



**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR**

**SHERIFF DEPARTMENT –
STATE CRIMINAL ALIEN ASSISTANCE
TITLE VI COMPLIANCE SITE REVIEW REPORT**

July 18, 2017

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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 Sheriff Department on June 06, 2017 with Flora Eatman, Finance Division Manager and Dr. Vinyl Baker, Division Grant Writer. The site review addressed the Title VI compliance requirements for the awarded grant for the funding period October 01, 2016 – September 30, 2017 in the total amount of \$31,265.00 for State Criminal Alien Assistance.

BACKGROUND

The Fulton County Sheriff Department is a peace office entrusted with the maintenance of law and order and the preservation of domestic tranquility. The Georgia Constitution mandates that each county has a sheriff, and legislation designates the Sheriff as the Chief Law Enforcement Officer in the county.

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 Sheriff 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 Sheriff Department examined the following requirements according to the agreement with the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice in conjunction with the U.S. Department of Homeland Security:

(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 Sheriff Theodore Jackson, providing notification of the site review. In addition, an email was sent to Flora Eatman, Finance Division Manager and Dr. Vinyl Baker, Division Grant Writer, 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 Sheriff Department thoroughly demonstrated Title VI compliance as required. The department displayed proper Title VI signage in appropriate places and on provided an informational link on the departmental website, 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 and/or Sheriff.

The Sheriff Department has adopted the County's complaint process and provides the information via signage postage throughout the Sheriff's Office Justice Center Tower, 9th Floor reception area, staff breakrooms and TG 500 payment Center. The department ensures LEP access and compliance through the use of the Superior Court's Translation service vendor for translation of vital service documents and the posting of Title VI poster in Spanish version.

The Sheriff 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 US Department of Justice.

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.