

## 2018 ANNUAL EEO PUBLIC FILE REPORT

### The KBOO Foundation

Station: KBOO (FM-NCE), Portland, OR

Reporting Period: September 21, 2017 – September 20, 2018

No. of Full-time Employees: 5 – 10

During the Reporting Period, one full-time position was filled. The information required by FCC Rule 73.2080(c)(6) is provided in the charts that follow.

### INITIATIVES

The employment unit engaged in the following broad outreach initiatives in accordance with various elements of FCC Rule 73.2080(c)(2):

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

SummerWorks/IRCO  
June 28-September 20, 2018  
KBOO supported 9 predominantly low-income youth of color in summer 2018, for approximately 1320 hours of internship. Interns worked in the finance, membership, volunteer, development, archives, web/new media, programming, and news departments. Internship duties included data entry and database management; clerical support and reception; marketing; budgeting; event planning, promotion and livestreaming; website content uploading and promotion; research; writing and editing; graphic design; photography; videography; audio-tape digitization; and reporting.

- Other internships during the reporting period include:
- News Department, 20 hours per week during June and July 2018; student from Whitman College, Walla Walla, Washington
- Volunteer Department, 2 hours per week for 4 months; student from Seton High School, Vancouver, Washington
- Production Department, 6 hours per day, 5 days per week, during the month of May; student from Catlin Gable High School, Portland, Oregon

*Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;*

The Program Director was a speaker for the Greenberg Distinguished Scholar Series at Reed College on April 19th and 20th at Reed College in Portland. She made a speech to 50 students and community members, and held a podcasting workshop for 20 students.

The Program Director was a guest speaker for two media classes at Portland State University on May 21st. She gave feedback about podcast creation.

The Program Director, who sits on certain hiring committees, participated in Mock Job interviews at David Douglas High School on April 2018.

KBOO Radio has also hosted, in the past year, about 100 high-school and university students on multiple tours of the KBOO facilities. The tours include a speech about the importance of communication, independent media, and job opportunities in the field of broadcasting. Many students learn recording and interviewing techniques.

The Program Director was the “artist in residence” at Grant High School in Portland OR from March - May 2018, teaching podcasting to high school students

Rosemary Anderson High School (RAHS),  
New Columbia Campus, fall 2017 to June 2018  
Portland, Oregon

The KBOO Station Managers teaches audio production and storytelling. Students are introduced to concepts of radio broadcasting and podcasting, as well as audio production, news production and interviewing skills for radio. Students practice recording using professional field recorders, as well as conducting interviews with their peers, teachers and members of the community about topics they chose, and digital editing. Students learn about storytelling, communications skills and critical thinking.

*Sponsorship of at least two events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting;*

KBOO offers volunteer orientations approximately 12 times per year with an average attendance of about 15 individuals. During the orientation we cover KBOO's history and organizational structure, how the work is organized into departments, and how to access information about available trainings, and station volunteer needs. We also cover community expectations, conflict resolution, and our program mission. The Volunteer Coordinator then sets appointments with each attendee to assess how to best get them started volunteering in a role that they are able to fill, that fits with their schedule, and that offers a path to building the skill set they desire for radio or office work.

KBOO offers free training courses that prepare community members both to volunteer at KBOO and also to pursue employment in radio broadcasting and production (as a number of our former volunteers have). 200 volunteers participated in at least one training class, and most took multiple classes. The following is an approximate count of the trainings we offered during the Reporting Period: 12 Newsroom orientations, 6 Writing for Radio, 6 Interviewing Techniques, 12 Digital Editing, 6 Advanced Digital Editing, 18 Board Operator Trainings, 36 Intro to Audio/Audio Production, and 12 FCC/Legal Training. We also offer one-on-one mentoring in Field Recording, Social Media, Board Operator skills, and Digital Editing.

The KBOO Youth Collective meets weekly, with attendance ranging between 6 and 15 youth 20 and under. New Youth Collective members are trained in digital editing by the Youth Advocate, and then are expected to produce content for the monthly hour-long youth collective public affairs show, The Underground. Further training opportunities include classes in basic production techniques, live-music mixing, advanced digital editing, writing for radio, interviewing skills, microphone technique, field recording and more, depending on the needs and wants of the Youth Collective Members. Their skills are used then on the Youth Collective's monthly public affairs and youth culture show, "The Underground," as well as our other monthly show, the two-hour Youth Randomonium, where youth DJs broadcast music, including about 50% youth-produced music, and live performances of youth bands. We trained approximately 50 youth between September 2017 to August 2018.

