

WJCT, INC.
PROGRAM PRINCIPLES, OBJECTIVES AND POLICIES

We believe that the goal of WJCT is to provide a diverse and high quality program service, which is distinctive and responsive to the needs and interests of the many communities served by WJCT.

Our principal aim is to reach many different audiences. WJCT programming seeks to broaden the experiences and horizons of all viewers throughout our coverage area. The Board of Trustees is licensed by the Federal Communications Commission to operate as WJCT and sets broad policy guidelines and programming objectives.

The Board of Trustees does not create programs or approve schedules for WJCT, Inc. These are the responsibilities of the President/CEO and the programming staff, whose performance is reviewed by the Board of Trustees in terms of the objectives and guidelines, which it has established.

The following is a general statement of those objectives and guidelines.

GENERAL PROGRAMMING

The Opportunity

Public broadcasting possesses the unique potential of a mass medium whose program content is not limited by the requirement to compete constantly for maximum audiences. We are able to put excellence ahead of acceptability, to broadcast not just the popular but also the profound, and to serve as the community's cutting edge by experimenting with new concepts in the world of the arts and ideas.

In addition, public broadcasting can broadcast special programs and events which might not otherwise be available to audiences in our coverage area.

Program Quality

We are committed to providing the highest quality programs that serve a wide variety of educational, informational, cultural, and entertainment needs and interests. This goal of program quality encompasses a host of considerations, including but not limited to excellence, creativity, artistry, accuracy, balance, fairness, timeliness, innovation, boldness, thoroughness, credibility, and technical virtuosity. Program quality must also be evaluated based on the program's ability to stimulate, enlighten, educate, inform, challenge, entertain, and amuse.

Diversity

We are committed to promoting diversity--diversity of program topics, producers, viewpoints, and funders -- in the belief that the public interest is best served by exposure to a wide variety of subjects and sources of information.

Program diversity furthers the goals of a democratic society by providing public access to the full range of ideas, information, and viewpoints required to make informed judgments about the issues of our time. The diversity of public television producers and funders helps to assure a wide variety of program subjects and approaches, providing a bulwark against program domination by any single point of view.

The goal of diversity also requires continuing efforts to assure that public broadcasting programs fully reflect the pluralism of our society, including, for example, appropriate representation of women and minorities.

Good Taste In Programming

Innovation in programming may occasionally raise questions of taste and propriety. We will exercise care to insure that programs dealing with novel or controversial themes reflect an integrity of purpose, without blatant disregard for the tastes and morals of the community. It is the policy of WJCT to adhere to all current program content ratings guidelines and to provide content advisories, when warranted.

Program Production

We are committed to producing the highest quality public broadcasting for local, regional, national, and international audiences.

Acquired Programs

In addition, we provide a window on the world for our local audience, by broadcasting selected programs acquired from a wide variety of programming sources.

Non-Commercialism

Our programs will not promote the sale of goods or services for profit and shall be devoid of material which recommends one product or service over another similar product or service.

We will not permit any transmission to be used for the sale of outside products or services, except that viewers may be informed as to companion materials supplemental to the educational objectives of the program.

Solicitation of funds is not permitted, except in the instance of generating support for the station.

In accordance with the requirements of the Federal Communications Commission, the sources of funding for programs shall be identified on-air in a manner which complies with the current WJCT, Inc. underwriting policy.

Non-Sectarianism

We shall not transmit any programs, which propose or imply acceptance or rejection of any religious belief or dogma.

SPECIAL AUDIENCE PROGRAMMING

The Responsibility

We will continually strive to be mindful of the interests and concerns of ethnic minorities and other special audiences. We will make a concerted effort to integrate the views and interests of these groups with special needs into our programming.

Pluralism in Programming

Public Broadcasting, however, will not be truly public if programs are conceived as exclusive messages intended only for certain audiences. We can best serve our many audiences through the presentation of a wide variety of subjects and viewpoints within our regular program schedule.

Not a Public Pulpit

We believe that public broadcasting should never allow itself to be used as a public pulpit to promote the interests of any special group or cause, however worthy. The time and space generally available in other media, including cable television, are more appropriate vehicles than public television, for members of the community who, wish to reach the public with special messages or programs.

