

## **EXHIBIT 2: Marfa Public Radio SEU: Outreach Self-Analysis Narrative (Amended)**

**Licensee: MARFA PUBLIC RADIO  
EEO REPORT, SCHEDULE 396**

***Marfa Public Radio (MPR)** is the Licensee of five full-service NCE FM radio stations in West Texas. The stations are operated as a regional public radio network, and are operated by a single staff. For purposes of EEO Rule 73.2080, these stations comprise a single Station Employment Unit ("SEU" or "MPR SEU"), composed of the following five full-service NCE stations:*

**KRTS(FM), Marfa, TX (164217)  
KXWT(FM), Odessa, TX (50038)  
KRTP(FM), Alpine, TX (173345)  
KDKY(FM), Marathon, TX (171963)  
KOJP(FM), Presidio, TX (198738)**

During the license years 2019-20 and 2020-21, the MPR SEU achieved broad and inclusive outreach throughout its communities of license through its broad and inclusive job vacancy recruitment practices and community outreach activities. The licensee and station management are Equal Opportunity Employers that strive to increase the diversity of its workforce. MPR complies with federal, state, and local Employment Opportunity (EEO) laws and the requirements of the Commission's EEO Rule 73.2080.

### **Recruitment**

During the 2019-20 license year, MPR developed what we call a "Code of Diversity," which is included on our website. This Code of Diversity was the result of much thought and discussion. In it we state that "we know that a diverse workforce, management team, governing body, and Community Advisory Board contribute greatly to our knowledge and understanding of the diverse communities in West Texas that we serve and to our ability to deliver content and services that will help us attract, grow, and engage audiences and help them achieve their full potential. We endeavor to recruit from a broad pool of candidates enabling us to hire and promote qualified candidates with a variety of cultural and ethnic backgrounds, personal experiences, characters, and talents that reasonably reflect the diverse needs and interests of the communities served by KRTS, KXWT, KRTP, KDKY, and KOUP."

In this Code, we commit to "continue to explore new opportunities for achieving and promoting this diversity and to monitor and evaluate our success. Marfa Public Radio meets the standards of federal and state law, our EEO policy, and the Corporation for Public Broadcasting's Diversity Eligibility Criteria."

<https://marfapublicradio.org/about/>

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For every full-time employment opportunity at MPR, a broad range of resources -- digital, local, regional, and national -- are utilized to encourage a broad and diverse range of applicants. All vacancies are posted on our website, [marfapublicradio.org](http://marfapublicradio.org). National postings include advertisements in *Current* and via the job boards at the National Association of Hispanic Journalists, National Association of Black Journalists, Asian American Journalists Association, Native American Journalists Association, and The Association of Gay and Lesbian Journalist. We also post openings on social media, with the Texas Workforce Commission, local universities, and local/regional newspapers.

During both the 2019-20 license year and the 2020-21 license year, the MPR SEU used numerous recruitment sources, as listed in the respective Recruitment Sources charts on the Amended 2019-20 EEO Annual Report and Amended 2020-21 EEO Annual Report. The MPR SEU has determined from this experience that the most productive recruitment sources in 2019-20 were MPR's own website, MPR's facebook site, and the local newspaper, the *Big Bend Sentinel*. During the 2020-21 license year, the MPR website and the online classified ads for the national journal *Current* were more productive. Each year, only three job vacancies occurred. For the majority of these recruitments in both years, the interviewees named the MPR website as their source. MPR continues to notify the listed referral organizations, including the Texas Workforce Commission and five Texas colleges and universities about job vacancies, listed Our experience has been that these sources have been more productive for finding interns than for job applicants.

### **Outreach Activities**

The MPR SEU employed more than five but fewer than ten full-time employees during the license period 2019-21. During license year 2020-21, the MPR SEU consisted of nine (9) full-time employees. As a result of MPR's most recent recruitment, however, the total is now ten (10) full-time employees because a new employee was hired on March 8, 2021 and will begin work on March 29, 2021. MPR has no part-time employees. Except for our Odessa station, we serve a largely rural, sparsely-populated region of the West Texas Big Bend area. Under the third prong of Rule 73.2080, since we had fewer than 10 employees, we were required to perform two outreach activities every two years. MPR, however, has consistently provided many more than one outreach activity per year, even during the pandemic when some outreach functions were suspended or became virtual, rather than in-person. MPR's outreach activities during this two-year period consisted of the following:

**Internships:** MPR offers a hands-on internship opportunity for students interested in public broadcasting careers. In 2019, the MPR internship program had one intern, a Sul Ross student, from July through December 2019. Due to the COVID pandemic, MPR

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suspended its internship program in 2020, but plans to resume it as soon doing so is deemed safe.

