



December 14, 2023

To: FCC Online Public Files

Re: EEO Audit Response for Louisiana Educational Television Authority,  
d/b/a Louisiana Public Broadcasting  
KLPA-TV, Alexandria, LA  
FCC Facility ID No. 38590

Louisiana Educational Television Authority (“LPB”), licensee of noncommercial educational (“NCE”) television broadcast station KLPA-TV, Alexandria, Louisiana, hereby responds to the letter dated October 30, 2023, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau (the “Audit Letter”).

Responses are numbered to correspond with the information requests made in the Audit Letter.

As indicated on LPB’s annual EEO Public File Reports, KLPA-TV is part of the licensee’s employment unit (the “Unit”), which includes the following NCE stations:

- WLPB-TV, Baton Rouge, Louisiana; FCC Facility ID No. 38586
- KLTL-TV, Lake Charles, Louisiana; FCC Facility ID No. 38587
- KLPB-TV, Lafayette, Louisiana; FCC Facility ID No. 38588
- KLTM-TV, Monroe, Louisiana; FCC Facility ID No. 38589
- KLPA-TV, Alexandria, Louisiana; FCC Facility ID No. 38590
- KLTS-TV, Shreveport, Louisiana; FCC Facility ID No. 38591

## 2. Audit Data Requested.

*(b)(i) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).*

The report for 2021-2022, uploaded as *Exhibit 1*, covers the period from January 23, 2021, to January 22, 2022. The report for 2022-2023, uploaded as *Exhibit 2*, covers the period from January 23, 2022, to January 22, 2023.<sup>1</sup>

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<sup>1</sup> In the process of preparing this response letter, LPB became aware that it had inadvertently omitted three filled full-time positions from its 2022-2023 EEO Public File Report. Accordingly, the 2022-2023 EEO Public File Report uploaded as *Exhibit 2* is an amended and corrected version of the report. The amended and corrected 2022-

*(b)(ii) For each station in the Unit that maintains a website, the website address. If the Unit's most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit's most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).*

LPB has one website for all stations in the Unit, <https://www.lpb.org/>. A link to the Unit's most recent annual EEO Public File Report can be found at <https://www.lpb.org/reports>, and the url for the EEO Public File Report itself is <https://media2.lpb.org/images/pdf/fcc/annual-eeo-public-file-report-2022-2023.pdf>.

*(b)(iii) For each of the Unit's full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), provide the date of hire as required by section 73.2080(c)(5)(vi) as well as dated copies of all advertisements, bulletins, letters, faxes, e-mails or other communications announcing the position, as described in section 73.2080(c)(5)(iii). However, to reduce the burden of responding to this audit, if you have sent a job notice to multiple sources, you may include in your response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).*

As indicated on LPB's annual EEO Public File Reports, LPB is a state-owned licensee, and is therefore required to use the Louisiana State Civil Service ("SCS") to recruit for openings at LPB's stations. SCS is the central human resources agency for the state of Louisiana. Specifically, SCS requires that LPB provide it with notice of all job vacancies through SCS's Louisiana Careers Online Application and Applicant Tracking System, which is used to manage the recruitment process for all Louisiana State employment from the creation of a requisition to the filling of the job. As both a regulatory and consultative agency, SCS provides LPB with systems and services that enable LPB to make merit-based, quality decisions regarding the hiring, development and retention of skilled and capable individuals. SCS's policies are guided by the provisions of Article X of the Louisiana State Constitution and are implemented in a manner which is both efficient as possible and cost effective to the citizens of Louisiana. Such policies are founded upon the principles of equal pay for equal work, equal opportunity, ability-based employment and promotion, and freedom from political influence.<sup>2</sup>

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2023 EEO Public File Report has now also been uploaded to each station's FCC online public file, as well as LPB's website.

<sup>2</sup> Although LPB, as a Louisiana State-owned entity, is required to conduct all of its recruiting and hiring activities through the Louisiana State Civil Service's Careers Online Application and Applicant Tracking System, in an effort to disseminate job vacancies as broadly as possible, LPB posts all job vacancies both on the LPB website and internally on LPB's intranet. Additionally, LPB posts job vacancies with supplemental sources such as Indeed.com and Handshake (*see Exhibits 3 and 4*). However, because Louisiana law mandates that LPB's entire recruiting

The Unit hired eight (8) full-time employees during the 2021-2022 period under review in *Exhibit 1*.

DATE OF HIRE	JOB TITLE
02/15/2021	Television Senior Producer 2
05/17/2021	Television Engineer Section Manager
06/21/2021	Administrative Assistant 6
07/26/2021	Accountant 1
08/23/2021	Human Resources Analyst A
09/07/2021	Administrative Coordinator 3-4
12/17/2021	Educational TV Technology Director
01/03/2022	Television Senior Producer 1

For documentation announcing these positions, see *Exhibit 3* corresponding to the 2021-2022 EEO Public File Report.

The Unit hired seventeen (17) full-time employees during the 2022-2023 period under review in *Exhibit 2*.

