A Working Group Report from the Editorial Integrity Project

Developing a Code of Transparency for Public Media

Introduction

The state of today’s journalism is the source of frequent lament: too much sensationalism, too much point of view, not enough resources. A vast array of information sources, often tailored to reinforce particular viewpoints, can make the traditional journalistic values of truth, accuracy and fairness seem passé.

We believe that public media can champion the resurgence of those values. But to do so will require more than just saluting certain principles. In fact, it won’t even be enough to embody those concepts in our work. We believe that public media needs to do something more. It needs to champion transparency.

We make that assertion because we believe that in order for audiences to see why those values still matter, we have to give them the opportunity to see how they guide our everyday enterprise. Only by opening up our decision making to scrutiny, by giving our audience the opportunity to verify whether our actions meet our principles, will the value of concepts like truth, accuracy and fairness become real.

In the following pages, we offer a guide to see how disclosure can be implemented in varying degrees, from transparency in how we make our coverage decisions to transparency in how we’re funded. We realize that this approach represents a significant change in basic operating
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procedures for many public stations, but we believe that transparency is an opportunity for public media. We think that the more we disclose about our guiding principles and how they inform our decision making process, the more we distinguish ourselves in today’s crowded media landscape. Charting a course that differs from other information providers will serve to reinforce the unique mission and role of public media in America life.

For these reasons that we believe public stations should adopt a “Code of Transparency”, which can serve as a step by step guide for pulling back the curtain on how we operate. The pages that follow represent our attempt at crafting such a station-based code. We recognize that no single code can fit each station. Stations have different missions, different audiences and different resources. Various elements in the following document will need to be adapted to fit each station’s specific circumstances, mission and resources. But in the end, we believe every station should ask itself how it can become more transparent. Some will do so by degree, others by quantum jump. We believe that adopting a code of transparency will serve each station’s mission, and in so doing, engender greater trust with our audience.

Code of Transparency

Draft

I. Purpose and principles: Why Transparency Makes Sense

- Mission
- Trust
- Accountability

II. Editorial Applications

- Program and story selection
- Principles of reporting
- Principles of editing

III. Transparency in Funding

IV. Transparency: Criticism and Controversy

V. Summary
I. Purpose and Principles: Why Transparency Makes Sense

As a public media entity, there are certain principles that guide our work, and we think it’s useful for our audience to understand why we operate the way we do. The purpose of this code is to spell out how these values shape our daily enterprise.

To begin, we believe that implementing a code of transparency is consistent with why we exist in the first place. Transparency serves to underline the importance of three core public media concepts: mission, trust and accountability.

Mission

First, being transparent is consistent with the nature of our public service mission. Essentially, we’re putting our processes on display because we want you to see what’s there. And what’s there begins with a mission: to inform, inspire, educate and entertain. Our mission isn’t to secure the highest ratings or deliver an audience to advertisers. Our mission is to deliver the content that people need.

By committing to the principle of transparency, we are saying, “We only have one reason to exist, and that’s to provide trustworthy content.” The purpose of this document, then, is to spell out how we try to accomplish that. In the following pages, we attempt to explain why we cover certain stories and not others. We articulate the principles that guide our reporting and editing process. And last, we provide information about the funding of public media and the steps we take to safeguard the integrity of our editorial product.

Trust

Our second reason for endorsing a policy of transparency, is that we want to sustain your trust. Being transparent about our decision making procedures means you can verify whether we’re upholding our part of the bargain. We often cite surveys which show that public broadcasting is a trusted institution,¹ but by becoming more transparent, we’ll either earn that trust on a continuing basis or we won’t. In essence, transparency becomes the way in which you determine whether we deserve the faith you’ve placed in us.

Accountability

Last, if transparency is a means to sustain trust, it is also an end in itself. That’s because the more we open up our operations, the more we will become accountable for our actions. Being transparent means there’s a built in motivation to stay true to our standards. In that sense,

¹ GfK Roper Public Affairs and Media poll, February 2009
transparency exerts a form of quality control on our work. When we spell out our standards for story selection, as we do in the next section of this document, then we make it that much more likely that we follow that approach. Transparency compels us to look in the mirror, to make sure that we are holding ourselves to the standards we advocate. In the end, transparency is a two way process. It allows you to see how we operate which in turn serves to reinforce our commitment to abide by the principles that are central to our mission.
II. Editorial Applications

You may have wondered from time to time why we’re covering a particular story or why we pursued a particular interview. What follows is a guide to key aspects of our daily editorial operations and the principles which guide those efforts.

