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April 26, 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
Delta College
Station WDCQ-TV, Bad Axe, MI (Facility ID 16530)

Dear EEO Staff:

On behalf of Delta College, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station WDCQ-TV, Bad Axe, Michigan.

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 Delta College

Enclosure



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April 25, 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**
Delta College
Station WDCQ-TV, Bad Axe, MI (Facility ID 16530)

EEO Staff:

Delta College hereby responds to an FCC audit letter dated March 22, 2024 requesting information concerning the EEO program of noncommercial educational television station WDCQ-TV, Bad Axe, Michigan. The WDCQ-TV employment unit (the “Unit”) employs more than five full-time employees, and Delta College therefore provides the following information in response to the audit request.

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

Item # 2(b)(ii). The WDCQ-TV station web site is available at: <https://www.deltabroadcasting.org/>. The annual EEO public file report is posted at: <https://www.deltabroadcasting.org/about/> 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
Broadcast IT Engineer	3/29/2023

Delta College 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). No organizations notified the station that they wanted to be notified of 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
Broadcast IT Engineer	4	Delta Website: 3 Indeed: 1 (<i>Note: not a direct posting by station; picked up from Delta College site posting</i>) No interviewees from other sources utilized: careerarc; HERConnect; Higher Ed; Pure Michigan Talent Connect; <i>or from other sources which are not direct postings but which pick up the Delta College site posting such as Mlive.com</i>

Item # 2(b)(v). Delta College 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 WDCQ-TV Unit is 11. The market for the Unit has a population of **fewer than** 250,000 persons. Based on these factors, Delta College is required to perform **two (2) initiatives** within a two-year period.

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

Establishment of Internship Program

- **WDCQ-TV internship and practicum program.** Offers students a chance to acquire professional experience through internships with commercial Radio and TV stations and practicum credit through the College’s PBS station, WDCQ-TV. Students participate during the academic year in the producing and production of a weekly prime time public affairs program, The Follow-Up. Students also earn credit toward graduation producing their own monthly program, individual news and/or mini-documentary segments, and the annual Delta College Commencement program on WDCQ-TV. All students in the EMB program are invited to participate as crew members during WDCQ’s membership drives and other locally produced programs. Several broadcasting students in the Electronic Media program participate in WDCQ productions each year.
- *Station personnel involved:* Delta College Public Media Program Manager, TV Operations Producer, TV Producer Director (2), FM Production Coordinator, FM Content Producer

***Hosting of Job Fair
Participation in Job Fairs***

- Great Lakes Bay Job Fair – hosted at Delta College, University Center, MI – June 9, 2022

- MAB Media Career Fair at the Great Lakes Broadcast & Sports Media Academy - Ford Field, Detroit, MI – December 7, 2022
- 2023 BCA Career Fair – Central Michigan University, Mt. Pleasant, MI – February 24, 2023
- *Station personnel involved:* Thomas Bennett, General Manager; Joe Yezak, Program Manager

Events with Educational Institutions Relating to Career Opportunities in Broadcasting

- **Delta College’s Electronic Media/Broadcasting course program** (“EMB”) provides students with a broad range of traditional classroom, laboratory, and real life hands-on learning opportunities, which can lead to broadcast internships and future broadcast job opportunities.
- EMB course curriculum in conjunction with WDCQ-TV: The EMB curriculum is designed to provide well balanced instruction in the fields of broadcasting and multimedia production. Beginning with an exploration of the history of radio and television, students then study audio and video production, through which they gain hands-on experience in laboratory and real time operating conditions. The program then concentrates on the growing and ever-changing fields of digital media productions and their practical applications. Students utilize TV production studios and computer labs to produce individual and group productions.
- *Station personnel involved:* Delta College Public Media Program Manager, TV Operations Producer, TV Producer Director (2), FM Production Coordinator, FM Content Producer

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:

Employees and applicants alike can review the Delta College Board Policy 8.001 – Equal Opportunity Institution on the public website along with all other Collegewide Board Approved Policies including those that prohibit any type of discrimination Board Policy 8.009 – Sexual Misconduct Policy, Board Policy – 8.010 – Title IX – Sexual Harassment Policy and Board Policy 8.012 – Equity Grievances. Additionally, Delta College’s Equal Opportunity Statement is posted/linked on several pages throughout the college’s online websites including:

- Consumer Information
- Delta College Public Media Legal Information
- Employment
- Equity
- Job Openings (external PeopleAdmin webpage)
- Violence Against Women Act

Upon hire, as a part of their new hire enrollment information, all new employees are directed to the college's policies and disclosures webpage where they are required to review the procedure manual along with any applicable employee handbook. Additionally, all full and part time regular employees are required to participate in the college's New Employee Orientation program. One session in this program, Delta College Policies and Procedures, focuses on ensuring all new hires are aware of and know how to find more information on all college policies and procedures.

