April 8, 2019

Dr. Lisa A. Rossbacher, President
Humboldt State University
1 Harpst Street
Arcata, CA 95521

Dear Dr. Rossbacher:

Subject: Advisory Report 18-105, KHSU Radio Station Operations, Humboldt State University

Per your request, we have completed our advisory review of KHSU Radio Station Operations at Humboldt State University and the report is attached for your review. Our review was conducted in accordance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing as they pertain to consulting and advisory services.

The campus is not required to formally respond to observations for advisory reviews; however, we recommend that campus management review all observations and take any necessary corrective actions to remediate and/or mitigate the risk(s) associated with the noted observations. Any observations requiring immediate attention were communicated to management during the course of the review.

I wish to express my appreciation for the cooperation extended by the campus personnel during the course of this review.

Sincerely,

Larry Mandel
Vice Chancellor and Chief Audit Officer
EXECUTIVE SUMMARY

PURPOSE AND OBJECTIVES

On July 19, 2018, the president of Humboldt State University (HSU) requested that advisory services review KHSU, HSU’s public radio station, to perform an evaluation of the station’s strategic alignment with the university’s mission, operations, administration, oversight practices, and governance.

Based on discussions with university management, the objectives of this review were to evaluate KHSU’s mission and alignment with the university’s mission, its organizational structure, administration and operations, and compliance with regulatory guidelines. This review included interviews with staff and volunteers, walkthroughs of operational areas, and surveys of other campuses to evaluate information related to mission, ownership, governance, student involvement, and funding.

CONCLUSION

In general, we found that KHSU provides an important service to the surrounding community. The station has long been a source for national, local, and campus news and information. However, we noted opportunities for improvement, particularly in the areas of strategic alignment, organizational structure, and governance.

**Strategic Alignment with HSU**
Over the years, the mission and goals of KHSU appear to have drifted from the station’s initial purpose, which was providing training and coursework opportunities for students, to the current objective of providing educational and entertaining programs to the community with very little student involvement. The university should evaluate KHSU’s mission and goals to determine whether they still align with the mission of the university and evaluate whether additional student involvement and training programs should be added.

**Organizational Structure**
The organizational structure at KHSU consisted of both university and Sponsored Programs Foundation (SPF) staff, and in some instances, university personnel were responsible for managing SPF employees. We suggest that the university evaluate KHSU’s organizational structure and lines of authority to determine whether the arrangement continues to meet the needs of the university and fulfill the station’s and the university’s mission.

**Governance**
Overall, we found that the organizational governance at KHSU could be improved. We noted that although the station was primarily managed by the university with support from auxiliary organizations, the station did not have a formal governing board. In addition, we noted that a community advisory board (CAB) with no delegated oversight authority appeared to play an unofficial role guiding KHSU operations. We recommend that the roles and responsibilities of all stakeholders be formally defined. We also suggest that the university identify and evaluate opportunities to ensure consistency in station operations and regulatory compliance and better serve the regional community.

In addition, we identified opportunities to improve some of KHSU’s operational practices.
and procedures in areas including communication, compliance, security, and information systems. A summary of observations noted during the review can be found in the Analysis and Observations section of this report.

**BACKGROUND**

KHSU-FM is a public radio station that provides a mix of national programs from National Public Radio (NPR), Public Radio International (PRI), Pacifica, and other producers alongside local news, public affairs, and music programs produced in Humboldt and Del Norte counties. The station serves as a voice for HSU in the communities of coastal Northern California and Southern Oregon.

In 1960, HSU applied for the first noncommercial license on a California college or university campus and operated at 10 watts on 90.5 FM. Soon after, the station was moved under the management of the theater department as an academic program offering coursework. By the early 1970s, a faculty advisor was appointed to the station, and the station began offering coursework through the speech communication department, where it remained until the mid-1980s. HSU students on the station staff were required to enroll in an academic course, while community members participated as volunteers.

In 1971, the journalism department began offering radio news workshop classes at KHSU. The students in the workshops produced KHSU newscasts during the fall and spring semesters.

The station remained almost exclusively a student training ground until 1982, when it boosted its power to 100 watts. At that point, the station began a gradual process of professionalization. It joined the NPR network in 1984, and the station signal was increased to 9,000 watts. In 1988, KHSU hired five full-time employees, who were needed to obtain Corporation of Public Broadcasting (CPB) funding.

