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Office of Inspector General  
United States Department of State

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ISP-IB-23-01

Office of Inspections

October 2022

# **Targeted Inspection of the U.S. Agency for Global Media: Editorial Independence and Journalistic Standards and Principles**

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## Summary of Review

At the request of the U.S. Congress,<sup>1</sup> the Office of Inspector General (OIG) conducted a targeted inspection to assess how the U.S. Agency for Global Media (USAGM) and its five broadcasting entities<sup>2</sup> (networks) complied with 22 Code of Federal Regulations (C.F.R.) Part 531, Statutory Firewall and Highest Standards of Professional Journalism. OIG also assessed whether USAGM and network staff followed internal policies and procedures intended to ensure adherence to the highest standards of professional journalism. OIG conducted an earlier targeted inspection, published in December 2020,<sup>3</sup> that reviewed USAGM's and the networks' compliance with journalistic standards up to June 2020. This targeted inspection covers the period from June 2020 to November 2021.

For this report, OIG reviewed editorial independence and firewall language in USAGM governing legislation, regulations, and internal policies and procedures, as well as staff and stakeholder views of editorial independence and the adoption, repeal, and planned reissuance of 22 C.F.R. Part 531. OIG interviewed staff from USAGM and all five networks.

OIG also reviewed an October 2021 Government Accountability Office (GAO) report that focused on USAGM's governance structure and oversight processes for its broadcasting entities<sup>4</sup> and reviewed selected documents from firewall-related legal action that occurred during the former USAGM leadership's tenure. Further, OIG noted that in June 2021, USAGM leadership hired independent experts to conduct a review of allegations referred to USAGM by the U.S. Office of Special Counsel (OSC)<sup>5</sup> and other events at USAGM during the period from June 2020 to January 2021. Because these completed and ongoing reviews address the specific alleged violations of editorial independence by previous USAGM leadership, OIG did not attempt to reach conclusions on those specific allegations in this targeted inspection. Instead, OIG assessed the overall effectiveness of USAGM and network policies, procedures, leadership actions, and training in establishing organization-wide clarity and compliance with editorial independence and the firewall during the period covered by this inspection, including while 22 C.F.R. Part 531 was in effect.

GAO recommended in its report that Congress consider legislation to define the parameters

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<sup>1</sup> State, Foreign Operations, and Related Programs Appropriations Bill, 2021, H.R. Rep. No. 116-444, page 36.

<sup>2</sup> The five entities are Voice of America, the Office of Cuba Broadcasting, Radio Free Europe/Radio Liberty, Radio Free Asia, and the Middle East Broadcasting Networks. For the purposes of this report, the term "broadcasting" is understood to encompass all media content produced and transmitted by the networks, including on digital platforms.

<sup>3</sup> OIG, *Targeted Inspection of the U.S. Agency for Global Media: Journalistic Standards and Principles* (ISP-IB-21-06, December 2020).

<sup>4</sup> GAO, *U.S. Agency for Global Media: Additional Actions Needed to Improve Oversight of Broadcasting Networks* (GAO-22-104017, October 2021).

<sup>5</sup> The U.S. Office of Special Counsel is an independent federal investigative and prosecutorial agency whose primary mission is to safeguard the merit system by protecting federal employees and applicants from prohibited personnel practices, especially reprisal for whistleblowing. Its basic authorities come from four federal statutes: the Civil Service Reform Act, the Whistleblower Protection Act, the Hatch Act, and the Uniformed Services Employment and Reemployment Rights Act.

of USAGM’s firewall, such as describing what is and is not permissible regarding network editorial independence.<sup>6</sup> Moreover, in this review, OIG found that 22 C.F.R. Part 531 did not add sufficient clarity for USAGM and network staff to consistently define violations or ensure compliance during the short period of time the regulation was in effect. USAGM and network staff told OIG several actions by USAGM leadership during the period 22 C.F.R. Part 531 was in effect<sup>7</sup> negatively impacted editorial independence and did not align with USAGM firewall principles. However, USAGM and network staff also said that unclear and inconsistent definitions of editorial independence and the firewall contributed to uncertainty about what constituted a firewall violation and to an uneven understanding at the working level about firewall protections, both in general and, in particular, when 22 C.F.R. Part 531 was in effect. OIG also found that USAGM’s internal procedures to address firewall issues and violations were outdated.

With respect to USAGM and the networks’ current adherence to the “highest standards of professional journalism,” OIG found that USAGM and network leadership communicated and modeled support for editorial independence and journalistic standards, although the Office of Cuba Broadcasting (OCB) could have more consistently communicated its priorities and objectives. Since February 2021, USAGM leadership had taken steps to improve oversight of internal controls governing journalistic standards, including issuing updated guidance in May 2021.

Furthermore, OIG found the networks generally had appropriate oversight of editorial controls, program reviews, and procedures to respond to violations of journalistic standards and principles, with exceptions at OCB and the Voice of America (VOA). Finally, regarding training on journalistic standards, OIG found that although all networks delivered training on standards, the quality and frequency varied. In August 2021, USAGM initiated a project to coordinate with the networks to develop an overall training policy, as recommended by OIG in its December 2020 report.<sup>8</sup>

This report includes nine additional recommendations to improve USAGM and network compliance with editorial independence and journalistic standards and principles. In its comments on the draft report, the USAGM concurred with all nine recommendations. OIG considers all nine recommendations resolved. USAGM’s response to each recommendation, and OIG’s reply, can be found in the Recommendations section of this report. USAGM’s formal written response is reprinted in its entirety in Appendix E.

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<sup>6</sup> GAO-22-104017, October 2021, pages 27-28.

<sup>7</sup> 22 C.F.R. Part 531 (June 15, 2020), repealed by 85 Fed. Reg. 79427 (December 10, 2020), was in effect from June 11, 2020, to October 26, 2020. Michael Pack was USAGM CEO from June 9, 2020, to January 20, 2021.

<sup>8</sup> ISP-IB-21-06, December 2020, page 17.

## BACKGROUND

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USAGM, known prior to August 22, 2018, as the Broadcasting Board of Governors, is an independent federal agency authorized by the U.S. International Broadcasting Act of 1994 (the 1994 Act)<sup>9</sup> to direct and supervise U.S. government-funded civilian international broadcasting. USAGM oversees two federal broadcast entities—VOA and OCB—and three private, nonprofit broadcast entities—Radio Free Europe/Radio Liberty (RFE/RL), Radio Free Asia (RFA), and the Middle East Broadcasting Networks (MBN). The three non-federal networks receive funding through grants issued and managed by USAGM. Together, the five broadcasting networks deliver program content in 62 languages to more than 100 countries using a range of broadcast and digital platforms.

USAGM’s overall mission is to inform, engage, and connect people around the world in support of freedom and democracy. Within that broad mission, however, the five broadcast entities have distinct mandates. VOA’s mission is to represent the United States, its people, and its policies, and to be a reliable and authoritative source of news. The missions of OCB, RFE/RL, and RFA are to serve as surrogate news sources in their respective regions and provide an example of free press and accurate and timely media reporting in countries where such sources of news are unavailable or limited. MBN serves as a hybrid of the two missions, by presenting accurate and objective news and information about the United States, the Middle East, and North Africa.

The combination of federal entities and non-federal grantee entities with differing legal authorities and organizational structures resulted from a series of Congressional and executive actions dating from 1942 (see Appendix B for historical chronology). The 1994 Act consolidated all U.S. government nonmilitary, international broadcasting under the oversight of a single agency, the present-day USAGM. An amendment in 2017 codified the agency’s oversight responsibilities under a CEO supported by the International Broadcasting Advisory Board (Advisory Board).<sup>10</sup> Further legislation in 2021<sup>11</sup> reinforced adherence to editorial independence<sup>12</sup> and journalistic standards and modified the authorities of the CEO and the Advisory Board.

### ***Timeline of Key International Broadcasting Actions and Legislation***

The International Broadcasting Act of 1994 established the International Broadcasting Bureau (IBB) and created a Broadcasting Board of Governors (BBG) with oversight authority over all international nonmilitary government broadcasting. Below is a timeline of key legislative,

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<sup>9</sup> Pub. L. No. 103-236.

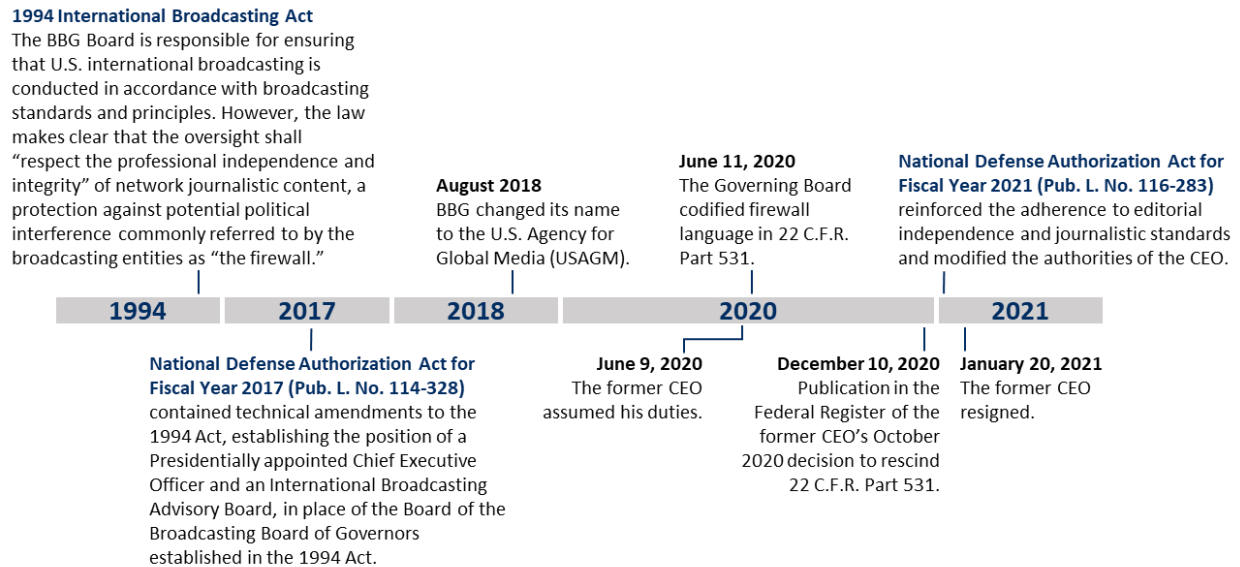
<sup>10</sup> National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328.

