



BROADCAST GUIDE FOR USING GARVEY SCHUBERT BARER EEO FORMS

Under the FCC's EEO Rules, broadcasters, cable operators, and other multichannel video programming distributors (MVPDs) have a basic obligation to widely disseminate information concerning each full-time job vacancy. This includes an affirmative obligation to provide notification to community and recruitment organizations that request information on job vacancies. The recruitment sources of all persons interviewed must be tracked.

The rules also require media employers to participate in longer-term recruitment initiatives by engaging in a minimum number of the initiatives set forth in the rule, such as job fairs, training, mentoring or participation in events sponsored by organizations interested in broadcast and cable employment issues.

The rules apply to employment units. A broadcast employment unit consists of all commonly owned stations located in the same market that share one or more employees, and includes employees working at stations the licensee operates in that market pursuant to a time brokerage agreement.

Headquarters employees of broadcast groups are not specifically covered by the new rules. Prior FCC decisions, however, reflect that headquarters personnel extensively involved in routine daily operations of individual stations could be considered part of a station's employment unit.

Attachments:

FORMS FOR EEO PUBLIC FILE REPORT

- Recruitment Initiatives Checklist
- List of Positions Filled
- Recruiting Sources Used
- Interviewee Referral Source Summary

INTERNAL CHECKLISTS AND FORMS

- Required Records
- Interview List for Opening
- Internal Analysis

Instructions are provided on each of the attached forms.

**BROADCAST EMPLOYMENT UNIT
RECRUITMENT INITIATIVES CHECKLIST**

Station(s): _____
(list all that are included within Employment Unit)

Community(ies) of License: _____

Date of Annual Report: _____
(enter the anniversary of the date the renewal application must be filed, which is four months prior to expiration of license)

No. of Full-time Employees:¹
5 – 10 _____ / More than 10 _____
(check the number that applies)

*In a **two-year** period an Employment Unit with more than 10 full-time employees must engage in at least four of the initiatives or events listed below. If the Employment Unit has 5 – 10 full-time employees or is located in a smaller market, it must engage in at least two of the listed initiatives or events.² The period begins on the date the stations within the Employment Unit must file their license renewal applications, and the 2nd, 4th, and 6th anniversaries thereof. Each year, on the anniversary date, an Employment Unit must list and briefly describe the initiatives undertaken in the past year, place that list in the local public inspection file of each station within the Employment Unit, and post that list on the station's web site if it has one.*

In the preceding year, the Employment Unit has engaged in (check all that apply):

		Ex. No. ³
_____	Participated in at least 4 job fairs by station personnel who have substantial responsibility in making hiring decisions.	1) _____ (Date/Location/Event)
		2) _____ (Date/Location/Event)
		3) _____ (Date/Location/Event)
		4) _____ (Date/Location/Event)
_____	Hosted at least one job fair .	1) _____ (Date/Location/Event)

¹ An employee with 50% or more ownership, or employees with 20% or more ownership where there is no owner with 50% or more ownership, are not regarded as employees.

² A "smaller market" is a metropolitan area with a population of fewer than 250,000, and any area outside all metropolitan areas as defined by the Office of Management & Budget.

³ For insertion in an EEO binder, place a description of the activity and/or proof of participation behind a numbered tab. Insert appropriate exhibit number in the line next to the activity.

_____ Co-sponsored at least one **job fair** with organizations in the business and professional community whose membership includes substantial participation by women and minorities. 1) _____
(Date/Location/Event)

_____ Participated in at least 4 **events** sponsored by **organizations** representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities. 1) _____
(Date/Location/Event)
2) _____
(Date/Location/Event)
3) _____
(Date/Location/Event)
4) _____
(Date/Location/Event)

_____ Established an **internship** program designed to assist members of the community to acquire skills needed for broadcast employment. Describe: _____

_____ Participated in **job banks, internet programs**, and other programs designed to promote outreach generally (*i.e.*, that are not primarily directed to providing notification of specific job vacancies). Describe: _____