All Delta College employees are asked to serve on Recruitment & Search Committees. Search Chairs and Search Committee Members review applications and work with the College's Human Resources Office in the hiring process. Hiring Managers discuss vacancies with the Human Resources Office to draft vacancy notices. Search Chairs and Committee Members are determined in conjunction with the Manager of Recruitment, and search committees are constructed depending on job classification level. A screening matrix provides an objective method of assessing applicants based on the hiring manager expectations and the job description. In addition, the matrix allows search committees to compare candidates based on job requirements and applicant's skills and experience. Depending on the position classification, the recommendation to hire must pass through, and be approved at, appropriate levels before Human Resources can make an offer.

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:

Whenever a vacancy occurs in any unit at the college, or when a unit identifies a specific need for their area, the human resources staff hiring process is followed. This process begins with a collaborative review and analysis of the position/need between the hiring manager, human resources, the unit's cabinet representative and finance to ensure the recommendation for the new or vacant position is equitable in relation to other positions at the college, within the unit and that the posting only includes relevant, necessary requirements so that the opportunity may reach as many applicants as possible. Human resources regularly evaluates and monitors the referral sources utilized by the college used for recruiting candidates and also seeks out additional recruitment sources on a case-by-case basis, depending on the specific needs and/or hard-to-fill status of a vacant position.

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 College utilizes a formal Performance Management and Compensation System which provides consistency and ensures equity in the administration of salary placement and annual increases. The Human Resources Office conducts a salary placement calculation to determine the starting salary of each new employee. The following factors are considered in calculating the salary placement:

Administrative/professional staff and support staff are evaluated under a comprehensive Performance Management System developed with the assistance of an outside consultant who worked with a committee of administrative/professional and support staff employees. The College's Performance Management and Compensation System acknowledges administrative/professional staff and support staff members who excel in their roles. As part of the evaluation process, employees are rated by their supervisors on the following appraisal factors: application of knowledge, effectiveness of communication, responsibility and dependability, quality and productivity, problem solving, flexibility and adaptability, professional development, supervision, and budget management. Employees are rated in each factor, and in general, ratings indicate the following:

- 4 – Consistently exceeds expectations
- 3 – Solid Performance, consistently meets high expectations
- 2 – Partially meets expectations, opportunity for improvement
- 1 – Does not meet expectations, requires substantial improvement, Performance

Performance on this ranking system is tied to compensation. High performance is acknowledged through greater salary increases.

Year-end appraisals are reviewed by two levels of administration. Appraisals are submitted by the first level supervisor to the second-level supervisor for approval. Once year-end appraisals are approved by second level supervisors, they are submitted to Human Resources. Human Resources reviews all of the appraisals and looks at ratings to ensure there are no apparent biases.

The salary pay grade chart is adjusted annually by applying the percentage increase as approved by the Board of Trustees. This helps to ensure that the College's salary schedule remains competitive.

As the staff hiring process continues for vacant positions and a search begins, search committee members are required to complete an acknowledgement form that states they have reviewed and agree to the confidentiality statement; that they have reviewed the unconscious bias training materials and agree to treat all applicants equitably; that they do not have any conflicts of interest; and that, if at any point in the search become aware of a possible conflict of interest that they will inform human resources immediately. Search committees also receive a search orientation and are able to review data from previous searches, if applicable, to analyze outcomes from prior searches to help develop strategies to support a successful, equitable search. At the orientation, search committees receive a supportive online notebook full of resources and tools to reference and utilize throughout the search and walks through the process. The notebook includes the following information:

- Information on Belonging, Equity, Diversity and Inclusion at Delta College
- Consciously Overcoming Unconscious Bias training materials
- The Reality of Intersectionality information
- Inclusion Advocate information

- Screening Matrix for evaluating applications directly with position requirements
- Search Strategy for planning interviews and developing questions
- Candidate Rating Sheet forms for committees to submit anonymous feedback following interviews
- Evaluation forms for committees to compile feedback as it relates to the strengths and opportunity gaps for each candidate in relation to the position requirements
- Recommendation to hire instructions

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

Delta College, 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,
DELTA COLLEGE

By:  _____

Print Name: Dr. Michael Gavin

Title: President

Date: April 25, 2024