Native American Youth Association 9th Grade Counts Program,  
July 2018

Members of 9th Grade Counts program come to KBOO at the beginning and end of their program to learn concepts of radio broadcasting and podcasting, as well as audio production and interviewing skills for radio. Students conduct and edit interviews with their peers about 9th Grade Counts. Students learn communications skills, editing skills and critical thinking.

*Provided **training** to management-level personnel on methods of ensuring equal employment opportunity and preventing discrimination.*

LGBTQ rights, with a focus on youth, Bridge 13, Sexual and Gender Minority Youth Resource Center (SMYRC).

February 16, 2018, 3 hours

Board, management, staff and volunteers attended this training during which we reviewed vocabulary and definitions. We discussed gender, sex and anatomy, the gender binary and oppression. Finally we discussed how to take this info and apply it to our interactions with each other.

Seeing the Masks--Breaking the Cycles rankism training

March 29, 2018

Board, management, staff and volunteers attended this training

during which we learned to recognize rankism and defense mechanisms in the workplace, and practiced interrupting harmful workplace interactions.

Beloved Community Anti-Oppressions 101, v2, Trainings Staff, board and key volunteers are required to attend these three-hour trainings, in alignment with our station's mission of radical equitable social change. The training is an introduction to the often unseen and unintended consequences of personal, structural, and institutional oppressions, including racism, sexism, classism, ableism, homophobia, transphobia, with a focus on examining and reducing microaggressions at KBOO.

The Beloved Community in Action Movie Night and Discussion Group

approximately 5 hours per month

Every month, staff and volunteers watch a documentary related to the various oppressions plaguing our society today, including racism, sexism, classism, ableism, homophobia, transphobia, and more, such as intersectionality. Later in the month the group meets to discuss the movie and topic in general. Participants study texts, learn from guest experts, and practice interrupting oppressions, with a goal making KBOO a model for anti-oppressions work and a place where all people can thrive.

*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*

National Federation of Community Broadcasters Regional Summit

September 2018, Santa Rosa, California

The Program Director and the Development Director, both of whom participate on certain hiring committees, attended this conference, where connections were made with community radio broadcasters nationally. The focus was on training and sharing resources.

Open Source Bridge Conference

June 2018, Portland, Oregon

The Web/New Media Director, who sits on certain hiring committees, attended this one-day conference for web/new media developers, and sat on panel discussions about open source forum software, security issues with web development and the potentials for artificial intelligence in media activism.

Northwest Media Summit

April, 2018 Portland OR

The Volunteer Coordinator, the Program Director, and the Development Director, who sit on certain hiring committees, attended this conference, where connections were made with community radio and television broadcasters nationally. The focus was on training and sharing resources.

Public Media Development and Marketing Conference

July, 2018 Chicago IL

The Development Director attended this conference of Public

Media fundraising and marketing staff. The focus was on training, sharing resources, and making connections with industry colleagues.

Also, as part of our 50th anniversary celebrations, we've had open house events targeted to the African American, Native, Queer, Latinx and Women's communities of Portland.

**POSITIONS FILLED**

DATE OF HIRE	JOB TITLE	RECRUITMENT SOURCE REFERRING HIREE
May 22, 2018	Director of Underwriting	Facebook

**INTERVIEWEE REFERRAL SOURCE SUMMARY**

Number of Persons Interviewed: 4

Recruitment Sources Used in Preceding Year	Number of Persons Interviewed that the Source Referred
KBOO Website	1
KBOO Facebook page	1
Word of Mouth	2

**RECRUITING SOURCES USED**

**Director of Underwriting**

Idealist.org  
www.idealist.org

KBOO social media posting  
KBOO website: www.kboo.fm  
KBOO on-air announcements

NAACP, Vancouver Branch  
360-256-6232  
PO Box 1903  
Vancouver, WA 98668  
naacpvancouver@gmail.com

Portland State University Career Center  
503-725-4613  
careerconnect@pdx.edu

Portland State University  
gflores@pdx.edu  
PSU thru Handshake

Public Radio Association of Development Officers -  
PRADO  
PRADO@listserv.syr.edu

**No source requested that it be notified of job vacancies**

Note: This report was revised after review by counsel in preparation for responding to the EEO audit.