_____ Participated in **scholarship** programs designed to assist students interested in pursuing a career in broadcasting. Describe: _____

_____ Established **training** programs designed to enable station personnel to acquire skills that could qualify them for higher level positions. Describe: _____

_____ Established a **mentoring** program for station personnel. Describe: _____

_____ Participated in at least 4 **events** or **programs** sponsored by **educational** institutions relating to career opportunities in broadcasting. 1) _____
(Date/Location/Event)
2) _____
(Date/Location/Event)
3) _____
(Date/Location./Event)
4) _____
(Date/Location/Event)

_____	Sponsored at least 2 events in the community designed to inform and educate the public as to employment opportunities in broadcasting.	1) _____ (Date/Location/Event)	_____
_____	Listed each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities.	2) _____ (Date/Location/Event)	_____
_____	Listed each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities.	Identify job banks/newsletters	_____
_____	Provided assistance to unaffiliated non-profit entities in maintaining web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting	Describe:	_____
_____	Provided training to management level personnel on methods of ensuring equal employment opportunity and prevent discrimination.	Describe:	_____
_____	Provided training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions.	Describe:	_____
_____	Participated in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.	Describe:	_____

REQUIRED RECORDS

Check if record maintained:

Date: _____

CHECK	TYPE OF RECORD	PLACED IN PUBLIC FILE ANNUALLY?*
_____	List of positions filled (see chart of “List of Positions Filled” for details).	Yes
_____	Recruiting sources used (see chart for details).	Yes
_____	List of referral sources of persons interviewed for each position filled (see chart of “Interview List for Opening” for details).	No
_____	List of aggregate number of interviews by source of referral during prior year (see chart of “Interviewee Referral Source Summary” for details).	Yes
_____	Dated copies of advertisements, bulletins, letters, faxes and e-mails or other communications announcing vacancies (organize by vacancy).	No
_____	Narrative documentation sufficient to disclose fully the nature of the initiative (see “Recruitment Initiatives Checklist,” <i>e.g.</i> , job fair, sponsorship, internship, scholarship, mentoring program, training program, community events, job banks, etc.). Must include (organize by event or initiative): <ul style="list-style-type: none"> • date of event • description of event or initiative • scope of station’s participation • station personnel involved. 	Yes
_____	Backup documentation of initiatives, such pamphlets, brochures, or other evidence of participation.	No

****Retain all records until after the grant of the next renewal application. If record does not go in the public file, retain record in station’s non-public recruitment files.***

Do NOT place this document in the local public file.

INTERNAL ANALYSIS
For all Employment Units

It is recommended that an internal review of the employment unit's outreach efforts occur at least every six months.

Has the Employment Unit:

Date: _____

- Recruited for every opening? Yes _____ No _____
- Stated on employment applications, job notices and web sites that the employer is an Equal Opportunity Employer or "EOE"? Yes _____ No _____
- Maintained records sufficient to verify accuracy of information provided in Form 396, Form 397, and EEO public file reports? Yes _____ No _____
- Analyzed its recruitment program on an ongoing basis (*i.e.*, for each opening) to ensure that it is effective in achieving broad outreach to potential applicants, and addressed problems found as a result of its analysis? Yes _____ No _____

Has the Employment Unit periodically analyzed measures taken to:

- Disseminate the Employment Unit's EEO program to job applicants and employees? Yes _____ No _____
- Review seniority practices to ensure that such practices are nondiscriminatory? Yes _____ No _____
- Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, or sex discrimination? Yes _____ No _____
- Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of a preference for one race, national origin, color, religion or sex over another? Yes _____ No _____
- Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner? Yes _____ No _____
- Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity of employment, irrespective of race, national origin, color, religion, or sex, and include an effective nondiscrimination clause in new or negotiated union agreements? Yes _____ No _____
- Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, or sex? Yes _____ No _____

Do NOT place this document in the local public file. Keep this document in the non-public records for the employment unit.

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