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April 21, 2021

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
Iowa Public Broadcasting Board
Station KDIN-TV, Des Moines, IA (Facility ID 29102)

Dear EEO Staff:

On behalf of Iowa Public Broadcasting Board, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station KDIN-TV, Des Moines, Iowa.

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 Iowa Public Broadcasting Board

Enclosure

April 21, 2021

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**
Iowa Public Broadcasting Board
Station KDIN-TV, Des Moines, IA (Facility ID 29102)

EEO Staff:

Iowa Public Broadcasting Board (“IPBB”) hereby responds to an FCC audit letter dated February 25, 2021 requesting information concerning the EEO program of noncommercial educational television station KDIN-TV, Des Moines, Iowa. The KDIN-TV employment unit (the “Unit”) employs more than five full-time employees, and IPBB therefore provides the following information in response to the audit request.

Item # 2(b)(i). IPBB encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) October 1, 2018 to September 30, 2019, and (ii) October 1, 2019 to September 30, 2020 as Attachment 1.

The station web site is available at: <https://www.iowapbs.org/>. The annual EEO public file report is posted at: <https://www.iowapbs.org/about/reports-to-the-community> .

Item # 2(b)(ii). The dates of hire for the positions filled during the periods covered by the 2018-2019 and 2019-2020 annual EEO public file reports are as follows:

Job Title	Date of Hire
Operations Assistant	May 14, 2019
Program Planner 2 / Engagement Manager	June 17, 2019
Accounting Tech 2	September 25, 2018
Information Tech Specialist 4	November 1, 2019
Human Resource Associate	November 4, 2019
Promotions Editor/Producer	December 2, 2019
Administrative Assistant 1	January 14, 2020

Media Integration Specialist	February 3, 2020
Accounting Clerk 2	September 14, 2020

IPBB 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 2018-2019 and 2019-2020 annual reporting periods). Note that some listed sources pick up and re-post the vacancy information from the IPBB’s state of Iowa postings and do not receive direct postings from IPBB. No organizations notified IPBB that they want to be notified of the Unit’s job openings.

Item # 2(b)(iii). 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 2018-2019 and 2019-2020 reports are as follows:

Job Title	Referral Source	# of interviewees
Operations Assistant	IPTV Internal Posting	1
	IPTV External Posting	0
	IPTV Web Site	0
	State of Iowa Internal Jobs Page	1
	Total	2
Program Planner 2 / Engagement Manager	IPTV Internal Posting	1
	IPTV External Posting	0
	IPTV Web Site	0
	State of Iowa Internal Jobs Page	1
	Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>)	1
	Internet/Electronic Bulletin Board	1
	IowaJobs.org (<i>re-posts from State of Iowa</i>)	0
	LinkedIn	1
	Social Media	0
	Referrals	2
Total	7	
Accounting Tech 2	IPTV Internal Posting	0
	IPTV External Posting	0
	IPTV Web Site	0
	State of Iowa Internal Jobs Page	4
	IowaJobs.org (<i>re-posts from State of Iowa</i>)	1
	Referrals	0
	Home Base Iowa Website (<i>re-posts from State of Iowa</i>)	1
	Internet/Electronic Bulletin Board	0
Total	6	
Information Tech Specialist 4	IPTV Internal Posting	0

	IPTV External Posting IPTV Web Site State of Iowa Internal Jobs Page Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>) LinkedIn Referrals Home Base Iowa Website (<i>re-posts from State of Iowa</i>) Internet/Electronic Bulletin Board Total	1 0 1 1 1 1 0 0 5
Human Resource Associate	IPTV Internal Posting IPTV External Posting IPTV Web Site State of Iowa Internal Jobs Page Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>) LinkedIn Referrals Home Base Iowa Website (<i>re-posts from State of Iowa</i>) Internet/Electronic Bulletin Board Total	0 0 0 2 2 1 2 0 0 7
Promotions Editor/Producer	IPTV Internal Posting IPTV External Posting IPTV Web Site State of Iowa Internal Jobs Page Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>) LinkedIn Referrals Home Base Iowa Website (<i>re-posts from State of Iowa</i>) Internet/Electronic Bulletin Board Other Total	0 1 1 2 0 0 0 0 0 0 1 5
Administrative Assistant 1	IPTV Internal Posting IPTV External Posting IPTV Web Site State of Iowa Internal Jobs Page Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>) LinkedIn Referrals Home Base Iowa Website (<i>re-posts from State of Iowa</i>) Internet/Electronic Bulletin Board Total	0 0 0 2 2 1 0 0 0 0 5

Media Integration Specialist	IPTV Internal Posting	0
	IPTV External Posting	0
	IPTV Web Site	1
	State of Iowa Internal Jobs Page	0
	Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>)	1
	LinkedIn	0
	Referrals	0
	Home Base Iowa Website (<i>re-posts from State of Iowa</i>)	0
	Internet/Electronic Bulletin Board	0
	Total	2
Accounting Clerk 2	IPTV Internal Posting	0
	IPTV External Posting	0
	IPTV Web Site	0
	State of Iowa Internal Jobs Page	1
	Career Website (ex. Indeed, Monster, Career builder) (<i>re-posts from State of Iowa</i>)	4
	LinkedIn	0
	Referrals	0
	Home Base Iowa Website (<i>re-posts from State of Iowa</i>)	0
	Internet/Electronic Bulletin Board	0
	Total	5

Item # 2(b)(iv). IPBB encloses documentation of recruitment initiatives performed during the periods covered by the 2018-2019 and 2019-2020 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 KDIN-TV Unit is 98. The market for the Unit has a population of more than 250,000. Based on these factors, IPBB is required to perform four (4) initiatives during each two-year period.

