



FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR

**BEHAVIORAL HEALTH AND DEVELOPMENTAL
DISABILITIES**

TITLE VI COMPLIANCE SITE REVIEW REPORT

June 27, 2017

TABLE OF CONTENTS

	PAGE
Introduction.....	1
Background.....	1
Objective.....	1
Scope.....	2
Methodology.....	2
Requirements, Findings and Recommendations.....	2
Conclusion	3

INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal Financial Assistance (FFA). Title VI compliance requirements apply to any county department, agency or sub-recipient that receives FFA.

The Office of the County Auditor conducted a site review of the Behavioral Health and Developmental Disabilities Department on June 06, 2017 with LaTrina Foster, Director and Charles Releford, Chief of Staff. The site review addressed the Title VI compliance requirements for the awarded grant for fiscal years (FY) July 2017 – June 2018 in the total amount of \$608,115.00.

The financial assistance is for the following programs:

- Community Substance Abuse Adult Services - \$208,115.00
- Community Substance Abuse Services (Clubhouse for Youth) - \$400,000.00

BACKGROUND

The mission of the Fulton County Department of Behavioral Health and Developmental Disabilities (BH/DD) is to provide high quality and culturally competent behavioral health care services to the citizens of Fulton County. The department offers a variety of services designed to assist clients in maintaining or recapturing their optimal level of functioning and stability which, when achieved, would lead to a more productive role for them within their families and their communities.

OBJECTIVES

The Office of the County Auditor has the responsibility of conducting Title VI Compliance Site Reviews of Federal financial assisted recipients and sub-recipients to determine whether they are honoring their commitments, as represented by certification, to comply with the Title VI/Non-discrimination Civil Rights requirements.

The primary objective of the site review was to determine if the Behavioral Health and Developmental Disabilities Department has met its General Reporting and Program-Specific contractual requirements of the state, federal and county laws, policies, rules and regulations relating to Title VI. In addition, requirements and guidance measures of Limited English Proficiency (LEP) for program sub-recipients and contractors were discussed.

The secondary objective of the Compliance Site Review was to provide technical assistance in the form of training and to make recommendations regarding corrective actions as deemed necessary and appropriate.

SCOPE

The scope of this Title VI Compliance Site Review of the Behavioral Health and Developmental Disabilities Department examined the following requirements according to the agreement with the State of Georgia:

(1) General Requirements

- a. Each application for federal assistance contains signed assurances or award contract agreement of compliance with Civil Rights regulations.
- b. A copy of the agency's Title VI complaint procedures.
- c. A copy of the agency's Title VI and LEP plan for providing access to Limited English populations.
- d. A posted copy of appropriate civil rights posters, pamphlets and notice to public information.
- e. Placement of the "babel" notice in service locations and on service documents.

(2) Program-Specific Requirements

- a. A description of how the agency monitors its sub-recipients for compliance with Title VI (if applicable).
- b. A copy of sub-recipients' Annual Title VI Certifications and Assurances (if applicable).
- c. Ensure meaningful access to programs and activities by persons with limited English proficiency.
- d. Promote the full and fair participation of all affected populations of programs and activities through public outreach strategies.

METHODOLOGY

A memorandum was sent to the Director, LaTrina Foster, providing notification of the site review. In addition, an email was sent to Charles Releford, Chief of Staff, providing the same notification information along with an electronic copy of the Title VI Compliance Site Review Tool used to conduct the monitoring. The tool provided a preview of compliance areas that would be assessed.

The review tool was utilized to access the various areas of the Agency's Title VI requirements as well as gather information relating to Title VI specialty areas (Public Participation/Outreach and Service Recipient Demographics (when applicable)).

In addition, the department's Title VI Liaison was provided Title VI Basics and Compliance Training and law updates during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance.

REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

No findings of Title VI deficiencies.

CONCLUSION

The Behavioral Health and Developmental Disabilities Department thoroughly demonstrated Title VI compliance as required. The department displayed proper Title VI signage in appropriate places, providing Title VI awareness to citizens and employees. Also, the department provided copies of the mandatory assurances/awarded contract agreement signed off by the Fulton County Chairman of the Board of Commission.

The Behavioral Health and Developmental Disabilities Department has adopted the County's complaint process and provides the information via signage postage throughout the department service areas, offices, club houses and centers. The department ensures LEP compliance through the use of an available language line and translation of vital documents and Title VI flyers into Spanish.

The Behavioral Health and Developmental Disabilities Department is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Department is very diligent and proactive in complying with Title VI requirements and contractual agreement with the State of Georgia.

The Office of the County Auditor has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools and training as well as provide technical assistance to Fulton County federal recipient programs and its sub-recipients. We will continue to ensure that each department and agency promotes and implements proper measures to meet and maintain compliance with Title VI requirements, policies and procedures.

Please provide a written response to this review within 10 days if findings and/or concerns are listed in this report. You may email your written response to the County Manager and Trina Alston, Title VI Coordinator, in the Office of the County Auditor. We would like to thank management and staff for their timely cooperation and assistance during this Title VI site review. The distribution of this report is reserved for the executive management of Fulton County and the Board of Commissioners.