

## **APPENDIX C**

### **Documentation Relating to Recruitment Initiatives**



Employment, Independence & Equality

10/2014  
Job Fair

The California Department of Rehabilitation is an employment resource connecting job seekers with disabilities and employers looking to hire.

## What's in it for Business?

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### Work Opportunity Tax Credit

Qualify for tax  
credits up to  
\$6,000 for hiring  
individuals with  
disabilities

### On the Job Training

Receive  
reimbursements  
and support during  
the job training  
period

### Job Accommodation Network

Learn about  
workplace  
accommodations  
and the Americans  
with Disabilities Act

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To learn more about free services for employers, contact:

**Karen Swanson**  
**Employment Coordinator**  
[Karen.Swanson@dor.ca.gov](mailto:Karen.Swanson@dor.ca.gov)  
**805-371-6293**



California DOR



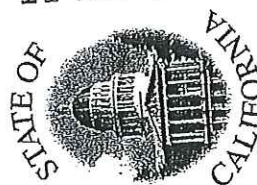
@CaliforniaDOR



[www.dor.ca.gov](http://www.dor.ca.gov)



WHAT'S IN IT  
FOR BUSINESS?



Karen Swanson  
Employment Coordinator  
Department of Rehabilitation  
101 Hodencamp Road, Suite 212  
Thousand Oaks, CA 91360  
(805) 371-6293 Voice  
(805) 371-6296 Fax  
(805) 371-6279 Main  
Karen.Swanson@dor.ca.gov





# WINDMILLS

This program is designed for Human Resource, hiring managers and supervisors to successfully include persons with disabilities as an excellent labor resource. It focuses on attitudes and human factors, as well as concerns and issues related to legal requirements and accommodation. Participants will:

- Explore the fears, biases and myths that create barriers for employees who become disabled through work or non-work related injuries and illnesses.
- Provide effective techniques for hiring and increasing the retention of employee's with disabilities.
- Create a catalyst for integrating these techniques and resources strategically into existing Diversity programs.

*"Fantastic insight  
into the lives and  
obstacles  
surrounding those  
with disabilities."  
-ADECCO Hiring  
Manager*

This presentation is a disability attitude change program that addresses the roots of emotions, fear and lack of knowledge from which unconscious and unintended acts of bias arise. The intent of the program is to focus on abilities and the diversity of our workforce.

**PROVIDED AT YOUR PLACE OF BUSINESS  
FREE OF CHARGE**

*"I have used  
Windmills both  
personally and  
professionally, with  
positive results."  
- Hiring Manager  
State of California*

To schedule a presentation or for  
additional information, please contact

DOR

[wdsinfo@dor.ca.gov](mailto:wdsinfo@dor.ca.gov)

(916)558-5400





Employment, Independence & Equality

I get by with a little help from my friends.....

Do you ever get a little help from your friends?

At DOR we have some candidates that can work, want to work and can do a great job, with a little help from a "job coach".

What is a JOB COACH?

It is some one that assists the new hire with learning their job tasks, at No Cost to the employer! It is called "Supported employment"

As the new hire learns their job tasks, the job coach fades to less time spent with the new hire.

This is great way to get a worker that will save you training time!

Want to know more?

Contact Aceile at DOR 805-371-6294



# JAN

## Job Accommodation Network

### Ask JAN!

#### Practical Solutions • Workplace Success

### What is the Job Accommodation Network?

The Job Accommodation Network (JAN) is the leading source of free, expert, and confidential guidance on workplace accommodations and disability employment issues. Working toward practical solutions that benefit both employer and employee, JAN helps people with disabilities enhance their employability and shows employers how to capitalize on the value and talent that people with disabilities add to the workplace.

