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May 6, 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
Augustana College
Station WVIK(FM), Rock Island, IL (Facility ID 3242)

Dear EEO Staff:

On behalf of Augustana College, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational radio station WVIK(FM), Rock Island, 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 Augustana College

Enclosure

5/6/2024

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**
Augustana College
Station WVIK(FM), Rock Island, IL (Facility ID 3242)

EEO Staff:

Augustana College hereby responds to an FCC audit letter dated March 22, 2024 requesting information concerning the EEO program of noncommercial educational radio station WVIK(FM), Rock Island, Illinois. The WVIK employment unit (the "Unit") employs more than five full-time employees, and Augustana College therefore provides the following information in response to the audit request.

Item # 2(b)(i). Augustana College 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 WVIK station web site is available at: <https://www.wvik.org/>. The annual EEO public file report is posted at: <https://www.wvik.org/public-file-station-governance>.

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
Station Manager	1/10/2022
Director of Development <i>Note: originally posted with position below as "Director of Development and Community Engagement" before being split into 2 positions.</i>	5/1/2022
Director of Community Engagement <i>Note: originally posted with position above as "Director of Development and Community Engagement" before being split into 2 positions.</i>	5/2/2022
Newsroom Fellowship <i>Note: recruited as Temporary Position for < 6 months</i>	6/6/2022
Director Corporate Support	8/15/2022
Newsroom Fellowship <i>Note: recruited as Temporary Position for < 6 months</i>	6/26/2023

Augustana 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 WVIK 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
Station Manager	1	Augustana College website 1 <i>No interviewees from other sources (such as WVIK website and Organization mailing list)</i>
Director of Development <i>Note: originally posted with position below as "Director of Development and Community Engagement" before being split into two positions.</i>	5	Augustana College website 5 <i>No interviewees from other sources (such as WVIK website and Organization mailing list)</i>
Director of Community Engagement <i>Note: originally posted with position above as "Director of Development and Community Engagement" before being split into two positions.</i>	2	Augustana College website 2 <i>No interviewees from other sources (such as WVIK website and Organization mailing list)</i>
Newsroom Fellowship <i>Note: recruited as Temporary Position for < 6 months</i>	3	Augustana College website 3 <i>No interviewees from other sources (such as WVIK website, Organization mailing list, Augustana College Journalism Department, Iowa Broadcast News Association, Illinois News Broadcasters Association, Iowa and Illinois Public Radio Stations, University of Iowa, University of Illinois, Illinois State University)</i>
Director Corporate Support	1	Augustana College website 1 <i>No interviewees from other sources (such as WVIK website, Organization mailing list)</i>
Newsroom Fellowship <i>Note: recruited as Temporary Position for < 6 months</i>	4	Augustana College website 4 <i>No interviewees from other sources (such as WVIK website, Organization mailing list, Augustana College Journalism Department, Iowa Broadcast News Association, Illinois News Broadcasters Association, Iowa and Illinois Public Radio Stations, University of Iowa, University of Illinois, Illinois State University, Asian American Journalism Association, National Association of Hispanic Journalists, National Association of Black Journalists)</i>

Item # 2(b)(v). Augustana 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 WVIK Unit is 7. The market for the Unit has a population of more than 250,000 persons. Based on these factors, WVIK is required to perform **two (2) initiatives** within a two-year period.

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

Training for Management Level Personnel on Equal Employment Opportunity and Anti-Discrimination

- Jared Johnson, Jay Pearce, Colleen Sibthorp, Amber Nowak, Autumn Loete, Pete Peterson, Michelle O'Neill, Herb Trix, Mindy Heusel, David Garner, Michael Wahlmann, and Megan Severson completed the Corporation for Public Broadcasting's "Preventing Harassment and Discrimination Gateway" online training September 30, 2021.
- Autumn Loete, Amber Nowak, Jared Johnson, Mindy Heusel, Pete Peterson, Jay Pearce, Herb Trix, Michael Wahlmann, and Michelle O'Neill completed Augustana College's "Preventing Harassment and Discrimination: Non-Supervisors with Title IX/Clergy Module" online training May 7, 2022.
- Autumn Loete, Pete Peterson, Amber Nowak, Marc Zyla, Jared Johnson, Herb Trix, Michelle O'Neill, Mindy Heusel, Susanna Kemerling, Heather Ohlensehlen, Jaren Schoustra completed Corporation for Public Broadcasting's "Preventing Harassment and Discrimination" online training September 30, 2022.