<sup>11</sup> William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283.

<sup>12</sup> Although the National Defense Authorization Act for Fiscal Year 2021 became law on January 1, 2021, the direction by Congress to insert the phrase, “editorial independence,” in 22 U.S. Code § 6202 was not executed because the intent of Congress could not be determined since the language in the Act did not align with the language in that section of the U.S. Code. See 22 U.S. Code § 6202 notes.

regulatory, and leadership changes. See Appendix B for a more detailed historical chronology of U.S. government international broadcasting. See Appendix D for a more detailed timeline of USAGM and network leadership from June 2020 to November 2021.

**Figure 1: Timeline of Relevant Legislative, Regulatory, and Leadership Changes**



Note: Although the National Defense Authorization Act for Fiscal Year 2021 became law on January 1, 2021, the direction by Congress to insert the phrase, “editorial independence,” in 22 U.S. Code § 6202 was not executed because the intent of Congress could not be determined since the language in the Act did not align with the language in that section of the U.S. Code. See 22 U.S. Code § 6202 notes.

Source: Compiled by OIG from information supplied by USAGM, Department of State, and other sources.

**Government Accountability Office Findings on the Firewall and 22 C.F.R. Part 531**

In October 2021, GAO released a report<sup>13</sup> focused on USAGM’s governance structure and oversight processes for its broadcasting entities. It examined three principal areas: (1) how recent statutory amendments have affected governing authority and organizational structure, (2) the extent to which USAGM’s management actions align with its policies on protecting editorial independence, and (3) USAGM actions to ensure oversight of network operations and accountability of its grantees.

GAO reported that USAGM and network officials said members of CEO Pack’s leadership team took several actions that did not align with statutory protections of editorial independence afforded to its broadcast entities. These protections include those in the 1994 Act that require the CEO and the Secretary of State to respect the professional independence and integrity of the agency and its networks.

GAO reported that according to network and USAGM staff it interviewed, USAGM’s previous leadership violated firewall protections when the former CEO rescinded the firewall regulation

<sup>13</sup> GAO-22-104017, October 2021.

(22 C.F.R. Part 531). In addition, network and USAGM staff told GAO that USAGM's previous leadership violated the firewall when it investigated and disciplined journalists for alleged violations of editorial standards or conflicts of interest, transferred or terminated two positions critical to journalistic independence, and attempted to participate in network meetings leading up to the 2020 U.S. presidential election.

GAO concluded that the USAGM leadership team in place at the time of OIG's present inspection had taken steps to strengthen the firewall. GAO reported that in February 2021, USAGM's new leadership team ended a hiring freeze, which allowed VOA and OCB to begin filling vacancies, including for a standards editor at the latter. GAO recommended that Congress consider legislation to define the parameters of USAGM's firewall, such as describing what is and is not permissible regarding network editorial independence.

### ***Legal Action During USAGM's Former Leadership Tenure Cited Firewall Violations***

On October 8, 2020, five senior USAGM employees,<sup>14</sup> who were later joined by the Programming Director of VOA, filed a lawsuit in federal court alleging that USAGM, under the former CEO's leadership, violated the statutory firewall under the 1994 Act, the First Amendment, and other laws.<sup>15</sup>

On November 20, 2020, the U.S. District Court for the District of Columbia issued a preliminary injunction prohibiting USAGM from making personnel decisions regarding particular journalists or editors; communicating directly with editors or journalists; or investigating editors, journalists, or their work on news stories, except as provided for in the USAGM Procedures for Violations of Principles, Standards, or Journalistic Code of Ethics. The judge found that the six plaintiffs, as federal employees, did not have standing to pursue violations of the 1994 Act in court until they had first exhausted all administrative remedies under the Civil Service Reform Act. However, the judge also found that because the Programming Director of VOA was a journalist as well as a federal employee, the director, and by extension all journalists who worked for the five networks, had standing to pursue legal action to protect their rights under the First Amendment.<sup>16</sup> The case was officially closed in May 2021 after a request for a voluntary dismissal.

### ***Whistleblower Complaints to the U.S. Office of Special Counsel and Department of State Office of Inspector General Included Alleged Firewall Violations***

On December 2, 2020, OSC referred allegations that it had received from 11 USAGM whistleblowers to USAGM leadership for investigation under 5 United States Code (U.S.C.) § 1213. Among the allegations were that the former USAGM leadership violated the firewall by reassigning a network's standards editor, removing another network's executive editor, and investigating a network individual reporter. The (now former) CEO's response to OSC, sent on

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<sup>14</sup> At the time of filing, the employees were on paid administrative leave.

<sup>15</sup> See *Turner v. U.S. Agency for Global Media*, 502 F. Supp. 3d 333 (D.D.C. 2020).

<sup>16</sup> *Ibid.*

January 20, 2021, the day he resigned, said that USAGM did not intend to take any action regarding the referred allegations. However, in June 2021, USAGM leadership hired independent experts to conduct a review of events at USAGM during the period from June 2020 to January 2021, including matters that OSC referred to USAGM on December 2, 2020.<sup>17</sup> At the time OIG completed its fieldwork for this targeted inspection, the independent review had not yet concluded. USAGM intends to submit a revised response to OSC once it has the results of the independent review.

Because the completed and ongoing reviews summarized above address the specifically alleged violations of editorial independence by previous USAGM leadership, OIG did not attempt to reach conclusions on those specific allegations in conducting this targeted inspection. Instead, consistent with OIG's responsibility to "recommend policies for activities designed . . . to promote economy, efficiency, and effectiveness in the administration of . . . programs and operations,"<sup>18</sup> OIG assessed the overall effectiveness of USAGM and network policies, procedures, leadership actions, and training in establishing organization-wide clarity and compliance with editorial independence and firewall requirements from June 2020 to November 2021.

## EDITORIAL INDEPENDENCE AND THE FIREWALL: STATUTORY AND REGULATORY PROVISIONS, USAGM GUIDANCE AND GRANTS, STAFF UNDERSTANDING, AND THE IMPACT OF LEADERSHIP ACTIONS WHILE 22 C.F.R. PART 531 WAS IN EFFECT

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To conduct this targeted inspection, OIG reviewed editorial independence and firewall language in USAGM governing legislation, regulations, grant agreements, and guidance, as well as staff and stakeholder views of editorial independence and the adoption, repeal, and planned reissuance of 22 C.F.R. Part 531. OIG also reviewed GAO's October 2021 report addressing USAGM editorial independence and the firewall;<sup>19</sup> an October 2020 federal lawsuit alleging that USAGM, under the former CEO's leadership, violated the statutory firewall under the 1994 Act, the First Amendment, and other laws;<sup>20</sup> information on complaints to the OSC and OIG that included alleged firewall violations; and information on an ongoing internal USAGM review of related matters that OSC referred to USAGM. Finally, OIG interviewed staff from all five networks to assess USAGM's and the five networks' compliance with the editorial independence requirements in 22 C.F.R. Part 531 and applicable legislation and agency guidance.

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<sup>17</sup> Additionally, on February 18, 2021, USAGM requested that OIG review the allegations in the OSC referral. OIG did not accept some of the allegations for review because they were already slated to be reviewed by GAO and USAGM.

<sup>18</sup> Inspector General Act of 1978, as amended, Section 2.

<sup>19</sup> GAO-22-104017, October 2021.

<sup>20</sup> See *Turner v. U.S. Agency for Global Media*, 502 F. Supp. 3d 333 (D.D.C. 2020).

USAGM and network staff told OIG they viewed several actions by the previous CEO and his leadership team to be potential violations of the firewall. However, USAGM and network staff also said that unclear and inconsistent definitions of editorial independence and the firewall contributed to uncertainty about what constituted a firewall violation and to an uneven understanding at the working level about firewall protections while 22 C.F.R. Part 531 was in effect, as discussed below. Further, as GAO reported in its October 2021 report, the parameters of the firewall are not clear in legislation,<sup>21</sup> and OIG found that 22 C.F.R. Part 531 and agency guidance did not add sufficient clarity for USAGM and network staff to consistently define violations or ensure compliance during the short period of time the regulation was in effect. OIG also found that USAGM leadership actions while 22 C.F.R. Part 531 was in effect reduced clarity and increased staff concerns regarding editorial independence. Finally, OIG determined that USAGM’s internal procedures to address firewall issues and violations were outdated.

***Legislation, Regulations, Grant Agreements, and Guidance Did Not Contain Clear Definitions of Editorial Independence and the Firewall***

OIG determined that the legislation, regulations, grant agreements, and guidance governing network editorial independence did not clearly or consistently define editorial independence and the firewall. See Table 1.