CURRENT AFFAIRS PROGRAMMING

The Objectives: A Better Informed Citizenry

We will not duplicate the many daily news programs broadcast by commercial stations, but rather we will supplement and complement them with more in-depth analysis and more detailed discussion of local, regional, national, and international affairs.

A better-informed citizenry through discussion of important issues is one of the most basic objectives of current affairs programming. Public broadcasting must take full advantage of its special opportunity to illuminate and explain public issues.

Accuracy

Our policy is to assure that program content is presented accurately and in context. Accuracy is insured by monitoring program content through a chain of responsibility from Producer to Senior Management to General Manager/CEO.

Objectivity and Fairness

Maximum objectivity is one of our single most important goals. Commentary, points of view, or opinion will be identified as such. WJCT reporters and interviewers will not express personal opinions on public affairs matters. We will endeavor to air programs that contain a fair and accurate presentation of facts. WJCT has "Guidelines on Journalistic Standards and Practices" on file (Attachment A), which ensure adherence to these policies.

Balance

Every attempt will be made to identify important areas of public debate, and to provide all significant parties to a controversy an opportunity to participate in current events programs. Fairness and balance will always be the station's objective in such programming.

However, the reasonable limits to the length of most programs are such that there will be occasions when fairness and balance must be achieved over time, rather than within a single program. In those instances where it is impossible to give adequate attention to differing sides on one given broadcast, every effort will be made to present these points of view in subsequent broadcasts.

A Forum for Issues and Candidates

Public broadcasting's programming flexibility provides it with the opportunity to broadcast important special events and to provide time for the presentation of political candidates and issues. Programs transmitted by WJCT shall never propose acceptance or rejection of any political belief, party or candidate.

PUBLIC PARTICIPATION IN WJCT

Audience Feedback

We are strongly committed to providing ways for viewers, listeners, critics, and others to express opinions or present information about programs or the topics addressed in those programs. We actively encourage audience feedback and respond to inquiries.

Financial Support

At the very heart of public broadcasting is the concept of voluntary public participation in the financial support of the station. Federal funds pay only a small percentage of our annual operating costs. Support from corporations and foundations underwrite only a portion of our program schedule.

Therefore, we must aggressively seek the financial support of our audiences. It is only through the broad-based financial participation of our own audience that we can maintain the independence, flexibility, and professionalism required to serve the community successfully.

Program Underwriting

We will accept no financial support which is conditional upon editorial control or review of specific program content. However, we will aggressively seek financial support for general programming. Federal Communications Commission requirements mandate that specific program content must be the station's responsibility.

Ascertainment and Community Feedback

Ascertainment of the community's needs and interests is an on-going and important activity of WJCT. Management and staff make numerous contacts with community institutions and individuals, ascertaining the community's needs and interests.

The WJCT Community Advisory Board, selected to represent the public interest, is wide and diverse in its representation, and organized in an active committee framework.

The WJCT communications staff also conducts ascertainment to determine community interests and needs.

In addition, the WJCT staff involved in acquiring, producing and scheduling programs regularly monitors these mechanisms to insure community interests and needs are considered carefully in the decision-making process.

Educational and Community Outreach

We will strive, whenever appropriate, to augment WJCT programming by undertaking educational and community outreach activities aimed at specially selected groups and/or individuals. Such activities will increase awareness of WJCT programs and increase the station's participation in and awareness of community issues. Educational and community outreach efforts allow the station to go beyond the WJCT basic program service and form new, long-term partnerships based on common community interests.

EDITORIAL INTEGRITY

Our reputation for quality reflects the public's trust in the editorial integrity of our programs. To maintain that trust, we are responsible for shielding the programming process from political pressure or improper influence from program funders or other sources.

The WJCT Board of Trustees has been entrusted with operating an independent public broadcasting service on behalf of the viewing/listening public. That trusteeship carries with it the obligation to ensure the responsible application by professional practitioners of a free and independent decision-making process, which is ultimately accountable to the needs and interests of all citizens.

Program decisions will be based on editorial criteria, and not based on either funding considerations or overt influence from individuals or groups with vested interests. To ensure this, the WJCT Board of Trustees has unanimously adopted the "Statement of Principles of Editorial Integrity in Public Broadcasting" (Attachment B).

CONCLUSION

Because public broadcasting is a dynamic institution, which is subject to on-going growth and development, the WJCT "Program Principles, Objectives and Policies" will be reviewed as necessary in order to insure that they reflect the range of concerns of the Board of Trustees.