Establishment of Training Programs to Enable Station Personnel to Acquire Skills

- Herb Trix attended the 135th Biannual INBA Convention in Peoria, Illinois May 6, 7, and 8, 2022.
- Autumn Loete, Amber Nowak, Jared Johnson, Mindy Heusel, Pete Peterson, Jay Pearce, Herb Trix, Michael Wahlmann, and Michelle O'Neill completed Augustana College's CoC: Data Security online training May 7, 2022.
- Autumn Loete, Amber Nowak, Jared Johnson, Mindy Heusel, Pete Peterson, Jay Pearce, Herb Trix, Michael Wahlmann, and Michelle O'Neill have completed Augustana College's "FERPA Basics" online training May 7, 2022.
- Autumn Loete, Jared Johnson, Amber Nowak and Michelle O'Neill participated in Greater Public's virtual Audience Development Summit webinar April 26 and April 27, 2022.
- Jared Johnson attended the 2022 Public Radio Super-Regional meeting in Denver, Colorado on April 11 and 12, 2022.
- Amber Nowak and Marc Zyla attended the Public Media Development and Marketing Conference 2022 in Chicago, Illinois, July 19-21, 2022.
- Amber Nowak completed an online webinar: CYE 2022 On-Air Fundraising Kick-Off on September 13, 2022.
- Mindy Heusel and Marc Zyla attended the Public Radio Content conference 2022 in New Orleans, Louisiana August 29-September 1, 2022.
- Amber Nowak completed AFP Quad Cities' Fall 2022 Introduction to Fundraising webinar September 15-November 5, 2022.

- Amber Nowak attended the Greater Public Roundtable: Small Station, Big Ambition webinar Tuesday, September 6, 2022.
- Amber Nowak completed RealTalk with YAYAHPs: DEIA Leadership in Public Media webinar October 11, 2022.
- Heather Ohlensehlen completed Greater Public Work Smart webinar, September 2022.
- Amber Nowak attended Greater Public PMDMC22 Encore webinar, September 21 & 22, 2022.
- Heather Ohlensehlen, Meg Christensen and Amber Nowak attended Quad City Community Foundations QC Granters Panel on February 8, 2023.
- Heather Ohlensehlen attended Wastyn & Associates WUW: Anatomy of a Good Donor Meeting on May 3, 2023. Heather Ohlensehlen completed Advanced Fundraising Course: Corporate Sponsorships and Foundation Giving on March 21, 2023.
- Heather Ohlensehlen attended Greater Public PMDMC 2023 July 11-13, 2023.

Establishment of Internship Program

- Provided direct exposure to broadcast journalism environment by offering paid internships for college students, or recent graduates, pursuing communications oriented coursework and careers.
- August 2021 through January 2022 -WVIK Newsroom Fellowship (5 Month Internship).
- June 2022 through December 2022 -WVIK Newsroom Fellowship (6 Month Internship).
- June 2023 through January 2024 -WVIK Newsroom Fellowship (6 Month Internship).
- *Station personnel involved:* Herb Trix, News Director, and Jay Pearce, General Manager.

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:

The WVIK hiring manager works with the Augustana College Human Resources department to administer the EEO policy for the station, including matters such as recruiting for open positions and oversight of non-vacancy-specific activities, chain of command for employment decisions, day-to-day and overall responsibility.

The Augustana College Director of Human Resources has the responsibility of ensuring the effective implementation of Augustana College and WVIK's EEO policies, investigating and addressing any complaints of employment discrimination, keeping informed of federal/state laws and providing guidance and training to institution administrators regarding these laws and any developments or updates, and reporting data to required federal and state agencies. Every Manager and Supervisor at WVIK is responsible for conducting his or her activities in a way to ensure full compliance with Augustana College's EEO policies.

All Augustana College employees are informed of the college's EEO policies and programs by way of the employee handbook and by way of a posting at station offices. Augustana College also notes that it is an Equal Opportunity Employer on all job postings, and all employees receive annual training regarding EEO policies including preventing discrimination and harassment.

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:

WVIK and the Augustana College Human Resources department regularly review their job posting distribution list with an eye toward enhancing the EEO program. Mailings returned as undeliverable are removed from the list. New addresses are added whenever they become known to the station management. Job specifications and classifications are periodically reviewed to ensure that all duties are accurately described, and that experience and education requirements are job-related. Job Titles are reviewed to ensure they are written without regard to sex, gender identity, sexual orientation, race, color, religion, national origin, physical or mental disability, veteran status, or any other characteristic protected by law. Application forms are reviewed to ensure that all requested job information is related.

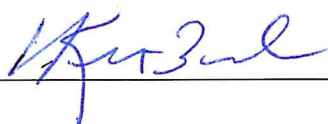
Item # 2(b)(ix). Efforts to periodically analyze measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect:

Augustana College recently did an exhaustive analysis of salaries campus wide, including the staff at WVIK. This review included an analysis to determine whether those systems are being administered without regard to an individual's sex, race, ethnicity, or other protected characteristics. When setting hiring salaries, WVIK makes reference to the Station Activity (Salary) Survey (SAS) collected by the Corporation for Public Broadcasting. WVIK also participates in the required annual performance review of all employees. Promotions and are based upon merit selection principles including performance and job-related criteria. Employees are encouraged to contact their supervisor or Human Resources should they want to learn information about another position within the institution. Hiring by WVIK is generally overseen by a committee of three to four people. For the Newsroom Fellowship, this has included an administrative staff member and newsroom employees. For higher profile positions, this will include a member of the public, a staff member, and a field expert (sometimes also a staff member, but not necessarily).

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

Augustana 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,
AUGUSTANA COLLEGE

By: 

Print Name: W. Kent Barnds

Title: Executive Vice President

Date: 5-6-2024