### What services does JAN provide?

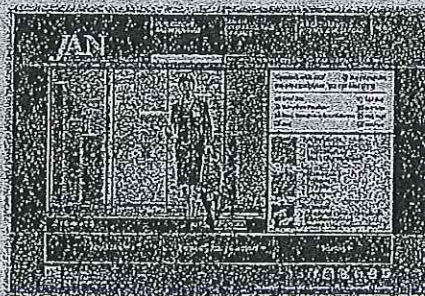
JAN's trusted consultants offer one-on-one guidance on workplace accommodations, the Americans with Disabilities Act (ADA) and related legislation, and self-employment and entrepreneurship options for people with disabilities. Assistance is available both over the phone and online.

### Who can benefit from JAN's services?

From Fortune 500 companies to entrepreneurs, JAN has served customers across the United States and around the world for more than 25 years. Those who can benefit from JAN's services include private employers of all sizes, government agencies, employee representatives, and service providers, as well as people with disabilities and their families.

### Why is JAN a trusted, expert resource?

JAN represents the most comprehensive job accommodation resource available. Its consultants are thought leaders and innovators on disability employment issues and all have earned at least one master's degree in their specialized fields, ranging from rehabilitation counseling to education and engineering.



### How can I contact JAN?

JAN offers several ways to obtain confidential, personalized assistance—anytime, anywhere. Get your questions answered...

- ✦ **By Phone:** From 9 a.m. to 6 p.m. ET, customers can call JAN toll-free to speak with a workplace accommodation expert. (800) 526-7234 (Voice) or (877) 781-9403 (TTY).
- ✦ **Via the Web:** AskJAN.org offers more than 300 disability-specific publications, as well as the Searchable Online Accommodation Resource (SOAR), which enables users to explore accommodation options for different disabilities and workplace settings.
- ✦ **On Demand:** JAN's online service provides customers with individualized e-mail and chat responses to questions about accommodations and the ADA.
- ✦ **Through Social Networks:** JAN connects with users through a variety of social media platforms, from Facebook and LinkedIn, to Twitter, blogs, and Second Life.
- ✦ **Through In-Person Trainings:** JAN delivers training workshops at events sponsored by corporations; organizations; and federal, state, and local governments.



A free confidential service  
of the Office of Disability  
Employment Policy,  
U.S. Department of Labor

AskJAN.org  
(800) 526-7234 (Voice)  
(877) 781-9403 (TTY)



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The Council of State Administrators of Vocational  
Rehabilitation (CSAVR) to Launch its  
Talent Acquisition Portal®!



Move Beyond Compliance and Gain the Competitive Edge –  
*“TAP into Talent”*

The Talent Acquisition Portal® (TAP) is led by the Council of State Administrators of Vocational Rehabilitation and The National Employment Team (NET) in partnership with disabledperson, Inc. TAP is an online system which includes both a national talent pool of Vocational Rehabilitation (VR) candidates looking for employment and a job posting system for businesses looking to hire individuals with disabilities.

TAP offers business the opportunity to post jobs, search candidate resumes based on skill sets and geographic availability, capture job metrics, generate compliance reports, interview candidates, have online job fairs, and have their jobs seen by individuals with disabilities across the country. Business will also benefit from VR Counselors and qualified candidates searching the available opportunities. Small, medium, and large businesses all have the opportunity to receive all the benefits TAP offers through flexible job posting packages, and outreach opportunities. TAP is supported by the NET which includes VR Business Consultants in every state, the territories and D.C. who can partner and can provide support services to your business at the national, state and local level.

Vocational Rehabilitation serves approximately 1 million individuals with disabilities per year, and has over 25,000 staff across 80 agencies in all 50 states and U.S. territories. VR offers the largest talent pool of candidates with disabilities in the United States, making [tapABILITY.org](http://tapABILITY.org) the premier web portal for business to hire individuals with disabilities.

**TAP offers business and employer customers the opportunity to:**

- Post jobs that will be seen in all 80 VR Agencies and 25,000 staff in the 50 States, Territories and DC
  - Use a State of the Art “TAP Matching” system linking your job to candidates that meet your employment needs.
  - Utilize a State of the Art API which will integrate with any company career site.