A variety of considerations are involved in the programming of WJCT. Judgments concerning the appropriateness of programming for the WJCT schedule involve both editorial and non-editorial considerations. The final decision as to whether a program is included in the schedule relates to the professional judgment of WJCT management, which must ensure that the program meets the WJCT "Program Principles, Objectives and Policies."

GUIDELINES ON JOURNALISTIC STANDARDS AND PRACTICES

These guidelines represent a distillation of the standards and practices that have helped reporters and current affairs producers in the past. They are not meant to be comprehensive, and so producers are encouraged to seek the advice or guidance of WJCT Management when confronted with specific cases.

We recognize that many of these standards and practices will appear quite familiar to you or will be based simply on common sense. Still, we believe it is valuable to share this document with you and, of course, to invite your thoughts and comments, for it is self-evident that no set of rules or standards can insure the result by itself. The guidelines are, for the most part, self-enforcing. The greater part lies wholly within the producer and the knowledge held by that producer.

The guidelines are divided into two Sections: Section I addresses standards and practices to be observed in the research, development, and production of public affairs programs; Section II outlines the major considerations for editing and post-production. Following Sections I and II, you'll find a general discussion of Fairness and a Legal addendum. Where the term "producer" is used, we mean to include reporters or other staff persons with day-to-day editorial control of a program or program segment.

These guidelines may be modified from time to time, and your comments will be helpful toward that end.

IN RESEARCHING AND FUNDING

1. Consult on Conflict of Interest Problems.
2. Obey the Law.
3. Consult Before Employing Hidden Cameras or Eavesdropping Devices.
4. Avoid Misrepresentation.
5. Seek Unrestricted Access and Use. Identify all Restrictions or Conditions on Access or Information.
6. Avoid Paying for Testimony.
7. Consult Before staging or Recreating Events.
8. Do Not Accept Gifts.

1. Consult on Conflict of Interest Problems

Any person on a documentary assignment who has a material interest -- whether a financial or other personal stake -- in a subject under documentary examination shall make that interest known to WJCT. It is the producer's responsibility to monitor any interest of these hired to carry out station projects.

Where the matter under examination may place the producer or other member of his or her team in possession of information which could lead to personal gain, especially in the case of “insider” knowledge of a publicly traded company, acting on that knowledge before the broadcast is prohibited.

2. Obey the Law

The obligations of producers are not different from those of a citizen when it comes to obeying the law except as noted herein. It is particularly important that the producer not violate the rights of others in the pursuit of a story.

Knowledge that a crime has been committed or is going to be committed, which endangers the person or property of others must be reported promptly to the appropriate public official.

Exceptions to the duty to report may be called for when the producer is investigating the misconduct of a public official who would have knowledge of it if such a report were made. In such a case the producer must consult with Senior Management before proceeding.

3. Hidden Cameras or Eavesdropping Devices

Electronic eavesdropping and the use of hidden cameras and recording devices should not be undertaken without WJCT Management approval. Ethically, WJCT is fundamentally opposed to the use of such techniques and feels that their use is justified only by the most extraordinary circumstances. There are, moreover, strong legal impediments to surreptitious recording/listening.

This does not apply to situations where a telephone conversation is recorded with the consent of both parties (one is sufficient in some jurisdictions) for purposes of accuracy.

4. Avoid Misrepresentation

In general, when a person’s participation or cooperation is sought in the production of a documentary or news report, that person must be apprised of the fact, and know why he or she is being asked to participate.

Material gathered under false pretenses may not carry the same implication of consent that otherwise applies to information freely given to a journalist. The use of a false identity may be justified, but only in the rarest of circumstances, and may not be made without advance approval by WJCT Management.

In other cases, however, an important story cannot be done without the producer’s withholding his or her own identity. Such cases are still exceptional and should be discussed in advance with station management.

5. Seek Unrestricted Access and Use. Identify All Restrictions or Conditions on Access or Information

The preferred case for public affairs programs occurs when access to a place or to a subject through interview is granted without any restriction or condition. Any question may be asked, none is rehearsed or identified beforehand, and no limit or condition is placed upon the uses made of the answers given. It is reasonable in exchange for such unrestricted use to explain the purpose of the inquiry and even to the extent known the general context in which the particular interviewee will appear. In special circumstances it may be desirable to provide questions ahead of time. For example, fairness requires that the subject of an investigative interview have the opportunity to check his or her records.

