

Amended Audit Response – March 1, 2024

Chicago Public Media Inc.  
848 East Grand Avenue  
Chicago, IL 60611

March 1, 2024

To the Online Public Files of the stations in the Employment Unit

Re: WBEZ (FM), Chicago, IL  
Facility ID No. 66649  
EEO Audit Response

Chicago Public Media Inc. (CPM), licensee of FM broadcast station WBEZ-FM, Chicago, IL, hereby responds to the letter dated October 30, 2023, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau. This response provides information relating to the licensee’s employment unit (the “Unit”), which includes the following stations:

- WBEZ (FM), Chicago, IL, Facility ID No. 66649
- WBEQ (FM), Morris, IL, Facility ID No. 92544
- WBEW (FM), Chesterton, IN, Facility ID No. 3248
- WBEK (FM), Kankakee, IL, Facility ID No. 33327
- WRTE (FM), Chicago, IL, Facility ID No. 10794

The following are our responses to the questions in part 2(b) of the audit letter.

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

The 2021-2022 Annual EEO Public File Report for the period from August 1, 2021 – July 31, 2022, is attached as **Exhibit 1**. The 2022-2023 Annual EEO Public File Report for the period from August 1, 2022 – July 31, 2023. is attached as **Exhibit 2**.

*(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).*

The most recent annual EEO Public File Report is linked on the following websites:

CALL SIGN	DOMAIN
WBEZ (FM)	<a href="https://www.wbez.org/pages/public-financial-documents">https://www.wbez.org/pages/public-financial-documents</a>
WBEQ (FM)	<a href="https://www.wbez.org/pages/public-financial-documents">https://www.wbez.org/pages/public-financial-documents</a>
WBEW (FM)	<a href="https://vocalo.org/about/">https://vocalo.org/about/</a>
WBEK (FM)	<a href="https://www.wbez.org/pages/public-financial-documents">https://www.wbez.org/pages/public-financial-documents</a>
WRTE (FM)	<a href="https://vocalo.org/about/">https://vocalo.org/about/</a>

(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), 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 a job notice was sent to multiple sources, the Unit may include in its 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 recruitment 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).

The Unit hired ninety-four (94) full-time employees during the period under review.

For job announcements, please see **Exhibit 3**, which contains documentations showing at least one notice for each full-time employee hired during the period under review.<sup>1</sup> For a list of additional sources to which the notice was distributed, please see **Exhibits 1 and 2**. In all instances, the stations in the Unit have retained notices sent to all additional sources used to retain the vacancy, as required by section 73.2080(c)(5)(iii).

Date of Hire	Title	Recruitment Source Referring Hiree
8/4/21	Producer 2 Talk	Referral
8/30/21	Podcast Producer 1	Chicago Public Media Website
8/31/2021	Enterprise News Reporter**	Poynter Foundation Fellowship
9/7/21	Traffic Coordinator	Referral
9/13/21	Sr. Mgr. CRM Systems	Referral
9/27/21	Chief Advancement Officer	Search Firm
10/7/21	Full Stack Software Engineer	Chicago Public Media Website
10/11/21	HR Talent Manager**	Chicago Public Media Website
10/14/21	Major Gifts Officer	Chicago Public Media Website
10/18/21	Producer 1 News	Chicago Public Media Website
10/25/21	Master Control Engineer	Chicago Public Media Website
11/15/21	Creative Manager	Chicago Public Media Website
11/29/21	Events Producer	Chicago Public Media Website
12/13/21	Coordinator, Development & Board Relations	Chicago Public Media Website
1/3/22	Statehouse Reporter	Chicago Public Media Website
1/10/22	Digital Producer 2	Chicago Public Media Website
1/10/22	Reporter 1 News	Referral
1/10/22	Director of Development	Chicago Public Media Website
1/10/22	Sr. Event Producer	Referral
2/7/22	Chief Audience Officer	Search Firm

<sup>1</sup> **Exhibit 12** contains notices for 4 positions (denoted in the table with \*\*) that were missing in the original Audit Response.

