



**FULTON
COUNTY**

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

April 29, 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 Fulton County Department for HIV Elimination, on April 23, 2025, with Jasmine Molin, Health Program Administrator. The compliance review addressed the Title VI compliance requirements for the grant for the period of March 01, 2024 – February 28, 2025, in the total amount of \$39,612,594.00 for programs and services essential to the Part A and Ending the HIV Epidemic in the U.S. (EHE) award.

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

PROGRAMS/SERVICES	FUNDING AMOUNT
Part A	\$32,273,615.00
EHE	\$ 7,338,979.00

BACKGROUND

The Ryan White Comprehensive AIDS Resources Emergency (CARE) Act of 1990 was established to help cities, states, and local organizations 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.

Fulton County's Department of HIV Elimination continues to manage the Atlanta area Ryan White Part A and EHE grants representing millions in annual federal funding each year. Part A funds are used to improve the availability and quality of care for low-income, uninsured, and underinsured individuals and families affected by the HIV disease in the 20-County Atlanta Eligible Metropolitan Area.

Ending the HIV Epidemic funds are used to link people with HIV who are either newly diagnosed, or are diagnosed but currently not in care, to essential HIV care and treatment and support services, as well as to provided workforce training and technical assistance.

These funds are received by the Department of HIV on behalf of Fulton, DeKalb, Cobb, and Gwinnett counties.

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 sub-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 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) and the Fulton County Department for 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 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. 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 for HIV Elimination demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to program participants and employees. The agency also presents language access rights in new hire orientation, on the organizational website and the distribution of medical interpreters' business cards to LEP patients. In addition, the recipient provided a copy of mandatory assurances/awarded contract agreement signed by the County's authorized certifying official, Dick Anderson, County Manager.

The agency has adopted the Fulton County's Title VI complaint process and provides Fulton's complaint process information via signage postings throughout the agency's common areas.

Department for HIV Elimination also provided public notification of rights and accessibility of Title VI. The sub-recipient ensures LEP compliance through the use of interpretation and translation services of vital documents and through the use of its translation line service and bilingual staff at no additional cost to clients.

The agency is compliant with Title VI Civil Rights policies, mandates, regulations, procedures, and contract agreements. The compliance site review demonstrated that the AHF location 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.