


INTEROFFICE MEMORANDUM



TO: Fulton County Board of Commissioners

FROM: Anthony Nicks, County Auditor,
Office of the County Auditor 

DATE: September 9, 2021

SUBJECT: Fulton County Juvenile Court Title VI
Compliance Site Review Reports dated
September 9, 2021

The Office of the County Auditor has completed the Fulton County Juvenile Court Title VI Compliance Site Review Reports dated September 9, 2021. Attached is a copy of our report.

There were no Title VI deficiencies found during the site visit. The agency is "IN COMPLIANCE" with Title VI of the Civil Rights Act of 1964. If you have any questions or need additional information, please contact me at extension 21019. Thank you.

Attachments: Fulton County Juvenile Court – Justice Coordinating Council, Title VI Review Report dated September 9, 2021

Fulton County Juvenile Court – Second Chance Act Grant, Title VI Review Report dated September 9, 2021

Cc: Richard Anderson, County Manager
Timothy Ezell, Chief Administrator Director
Dr. Vinyl Baker, Grants Procurement Officer



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
FULTON COUNTY JUVENILE COURT – SECOND
CHANCE ACT GRANT
TITLE VI COMPLIANCE SITE REVIEW REPORT**

September 9, 2021

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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 site review of Fulton County Juvenile Court on August 24, 2021 with Timothy Ezell, Chief Court Administrator Officer and Dr. Vinyl Baker, Grants Procurement Officer. The site review addressed the Title VI compliance requirements for Part A of the program for the period of October 01, 2017 – September 30, 2020 in the total amount of \$790,000.

BACKGROUND

The mission of the Fulton County Juvenile Court is first, to protect children and the community in matters brought before the court, to rehabilitate children, and to restore families; and second, to create opportunities for the community, partners, and stakeholders to actively engage in this mission.

The Administration Office of Fulton County Juvenile Court oversees the daily operations of multiple Court divisions: The Office of the Clerk of Court, Children in Need of Services (CHINS) Unit, Court and Family Services and Probation Services, in addition to directly managing agency level functions.

The Administration also oversees the development of the court's budget and provides personnel administration, procurement services, the fiscal management of grants, facility management and planning, and electronic and telecommunications system development and maintenance.

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 Fulton County Juvenile Court 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 Fulton County Juvenile Court examined the following requirements according to the agreement with the Department of Justice:

(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 Timothy Ezell, providing notification of the site review. In addition, an email was sent to Dr. Vinyl Baker, 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)).

In addition, the recipient's Title VI Liaison 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. Provided suggestions of additional placement for required Title VI Awareness and "We Speak" posters.

CONCLUSION

The Fulton County Juvenile Court 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 department monitors its sub-recipients to ensure that the same protocols of awareness are in place. The Fulton County Juvenile Court provided copies of the mandatory assurances/awarded contract agreements signed by the County Manager. In addition, they ensure that funded sub-recipients signed the agreements and compliance assurances.

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 copier room, court cafeteria, intake areas, and breakroom area).

The Fulton County Juvenile Court also provides public notification of rights and accessibility of Title VI. In addition, the recipient ensures LEP compliance through the use of vital documents and interpretation and translation services through the use of the County's Foreign Language Line service at no additional cost. The office also has "We Speak" poster placed at the building's information desk, the programs' reception desk and the entrance at the security desk.

The department is compliant with Title VI Civil Rights policies, mandates, regulations, procedures and contract agreements. The compliance site review demonstrated that the Fulton County Juvenile Court is thorough in complying with Title VI requirements of the U.S. Department of Justice and the Office Juvenile Justice and Delinquency Prevention.

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.