In some circumstances it may be necessary to agree to further conditions or restrictions to gain access, although agreement to such conditions should be the rare exception. When conditions or restrictions on use are part of the contract for access, the conditions should be so stated or explained on the program, and permission should be sought from WJCT Management when circumstances make this impossible.

6. Avoid Paying for Testimony

It is WJCT Management Policy not to pay for those interviewed for programs. Not only does it establish a bad precedent, but the credibility of any interviewee who is paid is rightly called into question.

7. Consult Before Staging or Recreating Events

The use of recreation can be an effective device, but there is a serious danger that the viewer will be confused by the presentation of something as real that is unreal. Therefore, where it may be appropriate to re-enact or stage an event, it must be labeled clearly and unmistakably as such.

Use of the “docudrama” or dramatized documentary form for an entire program or large portions of a program carries with it a major risk of viewer skepticism. This arises from the fact that there is inherently less believability associated with dramatizations, and that public criticism of this form has increased in recent years. Thus, it is a form to be avoided if other standard documentary techniques are available. There may, however, be unusual instances where no other technique can effectively convey the truth, e.g., dramatizing a trial transcript where the principals are unavailable.

In dramatizing a transcript, the record may be edited, but should otherwise be presented verbatim. This fact should be emphasized in the presentation, and transitional or continuity material should be clearly distinguishable from the verbatim dramatization.

8. Do Not Accept Gifts

Producers should pay their own way and be beholden to no one. Where, for special reasons, their costs are or must be borne by another, acknowledgment of that service within the program or the credits is necessary.

IN EDITING AND POST PRODUCTION

1. Edit to Compress, Not to Distort.
2. Ensure appropriate Use of Music/Effects.
3. Consult on Use of Obscene or Objectionable Materials.
4. Identify Sources.
5. Attribute All Non-Original Materials To Their Sources.
6. Do Not Pre-Screen for Interested Parties.
7. Do Not Show Out-takes or Notes to Outside Parties.

9. Edit to Compress, Not to Distort

In no area of documentary and news production is there greater reliance on the honesty of the individual producer than in editing.

It should be the objective of the editing process to collect and order all significant facts in a manner that fairly portrays the reality.

10. Limit the Use of Music/Effects

The use of music and/or effects to create impressions that are not found in reality can be objectionable. Music, for example, which editorializes or over dramatizes can detract from the program's credibility. Effects and/or music should not be used if the impression created for the viewer would be distorted or inaccurate.

In general, music/effects should be appropriate to and in keeping with the narrative line, and while this area is extremely subjective, the producer should guard against the temptation to use music/effects to communicate something that could not be supported in the script.

11. Consult on Use of Obscene or Objectionable Materials

In general, obscenities and materials offensive to general taste or manners (e.g., extreme violence, racial epithets, strong language, and nudity) should be avoided where inclusion is not necessary to an understanding of the matter at hand.

When it is judged that the exclusion of such material would have the effect of significantly distorting an important reality, the program should carry appropriate warnings to the viewer.

12. Identify Sources

As part of the cardinal responsibility of the producer to present all significant facts, those who speak to camera or who are invoked as authority for a statement of fact must be identified.

Identity in this case must also include relevant information about the source. It would be misleading, for example, to include the name of the person speaking and omit the fact that he or she was doing so from within a cell on murderers' row. By extension, any special interest motivating the speaker or interviewee should be made known in the program.

Use of an anonymous source may be required by special circumstances. It may be a condition of access to information that is of special relevance. It may be required to protect a person from harm. In any case, it should be resorted to last, when no other route to the same information is possible.

When the identity of the source cannot be made known, the reasons for anonymity should be given, and as much information about the sources should be given short of identification. Where it is not possible to indicate a source's special interest without identifying the source, such a source should not be used.

13. Attribute All Non-original Materials to Their Sources

With the exception of stock footage material, which may also need to be labeled as "library footage," all materials included in a program but not actually produced by the producer for the program should be clearly labeled as to its source. Identification may also need to include dates, when they are a significant factor. Identification at the time such footage is shown is preferred.

