

## Equal Employment Opportunity Program

### I. General Policy

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is our policy to promote equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin, age or sex.

It is our policy to communicate our equal employment policy and employment needs to sources of qualified applicants, without regard to race, color, religion, national origin, age or sex, and to solicit their recruitment assistance on a continuing basis.

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.

It is our policy to conduct a continuing program to exclude all unlawful forms of prejudice or discrimination based upon race, color, religion, national origin, age or sex from our personnel policies and practices and working conditions.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

### II. Responsibility for Implementation

Regina Dean, Executive Director, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age or sex. It is our policy to ensure a positive application and vigorous enforcement of our policies and to review and control managerial and supervisory performance in the administration of our equal employment opportunity policies.

### III. Policy Dissemination

It is our policy to disseminate our equal employment opportunity policies to job applicants, employees, and those with whom we regularly do business. To assure compliance with this requirement, we:

- 1) Post notices in our offices informing employees, and applicants for employment, of their equal employment opportunity rights, that we are an equal employment opportunity employer, that discrimination because of race, color, religion, national origin, age or sex is prohibited and that they have the right to notify and appropriate local, State or Federal agency if they believe they have been discriminated against;

2) Place a notice in bold type on our employment application informing prospective employees that discrimination because of race, color, religion, national origin, age or sex is prohibited and that they may notify an appropriate local, State or Federal agency if they believe they have been discriminated against.

#### IV. Recruitment

It is our policy to conduct a meaningful program of recruitment involving broad outreach in recruitment to all qualified job candidates. To assure compliance with this requirement, we:

- 1) Widely disseminate information about each full-time job opening in our operation to recruitment sources for the purpose of obtaining referrals for the available position and otherwise comply with Federal Communications Commission requirements applicable to the recruitment/outreach process;
- 2) Communicate to recruitment sources that we are an equal employment opportunity employer;
- 3) Analyze our recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of our analysis.

#### V. Promotion and Advancement

It is our policy to offer promotions of employees in a nondiscriminatory fashion without regard to race, color, religion, national origin, age or sex to positions of greater responsibility. To assure compliance with this requirement, we:

- 1) Instruct those who make decisions on placement and promotion that all employees are to be considered without discrimination, and that there should be ongoing review to ensure compliance with this requirement;
- 2) Give all employees equal opportunity for positions which lead to higher positions. Inquire as to the interests and skills of lower paid employees with respect to any of the higher paid positions, followed by assistance, counseling and effective measures to enable employees with interest and potential to qualify themselves for such positions;
- 3) Provide opportunity to perform overtime work on a nondiscriminatory basis.

#### VI. Analysis of Equal Employment Opportunity Efforts

It is our policy to analyze the results of the measures undertaken by us to recruit, hire and promote individuals and to identify and evaluate any difficulties encountered in implementing our equal employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:

- 1) Disseminate the station's equal employment opportunity program to job applicants and employees;
- 2) Review seniority practices to ensure that such practices are nondiscriminatory;
- 3) Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, age or sex discrimination;

- 4) 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, age or sex discrimination;
- 5) Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
- 6) Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, national origin, color, religion, age or sex, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
- 7) Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, age or sex.