## 2019 ANNUAL EEO PUBLIC FILE REPORT

### The KBOO Foundation

Station: KBOO (FM-NCE), Portland, OR

Reporting Period: September 21, 2018 – September 20, 2019

No. of Full-time Employees: 5 – 10

During the Reporting Period, six full-time positions were filled. The information required by FCC Rule 73.2080(c)(6) is provided in the charts that follow.

### INITIATIVES

The employment unit engaged in the following broad outreach initiatives in accordance with various elements of FCC Rule 73.2080(c)(2):

*Established an **internship** program designed to assist members of the community to acquire skills needed for broadcast employment.* SummerWorks/IRCO  
July-September 2019  
KBOO supported 8 youth for over 1260 hours of internship. Interns worked in the news, social media, web, development, and administrative departments. Interns worked on interviewing and writing, recording, and editing news stories; promoted KBOO and affiliated events; offered giveaways on social media; live-streamed musical performances; made graphics; translated our website into Spanish; worked on our bi-weekly newsletter; helped archive music; uploaded audio to our website and other podcast sites; wrote website analytics and accessibility reports; made webpages; filed; and organized the fundraising department.

*Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;* The Program Director was a trainer for the Activists Mobilizing for Power Conference hosted by the Western States Center in Spokane, Washington on September 7, 2019. She co-taught a day-long workshop on podcasting for about 50 people.

The Program Director and the Volunteer Coordinator were guests on January 30, 2019, at the Community Transition Project High School. They spoke about producing content for radio and podcasting, the importance of independent media, and volunteer and job opportunities in broadcasting and podcasting.

The Program Director, who sits on certain hiring committees, participated in Mock Job interviews at David Douglas High School in April 2019. KBOO Radio has also hosted, in the past year, about 120 high-school and university students on multiple tours of the KBOO facilities. The tours include a speech about the importance of communication, independent media, and job opportunities in the field of broadcasting. Many students learn recording and interviewing techniques.

International School of Beaverton,  
January 2019  
Beaverton, Oregon

KBOO participated in Culture Week with the Program Director teaching students in the middle school basic concepts of audio production and storytelling. Students practiced recording using professional field recorders, as well as conducting interviews with their peers.

*Sponsorship of at least two events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting;*

KBOO offers volunteer orientations approximately 12 times per year with an average attendance of about 20 individuals. During the orientation we cover KBOO's history and organizational structure, how the work is organized into departments, and how to access information about available trainings, and station volunteer needs. We also cover community expectations, conflict resolution, and our program mission. The Volunteer Coordinator then sets appointments with each attendee to assess how to best get them started volunteering in a role that they are able to fill, that fits with their schedule, and that offers a path to building the skill set they desire for radio or office work.

KBOO offers free training courses that prepare community members both to volunteer at KBOO and also to pursue employment in radio broadcasting and production (as a number of our former volunteers have). 200 volunteers participated in at least one training class, and most took multiple classes. The following is an approximate count of the trainings we offered during the Reporting Period: 6 Newsroom orientations, 3 Writing for Radio, 3 Interviewing Techniques, 6 Digital Editing, 3 Advanced Digital Editing, 10 Board Operator Trainings, 2 Field Recording Trainings, 20 Intro to Audio/Audio Production, and 12 FCC/Legal Training. We also offer one-on-one mentoring in Field Recording, Social Media, Board Operator skills, and Digital Editing.

The KBOO Youth Collective meets weekly, with attendance ranging between 6 and 15 youth 20 and under. New Youth Collective members are trained in digital editing by the Youth Advocate, and then are expected to produce content for the monthly hour-long youth collective public affairs show, The Underground. Further training opportunities include classes in basic production techniques, advanced digital editing, writing for radio, interviewing skills, microphone technique, field recording and more, depending on the needs and wants of the Youth Collective Members. Their skills are used then on the Youth Collective's monthly public affairs and youth culture show, "The Underground," as well as our other monthly show, the two-hour Youth Randomonium, where youth DJs broadcast music, including about 30% youth-produced music, and live performances of youth bands. We trained approximately 60 youth between September 2018 to August 2019.