The program and story selection process

How we select programs for our schedule

We select programs for broadcast that are consistent with our mission: to inform, educate, inspire and entertain. Every program on our broadcast schedule, along with our online content, should meet that test. In general, we believe that the power of media should be used to strengthen communities and enrich individual lives. We define both “strengthen” and “enrich” broadly. That’s why we provide coverage of both the state legislature and the state fair. Similarly, there are many communities within our service area. We believe it is our mission to recognize that diversity, and to make every effort to provide programs that meet those differing needs.

How we select stories for our news and public affairs programs

The stories we cover for broadcast and online delivery are selected at our editorial meetings. These meetings take place regularly and involve key decision-making staff including news managers, producers, editors and reporters.

➢ The basic questions we ask

In general our story selection process is guided by the following questions and/or criteria:

- Why is this story important and why now?
- What do we want to learn from this story?
- Is this story relevant to our audience? Will it be of high interest?
- How will our audience benefit by our telling this story?
- If this is a subject we've reported on frequently, what new developments make it worthy of additional coverage?
- Is there something new or unique that our journalism can add to this story?
Other factors we use to determine a story’s news-worthiness:

- Immediacy: the story’s timeliness
- Proximity: the story’s impact on our locale
- Novelty: the story’s fresh or novel aspects
- Impact: the story’s impact and emotional resonance
- Conflict: the story deals with an important controversy where conflicting views exist.

The beat system (Note: Include this section as appropriate)

You should also be aware that some reporters in our newsroom are assigned to specific topic areas called beats. We pick these coverage areas because of their ongoing importance in our community. Right now our beats and the reporters who cover them are as follows: (revise as appropriate).

- City government: Reporter and contact information:
- State government: Reporter and contact information:
- Economy: Reporter and contact information
- Health and science: Reporter and contact information:
- Criminal justice: Reporter and contact information:
- Arts and culture: Reporter and contact information
- Environment: Reporter and contact information:

Pragmatic considerations that impact coverage decisions

Not surprisingly, pragmatic considerations can sometimes affect what winds up on the air or online. These can include:

- Can we interview the people we need to? If not, are there other ways we can still tell the story?
- Do we have a reporter available to cover the story? If this is a television story, do we have access to the necessary crew as well as camera and sound equipment?
- Are there union or overtime issues that will affect the cost of covering this story?
- Is the cost of covering this story such that it will impact what else we’re able to cover?
How grant funding can impact the stories we cover

Sometimes we receive grants to provide specific coverage areas for our audience. For example, let’s say our news and public affairs operation has a grant from the ABCD Foundation to cover health care. The grant is for $50,000 in fiscal year 2012 and it obligates us to produce a range of stories and/or programs which increase our focus on health care over the course of the year.

Accepting such a grant would not only impact the amount of our health coverage, it would also impact our overall news service. If we receive funding to cover a particular topic, it may get more attention than an unfunded subject area. Therefore, it’s crucial that we follow the following criteria in determining whether we seek or accept a particular grant:

- The grant must be for a coverage area that we’ve decided is of importance to our viewers. For example, we would be inclined to accept a grant that would help us increase our coverage of the environment or of the criminal justice system.
- Similarly, we would not accept a grant that would obligate us to cover a topic beyond what we think it deserves. For example, we would not accept a grant to cover modern dance if the terms of the grant mandated coverage beyond what our editorial judgment would dictate.
- The funder does not decide or control how we select or report our stories.
- The funder can only be featured in our reporting if there is a legitimate news reason to do so. In such cases, the report must contain a reference to the fact that the organization is a funder of our news operation.

We will always disclose when our reporting is supported by a grant, and you’ll always be able to find out additional details about that funding arrangement on this website.

Additional information on our funding policies for news and public affairs is included in Section III of this code.

Why we don’t cover certain stories

There are also certain types of stories and events we usually don’t cover. This is not because the story categories and events listed below aren’t worthy; it’s simply a question of resource priorities. In general, we try to focus our efforts on covering the issues and challenges we think are of most significance to the people who live in our community. This means that at our station we normally don’t cover activities such as the following *(Note: This list will vary per station)*:

- Fund raising events for charitable causes
- Community cultural events such as community concerts and theatrical performances
- Celebrity interviews
- Youth and high school cultural and sporting events
- Authors on book tour

**Your participation in the story selection process**

Just as we want to open up our operating procedures, we also want to be open to hearing new perspectives about what’s going on in our community. Towards that end, we’ve developed three mechanisms to enhance public participation in our editorial process.