KHSU hired a new general manager in the mid-1980s, and the position reported to the dean of the college of arts and humanities, rather than the chair of the speech communication department. This reporting line remained in effect until the late 1990s, when KHSU staff began reporting to the president’s office. Eventually, the radio station staff began reporting to the vice president of advancement to better align the operations with the official communications functions of the university.

At the same time in the mid-1980s, the speech communication department added a full-time tenure-track faculty position with the goal of planning and implementing the creation of a student-run station (which was eventually realized as KRFH-AM) and develop expanded audio-production curriculum for students. The purpose was to provide a “minor league” station that could support curriculum for student training in on-air programming and news/public affairs.

KHSU has a long tradition of welcoming volunteer producers and show hosts to create music and public affairs programming; currently, approximately 50 volunteers contribute to the station’s on-air programming.

A community advisory board (CAB) has adopted the role of representing the community and
its interests and providing feedback to university management. The CAB is a self-governed group of listeners representing communities throughout the broadcast area. CAB members provide management and staff with feedback on programming, policies, community outreach, and a variety of other issues. The CAB’s bylaws specify that it serves in an advisory capacity, while final decisions are the responsibility of the university and KHSU management.

KHSU is not required to have a formal CAB, according to our discussions with a representative from the CPB and review of CPB and Federal Communications Commission requirements, because the KHSU radio station license is owned by a state agency.
GENERAL INFORMATION

SCOPE

The scope of the review included an evaluation of KHSU governance and oversight structures, administration and operations, and compliance with regulatory guidelines. The review focused on policies and practices in effect at the time of the review, with some analysis of past operational activities. The review of these aspects of KHSU falls in the larger context of the alignment of missions for KHSU and HSU.

We gained an understanding of operations through discussions with KHSU and campus personnel, volunteers, and other individuals who work with and provide support to the station, as well as through review of available documentation. We also researched other public radio stations within the California State University (CSU) system to obtain information regarding best practices in the industry. Based on this understanding, we developed review steps that included a combination of interviews and analytical procedures. Specifically, the scope included, but was not limited to, a review of the following areas:

- Strategic alignment of missions for KHSU and HSU
- Organizational structure
- Volunteers
- Communications
- Building and business security
- Transmitter site access
- Accounts payable
- FCC license and compliance

This review was requested by HSU management and was conducted as an advisory services engagement. The engagement was based on agreed-upon procedures defined by university management. This review was not an official CSU audit or investigation, and, therefore, university management is responsible to ensure that all observations are assessed and, if necessary, appropriately remediated at the campus’ discretion.

CRITERIA

This advisory review was conducted in conformance with the Institute of Internal Auditors’ *International Standards for the Professional Practice of Internal Auditing* as they pertain to consulting and advisory services.

This review also included limited review of the following:

- Corporation for Public Broadcasting Requirements
- Integrated California State University Administrative Manual (ICSUAM) §8000, *Information Security*
- ICSUAM §3000, *General Accounting*
- HSU *Delegated Fiscal Authority and Responsibility Policy*
- HSU *Travel Policy*
• HSU Key Policy
• HSU Procurement Card Guidelines
• Sponsored Programs Foundation Handbook
• KHSU Volunteer Handbook

ADVISORY TEAM

Assistant Vice Chancellor: Mike Caldera
Advisory Manager: Dane MacDonald
Senior Advisory Consultant: Samer Harb
ANALYSIS AND OBSERVATIONS

Below is a summary of areas covered in our review of KHSU operations, as well as the observations noted.

STRATEGIC ALIGNMENT

1. Strategic Alignment
   The mission, goals, and objectives of the station have evolved over the years. In the beginning, KHSU was almost exclusively a student training ground, with academic programs and coursework opportunities. In 1982, it began to transition into what it is today: a station whose mission is to educate and entertain people through innovative, high-quality public radio programming. In our discussions with KHSU personnel, we learned that the station fulfills an important need and provides an important service to the community; however, students have very limited involvement at the station. Currently, only about three students had involvement at the station, and the academic programs and coursework being offered through the station were limited.

