

WHRO-WHRV FCC 396 EEO REPORT

NARRATIVE STATEMENT

HAMPTON ROADS EDUCATIONAL TELECOMMUNICATIONS ASSOCIATION, INC.

EXHIBIT 3

Hampton Roads Educational Telecommunications Association, Inc., licensee of noncommercial educational radio stations WHRO-FM and WHRV(FM), and noncommercial educational TV station WHRO-TV, is committed to providing equal employment opportunities and has achieved broad and inclusive outreach during the past two years in connection with its overall EEO program, including recruitments for job vacancies and its completion of various non-vacancy-specific employment initiatives.

In terms of recruitment for open positions, we have achieved broad outreach by utilizing a wide variety of sources to publicize openings to a diverse audience of potential candidates, including sources such as local colleges and universities, online job sites, recruitment agencies, broadcasting associations, and public broadcasting industry organizations. With respect to non-vacancy-specific outreach activities, during the past two years we have completed various initiatives involving station personnel and the local community such as:

- Initiative #4 Events sponsored by educational institutions relating to broadcasting careers;
- Initiative #5 Internship Program;
- Initiative #8 Training Program;
- Initiative #11 Community events designed to inform/educate the public of broadcasting careers and;
- Initiative #14 Management/Staff training in equal employment opportunity and career development training.

Details on how we performed these Initiatives are included in the 2017-2018 and 2018-2019 EEO Reports submitted as exhibits 1 & 2 with this filing.

Our station management and organization also assist with our EEO program efforts. Bert Schmidt, President and CEO is the official responsible for the overall responsibility for equal employment opportunity at the stations. Sherby Wilks, Human Resources Officer, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions to provide equal employment opportunity to all qualified individuals without regard to race, ethnicity, religion, sexual orientation, socio-economic status, physical ability, marital status, veteran status, and national and geographic origin in all personnel actions including recruitment, evaluation, selection, promotion,

compensation, training and termination. It is also our policy to communicate these policies and employment needs to sources of qualified applicants.

Additionally, the station's Talent Manager within the HR department ensures that all hiring practices are in compliance with FCC guidelines. This includes outreach involvement with colleges and universities, job niche boards, minority-based organizations such as the National Association of Hispanic Journalists, and the National Association of Black Journalists, among other recruiting sources. All jobs posted include the station's commitment to equal opportunity employment mission statement. In addition, all applicants are directed to apply via the company's applicant tracking portal which in turn allows for a streamlined and fair hiring practice.

Furthermore, we instituted the position of Talent Manager in the fall of 2017 with a goal of supporting the success and growth of WHRO through effective recruiting, developing, and retaining top staff members. The Talent Manager carefully reviews the station's hiring practices and helps guide department managers with recruitment and compliance guidelines. The Talent Manager reviews the station's attrition trends and meets with the senior management team, as needed, to advise them of hiring needs. In addition, the Talent Manager partners closely with the senior management team when internal promotions and departmental transitions occurred to ensure a fair and equitable process. The Talent Manager also develops and conducts department-wide or position-specific talent development interventions to address business needs in alignment with organizational strategy. These strategic HR initiatives include performance management, competency management, succession planning, talent assessment, leadership development, coaching, and training. This position, along with the Human Resources Officer, ensures recruiting comports with FCC and other legal and organizational requirements.

The Human Resources Officer has also met with the senior executive team to discuss the Diversity initiatives, EEO policy and engaged them in a meaningful dialogue, refresher training and received an ongoing commitment and support from the executive team.

It is our policy to continually review our job structure and employment practices and maintain positive recruitment training, job design and other measures needed to ensure genuine equality of opportunity at all levels. These and other efforts have resulted in promotion, recruitment, and supervisory training of minority and female candidates.

The Human Resources Compliance Officer and the Talent Manager also attend bi-weekly meetings with the senior management team to provide guidance and expertise in relation to human resources matters to include compliance, recruitment, developmental training, and employee relations matters.