



FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
RYAN WHITE SUB-RECIPIENT – CLAYTON
COUNTY BOARD OF HEALTH
TITLE VI COMPLIANCE SITE REVIEW REPORT

January 7, 2019

TABLE OF CONTENTS

	PAGE
Introduction.....	1
Background.....	1
Objective.....	1
Scope.....	2
Methodology.....	2
Requirements, Findings and Recommendations.....	3
Conclusion	3

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 sub-recipient, Clayton County Board of Health (CCBOH) on December 10, 2018 with Hawa Kone, Program Coordinator. The site review addressed the Title VI compliance requirements for the Part A Ryan White Program for the period of March 1, 2018 – February 28, 2019 in the total amount of \$307,059.05.

BACKGROUND

Clayton County Board of Health seeks “A Healthier Clayton in One Generation.” Their comprehensive offering of health services, health education, and outreach programs address a wide variety of community health issues, including infant mortality, child and youth development, obesity, sexually-transmitted infections (STIs), food safety, unintentional injuries, infectious diseases, and emergency preparedness.

The agency’s mission is to improve the overall health and safety of the community through health promotion, prevention, protection, and preparedness planning activities that are evidence-based and data-driven.

The CCBOH Clinic is a Ryan White-funded clinic that provides comprehensive services for HIV positive adults, age 18 years or older, including:

HIV/AIDS and infectious disease specialists, nursing and primary care services

- Medical case management services
- Medication assistance programs
- Benefits advocacy
- Peer support and counseling
- Oral health care
- Referrals to regional HIV/AIDS service organizations
- Referrals to a full spectrum of medical specialty care services
- Medical transportation to and from appointments

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 Clayton County Board of Health 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 Clayton County Board of Health examined the following requirements according to the agreement with Part A of the Ryan White federal program administered by the United States Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA), HIV/AIDS Bureau (HAB):

(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 Hawa Kone, Jeff Cheek, Director of Ryan White, and Troy Scott, Ryan White Community Program Manager, providing notification of the site review. In addition, an email was sent to Ms. Kone, providing 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 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 sub-recipient’s Title VI Liaison was provided Title VI Basics and Compliance Training and law updates 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.

Recommendations

It was recommended that the agency provide additional Title VI “public to the notice”, compliant information and “babel” notice postings of language services at no additional cost, to inform program participants of LEP resource.

CONCLUSION

Clayton County Board of Health demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to clients and employees. Also, the sub-recipient provided a copy of the mandatory assurances/awarded contract agreement signed off by the Board of Health’s Interim District Health Director.

Clayton County Board of Health has adopted the Ryan White Program complaint process and Fulton County’s Title VI complaint process; however, a recommendation was made, to provide Fulton’s compliant information via signage postage throughout the center’s common areas (waiting areas, each clinic/site locations, medical labs, check-in and check-out areas), and the employee breakroom.

The agency also provides public notification of rights and accessibility of Title VI at new patient intake and also during patient’s six month visits and new hire orientation, Planning Council and Consumer Adviser Board meetings; however, a recommendation was made to provide “notice to the public” postings throughout the center’s common areas. In addition, the sub-recipient ensures LEP compliance through the use of translated posters, vital documents and pamphlets, interpretation and translation services through the use of a State Contract Language Line vendor, when needed at the center and bi-lingual staff at no additional cost to clients. It was also recommended for the agency to provide a “babel” notice to program information postings.

Clayton County Board of Health is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that Clayton County Board of Health Services is thorough in complying with Title VI requirements of the Part A Ryan White Program administered by the United States Department of Health and Human Services (HHS), Health Resources and services Administration (HRSA), and HIV/AIDS Bureau (HAB).

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 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.