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<th>Recommendation 1</th>
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<td>We recommend that the university evaluate KHSU’s mission and goals to determine whether they properly align with the university’s mission and goals. We also recommend that the university evaluate the level of student interest and involvement at KHSU and determine whether it would be appropriate and feasible to develop more opportunities for students through employment, internships, academic programs, and coursework.</td>
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ORGANIZATIONAL STRUCTURE

2. Organizational Structure
   Over the years, KHSU has evolved and experienced many changes in its management and organizational structure. Management for the station initially resided under the theater department, after which it was moved to speech communications. Later, management shifted to the president’s office, and finally, it moved to university advancement, where it currently resides. KHSU staff were state employees until the mid-1980s, when some new positions were added using non-state funding.

   Among the staff at the station, there are two state-side positions (a general manager and a chief engineer) and approximately eight SPF positions (a director and approximately seven staff). According to our discussions with university management, the eight staff positions were initially created under SPF to provide more flexibility; however, it was unclear whether the staffing arrangement continues to be appropriate for the university.

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<td>We recommend that the university evaluate KHSU’s organizational structure and lines of authority and compare them to those of other radio stations to determine whether the structure is functioning as intended and meeting the needs of the university.</td>
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GOVERNANCE AND OVERSIGHT

3. Governance

KHSU is a public radio station licensed to the Board of Trustees of the CSU for HSU and managed by the university. The HSU SPF and HSU Advancement Foundation provide support for the station; however, neither has any role in the governance of the station. The CAB has assumed the role of representing the interests of the community and providing advice to university management. Due to the size and complexity of KHSU and its role in the community, the university should consider the need for an oversight board with more governing authority. We surveyed four CSU public radio stations and found that one has an advisory council similar to the CAB at KHSU. The other three, however, are governed by CSU auxiliary organizations and boards. Specifically, we noted that:

- At campus 1, the radio station is operated by the university but receives financial accounting and administrative support from a CSU auxiliary organization through a service agreement. The station is a campus department and has an advisory council. The station general manager reports to the university vice president of administration and finance.
  - Funding for this radio station came from direct state support (7 percent), in-kind state support (13 percent), grants (9 percent), and the radio station* (71 percent).

- At campus 2, the radio station is an auxiliary organization. The station’s president/general manager reports to a board of directors with a dotted line to the campus president.
  - Funding for this radio station came from in-kind state support (12 percent), grants (9 percent), and the radio station* (79 percent).

- At campus 3, the radio station is operated by a CSU auxiliary organization, and the station general manager reports to the executive director of the auxiliary organization.
  - Funding for this radio station came from in-kind state support (18 percent), grants (7 percent), and the radio station* (75 percent).

- At campus 4, the radio station is operated by a CSU auxiliary organization. The station general manager reports to the university director of public engagement, who reports to the university vice president of university advancement.
  - Funding for this radio station came from direct state support (23 percent), in-kind state support (27 percent), grants (11 percent), and the radio station* (39 percent).

* May include listener contributions, underwriting, fund-raising, rental income, interest and dividends, and in-kind donations.

Recommendation 3

We recommend that the university:

a. Evaluate opportunities to improve governance and oversight over KHSU operations and determine the optimum governance structure.

b. Evaluate the purpose and role of the existing CAB to determine whether it is meeting the needs of the university.

c. Define the appropriate role of volunteers within KHSU operations.
4. **Communications and Social Media**
   KHSU has a website and Facebook and Instagram accounts; however, the station did not appear to have guidelines or procedures to define how these communication channels were to be used and the type of information that should be posted to the sites.

   We also noted that content posted to the KHSU website and social media feeds did not appear to be reviewed or monitored before being posted. Some staff and volunteers had the access necessary to post to the website, and there were multiple administrative roles assigned for the KHSU Facebook page.

   **Recommendation 4**
   We recommend that the university evaluate the KHSU website and Facebook and Instagram accounts to determine their purpose and the type of information that should be posted to each. We also recommend that the university establish a secondary review or other oversight processes to ensure that information is reviewed before it gets posted to the KHSU website and social media channels.

5. **Staff Meetings and Employee Morale**
   Weekly staff meetings were held at KHSU to discuss projects that individuals were working on. Certain KHSU staff members expressed their belief that management was withholding information at these meetings. Some staff members told us that they believed management was sharing information only when it was absolutely necessary. We also noted that no meeting agendas were being used at staff meetings, and staff members reported a general deterioration of employee morale.