14. Do Not Pre-screen for Interested Parties

The broadcast should be the first publication of a documentary. Pre-screening for reviewers is an established practice, but that is the only recognized exception to the rule.

Only members of the production team, the producing organization, and others who, at the invitation of the producer, can act as independent consultants should be permitted to view rough cuts, fine cuts, or any segments of the program before completion.

15. Do Not Show Out-takes or Notes to Outside Parties

It is vital that out-takes and notes not be shared with outside parties (e.g., police, interested parties, critics) unless compelled by legal action. However, the sale of out-takes or sharing of research material with other broadcasters and journalists may be called for either by contract or mutual agreement. Whenever the question arises it should be brought to WJCT Management's attention.

FAIRNESS

No list of specific guidelines has much meaning if the producer possesses a lack of sensitivity to issues of fairness. The pursuit of the truth is journalism's main objective and by extension is the main objective of any public affairs program. A sense of fairness is critical if the pursuit of truth is to have credibility and integrity; truth is an elusive combination of fact and opinion, of reason and experience. To ask for the viewers' trust requires an implicit promise: that we present information after a good-faith effort to arrive as close to the truth as is humanly possible. A good-faith effort, in turn, depends on a sense of fairness towards the subject matter and the people in the program.

Appearance of intent to be fair is a strength, not a weakness. If the intent is seen to be fair, whatever message the program carries is reinforced. When a program seems to the viewer to be unfair, it defeats itself. Nothing will so quickly destroy any journalistic endeavor as will a reputation that it is unfair. On a controversial subject, the ideal program is one that is persuasive, but not argumentative.

Specifically, fairness means that a producer will:

- approach stories with an open and skeptical mind and a determination through extensive research to become acquainted with a wide range of viewpoints;
- try to keep personal bias and opinion from unduly influencing the pursuit of a story;
- carefully examine contrary information at any point in a production;
- exercise care in checking the accuracy and credibility of all information received, especially as it may relate to accusations of wrongdoing;
- give individuals or organizations which are the subject of attack the opportunity to respond to those attacks;
- represent fairly the words and actions of the people portrayed;
- inform individuals who are the subject of an investigative interview in advance about the general areas of questioning and, if important for accuracy, will give those individuals an opportunity to check the records;
- try to present all significant facts that a viewer will need to understand what is being seen, including appropriate information to frame the program;
- always be prepared to assist in correcting errors.

Where there are conflicting viewpoints or opinions on subjects treated within the program, fairness does not require equal time being accorded to conflicting opinions. However, it does require the acknowledgment of, and responsible, if brief, statement of those conflicting opinions.

In making a good-faith effort to discover and report the truth, the public affairs producer performs a vital function. He or she serves the public's right to know, and guards the right of a free press to discuss, question, and challenge the actions of our government and of our public and private institutions. Producers who demonstrate a lack of sensitivity to fairness in carrying out

this function jeopardize the public's trust and risk being seen as prosecutors or propagandists for special interests.

LEGAL ADDENDUM

The Federal Communication Commission has three rules which have implications for any current affairs series: the "Fairness Doctrine," "Personal Attack," and "Equal Time."

1. Fairness Doctrine. While the Fairness Doctrine is not currently required by the FCC, its content is still worth noting. The Fairness Doctrine stipulates that in presenting "controversial issues of public importance," broadcasters provide a reasonable opportunity for the expression of all opinions on the issues. Adherence to good journalistic standards should result in compliance with this rule. The definition of "controversial issues of public importance" is subject to a case-by-case analysis.
2. Personal Attack Rule. If during the presentation of a "controversial issue of public importance," qualities such as "honesty, character, integrity" or similar qualities of any "identifiable" person or group are attacked, the broadcaster must offer a reasonable opportunity for the attacked person to respond. Just as the definitions of "controversial issue" and "public importance" vary and are subject to a case-by-case analysis, the definitions of "identifiable" and such qualities as "honesty, character, and integrity" are subject to the same vagaries.
3. Equal Time. If a legally qualified candidate for public office appears in a broadcast, opponents have the right to demand equal time. While some appearances might come within an exception to the rule if they are incidental to the subject of a bone fide news documentary, producers should be aware that appearances might trigger equal time requests. The Senior Vice President, TV/FM should be informed about any person appearing in the program who is a candidate for public office.

Concerns about these rules are generally a matter for executive attention because of the extremely complicated and convoluted manner in which they have been interpreted.