**Job fairs:** MPR participated twice in JobCon, the regional job fair run for the Big Bend area counties by the Texas Workforce Commission, on Feb 27, 2019 and Feb 26, 2020. We also actively supported these job fairs through PSAs and onsite reporting. MPR's editorial staff, office manager, and general manager/executive director all participated.

**Outreach with Local Educators:** Professional staff members of MPR routinely present information about careers in public broadcasting to classes in journalism, communications, and other subjects at local universities and high schools. In 2019-20, and, virtually in 20-21, the executive director made a presentation about MPR and careers in broadcasting to a Marfa HS class. Students were invited to apply for internships.

**Summer Shakeup:** MPR also participates in Summer Shakeup, a program developed by the Marfa Independent School District that guides elementary and middle-school students. The students learn how to produce their own radio program, from writing content to broadcasting it on the final day of the program. In 2019, MPR's Summer Shakeup program was led by the office manager and several reporters. In March 2020, the program became virtual due to the pandemic, and MPR was unable to participate directly, but continued to provide media support for the program. Once Summer Shakeup is safely re-established as an in-person program, MPR will resume its former level of active participation.

**Volunteer Program:** MPR has a group of 24 volunteers who receive training and acquire skills that can be used to pursue a career in radio. Volunteers so trained are eligible for hiring at MPR. The GM, office manager, and broadcast engineer held meetings and training sessions for volunteers in 2019, which continued online during the pandemic to teach the volunteers how to record audio at home. MPR management is in the process of developing a outreach initiative that would formalize aspects of this program into an apprenticeship model which would provide hands-on education and skills-development for members of the local community to help them qualify for more advanced positions in broadcasting. This program would not only benefit the community members who acquired advanced career skills, but will also help MPR recruit skilled local applicants for job vacancies, given the difficulty MPR has had in attracting experienced applicants to its remote rural location.

**National Job Boards and Job Banks:** In 2020-21, MPR committed to adding to its recruitment sources the job banks of several national journalism organizations whose membership includes significant numbers of ethnic or racial minorities and/or women. These include the National Association of Black Journalists, the Asian American Journalists Association, the National Association of Hispanic Journalists, the Native

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American Journalists Association, and the Association of Gay and Lesbian Journalists. MPR will continue to utilize these sources for all upper-level and professional vacancies going forward.

**Job Training:** On June 19, 2020, the programming and operations manager conducted a virtual training session with station DJs about how to record an audio program at home. In 2021, MPR will conduct three more training sessions, including podcasting, engineering, and reporting, to make careers in radio more accessible to local residents.

**Outreach in the Community:** MPR engages with its community in various other ways to bring attention to jobs at MPR and careers in broadcasting. These include the following, for one or both license years:

- The GM presented at service clubs, such as Rotary Club, about careers in broadcasting and public radio.
- In March 2021 a reporter presented to the Permian Basin Adult Literacy Center about reporting in the Permian Basin area and about working in public media at the radio station.
- MPR expanded its PSAs in Spanish and its Spanish-language programming for Spanish-speaking residents in its broadcast area.
- MPR held two virtual Open Houses, on Nov 11 and 12, 2020, to talk about the station, careers in radio, and how to break into the industry. These events were run by the executive director/GM and the office manager and resulted in an applicant for a vacant position.
- The GM, office manager, and reporting staff regularly provide tours of MPR's office and studios for area visitors, school groups, and community organizations. These tours were suspended as a pandemic precaution in March 2020, but will resume when it becomes safe to do so.

**Self-Analysis.** The officers, management, and operations staff at MPR periodically review their recruitment efforts and outreach activities to determine whether the stations are achieving sufficiently broad and inclusive outreach in the community and to local prospective employees and volunteers. We are increasing our diversity but must continue to improve. When MPR developed the new Code of Diversity, which was finalized and made public in early 2020, as discussed above, MPR recommitted, as a broadcaster and community fixture, to increase the diversity of our employee staff, management, governing body, our volunteers, and our community advisory board. This Code will guide our efforts going forward in future recruitments and outreach activities.