Talent Acquisition Portal®

## TAP Offers Candidates:

Vocational Rehabilitation's candidates with disabilities can explore job opportunities at the local, state or national level by utilizing TAP's "TAP Matching" which will match their skills to specific jobs and locations. Candidates will interface with companies who have a commitment to hiring qualified applicants with disabilities. These candidates do this with the support of their VR Counselor and the National Employment Team. The site is fully accessible.

## Compliance:

Although TAP was not built solely for compliance, it was built with the input of senior officials at the Office of Federal Contracts and Compliance (OFCCP) so TAP features all the necessary metrics for the new 503 and VEVRAA regulations. Employers will be more than impressed by the reporting metrics of TAP and the ease of generating your own reports.

## The Launch:

TAP was launched to VR nationally the first week of January 2014. The 80 agencies in the 50 states, territories and D.C. are currently populating the portal with their counselor and candidate population. This process is going smoothly. Once we reach a critical mass, we will open TAP up to business. Interested?

## Contact us:

Interested Employers please go to [tapABILITY.org](http://tapABILITY.org) or contact Kristopher Corso at [Kristopher@tapability.org](mailto:Kristopher@tapability.org) or Kathy West Evans at [KWest-Evans@rehabnetwork.org](mailto:KWest-Evans@rehabnetwork.org).

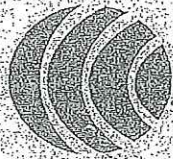


TAP Partnership is comprised of the Council of State Administrators of Vocational Rehabilitation (CSAVR), a membership organization of the Directors of the public Vocational Rehabilitation (VR) agencies across the U.S. CSAVR is a 501 (c) 3 non-profit organization with representation from every state, the territories and D.C. THE NET vision is to create a coordinated approach to serving business customers through a national VR team that specialized in employer development, business consulting and corporate relations offering business customers access to the largest talent pool of candidates with disabilities as well as a variety of technical assistance, consultation and support services. disabledperson, Inc. is a 501 (c) 3 non-profit organization whose mission is to reduce the high unemployment rate of individuals and veterans with disabilities nationwide.

TAP- PO BOX 230636 Encinitas, CA. 92023-0636 [Info@tapABILITY.org](mailto:Info@tapABILITY.org) . 858-375-6510

Talent Acquisition Portal®





# CUMULUS



Now Hiring:  
Promotions and Marketing  
Assistant  
Sales Representative

## CUMULUS APPLICATION FOR EMPLOYMENT

NAME: \_\_\_\_\_ DATE: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP: \_\_\_\_\_  
PHONE: \_\_\_\_\_  
SOCIAL SECURITY NO.: \_\_\_\_\_  
Are you currently employed? ☐ Yes ☐ No  
If yes, please provide details: \_\_\_\_\_  
Do you have the right to work in the United States?  
☐ Yes ☐ No  
If yes, please provide details: \_\_\_\_\_  
How many hours can you work weekly? \_\_\_\_\_  
Are you a U.S. citizen? ☐ Yes ☐ No  
If no, please provide details: \_\_\_\_\_  
Do you have a valid driver's license? ☐ Yes ☐ No  
If no, please provide details: \_\_\_\_\_  
EDUCATIONAL BACKGROUND

SCHOOL	LOCATION	MAJOR	DEGREE
High School			
College			
University			
Trade School			
Professional School			