**Table 1: Key Provisions of International Broadcasting Legislation, Regulations, Grant Agreements, and Guidance Related to Editorial Independence, the Firewall, and USAGM CEO Responsibilities**

Source	Description/Language
1994 International Broadcasting Act, as amended (22 U.S.C. 6201 et seq)	<ul style="list-style-type: none"> <li>• U.S. international broadcasting shall “be consistent with the broad foreign policy objectives of the United States” and be “conducted in accordance with the highest professional standards of broadcast journalism.” [22 U.S.C. § 6202(a)(1), (5)]</li> <li>• Broadcasting shall include “news, which is consistently reliable and authoritative, accurate, objective, and comprehensive;” and “a balanced and comprehensive projection of United States thought and institutions, reflecting the diversity of United States culture and society.” [22 U.S.C. § 6202(b)(1), (2)]</li> <li>• The USAGM CEO has authority to “review and evaluate the mission and operation of, and to assess the quality, effectiveness, and professional integrity of, all [broadcasting] activities within the context of the broad foreign policy objectives of the United States.” [22 U.S.C. § 6204(a)(2)]</li> <li>• The USAGM CEO is responsible for ensuring that U.S. international broadcasting is conducted in accordance with the 8 standards and 10 principles in § 6202(a) and (b). [22 U.S.C. § 6204(a)(3)]</li> <li>• The USAGM CEO has authority to “launch a review, using external, native-language and regional experts, the results of which are to be reported to the appropriate congressional committees, if a widespread</li> </ul>

<sup>21</sup> Ibid., pages 27-28.



Source	Description/Language
	<p>pattern of violations of the principles, standards, or journalistic code of ethics of a language service or grantee network has been identified.” (This authority was added by the Jan. 2021 amendments discussed below in this table.) [22 U.S.C. § 6204(a)(23)(C)] “The Secretary of State and the Chief Executive Officer, in carrying out their functions, shall respect the professional independence and integrity” of its broadcasting services and grantees. [22 U.S.C. § 6204(b)]</p>
<p>22 C.F.R. Part 531, Statutory Firewall and Highest Standards of Professional Journalism (June 2020)</p>	<p>Part 531.1 Overview, states, in part: “Pursuant to International Broadcasting Act of 1994, as amended (22 U.S.C. 6201 et seq.) (“the IBA” or “the Act”), and other applicable authorities: (a) All USAGM-funded networks must adhere to the highest professional standards of journalism, pursuant to section 303(a)(5) of the IBA, in order to produce news which is consistently reliable and authoritative, accurate, objective, and comprehensive, per section 303(b) of IBA. Accordingly, USAGM networks necessarily enjoy full editorial independence in order to maintain their ‘professional independence and integrity,’ per section 305(b) of the IBA. This statutorily mandated firewall protects the independence of the networks by insulating their editorial decisions from interference from those outside of the network. . . .”</p>
<p>USAGM’s Broadcasting Administrative Manual, Title II</p>	<p>Text of 22 C.F.R. Part 531 is incorporated in the Broadcasting Administrative Manual, June 2020.</p>
<p>Network grants (MBN, RFA, RFE/RL)</p>	<p>Language in the annual grants generally require network adherence to the journalistic standards and principles of the 1994 Act. Amended grant language in December 2020/January 2021 also emphasized the USAGM CEO’s discretion to conduct reviews regarding the standards, principles, or journalistic code of ethics.</p>
<p>Repeal of 22 C.F.R. Part 531 (Dec. 2020)</p>	<p>The Federal Register says, in part: “The United States Agency for Global Media . . . is repealing the regulation entitled ‘Firewall and Highest Standards of Professional Journalism’ published on June 15, 2020.” DATES: This rule is effective without actual notice as of December 10, 2020. For the purposes of enforcement, actual notice will be used as of October 26, 2020. [85 Fed. Reg. 79,427]<sup>a</sup></p>
<p>William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Pub. L. No. 116-283), Section 1299Q (Jan. 2021)</p>	<p>Added: STANDARDS AND PRINCIPLES—Section 303 of the United States International Broadcasting Act of 1994 (22 U.S.C. 6202) is amended—</p> <ul style="list-style-type: none"> <li>• In subsection (a), by inserting “, including editorial independence” before the semicolon at the end. [SEC. 1299Q(b)(1)]<sup>b</sup></li> <li>• In subsection (b), by inserting “, including editorial independence,” after “programing”. [SEC. 1299Q(b)(2)]<sup>b</sup></li> <li>• Modified the functions of the Advisory Board to include, among other functions, that the members of the Advisory Board shall advise the CEO to ensure that the CEO “fully respects the professional integrity and editorial independence of [USAGM] broadcasters, networks, and grantees,” [SEC. 1299Q(d)(4)].</li> <li>• And that “agency networks, broadcasters, and grantees adhere to the highest professional standards and ethics of journalism, including taking necessary actions to uphold professional standards to produce</li> </ul>

Source	Description/Language
	<p>consistently reliable and authoritative, accurate, objective, and comprehensive news and information.” [SEC. 1299Q(d)(4)].</p> <ul style="list-style-type: none"> <li>• Added USAGM CEO authority to conduct reviews, including “a review, using external, native-language and regional experts, the results of which are to be reported to the appropriate congressional committees, if a widespread pattern of violations of the principles, standards, or journalistic code of ethics of a language service or grantee network has been identified.” [SEC. 1299Q(c)(1)(C)]</li> </ul>

<sup>a</sup> Repeal of Regulation Entitled Firewall and Highest Standards of Professional Journalism, 85 Fed. Reg. 79,427 (Dec. 10, 2020).

<sup>b</sup> Although the National Defense Authorization Act for Fiscal Year 2021 became law on January 1, 2021, the direction by Congress to insert the phrase, “editorial independence,” in 22 U.S. Code § 6202 was not executed because the intent of Congress could not be determined since the language in the Act did not align with the language in that section of the U.S. Code. See 22 U.S. Code § 6202 notes.

**Source:** Compiled by OIG.

For example, the 1994 Act states that USAGM shall “respect the professional independence and integrity of the International Broadcasting Bureau,<sup>22</sup> its broadcasting services, and grantees.”<sup>23</sup> However, the 1994 Act also empowers the USAGM Board<sup>24</sup> “[t]o review and evaluate the mission and operation of, and to assess the quality, effectiveness, and professional integrity of, all such activities within the context of the broad foreign policy objectives of the United States” and “[t]o ensure that United States international broadcasting is conducted in accordance with the [Act’s] standards and principles.”<sup>25</sup> Similarly, the National Defense Authorization Act for Fiscal Year 2021 (FY2021 NDAA) calls on agency networks, broadcasters, and grantees to “adhere to the highest professional standards and ethics of journalism”<sup>26</sup> and requires the Advisory Board to advise the CEO to ensure the CEO “fully respects the professional integrity and editorial independence of [USAGM] broadcasters, networks, and grantees.”<sup>27</sup> However, the FY2021 NDAA also added language giving the USAGM CEO authority to conduct reviews, including an external review, “if a widespread pattern of violations of the principles, standards, or journalistic code of ethics of a language service or grantee network has been identified.”<sup>28</sup>

In addition, USAGM’s Broadcasting Administrative Manual, which remains in effect and incorporated the language of the now rescinded 22 C.F.R. Part 531, states the following:

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<sup>22</sup> The 1994 Act abolished the Board of International Broadcasting and established the Broadcasting Board of Governors. In 2018, the Broadcasting Board of Governors changed its name to the U.S. Agency for Global Media. See Appendix B: Historical Chronology of U.S. Government International Broadcasting.

<sup>23</sup> United States International Broadcasting Act of 1994, Pub. L. No. 103-236, § 305(c).

<sup>24</sup> The National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 1288(2), replaced “Board” with “Chief Executive Officer.”

<sup>25</sup> United States International Broadcasting Act of 1994, Pub. L. No. 103-236, § 305(a)(2)-(3).

<sup>26</sup> William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, § 1299Q(d)(4).

<sup>27</sup> Id.

<sup>28</sup> Id., § 1299Q(c)(1)(C).

[A] firewall exists between anybody involved with any aspect of journalism (e.g., the creation, editing, reporting, distributing, etc., of content) and everyone else in the organization. For purposes of USAGM, firewalls exist between the newsroom of a USAGM-network; everyone else in the organization; and the Executive Branch of the U.S. Government, as described herein.<sup>29</sup>

The Broadcasting Administrative Manual and 22 C.F.R Part 531 further define a firewall violation as follows:

This “firewall” is understood to be violated when any person within the Executive Branch or a Network, but outside the newsroom, attempts to direct, pressure, coerce, threaten, interfere with, or otherwise impermissibly influence any of the USAGM networks, including their leadership, officers, employees, or staff, in the performance of their journalistic and broadcasting duties and activities. It is also violated when someone inside the newsroom acts in furtherance of or pursuant to such impermissible influence.<sup>30</sup>

However, the Broadcasting Administrative Manual and 22 C.F.R. Part 531 also state:

The existence of a firewall does not mean the absence of oversight. This firewall shall not be construed to limit USAGM oversight conducted in a manner consistent with that conducted by other media organizations which operate editorially independent news divisions that adhere to the highest standards of journalism.<sup>31</sup>

The firewall does not prevent a USAGM CEO or Board from undertaking the same type of direction and oversight that those in equivalent leadership positions in or overseeing other reputable news organizations may provide, in a manner consistent with the highest standards of professional journalism.<sup>32</sup>

Similar to the International Broadcasting Act, the manual’s and 22 C.F.R. Part 531’s editorial independence requirements are tied to “the highest standards of professional journalism,” for which the manual and rescinded regulation provide only the following definition:

*Highest professional standards of journalism* means the highest professional standards in the field of journalism.<sup>33</sup>

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<sup>29</sup> U.S. Agency for Global Media, Broadcasting Administrative Manual, Title 2, Part 531.3(b); 22 C.F.R. 531.3(b).

