




INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners

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

DATE: August 17, 2016

RE: Atlanta Legal Aid Title VI Compliance Site Review Report dated August 16, 2016

The Office of Internal Audit has completed Atlanta Legal Aid (sub-recipient) Title VI Compliance Site Review dated August 16, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The department 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: Atlanta Legal Aid. Title VI Compliance Site Review Report dated August 16, 2016

Cc: Richard Anderson, County Manager
Jeff Cheek, Director
Ulicia Bolton, Project Officer (Ryan White Part A)
Kristin Verrill, Grants (Atlanta Legal Aid)



INTEROFFICE MEMORANDUM

TO: Jeff Cheek, Director, Ryan White Program

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

DATE: August 17, 2016

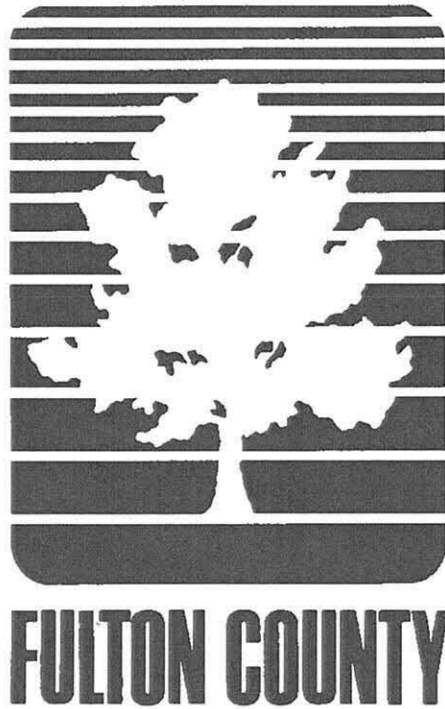
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**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR**

**RYAN WHITE SUB-RECIPIENT
ATLANTA LEGAL AID SOCIETY
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 Ryan White Agency's sub-recipient, Atlanta Legal Aid Society. The site review was conducted on May 23, 2016. 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 \$111,133.52 for the period of March 01, 2016 – February 28, 2017.

BACKGROUND

Atlanta Legal Aid Society helps low-income people meet basic needs through free civil legal services. The agency's mission is to provide free legal services in civil (non-criminal) matters to low-income residents of Fulton, DeKalb, Cobb, Gwinnett and Clayton Counties who meet the agency's income guidelines and case priorities.

The Health Law Unit was started as the AIDS Legal Project to address the legal needs of those impacted by the AIDS epidemic. The project assists persons living with HIV/AIDS to gain access to income, health care, housing and self-empowerment through wills and advance directives.

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 Atlanta Legal Aid Society, 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 DCBH – Ryan White Early Care 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 Whitney McGinniss, Grants Manager, 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

CONCLUSION

Atlanta Legal Aid Society thoroughly demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout employee work areas, public and private service areas, providing Title VI awareness to service clients and employees. In addition, the agency's clients receive Title VI information included inside of visitation packets. Employees receive the information in the employee handbook and employee training.

Atlanta Legal Aid Society assures Title VI compliance by designating Compliance Officers, placement of information in employee manuals, providing staff training on diversity/ADA/LEP issues and render public notice of general and Title VI grievance process. The agency also, has adopted the County's complaint process. In addition, the agency ensures LEP compliance through the provision of hiring bilingual staff, offering language courses to non-bilingual staff, utilization of telephone interpretation via contract service as well as the translation of vital documents into other languages when needed.

Atlanta Legal Aid Society 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 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.