Smart & Final  
12/14/14





Now Hiring  
Promotions and Marketing  
Assistant  
Sales Representative

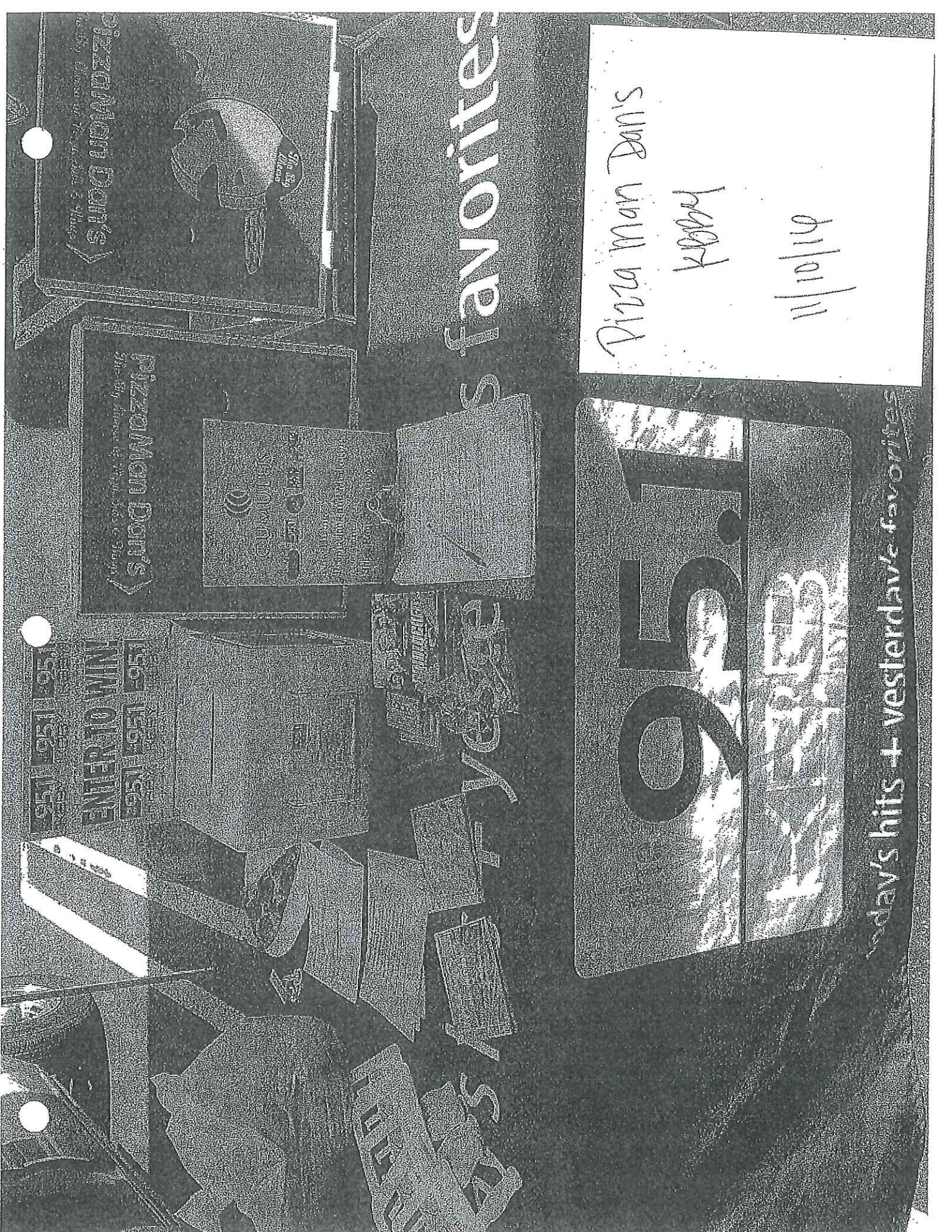


CUMULUS

[illegible]

