



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR  
DEPARTMENT HIV ELIMINATION SUBRECIPIENT  
– POSITIVE IMPACT HEALTH CENTERS  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**June 30, 2022**

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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 Title VI Compliance review of the Department of HIV Elimination subrecipient – Positive Impact Health Centers on July 28, 2022, with Heather Wademan, Quality and Compliance Manger, Karen Cross, Director of Client Services and Joey Helton, Chief Operating Officer. The compliance review addressed the Title VI compliance requirements for the Ryan White Part A grant for the period of March 01, 2022 – February 28, 2025, in the total amount of \$4,273,539.00.

Positive Impact Health Centers (PIHC) received FFA for the following programs and/or services:

<b>PROGRAMS/SERVICES</b>	<b>FUNDING AMOUNT</b>
Outpatient Ambulatory Health Services General	\$2,263,300
OAHS – Stop Gap	\$130,637
Oral Health	\$186,559
Health Insurance Premium and Cost Sharing Assistance	\$45,000
Mental Health	\$458,073
Substance Abuse Services	\$451,514
Medical Case Management	\$228,808
Food Bank/Home Delivered Meals	\$74,710
Medical Transportation	\$56,571
Quality Management	\$80,278
Linguistics	\$18,000
Non–Medical Case Management (MCM)	\$59,877
Non–MCM Patient Navigation	\$38,126
Psychosocial Support	\$74,532
Referral – General	\$41,413
Referral Insurance Navigation	\$66,133

## BACKGROUND

For 30 years, Positive Impact Health Centers have provided client-centered care to the HIV community and continuously works to prevent the transmission of HIV in Atlanta, Georgia. Comprehensive services are available at the Decatur, Duluth and Marietta Centers.

The agency provides HIV comprehensive specialty care through clinical care, mental health counseling, addiction treatment, support programs in medical case management, transportation and housing, patient navigators and through prevention, testing, Pre-exposure prophylaxis (PrEP) and Post-exposure prophylaxis (PEP).

The Ryan White Part A funds provides direct financial assistance to Eligible Metropolitan Areas (EMAs) that have been the most severely affected by the HIV epidemic to assist in developing or enhancing access to a comprehensive continuum of high quality, community-based care for low-income individuals and families with HIV disease.

## 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 subrecipient, Positive Impact Health Centers, 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 vital material language translation, proper Title VI awareness/access signage placement and recommendations regarding corrective actions as deemed necessary and appropriate.

## SCOPE

The scope of this Title VI Compliance Site Review of Positive Impact Health Centers examined the following requirements according to the agreement with United States of Health and Human Services (HHS), Health Resources and Services Administration's (HRSA) HIV/AIDS Bureau (HAB) and Fulton County's Department of HIV Elimination:

(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 Heather Wademan, providing notification of the site review and an electronic copy of the Title VI Compliance Site Review Tool used to conduct monitoring.

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)).

**REQUIREMENTS, FINDINGS AND RECOMMENDATIONS**

**Findings**

No findings of Title VI deficiencies.

**CONCLUSION**

Positive Impact Health Centers 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 subrecipient provided a copy of mandatory assurances/awarded contract agreement signed by the Executive Director.

The agency has adopted the Fulton County’s Title VI complaint process and provides Fulton’s complaint process information via signage postings throughout its health clinics’ patient waiting areas, check-in and check-out areas, treatment rooms, websites and employee common areas.

PIHC also provided public notification of rights and accessibility of Title VI. In addition, the subrecipient ensured LEP compliance through the use of interpretation and translation services of vital documents and through the use of its Foreign Language Line service at no additional cost to citizens. The agency also provided a copy of its language access communication plan and had “We Speak” posters placed at service entrances, check-in and check-out windows and common employee work areas.

The agency is compliant with Title VI Civil Rights policies, mandates, regulations, procedures and contract agreements. The compliance site review demonstrated that Positive Impact Health Centers are thorough in complying with Title VI requirements of U.S. HHS, HRSA, HAB and Fulton County’s Department of HIV Elimination.

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.