

May 6, 2024

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

RE: EEO Audit – WQPT-TV, Moline, IL (Facility ID 5468)

Dear Sir or Madam:

Western Illinois University (the “University”) hereby responds to the Commission’s notice of audit issued for WQPT-TV.¹ This response includes information about WQPT-TV, which is the only broadcast station within the employment unit (the “Unit,” or “Station”). The following subparagraphs correspond to the numbered paragraphs in the FCC’s audit notice.

i. **Public File Reports.** Copies of the Unit’s two most recent EEO public file reports for the periods covering August 1, 2021 to July 31, 2022 (“2021-2022 Reporting Period”) and August 1, 2022 to July 31, 2023 (“2022-2023 Reporting Period”) (the 2021-2022 Reporting Period and the 2022-2023 Reporting Period, together, the “Audit Period”) are attached as Exhibit 1 and Exhibit 2, respectively. As noted on the face of the reports, both were amended on May 6, 2024.

ii. **Website.** The Unit’s most recent public file report is posted on the Station’s website, <https://www.wqpt.org>.

iii. **Supporting Documentation for Vacancies and Dates of Hires.** The Unit filled three full-time vacancies during the Audit Period. Vacancy notices were sent to the list of recruitment sources in the EEO public file reports for the Audit Period. (None of these recruitment sources have been requested to be notified of vacancies.) Exhibit 3 contains copies of the notices sent to recruitment sources and/or screenshots of posting with those sources. The University uses a recruitment platform called Job Elephant to manage its recruitment efforts. Exhibit 3 contains summaries from Job Elephant documenting the sources to which the University sent the vacancies. The Unit did not air any vacancy-specific notices during the Audit Period but did air a general announcement inviting interested groups and organizations to contact the Station if they would like to be added to the list of recruitment sources. The text of the general announcement and log sheets of when these general announcements were aired

during the Audit Period are included in Exhibit 3. The dates of the three full-time hires during the Audit Period are provided in the EEO public file reports (see Exhibit 1 and Exhibit 2).

iv. Total Number of Interviewees and Referral Sources. The total number of interviewees for the three vacancies filled during the Audit Period and the referral sources of each interviewee are provided in the EEO public file reports for the Audit Period (see Exhibit 1 and Exhibit 2).

v. Documentation of Recruitment Initiatives. The Unit currently has a total of 7 full-time employees. The population of the market in which the Stations operate is more than 250,000.ⁱⁱ Therefore, the Unit is required to perform four points worth of recruitment initiatives within a two-year period pursuant to 47 C.F.R. §§ 73.2080(c)(2) and (e)(3).

The Unit engaged in a number of recruitment initiatives as shown in the EEO public file reports attached as Exhibit 1 and Exhibit 2. The Unit personnel involved in each recruitment initiative are generally listed in these reports. See Exhibit 4 for documentation of at least four points worth of initiatives.

vi. Discrimination Complaints. There are no pending or resolved complaints filed during the current license term 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 gender.

vii. Management's EEO Responsibilities. The University's Director of Equal Opportunity and Access serves as the EEO Officer of the Unit and is responsible for ensuring enforcement of its EEO policies and informing employees and applicants of its EEO policies and programs. Applicants are made aware that the Unit is an Affirmative Action and Equal Opportunity employer by a statement to this effect on the Station's website and all vacancy announcements. Details about the Unit's Equal Opportunity and Affirmative Action policy and plan are included in the Official University Policy Manual, which is made available to all employees on the University Policies website at wiu.edu/policies. The AA/EEO statement is on the civil service application and application website, all job postings, and is available to all employees on the University Policies website at wiu.edu/vpas/policies/affirmact.php.

viii. Analysis of EEO Program's Effectiveness. The University's Office of Human Resources monitors the recruitment and selection process for faculty, administrative and professional, civil service, and student employment positions. All faculty and administrative and professional searches are conducted by a search committee. Each search is assigned to a HR officer who monitors the selection process and reviews all reasons for non-selection to ensure equal opportunity and non-discrimination in each phase of the selection process. In addition, EOA analyzes the University's EEO recruitment program annually to ensure that it is effective and to address any problems found as a result. Civil service positions require applicants to go through a specific process established by the State Universities Civil Service System to ensure they are treated equally. All reasons for selection and non-selection of

candidates are reviewed by a HR officer before an offer is made to ensure hiring is based on legitimate, non-discriminatory, and job-related reasons.

ix. Analysis of Pay, Benefits and Selection Techniques. The University periodically analyzes pay and selection techniques to ensure that they provide equal opportunity and do not have a discriminatory effect. Benefits are administered by the State of Illinois. For Civil Service positions, compensation, seniority, promotions, and selection are administered in compliance with the State Universities Civil Service System statute and rules and in accordance with any relevant collective bargaining agreement(s). Salaries are determined by utilizing a comparison of College and University Professional Association Salary Surveys for same or like positions among our peers, market research, and internal equity.

The University is not a religious broadcaster, and is not subject to a time brokerage agreement.

I certify that the information and statements herein are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I acknowledge that the attached exhibits are considered material representations.

Please address any questions concerning this letter to the University's counsel, Emilie de Lozier of Wilkinson Barker Knauer LLP, at (202) 383-3378.

Very Truly Yours,



Kristi Mindrup, Ph.D.
Interim President
Western Illinois University

ⁱ Certain personally identifiable information has been redacted from the response materials.

ⁱⁱ The Stations operate in the Davenport-Moline-Rock Island, IA-IL Metropolitan Statistical Area, which had a population of 384,324 according to the 2020 U.S. Census.