<sup>30</sup> Broadcasting Administrative Manual, Title 2, Part 531.3(c); 22 C.F.R. 531.3(c).

<sup>31</sup> Broadcasting Administrative Manual, Title 2, Part 531.1(b); 22 C.F.R. 531.1(b).

<sup>32</sup> Broadcasting Administrative Manual, Title 2, Part 531.3(e)(3); 22 C.F.R. 531.3(e)(3).

<sup>33</sup> Broadcasting Administrative Manual, Title 2, Part 531.4(f); 22 C.F.R. 531.4(f).

Except in one instance,<sup>34</sup> the Broadcasting Administrative Manual and 22 C.F.R. Part 531 do not provide specific guidance on appropriate reconciliation of editorial independence and firewall protections with the USAGM CEO's statutory management and oversight responsibilities.

Adding to the inconsistency and uncertainty, the grantee networks' relationships with USAGM are governed by language in the annual grants, which require network adherence to the journalistic standards and principles of the 1994 Act, codified at 22 U.S.C. § 6202(a) and (b), rather than the Broadcasting Administrative Manual.<sup>35</sup> Further compounding the inconsistency and uncertainty during the period covered by this targeted inspection, the grant language was amended in December 2020, as discussed further below, emphasizing the USAGM CEO's discretion to conduct external reviews of violations of the principles, standards, or journalistic code of ethics.

***Network Staff Were Unclear on the Definition and Scope of the Firewall, Including While 22 C.F.R. Part 531 Was in Effect***

OIG found staff had varying interpretations of the definition and scope of the firewall. OIG found that inconsistencies and lack of clarity in the governing legislation, regulations, the Broadcasting Administrative Manual, and the networks' grants, as discussed in the preceding section of this report, contributed to different understandings of the firewall's reach.

Staff awareness of the firewall regulation in 22 C.F.R. Part 531 was uneven. In an OIG survey of selected USAGM and network staff, 49 percent of respondents answered "do not know" to the question whether their network updated any internal policies after the regulation was published as 22 C.F.R. Part 531 in June 2020. Similarly, 41 percent of respondents answered "do not know" to the question whether rescinding the regulation had any effect on their network's adherence to journalistic standards. Some staff who were aware of the regulation thought it unnecessary because the concept of the firewall was already enshrined in governing legislation.

Moreover, while VOA, OCB, and RFE/RL had instructions in their journalistic standards guides about how staff should report alleged firewall violations, neither MBN nor RFA had similar instructions in their guides, although both networks discussed firewall issues in their training materials. OIG found differing interpretations among staff over whether a violation of the firewall applied exclusively to newsroom issues or also to administrative areas such as human resources or budget decisions.<sup>36</sup> For example, some staff interpreted USAGM leadership's June 2020 decision to remove VOA's Standards Editor from the network's News Standards and Best

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<sup>34</sup> Broadcasting Administrative Manual, Title 2, Part 531.3(e)(4); 22 C.F.R. 531.3(e)(4).

<sup>35</sup> USAGM officials told OIG that the grantee networks do not have access to the Broadcasting Administrative Manual.

<sup>36</sup> As discussed earlier in this report, the authorities of the CEO are listed in 22 U.S.C. § 6204(a), which include to direct and supervise all broadcasting activities and to allocate funds appropriated for international broadcasting activities. In addition, 22 C.F.R. § 531.1(b) notes that the existence of a firewall does not mean the absence of oversight and that the firewall "shall not be construed to limit USAGM oversight conducted in a manner consistent with that conducted by other media organizations which operate editorially independent news divisions that adhere to the highest standards of journalism."

Practices Unit for 4 months as a way to use personnel actions to interfere with VOA's editorial independence. The GAO *Standards for Internal Control in the Federal Government*, Principle 14, states that organizations should internally communicate the necessary information to support an organization in fulfilling its objectives.<sup>37</sup> During this targeted inspection, USAGM was updating its firewall guidance and procedures but had not completed the process. Lack of comprehensive communication throughout USAGM and the networks on the definition and scope of the firewall increases the risk of potential firewall violations.

**Recommendation 1:** The U.S. Agency for Global Media should update its firewall guidance and procedures and disseminate the updates to agency and network staff. (Action: USAGM, in coordination with MBN, OCB, RFA, RFE/RL, and VOA)

***USAGM's Former Leadership Actions Reduced Clarity and Increased Staff Concerns Regarding Editorial Independence***

In December 2020, USAGM's former leadership amended the grants for the three grantee networks, RFE/RL, RFA, and MBN. The December 2020 amended agreements added language that gave the USAGM CEO "sole discretion" to identify a "widespread pattern of violations of the principles, standards, or journalistic code of ethics of a language service or grantee network and to launch a review," using external experts.<sup>38</sup> Although this new grant language was generally consistent with specific USAGM CEO authority under 22 U.S.C. § 6204(a)(23)(C), USAGM and network staff expressed concern that such sole discretion would have risked violating the grantee networks' editorial independence.

In addition, other amended grant language would have given grantee network board members an initial 2-year appointment during which they could not be removed involuntarily, and after serving 2 years, a member could be removed only for cause.<sup>39</sup> This could have had the effect of creating permanent, potentially partisan boards at the three grantee networks. Language in prior grant agreements did not address network board members' terms because board members of the Broadcasting Board of Governors also served on the grantee networks' corporate boards and were therefore bound by that board's terms. RFE/RL's then-acting president and editorial board sent an open letter on January 5, 2021, to the former USAGM CEO in which, among other matters, they contended that his actions to ensure RFE/RL's board would have members from only one political party risked the network's reputation for independence. In February 2021, the acting CEO rescinded the former leadership's December 2020 grant amendments.

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<sup>37</sup> GAO, *Standards for Internal Control in the Federal Government*, page 60 (GAO-14-704G, September 2014).

<sup>38</sup> December 2020 amended grant language for MBN, RFE/RL and RFA, Article VIII - USAGM Oversight and its Limitations, Section F.

<sup>39</sup> Amended grant language for the three grantee networks said, in part, "USAGM and the Non-Federal Entity agree that any of the Non-Federal Entity's board members, officers, directors, and heads of the network, who are appointed by the CEO and approved by the Non-Federal Entity's board of directors, may not be removed involuntarily for a period of two years after their appointment. Any removal after two years must be for cause." Article IV – Cooperation with USAGM Governance of United States International Broadcasting, Section b2.

Former USAGM leadership also rescinded 22 C.F.R. Part 531 in October 2020, stating that the regulation was “unworkable” for a variety of reasons, including that it undermined “the ability of USAGM to discharge its core statutorily mandated functions.”<sup>40</sup> In addition, in his message to staff, the former CEO stated that the regulation prevented him from fulfilling his responsibility as CEO to ensure that “individuals whose jobs are funded by the U.S. taxpayer adhere to the highest standards of their profession.”<sup>41</sup> However, as discussed below, USAGM and network staff told OIG they viewed the rescinding of 22 C.F.R. Part 531 as concerning for the networks’ editorial independence because it demonstrated that former USAGM leadership was willing to alter or eliminate firewall language.

***Staff Were Concerned About Lack of Permanence of Any Future Language on Editorial Independence and the Firewall***

OIG found concern among USAGM and network staff that any published language—whether in the form of regulations, policies, or procedures—on editorial independence and the firewall could be disregarded by future USAGM leadership. Although USAGM told OIG it intended to reissue the firewall regulation in a new C.F.R., USAGM and network staff told OIG they were concerned that the language would not be binding. The lack of a permanent commitment to editorial independence risked a “chilling effect” at the networks, in which staff would feel pressured to align their reporting to the views of the political leadership of USAGM. Such an effect would diminish the editorial independence of the networks and run counter to the intent of the governing legislation.

***USAGM’s Written Procedures Regarding Alleged Firewall Violations Were Outdated***

OIG found that some of the agency’s written procedures to review and adjudicate alleged firewall violations were outdated. USAGM staff told OIG that, prior to the FY 2017 legislative modifications in USAGM governance (addressed in the Background section of this report), the Broadcasting Board of Governors was typically involved in adjudicating and resolving alleged firewall violations. Although the National Defense Authorization Act for Fiscal Year 2017 created an International Broadcasting Advisory Board to replace the Board of the Broadcasting Board of Governors,<sup>42</sup> at the time of this targeted inspection, USAGM had no functioning board because members had not yet been nominated. USAGM officials told OIG that, in the absence of a Board, the Acting CEO’s leadership team adjudicated and resolved alleged firewall violations. As stated in the *GAO Standards for Internal Control in the Federal Government*, Principle 2.03,<sup>43</sup> organizations should establish internal oversight bodies to make oversight decisions so that the entity achieves its objectives in alignment with the organization’s integrity and ethical values. Outdated procedures to review and adjudicate alleged firewall violations raise risks that improper interference in the journalistic independence of networks will not be

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<sup>40</sup> Repeal of Regulation Entitled Firewall and Highest Standards of Professional Journalism, 85 Fed. Reg. 79,427 (Dec. 10, 2020).

<sup>41</sup> USAGM CEO October 26, 2020, message to staff “USAGM CEO Background on rescinding a so-called ‘firewall rule.’”

<sup>42</sup> National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, codified at 22 U.S.C. § 6205.