It is important that these rules not create a chilling effect on the pursuit of the documentary story, if carried on within the boundaries of the other journalistic standards and practices enumerated here. However, these rules may raise obligations on the part of WJCT, which could be unduly burdensome. Therefore, a producer should immediately advise WJCT Management if he or she has reason to believe that material to be included in the program will raise an obligation under these rules.

STATEMENT OF PRINCIPLES OF EDITORIAL INTEGRITY IN PUBLIC BROADCASTING

The mission of public broadcasting is to bring to its audience the highest accomplishments of our society and civilization in all of its rich diversity, to permit creative talent to fulfill the potential of the electronic media to educate and inform, and to provide opportunities for the diverse groupings of the North American people to benefit from a pattern of programming unavailable from other sources.*

No one is more important to the fulfillment of public broadcasting's mission than the men and women of the boards of trustees of the licensee stations. They are custodians of their institutions' fiscal reputation, a currency necessary to acquire support from those whose taxes and donations make public broadcasting possible. They are also the final guardians of public broadcasting's editorial integrity and its reputation in the marketplace of ideas, where reputation is legal tender.

Editorial integrity in public broadcasting programming means the responsible application by professional practitioners of a free and independent decision-making process which is ultimately accountable to the needs and interests of all citizens.

In order to assure that programs meet the standards of editorial integrity the public has a right to expect, the following five principles and guidelines establish a foundation for trustee action. The principles and guidelines also form a basic standard by which the services of a public broadcasting licensee can be judged. At the same time, they form a basis for evaluating all aspects of a public broadcasting station's governance, from enabling legislation to the policy positions of the licensee board. The ultimate goal of the principles and guidelines is to assist public broadcasting trustees in fulfilling their vital role in this important public service.

1. We are Trustees of a Public Service

Public broadcasting was created to provide a wide range of programming services of the highest professionalism and quality which can educate, enlighten and entertain the public, its audience and source of support. It is a noncommercial enterprise, reflecting the worthy purpose of the federal and state governments to provide education and cultural enrichment to their citizens.*

As trustees of this public service, part of our job is to educate all citizens and public policy makers to our function, and to assure that we can certify to all citizens that station management responsibly exercises the editorial freedom necessary to achieve public broadcasting's mission effectively.

* A Public Trust: The Report of the Carnegie Commission on the Future of Public Broadcasting. Bantam: New York, 1979.

2. Our Service is Programming

The purpose of public broadcasting is to offer its audiences public and educational programming which provides alternatives in quality, type and scheduling. All activities of a public broadcasting licensee exist solely to enhance and support excellent programs. No matter how well other activities are performed, public broadcasting will be judged by its programming service and the value of that service to its audiences.

As trustees, we must create the climate, the policies and the sense of direction, which assures that the mission of providing high quality programming, remains paramount.

3. Credibility is the Currency of Our Programming

As surely as programming is our purpose, and the product by which our audiences judge our value, that judgment will depend upon their confidence that our programming is free from undue or improper influence. Our role as trustees includes educating both citizens and public policy makers to the importance of the fact and to assuring that our stations meet this challenge in a responsible and efficient way.

As trustees, we must adopt policies and procedures, which enable professional management to operate in a way which will give the public full confidence in the editorial integrity of our programming.

4. Many of Our Responsibilities are grounded in Constitutional or Statutory Law

Public broadcasting stations are subject to a variety of statutory and regulatory requirements and restrictions. These include the federal statute under which licensees must operate, as well as other applicable federal and state laws. Public broadcasting is also cloaked with the mantle of First Amendment protection of a free press and freedom of speech.

As trustees we must be sure that these responsibilities are met. To do so requires us to understand the legal and constitutional framework within which our stations operate, and to inform and educate those whose position or influence may affect the operation of our licensee.

5. We Have a Fiduciary Responsibility for Public Funds

Public broadcasting depends upon funds provided by individual and corporate contributions, and by local, state and federal taxes. Trustees must therefore develop and implement policies, which can assure the public and their chosen public officials alike that this money is well spent.

As trustees, we must assure conformance to sound fiscal and management practices. We must also assure that the legal requirements placed on us by funding sources are

met. At the same time, we must resist the inappropriate use of otherwise legitimate oversight procedures to distort the programming process, which such funding supports.