2/14/22	Marketing Campaign Manager	Chicago Public Media Website
2/14/22	Traffic Assistant	Chicago Public Media Website
3/7/22	IT Help Desk/Facilities Coordinator	Chicago Public Media Website
3/7/22	Vocalo Host Producer 2	Chicago Public Media Website
3/7/22	Statehouse Reporter	Chicago Public Media Website
3/14/22	Full Stack Software Engineer	Chicago Public Media Website
3/14/22	External Editor	Referral
3/21/22	Vocalo Producer Audio Story Telling	Chicago Public Media Website
3/28/22	Membership Associate	Chicago Public Media Website
4/4/22	Executive Admin Development	Chicago Public Media Website
4/4/22	Digital Producer 2	Referral
4/18/22	Director, Talent Acquisition/Senior Recruiter	Chicago Public Media Website
5/16/22	Engagement Producer	Chicago Public Media Website
5/23/2022	Network Administrator	None Identified
8/8/2022	Audio Curator	Chicago Public Media Website
8/22/2022	Technical Project Manager	Indeed.com
8/16/2022	Data Analyst	LinkedIn Recruiter
8/15/2022	Producer, Reset	Referral
9/6/2022	Donor Engagement & Stewardship Manager	Indeed
9/19/2022	Digital Audio Anchor	Chicago Public Media Website
9/19/2022	Full Stack Software Engineer	Chicago Public Media Website
9/6/2022	Senior Product Manager	Indeed.com
9/19/2022	Senior Producer, Reset	Chicago Public Media Website
9/19/2022	Luminary Podcast Fellow	Northwestern University
9/19/2022	Luminary Podcast Fellow (2)	Northwestern University
9/6/2022	Visual Producer	Filled by an Intern
9/19/2022	Digital Engagement Producer, Reset	Internal
9/19/2022	Podcasts Fellow	Internal
9/19/2022	Reset Production Fellow	NABJ
9/19/2022	Producer 1, Reset	NABJ
10/3/2022	Membership Manager	Chicago Public Media Website
9/19/2022	Prospect Research Manager	Chicago Public Media Website
9/13/2022	Vocalo Intern	Loyola University Chicago
10/3/2022	Digital Reporting Fellow	Indeed
10/31/2022	Political/City Hall Reporter	Indeed
10/31/2022	Development Associate	Chicago Public Media Website
11/28/2022	UX Designer	Chicago Public Media Website
11/28/2022	Higher Education Reporter	Chicago Public Media Website
11/7/2022	Producer II, Reset	Referral
11/14/2022	Temporary Higher Education Reporter	Referral
12/8/2022	Temporary Visual Producer	Visual Producer's contract was extended.

12/28/2022	Benefits & Compliance Senior Manager	Search Firm
12/14/2022	Staff Accountant	Search Firm
1/9/2023	Digital Fundraising Strategist	Linkedin Recruiter
1/9/2023	Digital News Producer (Producer 1)**	Chicago Public Media Website
1/9/2023	Social Media Editor (Editor)	Linkedin Recruiter
1/9/2023	BGM Podcast Producer (Producer 2)	Referral
1/9/2023	Vocalo Intern	Loyola University Chicago
1/9/2023	Master Control Engineer	Referral
3/20/2023	Senior Philanthropy Officer	LinkedIn
3/20/2023	Design & Marketing Intern	LinkedIn
3/27/2023	Leadership Giving Officer	LinkedIn
4/3/2023	Manager, Board & Volunteer Relations	LinkedIn
4/3/2023	Benefits & Compliance Senior Manager	Search Firm
4/17/2023	Director of Audience Insights	Referral
4/17/2023	Senior Audience Analyst	Referral
6/5/2023	Master Control Engineer	Chicago Public Media Website
5/1/2023	Editor – Podcasts**	Internal
5/8/2023	Manager of Grants & Institutional Giving	LinkedIn Recruiter
5/22/2023	Director of Product Engineering	Referral
6/5/2023	Audio Intern	Chicago Public Media Website
6/5/2023	Events Intern	Chicago Public Media Website
6/5/2023	Digital Intern	Chicago Public Media Website
6/5/2023	Reset Intern	Chicago Public Media Website
6/6/2023	Chief People Officer	Search Firm
7/3/2023	Senior Director of Membership	Referral
7/5/2023	Senior Director of Strategy & Special Projects	Chicago Public Media Website
7/5/2023	Data Intern	University of Chicago
7/5/2023	Data Fellow	Arizona State
7/31/2023	Executive Assistant	Indeed
7/31/2023	Member Service Associate	Indeed
7/31/2023	Membership Associate	Referral

*(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 the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.*

For the total number of persons interviewed for each of the Unit's full-time vacancies and the referral source for each interviewee for all the Unit's full-time vacancies, please see **Exhibit 4**.

