspects of university life.

Southern Illinois University Carbondale has also made a priority of producing equal employment opportunities and creating a staff of the highest quality and diversity. To achieve a heterogeneous pool of qualified candidates needed for faculty and administrative positions, the University strives to have broad "good faith" searches and vigorous recruiting. A strong commitment to equal opportunity by all members of SIUC seeks to achieve the University's goals of equal opportunity employment and of recruiting and retaining diversified and qualified personnel.

**Items # 2(b)(x), 3 and 4** are not applicable.

SIU, through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,  
BOARD OF TRUSTEES OF SOUTHERN  
ILLINOIS UNIVERSITY

By:  \_\_\_\_\_

Print Name: Daniel Mahony

Title: President

Date: 5/1/2024