<sup>43</sup> GAO-14-704G, September 2014, page 24.

addressed. However, OIG did not make a recommendation to address this issue because, during the targeted inspection, USAGM updated its firewall procedures, including publishing updates to its public website, and had begun updating the procedures to reflect the creation of the International Broadcasting Advisory Board.<sup>44</sup>

## **LEADERSHIP ACTIONS AND COMMUNICATIONS REGARDING EDITORIAL INDEPENDENCE AND JOURNALISTIC STANDARDS AND PRINCIPLES**

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OIG reviewed USAGM and network leadership messages and interviewed USAGM and network staff to assess the efforts of the leadership team in place during this targeted inspection to support the firewall and model journalistic standards and principles. OIG also reviewed messages and interviewed staff to assess views of their leadership's communication on journalistic standards and principles. At the time of this targeted inspection, of the six leadership positions at USAGM and the five networks, three had acting heads: USAGM had an acting CEO, VOA had an acting director, and MBN had an acting president. OIG found that USAGM and network leadership modeled journalistic standards and principles and consistently communicated support for the firewall and journalistic standards, with an exception at OCB, as described below.

### ***USAGM and Network Heads Demonstrated and Communicated Support for the Firewall and Journalistic Standards***

OIG found that USAGM's acting CEO demonstrated leadership in proactively communicating support for the firewall and journalistic standards and principles. USAGM staff told OIG that the acting CEO modeled support for the firewall and adherence to journalistic standards and principles. In her January 21, 2021, welcome message, the acting CEO wrote, "[W]e have a lot of work ahead of us: reaffirm the firewall, the highest standards of professionalism, and the sacred editorial independence and journalistic integrity; and ensure the safety and security of our journalists." On May 20, 2021, she sent a memorandum to network heads, entitled "Program Review and Procedures for Violations of Journalistic Standards,"<sup>45</sup> that laid out procedures for addressing violations of journalistic ethics and standards. The memorandum stated that the procedures "shall be interpreted in a manner that is at all times respectful of the firewall and consistent with the journalistic independence of the individual networks." As part of her outreach to networks, the acting CEO initiated a "Best Practices Council," composed of network standards editors,<sup>46</sup> to promote compliance with journalistic standards and principles.

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<sup>44</sup> The GAO report also discussed USAGM leadership's firewall efforts, noting: "Current USAGM leadership has emphasized editorial independence and taken steps to strengthen the firewall." GAO-22-104017, October 2021, page 20.

<sup>45</sup> In August 2021, USAGM incorporated this memorandum into its Broadcasting Administrative Manual (Title 2- General Administration).

<sup>46</sup> The standards editor is responsible for ensuring compliance with the highest journalistic standards across a news entity's content on all platforms. VOA established a standards editor position in 2010. RFE/RL hired a standards editor in 2016. RFA did not have a dedicated standards editor position, opting instead to cover these functions with its existing editorial staff. MBN's position, called public editor, created in 2019, was vacant since August 2021,

Respecting the independence of the networks' standards editors, she did not attend council meetings.

OIG also found that most network leadership teams regularly sent messages to staff stating their commitment to journalistic standards and principles. For example, in a June 2021 message to staff regarding social media policy updates, VOA leadership reiterated that VOA journalists were responsible for adhering to VOA's journalistic standards as detailed in VOA's Best Practices guide. In an OIG survey of network staff, an average of 69 percent of respondents from four of the five networks strongly agreed that their network had established clear journalistic standards and principles. However, OIG found that although OCB had distributed an updated Best Practices guide to all employees, OCB leadership's communication with its staff had deficiencies, as discussed below.

***The Office of Cuba Broadcasting Leadership Did Not Communicate Journalistic Standards, Objectives, and Priorities as Consistently as Other Networks' Leadership***

Based on interviews and an OIG survey with OCB staff, OIG found that OCB leadership did not consistently communicate journalistic standards objectives and priorities to its staff. In an OIG survey of network staff, OCB had the lowest percentage of respondents who strongly agreed that their network had established clear journalistic standards and principles.<sup>47</sup> In addition, staff told OIG they were unaware of or not participating in OCB's program review, a major initiative for OCB and USAGM to ensure adherence to journalistic standards. OCB had held only one town hall meeting since the director arrived in May 2021.

USAGM's Strategic Plan (2018-2022) states that leadership should consistently communicate organizational goals, objectives, priorities, and performance expectations in a timely manner to staff at all levels. In addition, the *GAO Standards for Internal Control in the Federal Government*, Principle 14, states that organizations should internally communicate the necessary information to support an organization in fulfilling its objectives.<sup>48</sup> Moreover, GAO identified several steps that leadership should take for successful change management.<sup>49</sup> They include establishing a communication strategy to create shared expectations. At the time of the inspection, OCB's new leadership was addressing managerial challenges stemming from a frequent turnover of directors. Without consistently engaging and communicating with employees, OCB risks falling short of successful implementation of its journalistic standards goals and objectives.

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when the incumbent began serving as acting President for the network. At the time of the inspection, OCB was in the process of hiring a standards editor.

<sup>47</sup> In the OIG survey, 50 percent of OCB respondents strongly agreed that that their network had established clear journalistic standards and principles, whereas responses to the same question from the four other networks ranged from 60 to 75 percent.

<sup>48</sup> GAO-14-704G, September 2014, page 60.

<sup>49</sup> GAO, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations* (GAO-03-669, July 2003).



**Recommendation 2:** The Office of Cuba Broadcasting should implement a strategic communication plan that conveys journalistic standards objectives and priorities to staff. (Action: OCB)

## JOURNALISTIC STANDARDS: EDITORIAL CONTROL POLICIES AND PROCESSES

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OIG reviewed the editorial control policies and processes established by USAGM and the five networks to ensure adherence to journalistic standards and principles. All networks had written journalistic standards and principles consistent with the 1994 Act, codified at 22 U.S.C. § 6202(a), (b). These standards and principles were upheld primarily through three mechanisms: (1) daily editorial oversight procedures; (2) annual program reviews; and (3) a graduated review process for responding to minor and serious journalistic lapses. Standards editors assisted the networks by providing standards guidance and identifying potential lapses. OIG found that the networks generally exercised appropriate editorial control through these mechanisms, which were not only important tools to identify and address lapses in journalistic standards but were also intended to prevent similar future occurrences.

However, two networks—OCB and VOA—had deficiencies in one or more aspects of these mechanisms that jeopardized full adherence to journalistic standards, as described below.

### ***Office of Cuba Broadcasting Lacked Written Policies, Procedures on Editorial Review Process***

OIG found no written policies or procedures that defined the OCB editorial review process. Much of the workflow process was passed on orally or by email. Some staff told OIG that their content was not consistently reviewed by an editor, and others commented on editor-level staffing shortages due to budget cuts. OCB leadership acknowledged that, due to staffing shortages, the same person who produced the news could also conduct the editorial review, a practice which is contrary to professional journalistic standards. As a result, it was not clear whether content created specifically for OCB's website was consistently reviewed by an editor. The GAO *Standards for Internal Control in the Federal Government*, Principle 3.10,<sup>50</sup> states that effective documentation assists in the design of controls by establishing and communicating responsibilities to personnel, providing a means to retain organizational knowledge, and mitigating the risk of having that knowledge limited to a few personnel. Without written policies guiding the editorial review process, content may not be reviewed before broadcast, risking violations of journalistic standards.

**Recommendation 3:** The Office of Cuba Broadcasting should create written policies or procedures that define the editorial review process to ensure that all content is reviewed before broadcast. (Action: OCB)

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<sup>50</sup> GAO-14-704G, September 2014, page 29.

### ***Office of Cuba Broadcasting Lacked Written Procedures for Addressing Lapses in Journalistic Standards***

OIG found that OCB lacked written procedures for addressing lapses in journalistic standards. For example, OIG found no written procedures on the roles and responsibilities of OCB or USAGM personnel or offices involved in addressing lapses. Furthermore, OIG found no written guidance on how employees should raise potential violations or how allegations against them would be handled. Staff told OIG that many of OCB's routine procedures were conveyed orally rather than in writing. In the absence of written procedures, staff gave OIG inconsistent responses for how to report lapses and how allegations would be addressed. A May 20, 2021, memorandum from the acting USAGM CEO to network heads, entitled "Program Review and Procedures for Violations of Journalistic Standards," requires each network to develop and implement appropriate procedures for addressing standards violations. Without written procedures governing the process for addressing lapses in journalistic standards, OCB risks a violation not being handled in an appropriate or timely manner.

**Recommendation 4:** The Office of Cuba Broadcasting should develop and disseminate to staff written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: OCB)

### ***Voice of America's Annual Program Reviews Were Inconsistently Implemented***

The process for VOA's annual program reviews for language services<sup>51</sup> lacked consistent implementation. For example, although the VOA review process<sup>52</sup> identified the Program Review Self-Assessment Questionnaire for language service chiefs as the initial step in the review process, OIG found some reviews had self-assessment narratives instead of a completed questionnaire and others lacked any self-assessments entirely. In addition, VOA staff told OIG that program review analysts sometimes lacked foreign language proficiency, critical to analyzing content, yet did not use professional, written translations to review and understand content. In April 2019, USAGM issued a policy<sup>53</sup> on the annual program review process that called for translations where reviewers were not proficient in the language. VOA told OIG that staff shortages resulting from a 2020 hiring freeze prevented implementation of a thorough program review process. However, VOA also noted that the program review office had named a new director in March 2021 and was taking steps to ensure the annual program reviews would be completed according to VOA's and USAGM's policies. The lack of a consistent and comprehensive program review process risks overlooking journalistic standards deficiencies in language service content.

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<sup>51</sup> Program reviews are evaluations of the quality of a selection of programming of a language service based upon both internal and external feedback. The program review also addresses the political and media environment in the target market. The review aims to provide network leadership and USAGM an independent evaluation of the work of each language service.

<sup>52</sup> VOA, "The Performance Review Process."

