



INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners

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

DATE: August 17, 2016

RE: Workforce Development Division Title VI Compliance Site Review Report dated August 16, 2016

The Office of Internal Audit has completed the Department of Housing and Community Development Title VI Compliance Site Review Report dated August 16, 2016. Attached is a copy of our report.

There were no Title VI deficiencies found during the site monitoring. Your department 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.

Attachment: Workforce Development Division Title VI Compliance Site Review Report dated August 16, 2016

Cc: Richard Anderson, County Manager
Frankie Atwater, Director
Sonia Wilson, Division Manager



INTEROFFICE MEMORANDUM

TO: Frankie Atwater, Director, Housing and Community Development

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

DATE: August 17, 2016

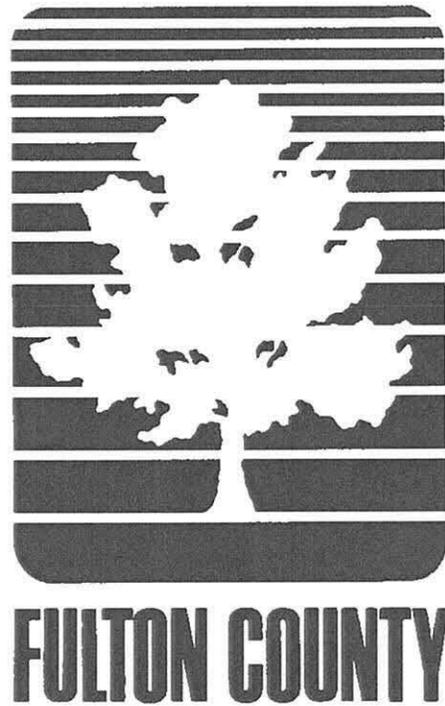
RE: Workforce Development Division Title VI Compliance Site Review Report dated August 16, 2016

The Office of Internal Audit has completed the Department of Housing and Community Development Title VI Compliance Site Review Report dated August 16, 2016. Attached is a copy of our report.

There were no Title VI deficiencies found during the site monitoring. Your department 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.

Attachment: Workforce Development Division Title VI Compliance Site Review Report dated August 16, 2016

Cc: Richard Anderson, County Manager
Sonia Wilson, Division Manager



**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR**

**WORKFORCE DEVELOPMENT DIVISION
TITLE VI COMPLIANCE SITE REVIEW REPORT**

AUGUST 16, 2016

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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 the Housing and Community Development's Workforce Development Division. The site review was conducted on July 12, 2016 with Sonia Wilson, Division Manager. The review addressed the Title VI compliance requirements for the federally funded Workforce Innovation and Opportunity Act (WIOA) programs, in the total amounts of \$1,001,049.00 for the period of March 01, 2016 – June 30, 2018, for the Youth Program, \$1,041,188.00 for the period of March 01, 2016 – June 30, 2018 Adult Program and \$1,649,839.00 for the period of March 01, 2016 – June 30, 2018 Dislocated Worker Program.

BACKGROUND

The mission of the Fulton County Human Services Office of Workforce Development is to assist Fulton County residents and metropolitan Atlanta area employers in developing and sustaining a world-class workforce that realizes viable incomes and benefits, thus strengthening their families and neighborhoods.

The office provides services to Fulton County Residents, Dislocated Workers, Adults and Youths in North Fulton, South Fulton and Adamsville.

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 Workforce Development Division 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 sub-recipients and contractors were discussed.

The secondary objective of the 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 Workforce Development Division examined the following requirements according to the contractual agreement with the Georgia Emergency Management:

(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 compliant 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.

(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

A memorandum was sent to Frankie Atwater, Fulton County's Director of Human Services, providing notification of the site review. Additionally, a memorandum and an email notification was sent to Sonia Wilson, Director of Programs, concerning the site review visit along with an electronic copy of the Title VI Compliance Site Review Tool used to conduct the monitoring. The tool provided a preview of compliance areas that would be assessed.

The review tool was utilized to access 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 Director of Programs and Social Services Manager were provided Title VI Basics and Compliance Training 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

Recommendations

Posting of flyers in common areas:

- Notice to the Public
- Posting of Title VI Informational
- Posting of “How to File a Complaint” process
- Provision of translated vital documents

CONCLUSION

The Workforce Development Division thoroughly demonstrated Title VI compliance as required. After notification of recommendations, the agency displayed proper Title VI signage in appropriate places throughout employee work areas, public and private service areas in program’s three centers, providing Title VI awareness and information to program participants and employees. In addition, the agency’s customers receive Title VI acknowledgement forms that they must sign when signing up for service.

The Workforce Development Division has adopted the County’s complaint process and provides the information via signage postage throughout the work and program service areas. The agency ensures LEP compliance through the provision of interpreters via vendors. As part of the agency’s strategic plan, translation of vital documents into other languages when needed will be available in the future.

The Workforce Development Division is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Agency is very diligent and proactive in complying with Title VI requirements of the Workforce Investment Act Program.

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 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 days if findings and/or concerns are listed in this report. You may email your written response to the County Manager 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.