



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
DEPARTMENT FOR HIV ELIMINATION
TITLE VI COMPLIANCE SITE REVIEW REPORT**

July 27, 2021

TABLE OF CONTENTS

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

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 Department for HIV Elimination on June 14, 2021 with Bridget Harris, Deputy Director. The site review addressed the Title VI compliance requirements for Part A of the program for the period of March 01, 2021 – February 28, 2022 in the total amount of \$31,913,268.70.

The Department for HIV Elimination received FFA for the following programs and/or services:

PROGRAMS/SERVICES	FUNDING AMOUNT	RECURRING
Part A	\$28,189,646.00	Yes
Ending the HIV Epidemic	\$ 3,313,122.00	Yes
Capacity Building	\$ 101,808.00	No
CARES Act	\$ 308,692.70	No

BACKGROUND

Formerly known as the Ryan White department, the department continues to manage the Atlanta area Ryan White Part A grants representing millions in annual federal funding each year. These funds are used to improve the availability and quality of core medical services and support services for low-income, uninsured, and underinsured individuals and families affected by HIV in the 20-County Atlanta Eligible Metropolitan Area (EMA).

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 Department for HIV Elimination 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 recipients, sub-recipients and contractors were discussed.

The secondary objective of the Title VI 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 Department for HIV Elimination examined the following requirements according to the agreement with the Eligible Metropolitan Area (EMA):

(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 "babel" notice in service locations and on service documents. (Notification of translation services provided at no additional cost to participants)

(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

An initial email was sent to Jeff Cheek, Director, providing notification of the site review. In addition, an email was sent to Bridget Harris, Deputy Director, providing an electronic copy of the Title VI Compliance Site Review Tool used to conduct monitoring. The tool provided a preview of compliance areas that would be assessed.

The review tool was utilized to assess 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 recipient's Title VI Liaison was provided Title VI Basics and Compliance Training and law updates (if applicable) during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous non-discrimination compliance.

REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

Findings

No findings of Title VI deficiencies.

CONCLUSION

The Department for HIV Elimination demonstrated Title VI compliance as required. The recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to citizens and employees. In addition, the department monitors its sub-recipients to ensure that the same protocols of awareness are in place. The Department for HIV Elimination provided a copy of the mandatory assurances/awarded contract agreement signed by the County Manager. In addition, they ensure that funded sub-recipients sign the agreements and compliance assurances.

The department has adopted the Fulton County's Title VI complaint process and provides Fulton's complaint process information via signage postings throughout the department's common areas (employee common work area and breakroom area).

The Department for HIV Elimination also provides public notification of rights and accessibility of Title VI. In addition, the recipient ensures LEP compliance through the use of vital documents and interpretation and translation services through the use of the County's Foreign Language Line service at no additional cost. The office also has "We Speak" poster placed at the receptionist's desk and at the entrance of the security desk.

The department is compliant with Title VI Civil Rights policies, mandates, regulations, procedures and contract agreements. The compliance site review demonstrated that the Department for HIV Elimination is thorough in complying with Title VI requirements of the EMA.

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's 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 business days if findings and/or concerns are listed in this report. You may email your written response to the County Manager, Dick Anderson, 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.