



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR  
FULTON COUNTY DEPARTMENT OF  
BEHAVIORAL HEALTH AND DEVELOPMENTAL  
DISABILITIES – DIVERSION AND DEFLECTION  
RECOVERY PROGRAM  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**July 21, 2025**

*“ Protecting your civil rights is good business”*

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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 Department of Behavioral Health and Developmental Disabilities, on June 25, 2025, with Afrika Cotton, Program Manager. The compliance review addressed the Title VI compliance requirements for the grant for the period of September 30, 2023 – September 30, 2026, in the total amount of \$1,599,99.00 for the Diversion and Defection Recovery Program.

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

PROGRAMS/SERVICES	FUNDING AMOUNT
<b>PAD COSSUP Diversion</b>	\$189,261.00
<b>FDR – Fulton County Diversion</b>	\$294,072.00
<b>Research and Evaluation</b>	\$50,000.00

**BACKGROUND**

The Fulton County Department of Behavioral Health & Developmental Disabilities (BHDD) provides comprehensive mental health and addiction treatment services to uninsured adults and Veterans. BHDD plays a vital role in both delivering and overseeing behavioral health services within the community, including initiatives such as the Diversion and Deflection Recovery Program. Through active collaboration with public safety partners and service providers, BHDD helps ensure that individuals facing behavioral health challenges receive appropriate, timely care—supporting recovery while reducing reliance on the criminal justice system.

The Diversion and Deflection Recovery Program is a court-related initiative aimed at reducing unnecessary involvement in the criminal justice system by addressing the root causes of behavioral health challenges. It employs two key strategies:

- **Diversion** occurs when a law enforcement officer has probable cause for an arrest but identifies that the individual’s behavior is driven by underlying issues such as substance use, mental illness, or extreme poverty. Instead of proceeding with arrest and booking, the officer redirects the individual to tailored support services that address their specific needs—helping to break the cycle of repeated legal system involvement.

- **Deflection** focuses on early intervention. It connects individuals to community-based mental health and substance use treatment services *before* any legal charges or arrests take place. By responding to behavioral health crises with care rather than criminalization, deflection reduces the burden on the justice system and fosters access to appropriate, timely care.

Together, these strategies provide a compassionate, effective alternative to traditional behavioral health and criminal justice responses, supporting recovery and stability while promoting public safety.

## 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 examined the following requirements according to the agreement with the Bureau of Justice Assistance (BJA) and Office of Justice Programs (OJP).

### (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 Latrina Foster, Director, providing notification of the site review. In addition, an email was sent to Afrika Cotton, Program Manager, providing an electronic copy of the Title VI Compliance Site Review Tool used to conduct monitoring. As well as a copy of Fulton County's Title VI Non-Discrimination and Limited English Proficiency Policy/Procedure. 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**

The department demonstrated Title VI compliance as required. The recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to program participants and employees. The office also presents language access rights in new hire orientation, on the organizational website and in take locations.

The office has adopted the Fulton County's Title VI complaint process and provides Fulton's complaint process information via signage postings throughout its service area, reception area, and employee common areas. In addition, the recipient provided a copy of mandatory assurances/awarded contract agreement signed by the County's authorized certifying official, Sharon Whitmore, Chief Financial Officer.

Fulton County Department of Behavioral Health and Developmental Disabilities also provided public notification of rights and accessibility of Title VI. The recipient ensures LEP compliance through the use of interpretation and translation services of vital

documents and through the use of Fulton County’s Foreign Language Translation Service and bilingual staff at no additional cost to clients.

The Office is compliant with Title VI Civil Rights policies, mandates, regulations, procedures, and contract agreements. The compliance site review demonstrated that the department is thorough in complying with Title VI requirements.

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.