KBOO has also started a podcasting hub at the Native Student and Community Center at Portland State University. We have trained 6 staff members, 4 who are college students, to use equipment to record speeches, interviews, and performances for eventual broadcast on KBOO Community Radio.

*Established training programs designed to enable station personnel to acquire skills that could qualify them for higher level*

Grassroots Radio Conference  
October 5-7, 2019, Portland, Oregon  
KBOO hosted this annual conference of grassroots media makers and activists. Sessions presented by station personnel include:

*positions.*

- The KBOO Archive — a case study, by The Program Director and Archive Contractor
- Tools and Resources for Emerging Independent Journalists and Intro to Mobile Journalism: 7 Ways You Can Use Your Cellphone to Document a News Event, by a regular newsroom volunteer
- Turning Listeners Into Raving Fans, by the Development Director and a volunteer music programmer
- Hip Hop Plenary Panel, by the KBOO Hip Hop Liaison
- Radical Inclusivity Plenary Panel, by the Volunteer Coordinator, Station Manager, and two regular public affairs volunteers
- Show, Don't Tell: How to Make Smart Fundraising Decisions, by the Development Director
- Website/Internet security for Community Stations, by the Web and Social Media Coordinator
- Starting Up Your Local Volunteer Newsroom, by a regular newsroom volunteer
- Forming a State-Wide or Region-Wide Community Media Organization, by the Development Director

*Sessions attended by station personnel include:*

- Survey of Radio Automation Tools, by the Program Director
- Streaming with Icecast, by the Program Director and an engineering volunteer
- Forming a statewide or region-wide community media organization, by the Program Director
- RBDS (Radio Text) is Easy, If You Know How!, by an engineering volunteer
- Radical Inclusivity Plenary Panel, by the Station Manager and numerous staff members, contractors, and music, public affairs and engineering volunteers

*Provided **training** to management-level personnel on methods of ensuring equal employment opportunity and preventing discrimination.*

The Beloved Community in Action and Discussion Group  
approximately 2 hours per month

Every month, a group of approximately 8 management, staff and volunteers meet to study texts, learn from guest experts, and practice interrupting oppressions, with a goal of making KBOO a model for anti-oppressions work and a place where all people can thrive.

NAVEX Global Training  
2019 Workplace Harassment

Management and staff completed this training on workplace harassment.

**POSITIONS FILLED**

Date of Hire	Job Title	Recruitment Source Referring Hiree
August 5, 2019	Evening News and Public Affairs Director	Handshake
August 1, 2019	Morning News and Public Affairs Director	Word of Mouth
August 1, 2019	Membership Director	Indeed.com
April 11, 2019	Chief Engineer	Word of Mouth
March 11, 2019	Director of Development	KBOO website
October 26, 2018	Evening News and Public Affairs Director	Word of Mouth

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**INTERVIEWEE REFERRAL SOURCE SUMMARY**  
 Number of Persons Interviewed: 21

Recruitment Sources Used in Preceding Year	Number of Persons Interviewed that the Source Referred
KBOO Website	3
Indeed.com	2
Linked-in	1
Macslis	5
Handshake	3
Word of Mouth	7

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**RECRUITING SOURCES USED**  
 2018 Evening News and Public Affairs Director

Idealist.org	KBOO programmers' email list
KBOO e-newsletter	KBOO website - www.kboo.fm
KBOO on-air announcements	

**RECRUITING SOURCES USED**  
 Director of Development

Idealist.org	Mt. Hood Community College
KBOO on-air announcements	Public Radio Association of Development Officers--
KBOO social media	PRADO
KBOO website - www.kboo.fm	PRADO@listserv.syr.edu

