



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
FULTON COUNTY OFFICE OF THE SHERIFF –
JUSTICE REINVESTMENT INITIATIVE
TITLE VI COMPLIANCE SITE REVIEW REPORT**

May 19, 2025

“ Protecting your civil rights is good business”

TABLE OF CONTENTS

	PAGE
Introduction.....	1
Background.....	1
Objective.....	2
Scope.....	2
Methodology.....	3
Requirements, Findings and Recommendations.....	3
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, agency or sub-recipient that receives FFA.

The Office of the County Auditor conducted a Title VI Compliance review of the Fulton County Office of the Sheriff, on May 6, 2025, with Dr. Vinyl Baker, Financial Systems Manager. The compliance review addressed the Title VI compliance requirements for the grant for the period of July 31, 2024 – September 30, 2025, in the total amount of \$231,894.50 for the Justice Reinvestment Initiative.

BACKGROUND

The Fulton County Office of the Sheriff is responsible for administration and operation of the Fulton County Jail (FCJ), provides security for all Courtrooms and Judges, and render Warrant Service/Civil Process, Special Operations, and Investigative Units. The also deliver expanded program and services to FCJ inmates.

Funded by the Bureau of Justice Assistance (BJA), the Justice Reinvestment Initiative (JRI) provide state leaders and stakeholders with the following:

- A collaborative process that engages and builds consensus with a wide range of state and local stakeholders and system leaders
- System-spanning data analysis to understand large-scale challenges, namely the drivers of prison and jail admissions, recidivism, and corrections costs, as well as more focused concerns such as returns to prison and jail from community supervision and high utilization of behavioral health and criminal justice resources by specific populations
- In-depth assessments of current statutes, policies, and practices to provide context for the data
- Clear and compelling findings that identify areas for improvement or innovation
- Stakeholder engagement to learn about on-the-ground dynamics and inform findings and recommendations
- Multiagency implementation support, including training, performance measurement and quality assurance, and the opportunity to apply for funding to seed successful implementation

Since 2018, the site-based program provides funding for jurisdictions to use the JRI process to address persistent or emerging crime and public safety problems, or to remove impediments to directly addressing them. The initiative reducing Violent Crime by Improving Justice System Performance program employs the Justice Reinvestment approach which recognizes that every justice agency has a role to play in preventing crime, apprehending, and prosecuting perpetrators, ensuring efficient and effective court

and pretrial decision-making, facilitating appropriate sentencing and treatment, and protecting community security. Grantees develop and implement innovative approaches to improve the efficacy of state, local, and tribal justice systems.

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 U.S. Department of Justice, Office of Justice Program, Bureau for Justice Assistance and CNA Corporation.

(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 Patrick Labat, Sheriff, providing notification of the site review. In addition, an email was sent to Dr. Baker 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 Sheriff's Office 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 jail facilities.

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, payment centers area, bonding waiting room 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 Office of the Sheriff 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 Sheriff's Office 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.