



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
DEPARTMENT OF HIV ELIMINATION
TITLE VI COMPLIANCE SITE REVIEW REPORT**

June 29, 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 HIV Elimination on June 15, 2023, with Nicole Antoine, Health Program Administrator. The compliance review addressed the Title VI compliance requirements for the grant for the period of March 01, 2023 – February 28, 2024, in the total amount of \$36,406,773.00 for programs and services essential to the Part A and Ending HIV Epidemic (EHE) award.

The program received FFA for the following programs and/or services:

PROGRAMS/SERVICES	FUNDING AMOUNT
Part A	\$31,327,260.00
EHE	\$ 5,079,513.00

BACKGROUND

The Ryan White Comprehensive AIDS Resources Emergency (CARE) Act of 1990 was established to help cities, states, and local organizations to provide services to persons living with HIV. The legislation was reauthorized in 1996, 2000, 2006, and 2009 and is now known as the Ryan White Treatment Extension Act of 2009. The Ryan White Program is the federal government’s most comprehensive effort to improve the quality and availability of care for medically underserved individuals and families affected by HIV. The U.S. Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA) and HIV/AIDS Bureau (HAB) administers the Ryan White Program. The majority of funds are used to address core medical services and essential supportive services. There are a variety of Parts to the legislation which serve the needs of different communities and populations. Part A, which Fulton County receives, targets funds to the locales that have been most severely affected by the HIV epidemic.

Fulton County’s Department of HIV Elimination is formerly known as the Ryan White Department. The department continues to manage the Atlanta area Ryan White Part A grants representing millions in annual federal funding each year. These funds are used to improve the availability and quality of core medical services and support services for low-income, uninsured, and underinsured individuals and families affected by HIV in the 20-County Atlanta Eligible Metropolitan Area (EMA).

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 HIV Elimination examined the following requirements according to the agreement with the Eligible Metropolitan Area (EMA), HIV/AIDS Bureau (HAB) of the Health Resources and Services Administration (HRSA) of the US Department of Health and Human Services (HHS):

(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 Jeff Cheek, Director, providing notification of the site review. In addition, an email was sent to Bridget Harris, Deputy Director, 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

HIV Elimination 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 Rob 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 (employee common work area and breakroom area).

HIV Elimination 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 HIV Elimination location is thorough in complying with Title VI requirements of the EMA.

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.