



INTEROFFICE MEMORANDUM

TO: Jeff Cheek, Director

FROM: Anthony Nicks, County Auditor *Anthony Nicks*

DATE: June 7, 2016

RE: Ryan White Sub-Recipient - DeKalb County Board of Health – Early Care Clinic Title VI Compliance Site Review Report dated June 7, 2016

The Office of Internal Audit has completed DeKalb County Board of Health – Early Care Clinic (sub-recipient) Title VI Compliance Site Review dated June 7, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The agency has been found to be “IN COMPLIANCE” with Title VI of the Civil Rights Act of 1964. As such, no written response is required. If you have any questions or need additional information, please contact me at extension 21019. Thank you.


Attachment: DeKalb County Board of Health – Early Care Clinic Title VI Compliance Site Review Report dated June 7, 2016

Cc: Richard Anderson, County Manager
Uliecia Bolton, Project Officer
Carolyn Hodge-Armstrong, Director of Programs (DCBH – Early Care Clinic)



INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners

FROM: Anthony Nicks, County Auditor 

DATE: June 7, 2016

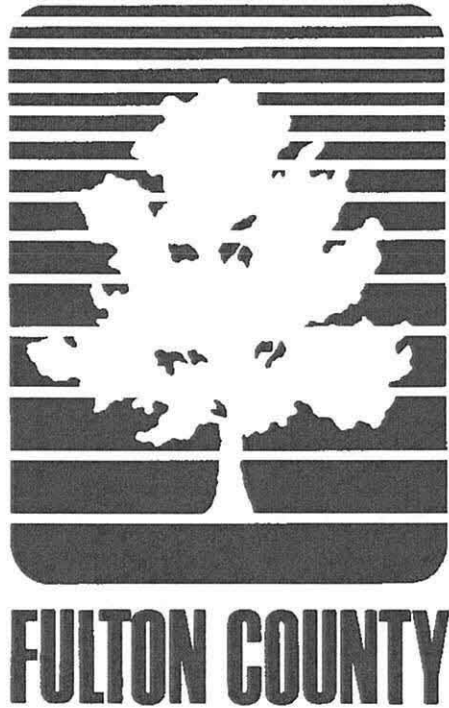
RE: Ryan White Sub-Recipient - DeKalb County Board of Health – Early Care Clinic Title VI Compliance Site Review Report dated June 7, 2016

The Office of Internal Audit has completed DeKalb County Board of Health – Early Care Clinic (sub-recipient) Title VI Compliance Site Review dated June 7, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The agency has been found to be “IN COMPLIANCE” with Title VI of the Civil Rights Act of 1964. As such, no written response is required. If you have any questions or need additional information, please contact me at extension 21019. Thank you.

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Cc: Richard Anderson, County Manager
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**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR**

**RYAN WHITE SUB-RECIPIENT
DEKALB COUNTY BOARD OF HEALTH – RYAN
WHITE EARLY CARE CLINIC
TITLE VI COMPLIANCE SITE REVIEW REPORT**

JUNE 07, 2016

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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 Ryan White Agency’s sub-recipient, Dekalb County Board of Health (DCBH) – Ryan White Early Care Clinic. The site review was conducted on May 20, 2016 with Carolyn Hodge-Armstrong, Program Coordinator, Phuong Le, Fiscal Policy Analyst and Dianne McWethy, Director of Administration. The review addressed the Title VI compliance requirements for the federally funded sub-grant, Ryan White Part A HIV/AIDS, in the total amount of \$812,226.63 for the period of March 01, 2016 – February 28, 2017.

BACKGROUND

The Ryan White Early Care Clinic is a comprehensive and innovative primary care HIV clinic that offers easily accessible, holistic medical, support and prevention services to individuals infected and affected by HIV. The clinic is an outpatient clinic specializing in the primary medical and dental care facility offering mental health, substance abuse, prevention and support services for HIV. The clinic is located at 445 Winn Way, Decatur, Georgia.

OBJECTIVES

The Office of the County Auditor has the responsibility of conducting Title VI Compliance Site Reviews of Federal financial assisted recipients and sub-ipients 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 Dekalb County Board of Health (DCBH) – Ryan White Early Care Clinic, as a sub-recipient, 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-ipients 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 DCBH – Ryan White Early Care Clinic was to examine the following requirements according to the contractual agreement with the Georgia Emergency Management:

(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.

(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 Jeff Cheek, Fulton County's Director of Ryan White, providing notification of the site review. Additionally, a memorandum and email notification was sent to Carolyn Hodge-Armstrong, Program Coordinator, concerning the site review visit 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 site review participants were provided Title VI Basics and Compliance Training during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance.

FINDINGS AND RECOMMENDATIONS

Findings

- No findings of Title VI deficiencies

Recommendations

- Additional placement of Title VI awareness flyers
- Posting of "How to File a Complaint" process flyers

CONCLUSION

DCBH – Ryan White Early Care Clinic thoroughly demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout employee work areas, public and private service areas and also on the agency’s website, providing Title VI awareness to program participants and employees. In addition, the agency’s clients receive Title VI information included inside of visitation packets. Employees receive the information in the employee handbook and employee training.

DCBH – Ryan White Early Care Clinic has adopted the County’s complaint process and provides the information via signage postage throughout the work and program service areas. As of April 28, 2011, the agency approved its own Language Access for Limited English Proficient and/or Sensory Impaired Consumers Policy 30-10. In addition, the agency ensures LEP compliance through the provision of freelance interpreters and bi-lingual employees as well as the translation of vital documents into other languages when needed.

DCBH – Ryan White Early Care Clinic is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Agency is very diligent and proactive in complying with Title VI requirements of Fulton County Ryan White Program.

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 30 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.