



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
DEPARTMENT OF HIV ELIMINATION
SUBRECIPIENT – NATIONAL AIDS EDUCATION
AND SERVICES FOR MINORITIES, INC. (NAESM)
TITLE VI COMPLIANCE SITE REVIEW REPORT**

November 12, 2020

TABLE OF CONTENTS

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

INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance 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 Department of HIV Elimination’s subrecipient, National AIDS Education and Services for Minorities, Inc. (NAESM) on October 23, 2020 with Roary Brodderick, Client Services Director. The site review addressed the Title VI compliance requirements for the Ryan White Part A grant for the period of March 01, 2020 – February 28, 2021 in the total amount of \$105,355.00. These funds are administered to the following areas:

Mental Health	\$ 59,707.07
Substance Abuse	\$ 40,511.93
Food Bank	\$ 3,636.00
Medical Transportation	\$ 1,500.00

BACKGROUND

NAESM, Inc. was established to address health disparities that disproportionately impacted the African American community, particularly Black gay men.

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 NAESM 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, subrecipients 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 NAESM examined the following requirements according to the agreement with the U.S. Department of Health and Human Services,

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 Mr. Brodderick providing notification of the site review and 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 subrecipient’s staff was provided Title VI Basics and Compliance Training and law updates (if applicable) 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.

CONCLUSION

NAESM demonstrated Title VI compliance as required. The subrecipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to program participants and employees. Also, the subrecipient provided a copy of the mandatory assurances/awarded contract agreement signed off by the Executive Director.

The agency has adopted Fulton County's Title VI complaint process and has ensured compliance via signage postings throughout the agency's common areas (waiting and check-out), group counseling room, and the employee breakroom.

NAESM also provides public notification of rights and accessibility of Title VI. In addition, the subrecipient ensures LEP compliance through the use of vital documents and interpretation and translation services through the use of translation services, when needed, and bi-lingual staff at no additional cost to clients.

The agency is compliant with Title VI Civil Rights' policies, regulations, procedures and contract agreements. The compliance site review also demonstrated compliance with the Title VI requirements of the U.S. Department of Health and Human Services, Health Resources and Services Administration's (HRSA) HIV/AIDS Bureau (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.