During the periods covered by the 2018-2019 and 2019-2020 reports, IPBB completed the following initiatives, involving station personnel as indicated:

Participation in at least four job fairs by station personnel who have substantial responsibility in making hiring decisions.

- *Station personnel involved:*
- Feb. 4, 2019: Kimberly Stoker, Human Resource Associate, participated in the State of Iowa career fair booth at the LGBTQ Career Fair presented by OneIowa, Wellmark, and UnityPoint.
- Feb. 14, 2019: Kimberly Stoker, Human Resource Associate, participated in the State of Iowa career fair booth at the Drake College Career Fair at the Olmsted Center.
- Feb. 26, 2019: Kimberly Stoker, Human Resource Associate, participated on behalf of IPTV at Iowa State University’s Greenlee School of Journalism and Communications Internship and Networking Fair.

- Aug. 2019: Kim Stoker participated on behalf of Iowa PBS at the Polk County River Place Career Fair.
- Oct. 1, 2019: Kim Stoker and Michelle Wendel participated on behalf of Iowa PBS at the 2019 Fall Jump Start Internship Career Fair at the Iowa State University Greenlee School of Journalism and Communications.
- Feb. 2020: Fern Kidder participated on behalf of Iowa PBS at the Iowa State University Greenlee School of Journalism and Communications Internship and Networking Fair.

Establishment of Internship Program

Iowa Public Television has a long-standing internship program for college and university students providing students with an opportunity to learn and develop practical skills. Interns worked in production, communications, and graphics, as well as in story development, project management, producing/planning, science, and politics/news.

- *Station personnel involved:* Laura Shannon, Production Supervisor; Alisa Dodg, Creative Director; Taylor Shore – Digital Content Manager; Fern Kidder – HR; Danny Engesser, Info Tech Specialist 3; Susan Ramsey, Director of Communications.

Mentorship Program

Iowa high school students participated in the high school mentorship program in 2019 and 2020 (modified program) at Iowa Public Television. The students observed and gained hands-on experience in all aspects of media journalism including videography, lighting/set design, video editing, graphic design, web production and storytelling. The student shadowed and assisted IPTV personnel during the process of creating broadcast and online content. Also, there were job shadowing opportunities with various production staff in 2019 and 2020.

- *Station personnel involved:*
- Chuck Czech, Production Manager; Dave Miller, Senior Producer/Director; Ken Harrison, Director of Education; Fern Kidder, HR; Karen Schaeffer, Admin Assistant 2; Joe Bustad, Graphic Artist; Taylor Shore, Digital Content Manager; Susan Ramsey, Communication Director; Sarah Lewis, Communications Coordinator; Tonya Weber, Communications Manager; Danny Engesser, Info tech Specialist 3

Training programs designed to enable station personnel to acquire skills that could qualify them for higher level employment.

Iowa Public Television employees have the opportunity to take classes through the State of Iowa Performance and Development Solutions and other vendors with courses covering business skills, computer skills, communication and interpersonal skills, conflict management and negotiation, customer service, diversity and cultural competence, government and law, human resources, leadership development, process and organizational management, self-development, team development and supervision. Employees are also given an opportunity to attend conferences and symposiums.

- *Station personnel involved:* Theresa Knight; Eden Tesfazghi; Bryan Bauer, Education Program Consultant; Josh Pronk, Accountant 2; Tiffany Morgan, Education Program Consultant; Stacie Steveson, Utilization Specialist; Matthew Kray, Accounting Tech 2; Michelle Wendel, Director of Administration; Stephanie Bernard, Business Office

Manager; Kaylynn Short, Accountant 3; Ken Harrison, Director of Education Services; Mekca Wallace-Spurgin, Utilization Specialist; Fern Kidder, Human Resources Associate; Director of Communications Susan Ramsey; Production Supervisor Laura Shannon; and others as identified in annual report attachments.

Providing training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination.

Iowa PBS supervisors take classes, webinars and attend conferences relevant to diversity and equal opportunity employment.

- *Station personnel involved:* Production Manager Chuck Czech; Matthew McPike, Programming & Operations Manager; Deb Herbold; Andrea Coyle; Michelle Wendel, Director of Administration; Kaylynn Short, Accountant; Senior Producer Andrew Batt; Producer/Director Peter Tubbs; Director of Production and Programming Justin Beaupre; Production Supervisor Laura Shannon and Creative Director Alisa Dodge.