(v) *Dated documentation demonstrating performance 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 amount in its response, i.e., two or four points worth. If any documentation provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask for additional verification.*

Chicago Public Media Inc. 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.

- Established an internship and fellowship program – **Exhibit 6.**
- Established a mentorship program – **Exhibit 5.**
- Trained managers on methods to ensure equal employment and prevent discrimination – **Exhibits 7– 8.**
- Sponsored events educating the public on employment opportunities in broadcasting – **Exhibits 9 – 10.**

(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 the Unit must report all complaints, regardless of their status or disposition.*

None.

(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), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.*

- A description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies:
  - All employees are required to adhere to the Equal Employment Opportunity Policy and Policy Against Harassment. **Exhibit 11, pp. 3–5.**
  - The Chief People Officer is responsible for overall implementation of EEO policies and initiatives. This includes recruiting, hiring, training, policy enforcement, and pay equity.
- How the Unit has informed employees and job applicants of its EEO policies and program:
  - For applicants:

- An EEO notice is included in every job posting.
- The “About” page of Chicago Public Media’s website links to a page containing information regarding its commitment to diversity, equity, and inclusion, and current initiatives in support of this program. <https://www.wbez.org/pages/dei>.
- For current employees:
  - New employees are provided with the Employee Handbook, which is available to all staff on the company intranet. The Handbook contains CPM’s Equal Employment Opportunity Policy and Policy Against Harassment.
  - CPM’s Manager, Diversity Equity & Inclusion (DEI) and the CPM Diversity Council host events and send educational information to employees to create spaces for employees to learn about different cultures and have conversations to learn about different perspectives.

*(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), a description of 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.*

Each month Human Resources receives information regarding the number of diverse applicants and hires. As part of the on-going effort to ensure diversity in the organization, CPM has set goals for the candidate pool and new hires, as well as the retention of employees of color. If there are retention issues present with any demographic group, CPM makes a concerted effort to reach out to that group to make them more engaged in the workplace. One recent example of this is the Hispanic/Latinx heritage month luncheon coordinated by the DEI Manager.

*(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), a description of 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.*

In 2022, CPM conducted a market pay study analyzing pay levels for positions within the organization. For non-union employees, the market study was used to evaluate compensation. A philosophy of paying between the 50th to 75th percentile was employed.

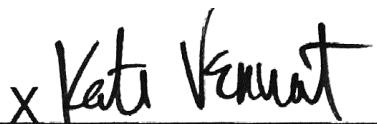
For union employees, the market pay study was used to inform minimum salary levels for job classifications during the negotiations for the successor collective bargaining agreement, covering May 13, 2022 through May 13, 2025. CPM’s EEO commitment is enshrined in the collective bargaining agreement with SAG-AFTRA, including Article 23 - Diversity: “CPM and the Union share a mutual commitment to the principles of diversity, equity and inclusion. CPM and the Union also share a mutual commitment to continue the active promotion of diversity, equity and inclusion in the workplace” and Article 26 - Non-Discrimination: “There shall be no discrimination against any person because of race, creed, religion, color, national origin, sex, gender, gender identity, sexual orientation, age, disability, or participation or non-participation in union activities, or any other legally protected status.” Unionized employees are also permitted by the collective bargaining agreement to request a reclassification and corresponding pay increase on two specified dates annually.

CPM also complied with the Illinois Department of Labor pay certification requirements for 2022. Illinois law requires private businesses with 100 or more employees in the State of Illinois to submit an application to obtain an Equal Pay Registration Certificate (EPRC) by providing certain pay, demographic, and other data to the Illinois Department of Labor (IDOL) and to recertify every two years after the first submission. The law also requires such employers to submit certain information with their application, including: a statement certifying that the business is in compliance with the Equal Pay Act of 2003 and other State and federal laws related to equal pay.

*(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.*

The licensee is not a religious broadcaster.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on information provided by the Assistant General Counsel.

  
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Kate Verrant  
Assistant General Counsel

Attachments: Exhibits 1 - 12