DATE OF HIRE	JOB TITLE
02/01/2022	Accounting Technician
02/28/2022	TV Engineer 3
03/02/2022	Administrative Coordinator 1
03/07/2022	TV Camera Operator 3
04/04/2022	TV Senior Producer 1
04/04/2022	TV Camera Operator 3
06/09/2022	Executive Director
06/21/2022	TV Engineer Director
07/05/2022	Educational TV Technology Program Specialist 1
09/19/2022	Administrative Coordinator 3
09/26/2022	Facility Maintenance Manager A
10/03/2022	Accountant Manager 1
10/05/2022	TV Engineer 2
10/17/2022	Deputy Director
10/31/2022	TV Camera Operator 3
11/14/2022	IT Applications Developer 2
12/14/2022	Public Information Director 1

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process is administered uniquely through the Louisiana State Civil Service’s Careers Online Application and Applicant Tracking System, the “Recruitment Source Referring” for each person interviewed and hired by LPB is always the Louisiana State Civil Service’s Careers website, as indicated on LPB’s annual EEO Public File Reports. Finally, for the Executive Director search, please note that LPB disseminated information about the opportunity to all the sources listed in the email from Skip Hinton at NETA Consulting included in *Exhibit 4*.

For documentation announcing these positions, see *Exhibit 4* corresponding to the 2022-2023 EEO Public File Report.

There are no organizations that have notified the Unit that it wants to be notified of the Unit’s job openings, as described in section 73.2080(c)(1)(ii).

*(b)(iv) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit’s full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.*

During the period under review in Exhibit 1, a total of 20 candidates were interviewed for vacancies indicated.

JOB TITLE	RECRUITMENT SOURCE REFERRING HIRE <sup>3</sup>	# INTERVIEWED
Television Senior Producer 2	Civil Service website	3
Television Engineer Section Manager	Civil Service website	1
Administrative Assistant 6	Civil Service website	1
Accountant 1	Civil Service website	4
Human Resources Analyst A	Civil Service website	3
Administrative Coordinator 3-4	Civil Service website	4
Educational TV Technology Director	Civil Service website	1
Television Senior Producer 1	Civil Service website	3

During the period under review in Exhibit 2, a total of 54 candidates were interviewed for vacancies indicated.

JOB TITLE	RECRUITMENT SOURCE REFERRING HIRE <sup>4</sup>	# INTERVIEWED
Accounting Technician	Civil Service website	4
TV Engineer 3	Civil Service website	1
Administrative Coordinator 1	Civil Service website	3
TV Camera Operator 3	Civil Service website	4
TV Senior Producer 1	Civil Service website	3
TV Camera Operator 3	Civil Service website	4
Executive Director	NETA	3
TV Engineer Director	Civil Service website	1
Educational TV Technology Program Specialist 1	Civil Service website	4

<sup>3</sup> As indicated above, and on LPB’s annual EEO Public File Reports, LPB is a state-owned licensee, and is therefore required to use the Louisiana State Civil Service (“SCS”) to recruit for openings at LPB’s stations. Accordingly, SCS is necessarily the referral source for each interviewee, with one exception. The one exception was for recruiting the Executive Director position. For the Executive Director search, though NETA, LPB disseminated information about the opportunity to all the sources listed in the email from Skip Hinton at NETA Consulting included in *Exhibit 4*.

<sup>4</sup> See note 2, above.

Administrative Coordinator 3	Civil Service website	4
Facility Maintenance Manager A	Civil Service website	2
Accountant Manager 1	Civil Service website	4
TV Engineer 2	Civil Service website	3
Deputy Director	Civil Service website	5
TV Camera Operator 3	Civil Service website	3
IT Applications Developer 2	Civil Service website	3
Public Information Director 1	Civil Service website	3

*(b)(v) Dated documentation of the Unit’s recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit’s total number of full-time employees and state whether the population of the market in which any of the Unit’s stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission’s rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation that you provide appears inadequate, e.g., it is not dated or does not clearly prove the Unit’s participation, the Commission may ask you for additional verification.*

LPB employs more than 10 full-time individuals in the Unit and operates in a market where the population is 250,000 or more. Accordingly, the Unit is required to participate in four recruitment initiatives over a two-year period. For documentation related to the Unit’s recruitment initiatives, please see *Exhibit 5*.

Documentation is provided evidencing participation in the following:

- LPB’s Internship program
- Annual Ethics
- Annual Sexual Harassment Prevention Training for Supervisors
- Annual Sexual Harassment Prevention Training for All Employees

*(b)(vi) Any pending or resolved complaints involving the Unit filed during the Unit’s current license term(s) before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that you must report all complaints, regardless of their status or disposition.*

None.

*(b)(vii) In accordance with section 73.2080(b), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.*

LPB provides equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin, or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training, and termination.

LPB's Human Resources Director is responsible for implementation and administration of EEO policies at the Unit. EEO policy implementation is reviewed annually by LPB's President & CEO in coordination with the Human Resources Director during the budget process and periodically throughout the year.