Pizza Man Dan's  
KBBY  
12/8/14



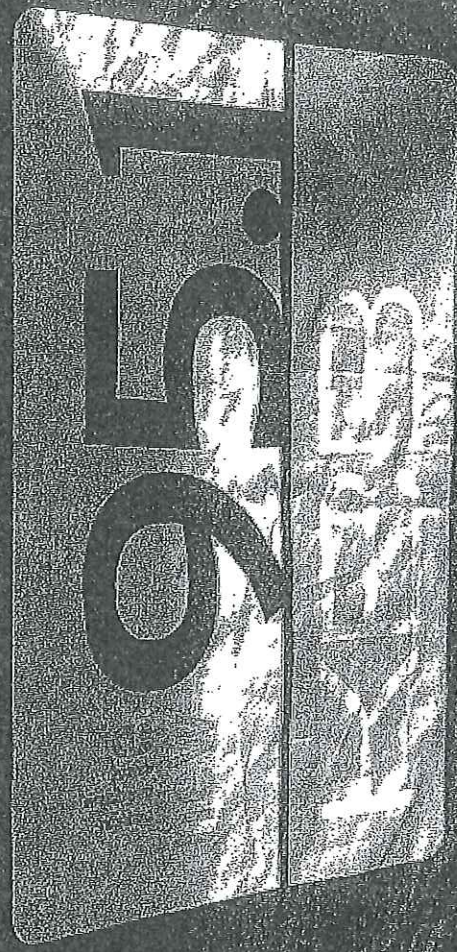


favorites

Pizza Man Dan's

happy

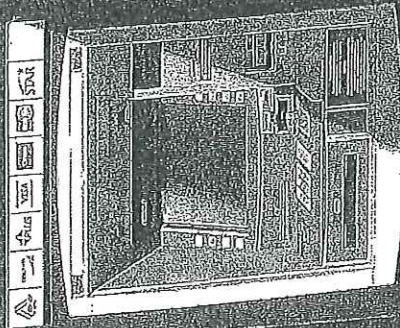
11/10/11



today's hits + yesterday's favorites



PremierAmerica  
CREDIT UNION  
Bank Where You Own the Place™



ENTER-TOWN  
100%  
KFFAY

100%  
KFFAY

100%  
KFFAY

100.7

KFFAY

California Country!