- Twice a year we will webcast our story meetings so that audiences can have a sense of our decision making process. If you’d like to be notified of one of these webcasts, you can register on our website.
- In addition, several times a year we will invite members of the community to the station to discuss specific topic areas that we plan to explore in our news coverage. A schedule for these meetings is also posted on our website.
- *(Note: Only applicable for some stations)* Our station participates in the Public Insight Network (PIN). PIN is a method we use to actively solicit new voices in our story coverage. When we cover certain select subjects, we will put out a “call for participants” on the PIN portion of our website. To learn more, visit the PIN section of our website.

We invite both your participation in these opportunities and your overall scrutiny of our story selection process.

**Principles of Reporting**

**How stories get covered**

Once we decide to report on a subject, we discuss how that story will be covered, including who we might interview. These decisions are based on several criteria including:

- What are we curious about? What are key elements, facts and points of view our audience needs to know?
- Who or what is most impacted by this story?
- Is additional context required to help the audience fully understand the story?
- Who are the key people needed to tell this story, and what are their biases or conflicts?
- Are there new voices we need to hear from?
• Are we reflecting an appropriate diversity of viewpoint and perspective, and where relevant, personal experience, race, ethnicity and gender?

The key principles that guide our reporting

Our reporting is shaped by a commitment to truth and accuracy. In their book, *The Elements of Journalism*, Tom Rosenstiel and Bill Kovach note that journalism’s first obligation is to the truth and that the essence of the craft is verification.²

➢ Accuracy and Attribution

We strive to be accurate in all of our reporting and provide verification for our findings. We also believe that it’s crucial to place the facts we report within the proper context. As the NPR Code of Ethics notes, “We make rigorous efforts … to ensure our facts are not only accurate but also presented in the correct context.” This is particularly crucial in how we conduct our political coverage. We recognize that reporting on controversial topics demands accuracy, full attribution, a non-partisan approach and context. The more heated the story subject, and the more contrary the political claim, the more crucial it becomes to report with care and context, always documenting the sources for our reporting. The only way we sustain your trust is if you can count on us to uphold those standards. If we expect you to trust our reporting, then the sources for our reporting should be fully transparent and verifiable.

➢ Additional key values

The NPR Code of Ethics states that news coverage must also be fair, unbiased, complete, respectful and honest. We seek to abide by those principles and subscribe to the following definitions as defined in the NPR Code:³

**Fairness**

"Fair" means that we present all important views on a subject. This range of views may be encompassed in a single story on a controversial topic, or it may play out over a body of coverage or series of commentaries. But at all times, the commitment to presenting all important views must be conscious and affirmative, and it must be timely if it is being accomplished over the course of more than one story. We also ensure that every possible effort is made to reach an individual (or a spokesperson for an entity) that is the subject of criticism, unfavorable allegations or other negative assertions in a story in order to allow them to respond to those assertions.

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² *The Elements of Journalism*, Bill Kovach and Tom Rosenstiel, 2007
³ NPR Code of Ethics, 2009
Unbiased

“Unbiased” means that we separate our personal opinions - such as an individual's religious beliefs or political ideology - from the subjects we are covering. We do not approach any coverage with overt or hidden agendas.

Honesty

"Honest" means we do not deceive the people or institutions we cover about our identity or intentions, and we do not deceive our listeners. We do not deceive our listeners by presenting the work of others as our own (plagiarism), by cutting interviews in ways that distort their meaning, or by manipulating audio in a way that distorts its meaning, how it was obtained or when it was obtained. The same applies to text and photographs or other visual material used online. Honesty also means owning up publicly and quickly to mistakes we make on air or online.

Respect

“Respect” means treating the people we cover and our audience with respect by approaching subjects in an open-minded, sensitive and civil way, and by recognizing the diversity of the country and world on which we report, and the diversity of interests, attitudes and experiences of our audience.

Sources to explore

We also seek to encourage our viewers and listeners to further explore the subject matter we cover. In addition to providing attribution for claims made in our reports, we will also try to provide sources for how our audience can dig more deeply into the topic at hand. While our coverage needs to be thorough and stand on its own, we believe it should also serve as a launching point for your own investigation.

Principles of Editing

Reporting is not a solitary endeavor, and an important element of the reporting process is how a story gets edited. Every reporter’s work, no matter the platform, is reviewed by a senior member of the news department. An editor’s job is to make sure the reporter covers the key elements of the story in way that’s clear and easily understood. It’s also the editor’s job to make sure the reporter has double checked his or her facts, provided the necessary attribution and presented the story in a fair and unbiased manner. As noted in the previous section, it’s
imperative that the editing process be honest, that decisions about what comments are included or excluded fairly represent that person’s point of view, and are faithful to what our reporting found to be the essence of the story.