   **Recommendation 5**
   We recommend that the university evaluate and identify opportunities to improve the productivity and effectiveness of staff meetings and employee morale within the department by focusing on:
   
   a. Positive and productive communication.
   b. Collaborative effort and emphasis on improving future operations.
   c. Appropriate and respectful use of meeting materials and information, including:
      o Defining how department and staff meeting information should be used and shared.
      o Determining whether information should be shared internally or externally.
      o Establishing a shared understanding of confidentiality and mutual respect.

6. **Payroll Services**
   SPF performs payroll services for KHSU and gets reimbursed for these services by the Advancement Foundation. However, according to SPF, this was not part of their mission.

   **Recommendation 6**
   We recommend that the university review the payroll services arrangement between SPF and KHSU and determine whether the arrangement should be changed or remain in place.
7. **Budget and Finance**
   According to financial reports, the university had to provide a one-time allocation of $135,000 in state funds to cover KHSU's budget deficit for fiscal year ending in 2018. We also noted that the preliminary budget for the current fiscal year 2018/19 did not accurately reflect the significant increase in operational expenses, decrease in revenue from listener support, or impact of the one-time funding provided by the university in the previous year.

   **Recommendation 7**
   We recommend that the university evaluate the level of funding KHSU receives from the state and ensure that budgeting practices involve realistic projections of state support and community support KHSU expects to receive each year.

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**COMPLIANCE**

KHSU is licensed as a public radio station by the Federal Communications Commission (FCC) and must operate in compliance with FCC regulations. The FCC, an independent United States government agency overseen by Congress, regulates interstate and international communications by radio, television, wire, satellite, and cable in the United States and is the federal agency responsible for implementing and enforcing America's communications laws and regulations.

8. **License**
   The California Broadcasters Association (CBA) performs alternative FCC compliance inspections for its members upon request for a fee of $500 per each radio station call letter. By bringing itself into compliance with the findings of these optional inspections, stations are exempted from standard FCC inspections for three years. HSU is a member of this association but has not used this service.

   **Recommendation 8**
   We recommend that the university consider using the CBA's optional inspection service. If using the service for each KHSU radio station call letter is not within KHSU's budget, the university may want to consider hiring the association to review one station to determine whether it would be beneficial to have the remaining stations reviewed, or whether it would be better to perform internal reviews.

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9. **Content Management**
   The FCC can assess fines and penalties if a radio station airs profanity. KHSU has the equipment and procedures in place to use an eight-second broadcast delay to allow time to block out profanity, but it does not have a policy relating to the use of the delay. In addition, it appears that only three individuals at KHSU are trained on the use of the broadcast delay.

   **Recommendation 9**
   We recommend that the university consider implementing a policy related to the use of the broadcast delay at KHSU, and once it determines when the broadcast delay is to be used, train appropriate personnel.
ADMINISTRATION AND OPERATIONS

10. Building Access
The campus key policy was outdated and did not address access cards, and access requests were being performed via email rather than through a standardized routing process.

In addition, the key card system was labor-intensive; to be activated, a new key card had to be swiped on each door that it was assigned to. Often facilities management relied on key card holders to perform the task of swiping a new or replacement card on all the assigned doors, which for KHSU employees could involve multiple doors. Additionally, any assigned door not swiped with a replacement card could continue to be unlocked with a prior (outdated) key card.

We also noted the following additional areas of potential risk related to building access:

- Records indicated that the former program director had a key to a transmitter site.
- Hard keys that were due were not always turned in. Keys that were not turned in were marked as lost, and a form was completed; however, the lock was not always re-keyed and the individual who lost the key was not always charged.
- Staff and volunteers continued to have access to the theater arts studio after the KHSU studio was moved to the Feuerwerker House.

Recommendation 10

We recommend that the university update the key policy to include access cards and current practices and consider developing a standardized process for routing and obtaining approvals for access requests. We also recommend that the university evaluate the functionality and efficiency of the current key card system to determine whether any changes should be made to the system to improve efficiency. In addition, we recommend that the university:

a. Ensure that the former program director does not continue to have access to a transmitter site.

b. Develop practices to address the risks involved with lost keys and ensure that keys are turned in when they are due.

c. Ensure that staff and volunteers do not continue to have unnecessary access to other university facilities, including the theater arts studio.

