



**FULTON
COUNTY**

FULTON COUNTY, GEORGIA

OFFICE OF THE COUNTY AUDITOR

**DEPARTMENT OF ATLANTA-FULTON COUNTY
EMERGENCY MANAGEMENT AGENCY –
MERCEDES BENZ COMMUNITY VACCINATION
CENTER**

TITLE VI COMPLIANCE SITE REVIEW REPORT

December 09, 2021

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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 Atlanta-Fulton County Emergency Management Agency (AFCEMA) on November 16, 2021 with Matthew Kallmyer, Director. The compliance review addressed the Title VI compliance requirements for the COVID-19 Disaster Recovery Effort reimbursement in the amount of \$5,937,294.05 received May 05, 2021.

The AFCEMA received reimbursements for mass vaccination efforts for the Mercedes Benz Community Vaccination Center.

BACKGROUND

The Atlanta-Fulton County Emergency Management Agency is responsible for providing management and coordination of mitigation, preparedness, response, and recovery activities within Fulton County.

The Atlanta-Fulton County Emergency Management Agency is a joint agency and the primary emergency management agency for Fulton County and the City of Atlanta.

The Atlanta-Fulton County Emergency Management Agency's mission is to enhance the preparedness and resiliency of our communities by coordinating and integrating activities necessary to build, sustain, and improve the capability to mitigate against, prepare for, respond to, and recover from natural or man-made disasters.

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 AFCEMA 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 the AFCEMA examined the following requirements according to the agreement with Federal Emergency Management Agency (FEMA) and Georgia Emergency Management and Homeland Security Agency (GEMA/HSA):

(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 Matthew Kallmyer, Director, providing notification of the site review. In addition, an email was sent to Cat Hofmann, Division Chief, providing 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

The AFCEMA demonstrated Title VI compliance as required in the three vaccination centers. The recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to citizens and employees. The AFCEMA provided a copy of the mandatory assurances/awarded contract agreement signed by the County Manager.

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 and the vaccination community centers.

The AFCEMA also provided public notification of rights and accessibility of Title VI. In addition, the recipient ensured 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 to citizens. The office also had "We Speak", Title VI Awareness and "How to File a Complaint" posters placed at service entrances of the centers.

The department is compliant with Title VI Civil Rights policies, mandates, regulations, procedures and contract agreements. The compliance site review demonstrated that the AFCEMA is thorough in complying with Title VI requirements of FEMA and GEMA/HSA.

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.