



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA**

**OFFICE OF THE COUNTY AUDITOR**

**DEPARTMENT OF HEALTH & HUMAN SERVICES,  
COMMUNITY DEVELOPMENT – HOME  
INVESTMENT PARTNERSHIP/COMMUNITY  
HOUSING DEVELOPMENT ORGANIZATION  
(HOME/CHDO)**

**TITLE VI COMPLIANCE SITE REVIEW REPORT**

**October 19, 2023**

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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 Health & Human Services, Community Development on September 22, 2023, with Nathan Simms, Division Manager-Federal Programs. The compliance review addressed the Title VI compliance requirements for the HOME Investment Partnership Program/Community Housing Development Organization (HOME/CHDO) Grant for the period of fiscal year 2021, in the total amount of \$699,003.10 for programs and services.

## **BACKGROUND**

The Fulton County Department of Health & Human Services, Community Development strengthens people, families, and communities through partnerships with various community organizations and outreach programs. The agency's partners include organizations that are non-profit, private sector, government, volunteer, and citizen advocates to assist with servicing the citizens of Fulton County.

The HOME Investment Partnerships Program (HOME) provides formula grants to states and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

Community Housing Development Organization (CHDO) is a special type of non-profit housing designation under the U.S. Department of Housing and Urban Development (HUD) HOME Program. These nonprofits must meet the U.S. Department of Housing and Urban Development requirements regarding board composition and community housing development activities.

## **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 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 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 Department of Health & Human Services, Community Development examined the following requirements and regulations according to the agreement with the U.S. Department of Housing and Urban Development (HUD):

### (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 Stanley Wilson, Director, providing notification of the site review. In addition, an email was sent to Nathan Simms, Division Manager-Federal Programs, 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)).

## **REQUIREMENTS, FINDINGS AND RECOMMENDATIONS**

### **Findings**

No findings of Title VI deficiencies.

## **CONCLUSION**

The Department of Health & Human Services, Community Development's CDBG-CV program 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 recipient provided a copy of mandatory assurances/awarded contract agreement signed by the authorized certifying official, Chairman Robb Pitts.

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.

The program 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 had "We Speak" posters placed at areas of service 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 the Department of Health & Human Services, Community Development locations are thorough in complying with Title VI requirements of the HUD.

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.