



## INTEROFFICE MEMORANDUM

**TO:** Fulton County Board of Commissioners  
**FROM:** *Anthony Nicks*  
Anthony Nicks, County Auditor  
**DATE:** May 6, 2015  
**RE:** Title VI Compliance Site Review Report – Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) dated April 30, 2015

---

The Office of Internal Audit has completed the compliance review for the Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult). Attached is a copy of the review report.

There were no Title VI deficiencies found during this site monitoring. The department 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 question or need additional information, please contact me at extension 21019. Thank you.

Attachment: Department of Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) Title VI Compliance Site Review Report dated April 30, 2015

Cc: Richard Anderson, County Manager  
Dr. Patrice Harris, Director, Health Services



## INTEROFFICE MEMORANDUM

**TO:** Dr. Patrice Harris, Director  
*Anthony Nicks*  
**FROM:** Anthony Nicks, County Auditor  
**DATE:** May 6, 2015  
**RE:** Title VI Compliance Site Review Report – Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) dated April 30, 2015

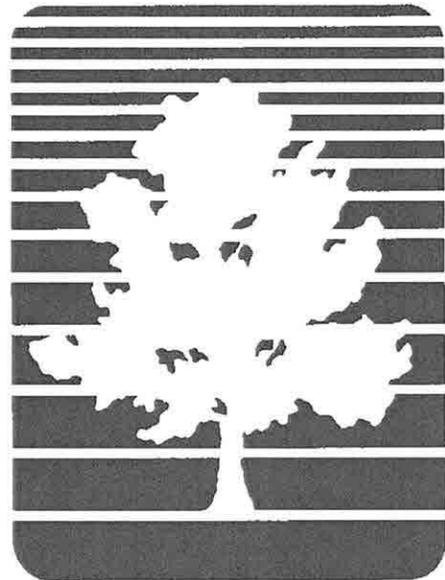
---

The Office of Internal Audit has completed Department of the Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) Title VI Compliance Site Review. Attached is a copy of our report.

There were no Title VI deficiencies found during the site monitoring. Your department is "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: Department of Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) Title VI Compliance Site Review Report dated April 30, 2015

Cc: Richard Anderson, County Manager



**FULTON COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF INTERNAL AUDIT  
BEHAVIORAL HEALTH AND DEVELOPMENTAL  
DISABILITIES**

**(Community Substance Abuse Services – Adult)  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**April 30, 2015**

## TABLE OF CONTENTS

	PAGE
Introduction.....	1
Background.....	1
Objective.....	1
Scope.....	2
Methodology.....	2
Requirements, Findings and Recommendations.....	2
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 or agency that receives FFA.

The Office of Internal Audit conducted a site review of Behavioral Health and Developmental Disabilities – Community Substance Abuse Services (Adult) Program on April 10, 2015 with Program’s Director of Clinical Services and Program Manager. The federal sub-grant award is for fiscal year (FY) July 1, 2014 – June 30, 2015 in the amount of \$208,115.00. Our site review addressed Title VI/Non-discrimination Compliance requirements for the Department of Behavioral Health and Developmental Disabilities.

## **BACKGROUND**

The Department of Behavioral Health and Development Disabilities (DBHDD) provide high quality and culturally competent behavioral health care services to the most-in-need citizens of Fulton County through a variety of treatment and rehabilitation services models.

The department’s Adult Addictive Diseases and Substance Abuse Services Program provides on-demand treatment services, without waiting lists or significant delays or obstacles to access by adhering to guidelines of the National Institute on Drug Abuse (NIDA) evidence-based Principles of Addiction Treatment and offers the Core Service Elements recommended by the Center for Substance Abuse Treatment.

## **OBJECTIVES**

The Office of Internal Audit has the responsibility of conducting 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 Compliance Site Review was to determine if the Community Substance Abuse Services Adult Program has met its General Reporting and Program-Specific requirements of the state and federal laws, rules and regulations and the Department of Behavioral Health and Development policy relating to Title VI. In addition, requirements and guidance measures of Limited English Proficiency (LEP) for program sub-recipients 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 the Community Substance Abuse Services Adult Program examined the following requirements according to DBHDD Civil Rights Program for behavioral health:

(1) General Requirements

- a. Each application for federal assistance contains a signed assurance of compliance with Civil Rights regulations
- b. A copy of the agency's Title VI compliant 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

An email notification was sent to the Program's Director of Clinical Services and the Behavioral Health Program Manager advising of the site review visit and an electronic copy of the Title VI Compliance Site Review Tool that would be used to conduct the monitoring. The tool provided the Program a preview of compliance areas that would be assessed

The review tool was utilized to access the various areas of the Program's Title VI requirements as well as gather information relating to Title VI specialty areas (Public Participation and Outreach and service recipient demographics (when applicable)).

In addition, the agency was informed that Title VI Basics and Compliance Training would be conducted during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance.

## REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

No findings of Title VI deficiencies.

## CONCLUSION

The Community substance Abuse Services (Adult) Program 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 the Federal and State awarding agency of The Department of Behavioral Health and Development Disabilities.

The Office of Internal Audit has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools, and training, as well as provide technical assistance to federal recipient programs county-wide. 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 Internal Audit at [Trina.Alston@fultoncountyga.gov](mailto:Trina.Alston@fultoncountyga.gov). 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.