



## INTEROFFICE MEMORANDUM

**TO:** Fulton County Board of Commissioners

**FROM:** Anthony Nicks, County Auditor *Anthony Nicks*

**DATE:** October 03, 2016

**RE:** Ryan White Sub-Recipient – Emory Midtown Clinic of Infectious Diseases Title VI Compliance Site Review Report dated October 03, 2016

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The Office of the County Auditor has completed Emory Midtown Clinic of Infectious Diseases (sub-recipient) Title VI Compliance Site Review dated October 03, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The agency has been found to be "IN COMPLIANCE" with Title VI of the Civil Rights Act of 1964. As such, no written response is required. If you have any questions or need additional information, please contact me at extension 21019. Thank you.


Attachment: Ryan White Sub-Recipient – Emory Midtown Clinic of Infectious Diseases Title VI Compliance Site Review Report dated October 03, 2016

Cc: Richard Anderson, County Manager  
Jeff Cheek, Director  
Troy Scott, Project Officer  
Breggie James, Program Administrator (Emory Midtown Clinic)



## INTEROFFICE MEMORANDUM

**TO:** Jeff Cheek, Director

**FROM:** Anthony Nicks, County Auditor 

**DATE:** October 03, 2016

**RE:** Ryan White Sub-Recipient - Emory Midtown Clinic of Infectious Diseases Title VI Compliance Site Review Report dated October 03, 2016

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The Office of the County Auditor has completed Emory Midtown Clinic of Infectious Diseases (sub-recipient) Title VI Compliance Site Review September 30, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The agency has been found to be "IN COMPLIANCE" with Title VI of the Civil Rights Act of 1964. As such, no written response is required. If you have any questions or need additional information, please contact me at extension 21019. Thank you.

Attachment: Ryan White Sub-Recipient – Emory Midtown Clinic of Infectious Diseases Title VI Compliance Site Review Report dated October 03, 2016

Cc: Richard Anderson, County Manager  
Troy Scott, Project Officer  
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**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR**

**RYAN WHITE SUB-RECIPIENT  
EMORY MIDTOWN CLINIC OF INFECTIOUS  
DISEASES  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**OCTOBER 03, 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 Ryan White Agency's sub-recipient, Emory Midtown Clinic of Infectious Diseases. The site review was conducted on September 22, 2016 with Breggie James, Program Administrator, Ritanza Abron, Program Coordinator and Nordia Edwards, Data and Quality Manager. The review addressed the Title VI compliance requirements for the federally funded sub-grant, Ryan White Part A HIV/AIDS, in the total amount of \$895,933.79 for the period of March 01, 2016 – February 28, 2017.

## **BACKGROUND**

The Emory Infectious Diseases Clinic at Emory University Hospital Midtown is a well-established provider with extensive experience in caring for patients diagnosed with infectious diseases including hepatitis, HIV, Sexually Transmitted Diseases (STDs), transplant or travel related infections. The Clinic, established in 1989, is part of The Emory Clinic, a premier multi-specialty group in the Southeast U.S. comprised of faculty members from Emory University School of Medicine.

Part of the organization's mission is to reduce the impact of hepatitis, HIV, and STDs within the metro Atlanta area and to improve and expand their ability to provide services to clinic patients. The Clinic provides care for the HIV infected patients from preventive and proactive care in the early stages of infection to terminal care as needed. Education, antiretroviral therapy, immunizations and medications to prevent opportunistic infections are also central to their treatment strategy.

## **OBJECTIVES**

The Office of the County Auditor has the responsibility of conducting Title VI Compliance Site Reviews of Federal financial assisted recipients and sub-ipients 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 Emory Midtown Clinic of Infectious Diseases, as a sub-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 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 The Emory Infectious Diseases Clinic was to examine 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 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.

### (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 Jeff Cheek, Fulton County's Director of Ryan White, providing notification of the site review. Additionally, a memorandum and email notification was sent to Breggie James, Program Administrator, 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 site review participants 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.

## FINDINGS AND RECOMMENDATIONS

### Findings

- No findings of Title VI deficiencies

### Recommendations

- Posting of “Notice to the Public” flyers
- Posting of “How to File a Complaint” process flyers
- Additional placement of Title VI flyers in employee common areas (breakroom) and in Social Worker offices

## **CONCLUSION**

Emory Midtown Clinic of Infectious Diseases demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout exam rooms, providing Title VI awareness to service clients and clinic staff. In addition, the agency’s clients receive Title VI information included along with Emory’s “Patient’s Rights” material packets and this information is also posted on the wall of each floor near elevators. Employees receive the information in the employee handbook and during employee training.

Emory Midtown Clinic of Infectious Diseases assures Title VI compliance by adopting the County’s complaint process. In addition, the agency ensures LEP compliance through the provision of sign language and interpreter services when requested as well as the translation of vital documents into other languages when needed.

Emory Midtown Clinic of Infectious Diseases is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Agency is diligent and proactive in complying with Title VI requirements of Fulton County Ryan White 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.