



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR  
FULTON COUNTY SHERIFF OFFICE – SMART  
REENTRY  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**September 17, 2019**

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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 recipient, Sheriff's Office on August 28, 2019 with Flora Eatman, Finance Division Manager and Dr. Vinyl Baker, Grants Manager. The site review addressed the Title VI compliance requirements for the Smart Entry grant for the period of October, 2016 – October, 2019 in the total amount of \$1,000,000.00.

## **BACKGROUND**

The Georgia Constitution mandates that each county has a sheriff, and legislation designates the sheriff as the chief law enforcement officer in the county. The sheriff retains the authority to intervene in any law enforcement effort within the county when he feels compelled to do so.

## **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 Sheriff's Office 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 the Sheriff's Office examined the following requirements according to the agreement with the State of Georgia – Accountability Courts and U.S Department of Justice (DOJ):

(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 Sheriff Theodore "Ted" Jackson providing notification of the site review. In addition, an email was sent to Flora Eatman providing 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 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 provide additional Title VI complaint process information and "babel" notice postings of language services at no additional cost, to inform program participants of LEP resource.

**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 citizens and employees.

Also, the recipient provided a copy of the mandatory assurances/awarded contract agreement signed off by Sheriff Jackson.

The office has adopted the Fulton County's Title VI complaint process; however, a recommendation was made, to provide Fulton's complaint process information via signage postings throughout the department's common areas (front entrance 9<sup>th</sup> floor of Justice Center Tower, breakrooms, GCIC and Bonding waiting room, and Fulton County Jail).

The Sheriff's Office also provides public notification of rights and accessibility of Title VI. In addition, the recipient ensures LEP compliance through the use of vital documents and pamphlets, interpretation and translation services through the use of the County's Foreign Language Line service, when needed at the center and bi-lingual staff at no additional cost to clients. It was also recommended for the agency to provide a "babel" notice for program information postings.

The office is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that, the Sheriff's Office is thorough in complying with Title VI requirements of the State of Georgia and U.S Department of Justice.

The Office of the County Auditor has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools and trainings 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.