Premier America  
KFFAY

11/3/14

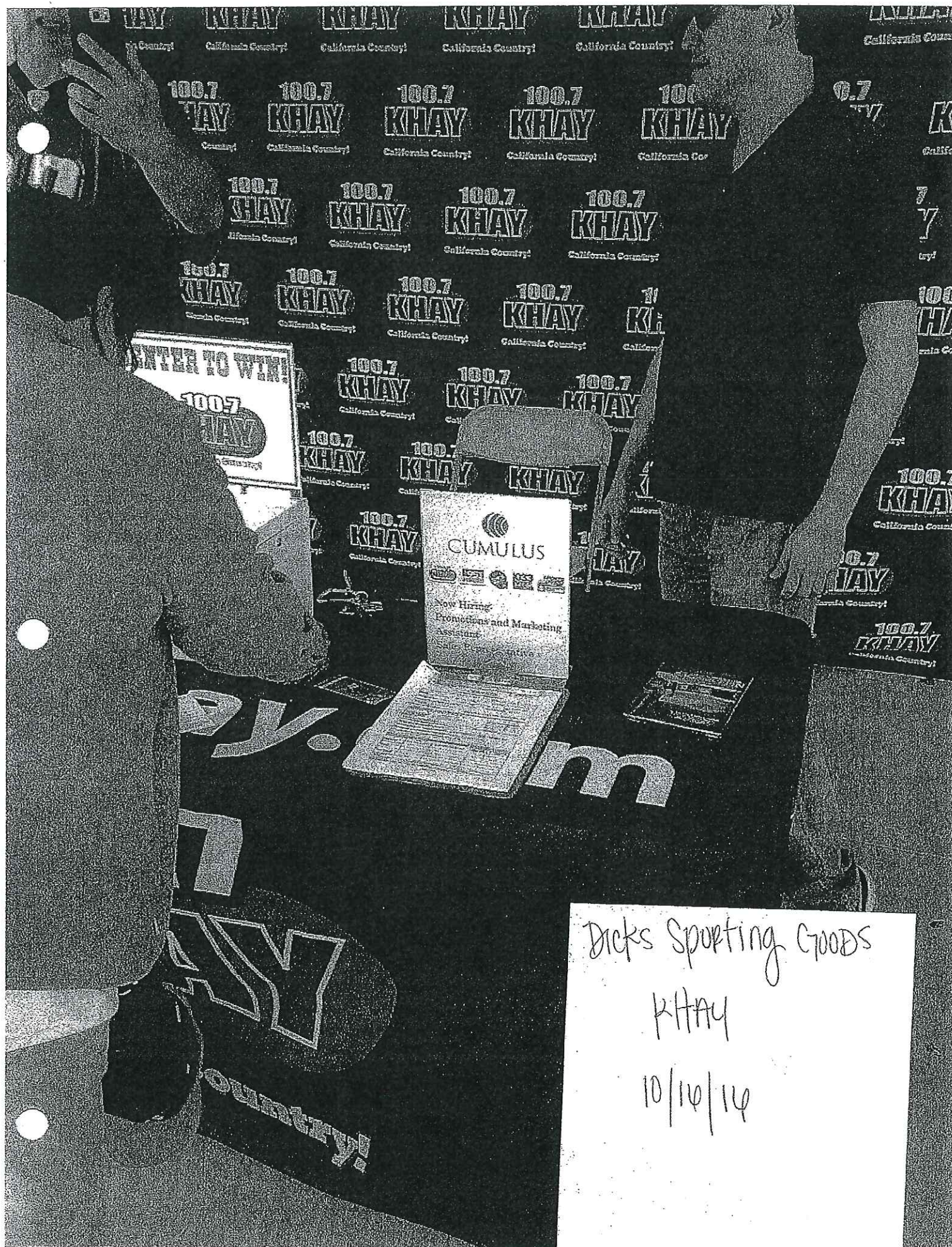


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THE  
FALL

103THEVIBE.CO





Dicks Sporting Goods

KHAY

10/10/14



## **Tonya Graybill**

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**From:** Cody Seybold  
**Sent:** Wednesday, October 21, 2015 2:10 PM  
**To:** Brittany Gunther  
**Subject:** SBCC Job Fair EOE Photo  
**Attachments:** EOE SBCC Job Fair 102115.jpg

Here is the EOE Photo taken today from SBCC Job Fair

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Cumulus Media  
is hiring!

We are actively seeking qualified candidates for Sales and assistants and interns in the Promotional Department.  
Apply Today!

Cumulus Media is an Equal Opportunity Employer

Cumulus Media  
is hiring!

We are actively seeking qualified candidates for Sales and assistants and interns in the Promotional Department.  
Apply Today!

Cumulus Media is an Equal Opportunity Employer

103.3  
THE VIBE

1033THEVIBE.COM





Cumulus Media  
Oxnard-Ventura is  
Hiring!

Please take an application to apply.  
Cumulus Media is an equal opportunity employer.

PLEASE PRINT ALL  
INFORMATION REQUESTED  
EXCEPT SIGNATURE



CUMULUS

APPLICANTS MAY BE  
TESTED FOR  
ILLEGAL DRUGS

APPLICATION FOR EMPLOYMENT

Name \_\_\_\_\_ DATE \_\_\_\_\_  
Last First Middle  
Present Address \_\_\_\_\_  
Number Street City State Zip  
How long have you lived at this address? \_\_\_\_\_ Social Security No. \_\_\_\_\_  
Telephone (\_\_\_\_) \_\_\_\_\_  
If under 18, please list age \_\_\_\_\_ If under 18, do you have a work permit? ☐ Yes ☐ No  
If offered employment, will you be able to provide proof of your identity and eligibility to work in the United States as required by federal law? ☐ Yes ☐ No  
Position applied for (1) \_\_\_\_\_ Days/hours available to work  
(2) \_\_\_\_\_ No Pref \_\_\_\_\_ Thur \_\_\_\_\_  
(Be specific) Mon \_\_\_\_\_ Fri \_\_\_\_\_  
Tue \_\_\_\_\_ Sat \_\_\_\_\_  
Wed \_\_\_\_\_ Sun \_\_\_\_\_  
How many hours can you work weekly? \_\_\_\_\_ Can you work nights? \_\_\_\_\_  
Are you willing to work overtime if asked? \_\_\_\_\_  
Employment desired ☐ FULL-TIME ONLY ☐ PART-TIME ONLY ☐ FULL- OR PART-TIME  
On what date are you available to begin working? \_\_\_\_\_  
Do you currently have a valid driver's license? ☐ Yes ☐ No