But we also acknowledge that editing is art as much as science. It requires both an obligation to fairness and accuracy, as well as the desire to build a story that’s clear and holds our interest. Just as we have an obligation to accuracy we also have a responsibility to value your time and make our reporting interesting. An editor’s job, along with the reporter’s, is to make sure that our stories achieve that standard.

Transparency in editing

We are interested in experimenting with several ways in which we can make the editing process more accessible. Here are several steps we plan to take:

- When a particularly noteworthy, compelling or controversial story airs, the reporter and editor will post a blog entry about how they went about putting the story together. This entry will offer a candid assessment of the tough reporting and editing choices that were made, as well as detailing the pragmatic decisions, such as time limitations, that are always part of the editorial process.
- When we broadcast an edited interview with a newsmaker about a particularly significant news development, we will endeavor to post the entire interview on our website, time and resources permitting. This will afford you both the opportunity to see the newsmaker’s entire comments but also to assess whether or not our edited story fairly represented the interview as a whole.
- Twice a year, we will hold an open house in which you’ll be able to visit with newsroom staff and observe the story editing process.
III. Transparency in Funding

As noted in an earlier section of this code, how we’re funded impacts what we do, which means funding becomes an arena where full disclosure and transparency is particularly important. In 2004, University of Oregon Professor Alan Stivitsky and NPR Ombudsman Jeffrey Dvorkin put the problem like this:

“The facts of life in public radio include the need to seek outside funding to pay for what we do. Money, of course, often comes with strings attached, whether explicit or implicit. Our challenge, then, is to obtain the funds we need, while keeping the funders from influencing our journalism.”

The Updated Guide for Public Radio Journalism, 2004

In response to this challenge, we commit to the following principles:

- We will disclose all our grant funding sources on our website.

- We will disclose what those funding arrangements obligate us to do. This includes:
  - The amount of the grant
  - The approximate range of stories we are targeting to produce
  - The timeline in which those stories will be broadcast

- There are certain funders whose support we will not accept. For example, a funder whose agenda is designed to bring about a specific political outcome or to influence public policy on controversial matters cannot fund news specials about a related topic area.

- We will also not accept funding that obligates us to provide more extensive coverage of a topic than its news value dictates.

- The following sources of funding are never acceptable:
  - Political parties and candidates
  - Organizations who espouse views that are generally accepted as extreme

- Funding of specific programs or coverage areas is always disclosed on air.
➢ If a funder winds up as a subject of a news story, the story will be introduced or followed by a reference to the organization’s status as a funder of this station. The funder will play no role in the reporting, direction or editing of such a story.

➢ On occasion, during radio and television stations breaks, our on-air announcers will broadcast a message along the following lines: “You can find out more about who funds this station as well as examine station funding policies by visiting our website.”

➢ We will ensure that there is a firewall between funders and our specific editorial decision making process. As a station we subscribe to the following policy points developed by American Public Media: 4

- Requests by funders to have contact with news staff and programs should come through the station’s development office. The requests will be forwarded to senior leaders. It’s acceptable for funders to request annual meetings with senior leaders to discuss coverage and future vision.
- Story ideas from funders must go through the development office. News staffs and program producers will determine which stories and shows to pursue.

**Funding Summary**

There is understandable skepticism about the influence of money on media. And yet, of course, we cannot do our work without funding support. We pledge to be transparent about the support we receive. It is our challenge and our mandate that that support not distort our editorial judgment.

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4 Guideline for APM Funders, American Public Media, 2011
IV. Transparency: Criticism and Controversy

All stations find themselves on the receiving end of criticism, and from time to time ensnared in deeper controversies. The NPR’s Code of Ethics, which this station subscribes to, provides useful guidance on how to sort out specific ethical dilemmas. Criticism and controversy can also provoke the urge to retreat behind closed doors as we wrestle with difficult decisions or assess how we should respond to outside criticism. In this section of the Code, we outline how we will attempt to keep the door open when the temptation is pull it shut.

Schedule, Budget and Staffing Controversies

We know from experience that whenever the broadcast schedule changes, criticism is sure to follow. Similarly we know that both budget cuts and surges in spending that result in significant programming or staffing changes can trigger strong audience interest. In such cases, we will do the following:

1) The General Manager or Program Director will explain as candidly as possible, usually on the station’s website, why a program change is being made. If the reason for the change is lack of audience, we will say so. If it’s for budgetary reasons or grant changes, we will acknowledge that as well.