Participation in job banks, internet programs, and other programs designed to promote outreach general.

Iowa Public Television staff will go to schools to discuss careers in public broadcasting. IPTV offers a behind-the-scenes tour including studios, producers/directors' area, control room, scene shop, and the film library. External job openings were shared with multiple colleges and with Homebase Iowa.

- *Station personnel involved:* Instructional Media Design & Development Coordinator Bryan Bauer; journalist/moderator David Yepsen; KIDS Clubhouse Adventures host Dan Wardell; Senior Producer Dave Miller; Engagement Manager Caryline Clark; KIDS Clubhouse Adventures host Abby Brown; Programming Manager Matthew McPike and Instructional Media Coordinator Tiffany Morgan; and others as identified in annual report attachments.

Item # 2(b)(v). The following complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex were filed during the current license term before a body having competent jurisdiction under applicable law:

Delaney Howell v. Iowa PBS, filed April 15, 2020 in Iowa District Court for Polk County, Case No. LACL147733, removed to U.S. District Court for the Southern District of Iowa, Civil Case No. 4:20-cv-00140. Plaintiff Howell is a former temporary employee and was a host of Iowa PBS's syndicated news program, *Market to Market*. Howell alleges she was paid less as host than her male predecessor in violation of the Federal Equal Pay Act. The case is currently pending.

Delaney Howell v. Iowa PBS, David Miller, and Molly Phillips, Individually and in their Official Capacities, filed August 11, 2020 in Iowa District Court for Polk County, Civil Case No. LACL148466; complaint previously filed April 30, 2020 with Iowa Civil Rights Commission (ICRC), ICRC No. 04-20-75036; EEOC No. 26A-2020-00527C. The Plaintiff alleges wage discrimination in violation of the Iowa Civil Rights Act on the same grounds as in the Federal

case noted above. Additionally, Plaintiff alleges Iowa Civil Rights Act claims of sex discrimination and retaliation based on Plaintiff's termination from employment at Iowa PBS. The case is currently pending.

Item # 2(b)(vi). 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:

Iowa PBS is a Department of the State of Iowa and must adhere to all State of Iowa policies and procedures. Iowa PBS management is responsible for implementing the State of Iowa EEO/AA policies. Iowa PBS managers participate in the Equal Employment/Affirmative Action training that is provided by the Iowa Department of Administrative Services, Performance & Development Solutions (PDS). All employees of Iowa PBS receive and sign off on receiving both the State of Iowa Employee Handbook and the Iowa PBS Employee Handbook. The State of Iowa Employee Handbook includes a section which includes the Equal Opportunity, Affirmative Action, and Anti-Discrimination Policy for Executive Branch Employees. The Iowa PBS Employee Handbook includes a paragraph that refers employees to the Iowa Department of Administrative Services website and the EEO/AA policy.

Anyone that applies for a job at Iowa PBS must apply through the State of Iowa's applicant system, NeoGov through the Iowa Department of Administrative Services website. The State's website includes a statement that "The State of Iowa is an Equal Employment Opportunity/Affirmative Action Employer". Iowa PBS is also required to annually report to the Iowa Department of Administrative Services an Affirmative Action report for the prior fiscal year along with plans for the new fiscal year.

Item # 2(b)(vii). 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:

As part of the completion of the annual Affirmative Action plan annually, Iowa PBS reviews the efforts made for recruitment and determines if any changes are needed for the upcoming year. The Iowa Department of Administrative Services provides reports that includes data on applicant flow by minority, applicant flow by sex, and workforce/labor force composition. These reports are used in conjunction with the prior year Affirmative Action plan to determine what, if any, changes are needed for the upcoming year.

Item # 2(b)(vii). 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:

Iowa PBS is a department of the State of Iowa. The State of Iowa, Iowa Department of Administrative Services-Human Resources, has a classification and compensation section that is responsible for the review of all job classifications of the State of Iowa. All benefits that Iowa PBS employees are eligible for are also administered by the Iowa Department of Administrative Services-Human Resources, benefits section. All positions that are open for employment at Iowa

PBS must be posted on the State of Iowa hiring system, NeoGov. All applicants are screened by the Iowa Department of Administrative Services to ensure they meet the minimum qualifications of the job classification that they applied for. Prior to any applications/resumes being given to the Iowa PBS hiring manager, that hiring manager must provide a resume scoring matrix that will be used when reviewing resumes as well as the interview questions that will be asked during the interview process. All resumes are reviewed using the same scoring matrix, and the top scoring candidates are invited for an interview. Interview questions are scored and the top score is offered the position. If the hiring manager feels a different candidate would be better for the position than the top scorer, then a justification must be done as to why the position would be offered to someone other than the top scoring candidate.

Items # 2(b)(ix), 3(a), 3(b), 3(c), and 3(d) are not applicable.

Iowa Public Broadcasting Board, 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,
IOWA PUBLIC BROADCASTING BOARD

By: Molly M Phillips

Print Name: Molly M Phillips

Title: Exec Dir. + Gen. Mgr.

Date: 4-21-2021