<sup>53</sup> USAGM's Office of Policy and Research, "Expectations for Network Program Review," April 2019.

**Recommendation 5:** Voice of America should require all language services to complete the annual program reviews according to network and U.S. Agency for Global Media policies. (Action: VOA)

***Voice of America's Annual Program Review Process Lacked Written Action Plans***

OIG found VOA's annual program reviews of language services lacked written action plans to implement recommendations made during the review. In April 2019, USAGM issued a policy<sup>54</sup> for each network's program review process, which was reconfirmed in the acting CEO's May 2021 policy guidance memorandum discussed earlier. The policy requires that the review process include a written report of each evaluation, including action plans to address any deficiencies found during the review. The action plans should identify the responsible offices and expected timeframes for resolving any deficiencies, with monitoring at regular intervals to ensure progress. VOA staff were unable to provide any written action plans to OIG. Rather than written action plans, VOA staff told OIG they relied on meetings and emails to address any deficiencies. The lack of action plans in language service reviews risks limiting the implementation of recommendations and best practices identified during the annual program review process.

**Recommendation 6:** Voice of America should develop and distribute to staff a written action plan for each annual program review, to include how action items will be implemented and enforced. (Action: VOA)

***Voice of America Lacked Written Procedures for Addressing Lapses in Journalistic Standards***

OIG found that VOA lacked written procedures for addressing allegations of lapses in journalistic standards. For example, OIG found no written procedures on the roles and responsibilities of VOA personnel or USAGM offices involved in addressing allegations. Furthermore, OIG found no written guidance on how employees should raise potential lapses or how allegations against them would be handled. The lack of written guidance occurred because VOA traditionally used oral instructions to communicate many routine procedures. However, in the absence of written procedures, VOA staff gave OIG inconsistent responses for how to report lapses and how allegations would be addressed.

The lack of written procedures on the roles and responsibilities of relevant personnel and offices in addressing allegations of lapses of journalistic standards contributed to delays in addressing alleged lapses. For example, in one instance, although initial suspicions of plagiarism by a contract reporter arose in July 2020, VOA did not review the issue until the allegations resurfaced in November 2020.<sup>55</sup> Subsequently, neither the network nor USAGM acted until 7 months later, in June 2021, after being contacted by an outside journalist who was writing a

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<sup>54</sup> Ibid.

<sup>55</sup> The VOA Standards Editor, who, among other duties, reviews allegations of plagiarism, was detailed to USAGM for approximately 4 months, from mid-June to mid-October 2020.

story on the alleged plagiarism. OIG determined that confusion regarding roles and responsibilities contributed to these delays.

As stated earlier, the May 20, 2021, memorandum from the Acting USAGM CEO to network heads, entitled “Program Review and Procedures for Violations of Journalistic Standards,” requires each network to develop and implement appropriate procedures for addressing standards violations. Without written procedures governing the process for addressing journalistic standards violations, VOA risks compromising its commitment to uphold the highest journalistic standards.

**Recommendation 7:** Voice of America should develop and disseminate to staff, including through training, written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: VOA)

***Although Voice of America Standards Editor’s Scope of Responsibility Was Extensive, Authority Was Unclear to Staff***

OIG found the VOA Standards Editor’s authority was unclear. The Standards Editor was responsible for ensuring the highest journalistic standards across content on all 47 of VOA’s language service platforms. However, the Standards Editor’s authority rested on a shared, unwritten agreement that VOA would implement the editor’s journalistic standards guidance. As a result, the editor did not have the authority to ensure compliance. The GAO *Standards for Internal Control in the Federal Government*, Principle 3.01,<sup>56</sup> states that management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives. Furthermore, Principle 3.10 states that effective documentation assists in the design of controls by establishing and communicating responsibilities to personnel.<sup>57</sup>

Staff told OIG that language services staff occasionally ignored guidance, including from VOA’s Standards and Best Practices Guide, and had not taken corrective action on standards violations. For example, despite learning of a case of suspected plagiarism in the Africa Division in February 2020, which the Standards Editor confirmed that same month, VOA did not remove the related content until 8 months later. OIG determined that confusion over roles and responsibilities, including that of the Standards Editor, contributed to the delay. Lack of a clear definition of the Standards Editor’s authority risks compromising VOA’s commitment to uphold the highest journalistic standards.

**Recommendation 8:** Voice of America should clarify the roles and authorities of the Standards Editor in implementing standards-related guidance for all staff. (Action: VOA)

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<sup>56</sup> GAO-14-704G, September 2014, page 27.

<sup>57</sup> GAO-14-704G, September 2014, page 29.

## **Spotlight on Success: Radio Free Europe/Radio Liberty Coverage of the 2020 Conflict in Nagorno-Karabakh**

In line with RFE/RL's editorial policy for covering conflicts between countries in its area of coverage, the Armenian and Azerbaijan language services cooperated during the conflict in Nagorno-Karabakh in 2020 to ensure balanced and unbiased reporting. Even before the outbreak of armed hostilities in September 2020 between Armenia and Azerbaijan, the RFE/RL Editorial Board discussed with the Armenian and Azerbaijan Language Service Directors the need to exchange their journalists' reports. RFE/RL's Standards Editor monitored both language services' content to evaluate balance. For example, both services included stories from the perspective of the opposing side on civilian casualties, based on official statements, impartial experts, and civilian interviews. Both services used reports prepared by the Central Newsroom, which drew on both services' material and added regional and international context. These efforts ensured that each service was able to achieve balance in its reporting, avoid repeating propaganda or encouraging nationalism, and prevent demonization of the other country. In addition, the services had balanced and unbiased coverage of the conflict despite anger and threats from elements of the services' audiences and pressure by regional governments to influence their reporting.

## **ONBOARDING AND TRAINING**

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OIG reviewed orientation and training materials on journalistic standards at the five networks. All networks had orientation materials for newly hired staff that explained editorial independence and journalistic standards. However, training on journalistic standards varied at the five networks. For example, at the time of the inspection, RFE/RL was translating its mandatory journalistic standards training into languages widely spoken among RFE/RL staff, with a planned completion date of January 2022. RFA and MBN offered some journalism standards training in various languages used by staff. VOA, whose staff, like RFA and RFE/RL staffs, spoke a wide variety of languages, offered journalistic standards training primarily in English. MBN was planning to increase its mandatory training on the standards. OCB inconsistently tracked who had completed mandatory training. In August 2021, USAGM initiated a project to assist each network to develop systematic journalistic standards training, as OIG recommended in its December 2020 report,<sup>58</sup> which will address these deficiencies.

In addition, OIG found that OCB's offering training only in English hindered employees' full understanding of the training material, as described below.

### ***Office of Cuba Broadcasting English Language Training Left Gaps in Understanding***

During the inspection, OIG observed that the working language at OCB, including during management meetings, was Spanish. One manager estimated that only 20 percent of OCB's staff were proficient in English.<sup>59</sup> However, OCB offered training in English only. As a result, OIG found that many employees did not understand the instructors or the instructional materials as

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<sup>58</sup> ISP-IB-21-06, December 2020.

<sup>59</sup> According to USAGM, there is no agency-wide policy regarding proficiency in English.

well as they would if the training were offered in Spanish. USAGM's Broadcasting Administrative Manual states training is provided for the purposes of ensuring the optimum performance of employees in their jobs.<sup>60</sup> In addition, according to GAO's *Standards for Internal Control in the Federal Government*, Principles 14.01 and 14.07,<sup>61</sup> management should internally communicate the necessary quality information to achieve the entity's objectives and select appropriate methods to do so. Training only in English risks uneven understanding that may contribute to employees' inadvertently misapplying or violating journalistic standards and principles.

**Recommendation 9:** The U.S. Agency for Global Media should offer the Office of Cuba Broadcasting a Spanish-language option for training on journalistic standards and principles. (Action: USAGM, in coordination with OCB)

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<sup>60</sup> Broadcasting Administrative Manual, Title 4, Part 422a.

<sup>61</sup> GAO-14-704G, September 2014, pages 60-61.

## RECOMMENDATIONS

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OIG provided a draft of this report to U.S. Agency for Global Media (USAGM) stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to USAGM, the Office of Cuba Broadcasting, and Voice of America. USAGM and its broadcasting entities' complete responses can be found in Appendix E.<sup>1, 2</sup> USAGM, the Office of Cuba Broadcasting, and Voice of America also provided technical comments that were incorporated into the report, as appropriate.<sup>3</sup>

**Recommendation 1:** The U.S. Agency for Global Media should update its firewall guidance and procedures and disseminate the updates to agency and network staff. (Action: USAGM, in coordination with MBN, OCB, RFA, RFE/RL, and VOA)

**Management Response:** In its September 13, 2022, response, USAGM concurred with this recommendation. USAGM estimated completion in FY 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that USAGM updated its firewall guidance and procedures and disseminated the updates to agency and network staff.

**Recommendation 2:** The Office of Cuba Broadcasting should implement a strategic communication plan that conveys journalistic standards objectives and priorities to staff. (Action: OCB)

**Management Response:** In its September 13, 2022, response, the Office of Cuba Broadcasting concurred with this recommendation. The Office of Cuba Broadcasting estimated completion in FY 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Cuba Broadcasting implemented a strategic communication plan that conveys journalistic standards objectives and priorities to staff.

**Recommendation 3:** The Office of Cuba Broadcasting should create written policies or procedures that define the editorial review process to ensure that all content is reviewed before broadcast. (Action: OCB)

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<sup>1</sup> OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

<sup>2</sup> OIG requested that the Office of Cuba Broadcasting and Voice of America work through USAGM to incorporate their comments into the single, official response.

<sup>3</sup> OIG revised recommendations 4, 6, 7, and 8 in response to USAGM's technical comments.