11. Transmitter Access and Maintenance
The chief engineer was the only person who had physical and remote access to all of the transmitter sites, and maintenance logs were not being maintained for all of the sites.

Recommendation 11

We recommend that the university select and train an additional staff member who can access the transmitter sites to serve as backup for the chief engineer, and consider establishing and enforcing a policy of maintaining maintenance logs for each site.
12. Accounts Payable
We reviewed the accounts payable listing to determine whether there were any untimely invoices, and we found that invoices were not always paid before their due date. Furthermore, travel expenditures were not always submitted timely and did not always have adequate support for mileage claims. We also noted that ProCard reconciliations were not always submitted and approved timely and that training for ProCard holders was not always completed timely.

Recommendation 12
We recommend that the station pay all invoices timely. We also recommend that the university remind KHSU individuals responsible for processing travel expenditures of the requirement to submit travel expenditures timely and include appropriate support according to campus policy. Additionally, we recommend that the university remind KHSU to submit ProCard reconciliations timely, following campus policy, and ensure the timely completion of ProCard training.

13. Inventory
We were unable to locate many of the items associated with an acquisition of inventory by KHSU. After further inquiry, we determined that the items may have not been received by the campus.

Recommendation 13
We recommend that the university attempt to locate the missing inventory items, and if necessary, consider following up with the third party that was responsible for providing the items to determine whether the items were ever delivered.

14. Information Technology
Information technology (IT) practices at KHSU need improvement to ensure that data and information are appropriately managed and safeguarded in accordance with ICSUAM §8000. Best practices encourage the use of unique login credentials for all system users and continuous monitoring of access. We noted that KHSU servers were managed by KHSU staff rather than by the university and that the only involvement the HSU information and technology services (ITS) had with KHSU IT was to provide network access for internet and phones. Based on our discussions and a walkthrough of KHSU IT operations, we noted that:

- The terminals on the KHSU computer had a default login; therefore, there was not a unique login for each individual.

- The server room may not have been properly ventilated.

- Servers were not contained in a secure area and were exposed to staff, volunteers, and visitors.

- Email forwarding services were provided by an external hosting company that had not been evaluated by the university’s ITS.

- At least one former CAB member who no longer needed a KHSU email address continued to have an active email address.

- The process for creating an email account was typically informal and conducted through email.
• There was no separation checklist that included closing an email or website user account or other login access when an employee or volunteer separated from KHSU.

We reviewed a listing of individuals who had access to post on the KHSU.org website to determine whether access was properly granted, and we found that:

• Four individuals listed on the KHSU.org access list were not staff members, nor were they included on the current list of volunteers.

• One account deactivation was untimely.

We also reviewed administrative roles for the KHSU Facebook site and noted that there were multiple people who had been assigned administrative access. We found that one CAB member who had been a volunteer and the CAB chair had administrator access to the KHSU Facebook page.

**Recommendation 14**

We recommend that the university:

a. Establish unique logins, access reviews, and other appropriate controls over individual access to the KHSU servers and other IT assets.

b. Assess the need to improve ventilation in the server room.

c. Ensure that servers and other sensitive equipment are located in a secured area.

d. Consider bringing KHSU email hosting in-house or ensure that the hosting company is appropriately evaluated by the university’s ITS.

e. Deactivate the email addresses of any former CAB members.

f. Develop procedures to ensure that approval to create email accounts is formally documented.

g. Develop a separation checklist to include the closing of email accounts and other IT assets.

h. Review the individuals listed on the KHSU.org access list, with a special emphasis on individuals who are not staff members and are not listed on the current volunteer listing, to ensure access is appropriate.

i. Ensure that account deactivations are performed timely.

j. We also recommend that the university remove administrator access to the KHSU Facebook page from individuals who no longer need it and evaluate whether university IT should be more involved with KHSU IT operations and server management.

**15. Human Resources**

Two of KHSU’s sponsored program employees did not have job descriptions. Although SPF does not require job descriptions for hourly employees, job descriptions would help to ensure that employees have a clear understanding of their roles and responsibilities.
In addition, in our discussions with KHSU employees, we noted that employee training was limited.

