



FULTON COUNTY

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
RYAN WHITE SUB-RECIPIENT – SAINT JOSEPH’S
MERCY CARE SERVICES, INC.
TITLE VI COMPLIANCE SITE REVIEW REPORT**

December 18, 2018

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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 sub-recipient, Saint Joseph's Mercy Care Services, Inc. (Mercy Care) on December 07, 2018 with Patricia Parsons, Manager of Infectious Disease. The site review addressed the Title VI compliance requirements for the Part A Ryan White Program for the period of March 1, 2018 – February 28, 2019 in the total amount of \$794,125.16.

BACKGROUND

Established in 1982, Mercy Care became a member of Saint Joseph's Health System and Trinity Health. With faith and community as the core of their mission, the organization provided countless ways to care for those experiencing homelessness, poverty, mental illness and linguistic isolation throughout Georgia. Mercy Care is a federally qualified health center and Atlanta's only healthcare for the homeless program.

For more than 20 years, Mercy Care has provided a singular source of outreach, testing and treatment for HIV patients as part of their primary medical services. The Early Intervention Clinic (EIC) is a Ryan White funded program that delivers comprehensive HIV medical care including medical labs, medication and support to persons living with HIV.

OBJECTIVES

The Office of the County Auditor has the responsibility of conducting Title VI Compliance Site Reviews of FFA 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 Mercy Care 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 training and to make recommendations regarding corrective actions as deemed necessary and appropriate.

SCOPE

The scope of this Title VI Compliance Site Review of Mercy Care examined the following requirements according to the agreement with Part A of the Ryan White federal program administered by the United States Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA), HIV/AIDS Bureau (HAB):

(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 Patricia Parsons, Jeff Cheek, Director of Ryan White, and Troy Scott, Ryan White Community Program Manager, providing notification of the site review. In addition, Ms. Parson was also provided 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 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)).

In addition, the sub-recipient'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

Findings

No findings of Title VI deficiencies.

Recommendations

It was recommended that the agency provides babel notice postings of language line services, at no additional cost, to inform program participants of LEP resources.

CONCLUSION

Mercy Care demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to clients and employees. Also, the sub-recipient provided a copy of the mandatory assurances/awarded contract agreement signed off by Mr. Alan Bradford, Chief Executive Officer (CEO).

Mercy Care has adopted the Ryan White Program complaint process and Fulton County's Title VI complaint process; however, a recommendation was made, to provide Fulton's compliant information via signage postage throughout the center's common areas (waiting areas, each clinic/site locations, medical lab, check-in and check-out area), and the employee breakroom.

The agency also renders Title VI awareness by providing public notification of rights and accessibility of Title VI at new hire orientation, the EIC Peer Support Group meetings and the Client Advisory quarterly meetings. In addition, the sub-recipient ensures meaningful access and LEP compliance through the use of translated posters, service brochures, service surveys, as well as oral interpretation and written translation services through Cyracom, a language line vendor, when needed, at no additional cost to clients.

Mercy Care is compliant with the general requirements of Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that Mercy Care is thorough in complying with Title VI requirements of the Part A Ryan White Program administered by the United States Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA), and HIV/AIDS Bureau (HAB).

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 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.