**Management Response:** In its September 13, 2022, response, the Office of Cuba Broadcasting concurred with this recommendation. The Office of Cuba Broadcasting estimated completion in FY 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Cuba Broadcasting created written policies or procedures that define the editorial review process to ensure that all content is reviewed before broadcast.

**Recommendation 4:** The Office of Cuba Broadcasting should develop and disseminate to staff written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: OCB)

**Management Response:** In its September 13, 2022, response, the Office of Cuba Broadcasting concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Cuba Broadcasting developed and disseminated to staff written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved.

**Recommendation 5:** Voice of America should require all language services to complete the annual program reviews according to network and U.S. Agency for Global Media policies. (Action: VOA)

**Management Response:** In its September 13, 2022, response, Voice of America concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Voice of America required all language services to complete the annual program reviews according to network and USAGM policies.

**Recommendation 6:** Voice of America should develop and distribute to staff a written action plan for each annual program review, to include how action items will be implemented and enforced. (Action: VOA)

**Management Response:** In its September 13, 2022, response, Voice of America concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Voice of America developed and distributed to staff a written action plan for each annual program review, to include how action items will be implemented and enforced.



**Recommendation 7:** Voice of America should develop and disseminate to staff, including through training, written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: VOA)

**Management Response:** In its September 13, 2022, response, Voice of America concurred with this recommendation. Voice of America estimated completion in FY 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Voice of America developed and disseminated to staff, including through training, written procedures governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved.

**Recommendation 8:** Voice of America should clarify the roles and authorities of the Standards Editor in implementing standards-related guidance for all staff. (Action: VOA)

**Management Response:** In its September 13, 2022, response, Voice of America concurred with this recommendation. Voice of America estimated completion in FY 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Voice of America clarified the roles and authorities of the Standards Editor in implementing standards-related guidance for all staff.

**Recommendation 9:** The U.S. Agency for Global Media should offer the Office of Cuba Broadcasting a Spanish-language option for training on journalistic standards and principles. (Action: USAGM, in coordination with OCB)

**Management Response:** In its September 13, 2022, response, USAGM concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that USAGM offered the Office of Cuba Broadcasting a Spanish-language option for training on journalistic standards and principles.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This review was conducted from March 15, 2021, to January 28, 2022, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and the Congress with systematic and independent evaluations of the operations of the Department and the USAGM. Consistent with the U.S. International Broadcasting Act of 1994, this review focused on USAGM's and its five broadcasting entities' (Voice of America, Office of Cuba Broadcasting, Radio Free Europe/Radio Liberty, Radio Free Asia, and the Middle East Broadcasting Networks) compliance with editorial independence and journalistic standards and principles.

OIG's specific inspection objectives were to determine whether:

- (1) USAGM and the five networks complied with requirements under 22 Code of Federal Regulations (C.F.R.) Part 531 regarding editorial independence, while this regulation was in force between June 11, 2020, and October 26, 2020.<sup>1</sup>
- (2) USAGM and network leadership provided appropriate oversight of internal controls governing editorial independence and journalistic standards and principles and messaged and modeled those standards and principles.
- (3) USAGM and the five entities established and implemented journalistic standards and principles consistent with the requirements in the 1994 Act, including having appropriate oversight of editorial controls, program reviews, and procedures to respond to violations of journalistic standards and principles.
- (4) Training and policy manuals provided to employees across the five entities were sufficient to ensure awareness of the "firewall" and compliance with journalistic standards and principles.

The 1994 Act bars OIG from evaluating the philosophical or political perspectives of broadcasting content.<sup>2</sup> Therefore, OIG did not assess network journalistic content.

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<sup>1</sup> Regarding the repeal of 22 C.F.R. Part 531, the Federal Register says, in part: "This rule is effective without actual notice as of December 10, 2020. For the purposes of enforcement, actual notice will be used as of October 26, 2020." [Document Citation: 85 FR 79427]

<sup>2</sup> According to the United States International Broadcasting Act of 1994, 22 United States Code (U.S.C.) § 6209a(b), "The Inspector General of the Department of State and the Foreign Service shall respect the journalistic integrity of all the broadcasters covered by this chapter and may not evaluate the philosophical or political perspectives reflected in the content of broadcasts."

OIG used a risk-based approach to prepare for this inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG largely conducted the inspection remotely and generally relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. However, OIG was able to conduct a site visit to the Office of Cuba Broadcasting in Miami, Florida, and conduct in-person interviews with office leadership and staff. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence collected or generated, to develop its findings, conclusions, and actionable recommendations.

Mark Asquino, Amy Bliss, Isabella Detwiler, John Hardman, Laura Hettinger, Kristi Hogan, and Derwood Staeben conducted this review. Other report contributors include Leslie Gerson, Diana McCormick, and Rebecca Sawyer.

## APPENDIX B: HISTORICAL CHRONOLOGY OF U.S. GOVERNMENT INTERNATIONAL BROADCASTING

1942	The Voice of America (VOA) began broadcasting in 1942 to counter Nazi propaganda.
1948	The United States Information and Educational Exchange Act of 1948 (Pub. L. No. 80-402), known as the Smith-Mundt Act, established the terms for U.S. government engagement in public diplomacy and authorized creation of an “information service to disseminate abroad information about the United States, its people, and policies.”
1950	Radio Free Europe/Radio Liberty (RFE/RL) went on the air with a broadcast to Czechoslovakia.
1953	President Eisenhower established the United States Information Agency (USIA), under Executive Order 10477 and the President’s Reorganization Plan No. 8, to carry out public diplomacy. VOA became the single largest element of USIA.
1973	The Board for International Broadcasting Act of 1973 (Pub. L. No. 93-129) established the Board for International Broadcasting to oversee and fund RFE/RL.
1976	President Ford signed into law (Pub. L. No. 94-350) the Voice of America Charter, intended to protect the independence and integrity of VOA programming.
1983	The 1983 Radio Broadcasting to Cuba Act established Radio Marti.
1990	The Television Broadcasting Act to Cuba established TV Marti; Radio and TV Marti merged under the Office of Cuba Broadcasting (OCB).
1990	USIA established the Bureau of Broadcasting to consolidate its three broadcasting services—VOA, the WORLDNET Television and Film Service, and Radio and TV Marti—under one umbrella organization supported by an Office of Engineering and Technical Operations.
1994	The International Broadcasting Act of 1994 (Pub. L. No. 103-236) abolished the Board for International Broadcasting, established the Broadcasting Board of Governors (BBG) within USIA, and brought all U.S. nonmilitary international broadcasting under the aegis of BBG.
1996	Radio Free Asia (RFA) was founded under the provisions of the 1994 Act (Pub. L. No. 103-236).
1998	The Foreign Affairs Reform and Restructuring Act of 1998 (Pub. L. No. 105-277) abolished USIA and divided its duties between the Department of State and BBG, which became a separate agency in 1999. BBG assumed authority for VOA, OCB, and its three grantee organizations (RFE/RL, RFA, and the Middle East Broadcasting Networks).
2002	Radio Sawa began broadcasting in 2002. The Middle East Broadcasting Networks (MBN), established in 2003, began Alhurra Television broadcasts in 2004.
2016	The National Defense Authorization Act for Fiscal Year 2017 (Pub. L. No. 114-328) contained technical amendments to the 1994 Act, establishing the position of Chief Executive Officer and an International Broadcasting Advisory Board, in place of the Board of the Broadcasting Board of Governors established in the 1994 Act.
2018	BBG changed its name to the United States Agency for Global Media (USAGM) to reflect its modern operations beyond radio and television into digital and mobile platforms.
2021	The William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Pub. L. No. 116-283) confirmed the adherence to editorial independence and journalistic standards and modified the authorities of the CEO and the Advisory Board.

**Source:** Compiled by OIG from information supplied by USAGM, Department of State, and other sources.

## APPENDIX C: JOURNALISTIC STANDARDS AND PRINCIPLES

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### **The International Broadcasting Act of 1994—Standards and Principles**

#### ***(a) Broadcasting Standards***

United States international broadcasting shall:

- (1) Be consistent with the broad foreign policy objectives of the United States.
- (2) Be consistent with the international telecommunications policies and treaty obligations of the United States.
- (3) Not duplicate the activities of private United States broadcasters.
- (4) Not duplicate the activities of government supported broadcasting entities of other democratic nations.
- (5) Be conducted in accordance with the highest professional standards of broadcast journalism.
- (6) Be based on reliable information about its potential audience.
- (7) Be designed so as to effectively reach a significant audience.
- (8) Promote respect for human rights, including freedom of religion.

#### ***(b) Broadcasting Principles***

United States international broadcasting shall include:

- (1) News which is consistently reliable and authoritative, accurate, objective, and comprehensive.
- (2) A balanced and comprehensive projection of United States thought and institutions, reflecting the diversity of United States culture and society.
- (3) Clear and effective presentation of the policies of the United States government and responsible discussion and opinion on those policies, including editorials, broadcast by the Voice of America, which present the views of the United States government.
- (4) The capability to provide a surge capacity to support United States foreign policy objectives during crises abroad.
- (5) Programming to meet needs which remain unserved by the totality of media voices available to the people of certain nations.
- (6) Information about developments in each significant region of the world.
- (7) A variety of opinions and voices from within particular nations and regions prevented by censorship or repression from speaking to their fellow countrymen.
- (8) Reliable research capacity to meet the criteria under this section.
- (9) Adequate transmitter and relay capacity to support the activities described in this section.
- (10) Training and technical support for independent indigenous media through government agencies or private United States entities.