Also, we noted that there was no campus volunteer separation form that would ensure that equipment and other items were returned and that IT access would be removed. Ideally, a separation form would include equipment and key return, building access removal, and IT access removal. In addition, we noted the following:

- There was no formal process for volunteer training.
- Three radio station hosts listed on the KHSU.org website did not have volunteer registration forms.
- Volunteer registration forms were not always completed timely.
- Volunteer registration forms did not include information about the type of work to be performed and the type of computer and facility access needed to perform the volunteer duties.
- The volunteer handbook had not been recently updated to reflect changes in personnel positions and contact information. (Note: The campus has plans to create a campuswide volunteer handbook that will include a separate appendix for each department.)

**Recommendation 15**

We recommend that the university consider creating and updating job descriptions for KHSU sponsored programs employees. We also recommend that the university evaluate the department’s training needs and the resources available to meet those needs and develop a campus volunteer separation form to ensure that equipment and other items are returned and IT access is removed.

In addition, we recommend that the university:

a. Develop a volunteer training program.

b. Ensure that volunteer hosts and groups listed on the KHSU.org website are registered as HSU volunteers.

c. Ensure that volunteer registration forms are completed timely.

d. Consider gathering information about the type of work to be performed and the type of computer access needed on the volunteer registration forms.

e. Review and update the volunteer handbook.

16. **Property and Equipment**

At HSU, property worth more than $5,000 and assets that store personally identifiable information are inventoried, tagged, and tracked. KHSU’s larger assets are transmitters, antennas, and receivers. Capital assets are the property of the state of California. A physical inventory of capital assets is performed once a year, and any changes in the physical inventory are noted.
Items that are worth less than $5,000 are not inventoried, tagged, and tracked through HSU capital asset process, but the university encourages departments to track these assets themselves. ICSUAM §3150, Administration of University Property, suggests that campuses establish a threshold for tracking equipment valued at less than $5,000 based on an analysis of cost versus benefit and risk of misuse or misappropriation. It further states that sensitive equipment, equipment that is easily subject to theft or loss based on an analysis of cost and risk by the campus, must be inventoried, tagged, and tracked.

**Recommendation 16**

We recommend that KHSU consider the need to track inventory on items that are worth less than $5,000, and inventory, tag, and track sensitive equipment.

**17. Receipts**

KHSU receives cash and checks about four times a year that total approximately $1,000. However, KHSU is not an authorized cashiering location, and therefore, these payments should be forwarded to the main cashier’s office as required by HSU and CSU policy and procedures.

**Recommendation 17**

We recommend that KHSU direct cash and cash equivalents to the main cashier’s office or establish alternative controls for handling and safeguarding cash and cash equivalents in compliance with HSU and CSU policies and procedures.

**18. Gifts-in-Kind**

Gifts-in-kind, sometimes in the form of gift cards, are occasionally used by KHSU as an incentive for individuals to make donations. Gift cards are stored in a locked drawer accessible by only three individuals. When a donation is received, it is inputted into the donor database (Raiser’s Edge), and a thank you letter is sent for the donation, along with a gift card, if a gift card was offered as an incentive. We noted an opportunity to better reconcile and track gift cards at KHSU. According to our discussions, the campus has a gift card process used for Intercollegiate Athletics that can be tailored to KHSU.

**Recommendation 18**

We recommend that the university improve existing processes for reconciling and tracking gift cards issued by KHSU in compliance with HSU policy and procedures.

**19. Pledges Receivable**

Every six months, the KHSU development director generates a listing of long-outstanding pledges, reviews it, and approves any items that need to be written off. We noted an opportunity to improve pledges receivable processes at KHSU related to aging, review, collection, allowance, and write-off of pledges. According to our discussions, philanthropic services has a pledges receivable procedure that could be tailored to KHSU.
Recommendation 19

We recommend that the university improve pledges receivable procedures at KHSU to ensure that they include information related to aging, review, collection, allowance, and write-off of pledges.

We recommend that the university implement the recommendations noted above to improve KHSU’s mission alignment with HSU, operations, administration, and oversight practices and to help the station function more effectively. We also suggest that the university consider practices used by other stations serving the CSU and identify and evaluate opportunities to reduce the costs of operating KHSU and improve the public service provided by KHSU to the regional community.