2) Similarly, station leadership will disclose station budget changes and their effect on station operations. These postings will be done in a factual and reportorial manner rather than being used as a means to lobby for audience support.

3) If there is sufficient public debate about programming, budgetary or staffing changes, station leadership will engage in either an online chat or an “Ask the Manager” call-in program to respond to audience concerns.

In the end, while we recognize that you may not always agree with our decisions, our goal is that you’ll agree with our decision making process.

Transparency and Tough Choices

Sometimes stations find themselves faced with a decision that will have a significant impact on both its own staff, the local journalism community and the audience at large. For example, let’s say we’re faced with a decision about whether to discontinue a long running news and public affairs series or whether to broadcast a highly controversial documentary produced by a local independent filmmaker. The factors involved in these decisions are complex and multi-layered. In situations like this we will consider doing the following:
• When making decisions with widespread ramifications, it’s important not to be too insular, and if possible secure outside advice. Yet no public media outlet in the country has its own ombudsman. During the coming year, we will engage our local university journalism school in a conversation about whether the journalism school faculty could serve as volunteer ombudsmen.

• Producing a “case study” webcast about what decision was made and why. Such a program could consist of senior managers reflecting on the decision, perhaps being questioned by members of the public or students at the local journalism school.

Transparency in Program Assessments

At our station, we continually assess our programming. After each of our local call-in shows, for example, we sit down to critique what transpired. But this critique process normally occurs between like-minded individuals within the same station department. During the coming year, we would like to include both different station personnel and members of the community in the critiquing process.
V. Code of Transparency: Summary

As noted at the beginning of this code, we have the good fortune, and the great obligation, to have a singular mission: to provide you with content that enriches your life and the community in which you live. While the work we do to accomplish that mission will always be our primary focus, as consumers you have the right to find out how we go about that task. We recognize that in a time where information channels abound, the more you know about us the better.

In the end, transparency is in both our interest and yours.

Summary Observations and Recommendations

The preceding draft “Code of Transparency” is intended to serve as a template for stations to adapt according to their specific mission and resource capacity.

The following observations and recommendations summarize our reasons for encouraging stations to take this action and the additional steps we believe the public media system needs to encourage:

1) We believe that becoming more transparent will help public media outlets distinguish themselves in today’s crowded media environment.

2) We believe that transparency is consistent with our mission. Public media stations have a singular mission of public service, one that is without hidden agendas.

3) Establishing transparency polices will serve to reinforce the public trust. Transparency allows the audience to verify what we do.

4) Establishing transparency policies will serve to hold stations accountable. Opening up our operation in varying degrees and publicizing our editorial standards and processes will require us to act accordingly. Transparency won’t just change things for our audience. It will change us.

5) We recommend that all stations adopt a Code of Transparency that fits their specific circumstance. We believe that creating such a code is in every station’s interest.

6) We recommend that any Code of Transparency spell out the station’s key editorial and grant funding policies
7) We recommend that this draft Code of Transparency be made available to all public stations in an easily adaptable web based form, so that resource constrained stations have a template they can easily revise.

8) We recommend that CPB investigate ways in which ombudsmen services could be deployed to individual stations. This could take a variety of forms including:

   a. Making CPB, NPR or PBS ombudsmen available to individual stations
   b. Funding several pilot projects where stations obtain services from local university journalism schools or create audience panels
   c. Establishing a panel of news leaders at various stations around the country who would be willing to pick up the “red phone” and provide consultation to individual stations

9) We recommend that CPB sponsor a series of regional workshops for stations. These workshops would be designed to spark discussion about the issue of transparency, and would also serve as working sessions for stations to craft and revise their individual codes. The goal of these workshops would be for each attendee to go home with a draft code that suits his or her station’s particular needs.
This paper is based upon a series of discussions that were held during the summer of 2011. Participants were part of a working group established by the Editorial Integrity in Public Media Project and included the following individuals:

- Bill Hanley, VP Public Engagement/Strategic Partnerships, Twin Cities Public Television
- Tanya Ott, News Director, WBHM, Birmingham, Alabama
- James Steinbach, General Manager, Wisconsin Public Television
- Becky Magura, General Manager, WCTE, Cookeville, Tennessee
- Mike Marcotte, Consultant and former News Director, KPBS, San Diego
- Yolette Garcia, Assistant Dean, Southern Methodist University and board member KERA, Dallas
- Chris Worthington, Managing Director, Minnesota Public Radio News
- Joanne Elgart Jennings, Executive Producer KQED, San Francisco

The working group discussions were facilitated by David Iverson.