EDUCATIONAL BACKGROUND

	NAME	LOCATION (Complete mailing address)	NO. YEARS COMPLETED	MAJOR/DEGREE & GPA
High School				
College				
Trade School				
Professional School				
Date of last SAT/ACT or other scholastic aptitude test, if applicable		Test Score		
Date of last GMAT, GRE, LSAT, MCAT test, if applicable		Test Score		





### Acknowledgement of Volunteer Status

I, \_\_\_\_\_, hereby acknowledge that I will serve as an unpaid intern for Cumulus Media, Inc and its subsidiaries ("Cumulus") for the period from 1/7/16 through 6/10/16. This work is solely being done on a volunteer basis. I will not receive any monetary compensation for the work and time that I give to Cumulus. I understand and acknowledge that I have no rights under any federal, state or local statutes to any wages or benefits in connection with this volunteer position. I agree that I am being accepted in the Cumulus Internship Program as part of my studies and school, and that I am required to participate as part of the class credit I will receive from school. I further understand that the training I will receive from Cumulus is for my own benefit and that I am not entitled to a job at the conclusion of the internship period.

[Redacted Signature]  
Signature

[Redacted Name]  
Print Name

1/7/16  
Date





### Acknowledgement of Volunteer Status

I, [REDACTED], hereby acknowledge that I will serve as an unpaid intern for Cumulus Media, Inc and its subsidiaries ("Cumulus") for the period from 07/2015 through 08/2015. This work is solely being done on a volunteer basis. I will not receive any monetary compensation for the work and time that I give to Cumulus. I understand and acknowledge that I have no rights under any federal, state or local statutes to any wages or benefits in connection with this volunteer position. I agree that I am being accepted in the Cumulus Internship Program as part of my studies and school, and that I am required to participate as part of the class credit I will receive from school. I further understand that the training I will receive from Cumulus is for my own benefit and that I am not entitled to a job at the conclusion of the internship period.

[REDACTED]  
Signature

[REDACTED]  
Print Name

07/07/2015  
Date



[REDACTED]

---

**From:** Brittany Gunther [mailto:Brittany.Gunther@cumulus.com]  
**Sent:** Friday, May 06, 2016 9:32 AM  
**To:** John Barone <John.Barone@cumulus.com>  
**Subject:** Re: Thank you from Veronica -Ventura College

Thank you!

*Brittany Gunther*

*Traffic Assistant / Notary Public / Digital-Ad Operations  
Cumulus Broadcasting Oxnard/Ventura*

---

**From:** John Barone  
**Sent:** Friday, May 6, 2016 9:24 AM  
**To:** Brittany Gunther  
**Subject:** FW: Thank you from Veronica -Ventura College

See below, don't know if you need this for the EEO files

\*\*\*\*\*

John Barone  
Program Director  
106-3 Nash Icon/KRRF  
Sports Radio 1450 KVEN-AM  
Cumulus Broadcasting  
1376 Walter St, Suite 6  
Ventura, Ca. 93003  
Ph: 805-642-8595  
Email: [john.barone@cumulus.com](mailto:john.barone@cumulus.com)