RECRUITING SOURCES USED  
Chief Engineer

Indeed.org	Pineros y Campesinos Unidos del Noroeste Reyna Lopez Exec Director reynalopez@pcun.org
KBOO on-air announcements KBOO programmers' email list KBOO website - www.kboo.fm KBOO social media	Regional Arts and Culture Council <a href="http://www.racc.org/resources/jobs">http://www.racc.org/resources/jobs</a> Einar Sunde II (IT Manager) (503) 823-5100 esunde@racc.org Joshua Hertzler IT support (503) 823-5357 jhertzler@racc.org
Linked In	University of Portland Willamette University
Mt. Hood Community College	Society of Broadcast Engineers, Portland
NAACP, Vancouver Branch naacpvancouver@gmail.com	University of Portland University of Oregon University of Washington University of Washington, Tacoma Washington State University Western Oregon State University Eastern Oregon State University Lewis & Clark University Oregon State University University of California, Berkeley University of California, Los Angeles University of California, Riverside University of California, Santa Barbara University of California, Santa Cruz
National Federation of Community Broadcasters listserve@nfcfb.org <a href="https://nfcfb.org/community-radio-jobs/">https://nfcfb.org/community-radio-jobs/</a>	
Open Signal Carl Kucharski (503) 288-1515 x18 carl@pcmtv.org Jim Bruce (IT admin) (503) 673-8662 jim@opensignalpdx.org Noah Dorsey (Media Services) (503) 288-1515 x621 ndorsey@opensignalpdx.org Justen Harn (Exec Director) (503) 673-8704 justen@opensignalpdx.org	
Oregon Association of Broadcasters theoab@theoab.org 503-443-2299	

RECRUITING SOURCES USED  
2019 Evening News and Public Affairs Director

African American Chamber of Commerce  
Nova: 503-244-5794  
Roy@AfricanAmericanChamberOfCommerce.Com  
[http://www.blackchamber.info/email\\_link.cfm](http://www.blackchamber.info/email_link.cfm)

Albina Ministerial Alliance  
internalcomm@albinaministerialcoalition.org  
chair@albinaministerialcoalition.org  
asstchair@albinaministerialcoalition.org  
<https://www.facebook.com/AMA-Coalition-for-Justice-Police-Reform-328861034751>

American Indian Radio On Satellite (AIROS)  
<https://www.visionmakermedia.org/opportunities-0>  
visionmaker@unl.edu

Asian American Journalists Association - pdx  
<https://aaja.wordpress.com>  
Centro Cultural  
centroinfo@centrocultural.org

Centro Cultural of Washington County

CNRG List Serv  
<https://www.facebook.com/CNRGPortland/>

Corporation for Public Broadcasting  
<https://www.cpb.org/jobline/kboo-fm/morning-news-and-public-affairs-director/2019-07-01-000000>  
<https://www.cpb.org/jobline/kboo-fm/evening-news-and-public-affairs-director/2019-07-01-000000>

Association for Women in Communication  
erin.lewis@communitybrands.com  
727.497.6565 x3452  
<https://awc.careerwebsite.com/job/evening-news-and-public-affairs-director/49073988/>  
<https://awc.careerwebsite.com/job/morning-news-and-public-affairs-director/49073993/>

craigslist.com

Handshake.com  
covers:  
Portland State University  
Lewis and Clark College  
George Fox University  
Gonzaga College  
Pacific University  
University of Oregon

indeed.com

Journalism and Women Symposium  
jaws@jaws.org

Journalism Jobs  
<https://www.journalismjobs.com/job-listing/1653542>  
<https://www.journalismjobs.com/job-listing/1653544>

KBOO e-newsletter  
KBOO on-air announcements  
KBOO programmers' email list  
KBOO public affairs program  
KBOO website - [www.kboo.fm](http://www.kboo.fm)  
KBOO social media

macslist.org

NAACP, Vancouver Branch  
naacpvancouver@gmail.com

National Federation of Community Broadcasters  
listserve@nfcfb.org  
<https://nfcfb.org/community-radio-jobs/>

Open Signal

Skanner Newspaper  
Jerry Foster: (503) 285-5555  
advertising@theskanner.com

Women's International News Gathering Service (WINGS)  
wingsproducers@yahoo.com  
604-876-6994

RECRUITING SOURCES USED  
Morning News and Public Affairs Director

African American Chamber of Commerce  
Nova: 503-244-5794  
Roy@AfricanAmericanChamberOfCommerce.Com  
[http://www.blackchamber.info/email\\_link.cfm](http://www.blackchamber.info/email_link.cfm)