#### ***(c) Voice of America Broadcasts***

The long-range interests of the United States are served by communicating directly with the peoples of the world by radio. To be effective, the Voice of America must win the attention and

respect of listeners.

These principles will therefore govern Voice of America (VOA) broadcasts:

- (1) VOA will serve as a consistently reliable and authoritative source of news. VOA news will be accurate, objective, and comprehensive.
- (2) VOA will represent America, not any single segment of American society, and will therefore present a balanced and comprehensive projection of significant American thought and institutions.
- (3) VOA will present the policies of the United States clearly and effectively, and will also present responsible discussions and opinion on these policies.

**Source:** The United States International Broadcasting Act of 1994, as amended, 22 United States Code (U.S.C.) § 6202.

## APPENDIX D: TIMELINE OF LEADERSHIP APPOINTMENTS AT USAGM AND THE NETWORKS

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### **June 2020**

The Senate confirmed Michael Pack as U.S. Agency for Global Media (USAGM) Chief Executive Officer (CEO). The director of Voice of America (VOA) resigned. The CEO removed the presidents of the grantee networks<sup>1</sup> and replaced the grantee network board members. The CEO named interim heads of all five networks.

### **December 2020**

The CEO named new heads of all five networks: Ted Lipien as President of Radio Free Europe/Radio Liberty (RFE/RL), Stephen Yates as President of Radio Free Asia (RFA), Victoria Coates as President of the Middle East Broadcasting Networks (MBN), Jeffrey Shapiro as Director of the Office of Cuba Broadcasting (OCB),<sup>2</sup> and Robert Reilly as Director of VOA.

### **January 20-24, 2021**

The CEO submitted his resignation. President Biden selected VOA Director of Programming Kelu Chao as acting CEO of USAGM. The directors of VOA and OCB left their networks. The acting CEO requested the resignations of the grantee network presidents. The acting CEO appointed VOA News Center Director Yolanda Lopez as acting Director of VOA and OCB Deputy Director Alvaro Alba as acting Director of OCB. Bay Fang resumed her position as President of RFA. MBN Vice President for Administration and Finance Kelley Sullivan became acting President of MBN.

### **February 2021**

Jamie Fly resumed his position as President of RFE/RL.

### **April 2021**

The acting CEO appointed Sylvia Rosabal as Director of OCB.

### **July 2021**

MBN Senior Vice President for Content Hassan Shwiki became acting President of MBN.

### **November 2021**

President Biden nominated former VOA Director Amanda Bennett as USAGM CEO.

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<sup>1</sup> Grantee network presidents were Radio Free Asia (RFA) President Bay Fang, Radio Free Europe/Radio Liberty (RFE/RL) President Jamie Fly, and Middle East Broadcasting Networks (MBN) President Alberto Fernandez.

<sup>2</sup> Mr. Shapiro had been OCB acting director since June 2020.

## APPENDIX E: MANAGEMENT RESPONSE

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U.S. AGENCY FOR  
GLOBAL MEDIA

330 Independence Avenue SW | Washington, DC 20237 | usagm.gov

September 13, 2022

Ms. Sandra Lewis  
Assistant Inspector General  
Office of Inspections  
Office of Inspector General  
U.S. Department of State

Dear Ms. Lewis:

Thank you for the opportunity to respond to the Office of Inspector General's (OIG) draft report titled, *Targeted Inspection of the U.S. Agency for Global Media: Editorial Independence and Journalistic Standards and Principles*.

The U.S. Agency for Global Media (USAGM) appreciates OIG's top line findings in the summary of review that:

- "USAGM and network leadership communicated and modeled support for editorial independence and journalistic standards;" and
- "The networks generally had appropriate oversight of editorial controls, program reviews, and procedures to respond to violations of journalistic standards and principles."

The agency hopes the final report will reflect the significance of those top line findings.

USAGM and network management have reviewed the report's nine recommendations and are already planning appropriate actions in response. However, because all inspections represent a snapshot in time, USAGM would like to highlight improvements its networks have made since the fieldwork for this inspection ended. In several cases, USAGM networks have already taken action to address the OIG's recommendations.

Since her appointment in May 2021, the Director of the Office of Cuba Broadcasting (OCB) and her management team have taken numerous steps to improve oversight and communication of journalism standards, including all of the following:

- **Standards and Best Practices Editor Hired.** OCB hired a Standards and Best Practices (S&BP) Editor, who joined OCB in January 2022. Since then, the S&BP Editor attends all editorial meetings and is available for one-on-one consultations with all editorial staff.





- Improved Editorial Workflows Established. OCB management established newly-improved editorial approval workflows for all distribution platforms and communicated these new workflows to all staff.
- Editorial Meetings and Planning Calls Twice Daily. In both the morning and afternoon, the Editor-in-Chief and leads for each distribution platform meet to discuss the stories of the day and assignments. Editorial meetings previously occurred at OCB, but not on a regular basis, and never twice daily.
- Spot-checks Occurring Regularly. Senior managers perform unannounced spot-check of content and attend radio recordings.
- Internal Communication Increased. The OCB Director holds weekly senior manager meetings. These calls include reviews of any journalistic issues that require attention.
- Staff Trained by Standards Editors. In May 2022, the Voice of America's (VOA) S&BP Editor and OCB's S&BP Editor conducted mandatory training on fair use, attributions, social media policies, sourcing, and political activity for OCB employees.

In addition, while the OIG found that VOA program reviews lacked consistency when assessing VOA program reviews in 2021, key issues mentioned in the draft report have been addressed. The agency hopes that the following will be reflected in the report to provide context:

- Action Plans. VOA has used written action plans as part of its program review process since February 2021.
- Self-Assessments. VOA provides a standardized self-assessment questionnaire to language services as an opportunity for service chief input, but not as a requirement.
- Content Translation. Content that needs close review has always been translated by outside translators. But not all VOA program reviews require translation because they focus on production or workflow issues. In those cases, VOA uses machine translation (which is permitted under USAGM policy).

USAGM appreciates OIG's detailed analysis of the editorial independence requirements (commonly referred to as "the firewall") in the U.S. International Broadcasting Act and the history of 22 C.F.R. Part 531 – both the regulation's adoption and repeal. Ultimately, the credibility and adherence to the highest standards of professional journalism require a guarantee that USAGM networks are independent from political influence.

USAGM appreciates the highly professional work of OIG staff during this inspection. Agency management is considering how to implement or demonstrate its current compliance with each recommendation. Please see more information in USAGM's enclosed recommendation by recommendation response in the OIG's suggested template. Should you have any additional questions, please do not hesitate to contact me or members of my team.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kehu Chao', with a stylized, cursive flourish at the end.

Kehu Chao  
Acting Chief Executive Officer

Enclosure

**USAGM Response to Draft OIG Report**

*Targeted Inspection of the U.S. Agency for Global Media: Editorial Independence and Journalistic Standards and Principles*

**Recommendation 1:** The U.S. Agency for Global Media should update its firewall guidance and procedures and disseminate the updates to agency and network staff. (Action: USAGM, in coordination with MBN, OCB, RFA, RFE/RL, and VOA)

**Management Response:** USAGM concurs. The agency plans to update its firewall guidance and communicate that guidance to agency and network staff in fiscal year 2023.

**Recommendation 2:** The Office of Cuba Broadcasting should implement a strategic communication plan that conveys journalistic standards objectives and priorities to staff. (Action: OCB)

**Management Response:** USAGM and OCB concur. OCB will implement a strategic communication plan that conveys journalistic standards objectives and priorities to staff in fiscal year 2023.

**Recommendation 3:** The Office of Cuba Broadcasting should create written policies or procedures that define the editorial review process to ensure that all content is reviewed before broadcast. (Action: OCB)

**Management Response:** USAGM and OCB concur. OCB will develop written guidance that defines the editorial review process in fiscal year 2023.

**Recommendation 4:** The Office of Cuba Broadcasting should develop and disseminate to staff written policies governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: OCB)

**Management Response:** USAGM and OCB concur. OCB will develop written guidance governing how journalistic standards lapses will be addressed and disseminate that guidance to staff.

**Recommendation 5:** Voice of America should require all language services to complete the annual program reviews according to network and U.S. Agency for Global Media policies. (Action: VOA)

**Management Response:** USAGM and VOA concur. VOA implemented this recommendation prior to the inspection. The agency will provide documentation of the steps VOA has taken under separate cover.

**Recommendation 6:** Voice of America should develop a written action plan for each annual program review, to include how action items will be implemented and enforced. (Action: VOA)

**Management Response:** USAGM and VOA concur. VOA implemented this recommendation prior to the inspection. The agency will provide documentation of the steps VOA has taken under separate cover.

**Recommendation 7:** Voice of America should develop and disseminate to staff written policies governing how journalistic standards lapses will be addressed, as well as the roles and responsibilities of the various personnel and offices involved. (Action: VOA)

**Management Response:** USAGM and VOA concur. VOA plans to update the VOA Best Practices Guide to more thoroughly explain reporting procedures for journalistic lapses and will highlight the process. The agency expects to complete this update during fiscal year 2023.

**Recommendation 8:** Voice of America should clarify the roles and authorities of the Standards Editor in implementing standards-related guidance. (Action: VOA)

**Management Response:** USAGM and VOA concur. VOA plans to update the VOA Best Practices Guide to more thoroughly explain the role of the Standards Editor. The agency expects to complete this update during fiscal year 2023.

**Recommendation 9:** The U.S. Agency for Global Media should offer the Office of Cuba Broadcasting a Spanish-language option for training on journalistic standards and principles. (Action: USAGM, in coordination with OCB)

**Management Response:** USAGM and OCB concur. The agency will ensure OCB staff have a Spanish-language option for training on journalistic standards and principles.



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