



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

**RYAN WHITE AGENCY  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**APRIL 27, 2017**

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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 Ryan White Agency on April 06, 2017 with the department’s Title VI Liaison and Assistant Director, Bridget Harris. The site review addressed the Title VI compliance requirements for the federal grant award for fiscal year (FY) March 2017 – February 2018 in the amount of \$25,114,081.00 supporting the following 17 sub-recipients:

AGENCY	TOTAL
AID ATLANTA	\$ 2,510,149.94
AIDS HEALTHCARE FOUNDATION	\$ 479,584.84
ANIZ	\$ 179,800.79
ATLANTA LEGAL AID	\$ 106,133.49
CLARKE COUNTY BOARD OF HEALTH	\$ 111,415.25
CLAYTON COUNTY BOARD OF HEALTH	\$ 324,873.34
COBB COUNTY BOARD OF HEALTH	\$ 743,271.79
DEKALB COUNTY BOARD OF HEALTH	\$ 812,226.59
EMORY MIDTOWN	\$ 895,933.79
FULTON COUNTY HEALTH AND WELLNESS	\$ 2,538,700.22
GRADY INFECTIOUS DISEASE PROGRAM (IDP)	\$ 8,168,316.12
HERE'S TO LIFE	\$ 284,094.88
ST. JOSEPH'S MERCY CARE	\$ 1,109,868.20
NAESM	\$ 116,599.12
OPEN HAND ATLANTA	\$ 984,429.24
POSITIVE IMPACT	\$ 2,954,266.98
RECOVERY CONSULTANTS	\$ 23,591.28

**BACKGROUND**

The purpose of the Ryan White Part A program is to improve the availability and quality of care for low-income, uninsured, and underinsured individuals and families affected by HIV disease in the 20 county Atlanta Eligible Metropolitan Area. Funds are also used to support the Metropolitan Atlanta HIV/AIDS Health Planning Council, the Planning body that establishes service priorities and allocates funds in the EMA.

**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 Ryan White Agency 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 continuous improvement strategies and corrective actions as deemed necessary and appropriate.

## **SCOPE**

The scope of this Title VI Compliance Site Review of the Ryan White Agency examined the following requirements according to the agreement with the Federal Health and Human Services (HHS):

### (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.
- e. Placement of "babel" notice in service locations and on service documents.

### (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 the Jeff Check, Director, providing notification of the site review. In addition, an email was sent to Bridget Harris providing the same notification information 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 monitoring 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 department's Title VI Liaison was provided Title VI Basics and Compliance Training and law updates during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance.

## **REQUIREMENTS, FINDINGS AND RECOMMENDATIONS**

No findings of Title VI deficiencies.

## **CONCLUSION**

The Ryan White Agency thoroughly demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places, providing Title VI awareness to citizens and employees. Also, the agency provided copies of the mandatory assurances/awarded contract agreement signed off by the Fulton County Chairman of the Board of Commission.

The Ryan White Agency has adopted the County's complaint process and provides the information via signage postage throughout the agency's service areas, offices and common work areas. The agency ensures LEP compliance through the translation of vital documents and Title VI flyers into Spanish.

The Ryan White Agency 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 Federal awarding agency of HHS.

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.