LPB's EEO Policy is distributed to all employees as part of LPB's Personnel Policy Manual and is publicly available at <https://www.lpb.org/intranet/human-resources>. The EEO Policy contains a description of LPB's employment policies which includes a commitment to diversity:

LETA and all offices under its jurisdiction reaffirms its policy of equal opportunity by hereby stating that no person shall, on the basis of race, color, religion, sex, age, national origin, disabled, veteran status, or any other non-merit factor, be discriminated against in any employment practice. The agency is committed to this policy because it is our belief that it is morally right, it is good personnel management, and it is legally required by Title VII of the Civil Rights Act of 1964, as amended; by the Equal Opportunity Act of 1972; Executive Order 11246; the Rehabilitation Act of 1973, as amended; and the Vietnam Era Veterans' Readjustment Assistance Act of 1974; and Americans with Disabilities Act of 1990.

LETA will take affirmative action to ensure that the following policies will be implemented at all levels of administration:

1. Recruit, hire, place, train and promote in all job classifications without regard to non-merit factors such as race, color, age, religion, sex, national origin, disability, or veteran status, except where such a factor is a bona fide occupational qualification.
2. Identify and use existing and potential talent through upgrading and promotion of present employees. All promotions will be based only on valid equal employment promotional requirements.
3. Base decisions on employment so as to further the principles of equal employment opportunity.
4. Ensure that all personnel actions, such as compensation, benefits, transfers, layoffs, recall from layoffs, education, tuition assistance, and social and recreational programs, be administered without regard to race, color, religion, sex, age, national origin, disability, veteran status or any other non-merit factor.

A copy of the EEO Policy is uploaded as *Exhibit 6*.

Additionally, LPB's Employee Handbook states:

As an EEO/APP employer, it is the policy of LETA to recruit, hire and promote for all job classifications without regard to age, race, color, religion, sex, national origin, veteran status, marital status, and physical or mental limitations (except where those limitations would interfere with a bona fide occupational qualification). LETA also ensures that all other human resource actions such as compensation, benefits, transfers, layoffs, and agency-sponsored training, and education, social and recreational programs are administered without regard to these conditions.

A copy of the LPB's Employee Handbook is publicly available at <https://www.lpb.org/intranet/human-resources> and is uploaded as Exhibit 7.

All persons involved in employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training, and termination of employees likewise have responsibility for implementation and are required to make their decisions so as to ensure that LPB's policies and programs are adhered to, and that no person is discriminated against in employment because of race, color, religion, national origin, or sex. Legally required notices are posted informing applicants and employees that LPB is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

On an annual basis, LPB conducts harassment training for all LPB staff members, in accordance with the State of Louisiana.

*(b)(viii) In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.*

During the current license term, as part of its effort to ensure the effectiveness of its EEO program, the Unit conducts an ongoing assessment of the success of its recruitment efforts. The Unit employs a Human Resources Director who is responsible for recruitment, retention, employee relations, and benefits administration, and is tasked with enhancing the Unit's EEO processes and strategic initiatives. This position reports directly to LPB's President & CEO.

Recruitment efforts are analyzed against the Commission's EEO rules and regulations on recruitment to ensure compliance. The Unit's recruitment efforts are all done in a manner that contains no indication, either explicit or implicit, of a preference for one race, national origin, color, religion, or sex over another.

*(b)(ix) As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), describe the Unit's efforts to analyze periodically its 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. If the Unit has one or more union agreements, describe how the Unit*



*cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.*

LPB manages pay levels, compensation, and benefits for positions within the Unit and ensures all employees regardless of race, color, religion, national origin, or sex have equal opportunities for and access to pay increases, promotions, or job openings. As indicated on LPB's annual EEO Public File Reports, LPB is a state-owned licensee, and is therefore subject to requirements and restriction imposed by the State of Louisiana. On an annual basis, the Human Resources Director assesses both compensation and benefits offered by the Unit, comparing and benchmarking against national and regional data including other public media licensees. The Unit regularly reviews its practices to ensure that such practices are nondiscriminatory.

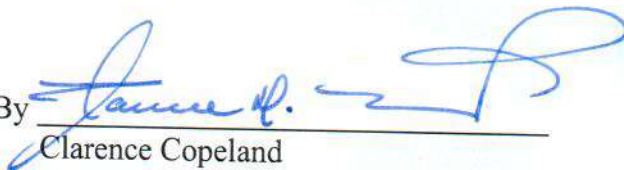
During budgeting, the station conducts regular review of rates of pay and fringe benefits for employees having the same duties, and if necessary takes action to eliminate any inequities based upon race, national origin, color, religion, or sex discrimination. Raises are awarded only on the basis of tenure and job performance. And promotions within the Unit are reviewed to ensure that they are made in a nondiscriminatory manner.

There are no union contracts or union employees within the Unit.

*(b)(x) If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.*

LPB is not a religious broadcaster.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, based on information provided by LPB management.

By   
Clarence Copeland  
President & CEO