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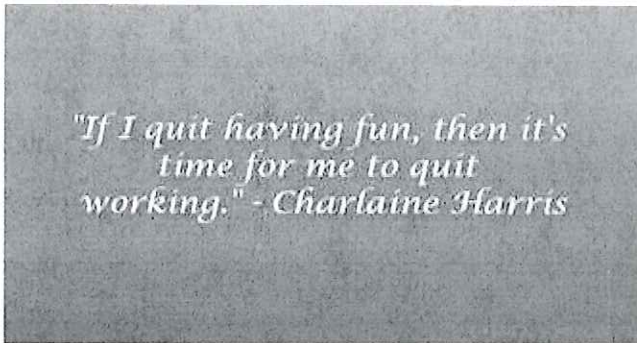
**From:** Veronica Allen [mailto:VAllen@vcccd.edu]  
**Sent:** Friday, May 06, 2016 9:18 AM  
**To:** John Barone  
**Subject:** [BULK] Thank you from Veronica -Ventura College



Morning John Barone

Cumulus Media Inc

I personally would like to thank you for attending our annual Career Job Fair at Ventura College. You helped in making this event successful and fun. I look forward in seeing you next year.



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Cumulus Media Email Policy

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## **APPENDIX D**

### **Declaration of Tonya Graybill**



## **DECLARATION**

Tonya Graybill hereby declares as follows:

1. I am the Business Manager for radio stations KVYB(FM), Santa Barbara, California; KBBY-FM, Ventura, California; KRUZ(FM), Oak View, California; KHAY(FM), Ventura, California; and KVEN(AM), Ventura, California, all of which are licensed to Cumulus Licensing LLC ("Cumulus"). I have held this position since May 6, 2018. The office for the station employment unit ("SEU") is located at 1376 Walter Street, Ventura, California 93003.
2. I am providing this Declaration in response to a letter dated June 19, 2018 from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission ("FCC"), concerning a random audit of the SEU's compliance with the FCC's equal employment opportunity ("EEO") rule, 47 C.F.R. § 73.2080.
3. Since becoming the Business Manager in May 2018, I now am responsible for all EEO matters affecting the SEU, including the preparation of EEO public file reports and record-keeping with respect to all recruitment and hiring within the SEU. During the two reporting periods which are the subject of the current audit, a substantial portion of the EEO responsibilities for the SEU were handled by two individuals who no longer are employed by Cumulus. Specifically, from approximately August 2015 until July 20, 2016, the distribution of job vacancy announcements with respect to employment matters was handled by the SEU's former Traffic Assistant/Digital-Ad Operations, Brittany Gunther, who no longer is employed by Cumulus. Ms. Gunther handled nearly all of those duties relating to the EEO program herself during that time period. After her departure, the distribution of job vacancy announcements to recruitment sources within the EEO program was handled by the SEU's former Sales Assistant, Jill McBarron, from approximately August 1, 2016 until June 23, 2017, when Ms. McBarron left



the company. Like Ms. Gunther, Ms. McBarron handled nearly all of those duties concerning the EEO program during the above time period, including maintaining copies of job vacancy announcements and the related correspondence.

4. Due to the departures of Ms. Gunther and Ms. McBarron, the SEU is unable to provide documentation for certain job vacancies listed in its EEO public file reports. Efforts have been taken to search the email files of both former employees, but Cumulus still has not been able to recover documentation to reflect that the job vacancy announcements for certain positions were sent to all of the various recruitment sources listed in Section I of its EEO public file reports.

5. In an effort to avoid this problem in the future, those SEU personnel who have responsibility for sending out job vacancy announcements to recruitment sources will be required to provide copies of their correspondence to other SEU staff members to help ensure that, in the event those employees handling the distribution of job vacancy announcements should leave the company, there will be other Cumulus employees within the SEU who will have records of both the job vacancy announcements and the recruitment sources who received those job postings for each full-time position during each reporting period. Additionally, the SEU will create physical, paper files for each position with all documentation contained therein. Once a position is filled or the initiative is completed, I will review the documentation to ensure it is accurate and complete, and it then will be uploaded to an EEO file on the SEU's server.



I hereby declare under penalty of perjury that the foregoing is true and correct.

Signed and dated this 23rd day of August, 2018.

  
Tonya Graybill