Albina Ministerial Alliance  
internalcomm@albinaministerialcoalition.org  
chair@albinaministerialcoalition.org  
asstchair@albinaministerialcoalition.org  
<https://www.facebook.com/AMA-Coalition-for-Justice-Police-Reform-328861034751>

American Indian Radio On Satellite (AIROS)  
<https://www.visionmakermedia.org/opportunities-0>  
visionmaker@unl.edu

Asian American Journalists Association - pdx  
<https://aaja.wordpress.com>  
Centro Cultural  
centroinfo@centrocultural.org

Clackamas Community College  
<https://www.collegecentral.com/clackamas>

Centro Cultural of Washington County

Corporation for Public Broadcasting  
<https://www.cpb.org/jobline/kboo-fm/morning-news-and-public-affairs-director/2019-07-01-000000>  
<https://www.cpb.org/jobline/kboo-fm/evening-news-and-public-affairs-director/2019-07-01-000000>

Association for Women in Communication  
erin.lewis@communitybrands.com  
727.497.6565 x3452  
<https://awc.careerwebsite.com/job/evening-news-and-public-affairs-director/49073988/>  
<https://awc.careerwebsite.com/job/morning-news-and-public-affairs-director/49073993/>

craigslist.com

Handshake.com  
covers:  
Portland State University  
Lewis and Clark College  
George Fox University  
Gonzaga College  
Pacific University  
University of Oregon

indeed.com

Journalism and Women Symposium  
jaws@jaws.org

Journalism Jobs  
<https://www.journalismjobs.com/job-listing/1653542>  
<https://www.journalismjobs.com/job-listing/1653544>

KBOO e-newsletter  
KBOO on-air announcements  
KBOO programmers' email list  
KBOO public affairs program  
KBOO website  
KBOO social media

macslist.org

NAACP, Vancouver Branch

naacpvancouver@gmail.com

National Federation of Community Broadcasters  
listserve@nfcbr.org  
<https://nfcbr.org/community-radio-jobs/>

The Nonprofit Network  
<http://www.thenonprofitnetwork.org>

Open Signal

Skanner Newspaper  
Jerry Foster: (503) 285-5555  
advertising@theskanner.com  
JerryFoster@theskanner.com

Women's International News Gathering Service  
(WINGS)  
wingsproducers@yahoo.com  
604-876-6994

RECRUITING SOURCES USED  
Membership Director

Albina Ministerial Alliance  
internalcomm@albinaministerialcoalition.org  
chair@albinaministerialcoalition.org  
asstchair@albinaministerialcoalition.org  
<https://www.facebook.com/AMA-Coalition-for-Justice-Police-Reform-328861034751>

American Indian Radio On Satellite (AIROS)  
<https://www.visionmakermedia.org/opportunities-0>  
visionmaker@unl.edu

Centro Cultural  
centroinfo@centrocultural.org

CNRG List Serv  
<https://www.facebook.com/CNRGPortland/>

Corporation for Public Broadcasting  
<https://www.cpb.org/jobline/kboo-fm/morning-news-and-public-affairs-director/2019-07-01-000000>  
<https://www.cpb.org/jobline/kboo-fm/evening-news-and-public-affairs-director/2019-07-01-000000>

indeed.com

KBOO e-newsletter  
KBOO on-air announcements  
KBOO programmers' email list  
KBOO public affairs program  
KBOO social media

Mac's List  
macslist.org

NAACP, Vancouver Branch  
<https://www.facebook.com/VancouverNAACP/>

National Federation of Community Broadcasters  
listserve@nfcfb.org  
<https://nfcfb.org/community-radio-jobs/>

Open Signal  
yousef@opensignalpdx.org  
<https://opensignalpdx.switchboardhq.com/posts/46909>.

Skanner Newspaper  
Jerry Foster: (503) 285-5555  
advertising@theskanner.com  
JerryFoster@theskanner.com

University of Portland  
Willamette University  
Eastern Oregon University  
Lewis & Clark College  
Oregon State University  
Portland State University  
Reed College  
University of Washington

**No source requested that it be notified of job vacancies**

Note: This report was revised after review by counsel in preparation for responding to the EEO audit.