



**FULTON COUNTY, GEORGIA**  
**OFFICE OF THE COUNTY AUDITOR**  
**DEPARTMENT OF COMMUNITY DEVELOPMENT**  
**WORKFORCE DEVELOPMENT DIVISION**  
**TITLE VI COMPLIANCE SITE REVIEW REPORT**

**November 14, 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 Department of Community Development - Workforce Development Division on October 26, 2017 with Kim Benjamin, Community Development Specialist. The site review addressed the Title VI compliance requirements for the following three grants for the period of April 1, 2017 – June 30, 2019 in the total amount of \$3,287,248.00:

- Workforce Investment Opportunity Act (WIOA) Adult Program \$908,605
- Workforce Investment Opportunity Act (WIOA) Dislocated Worker \$1,435,762
- Workforce Investment Opportunity Act (WIOA) Youth Program \$942,881

## BACKGROUND

The Workforce Development Division's programs are designed to assist Fulton County residents and employers in developing and sustaining a workforce that realizes viable includes and benefits.

Currently there are three Workforce Development offices to service and support the citizens of Fulton County located at:

1. 5710 Stonewall Tell Rd, #16,  
College Park, Georgia 30349
2. Adamsville Reginal Health Center, 2<sup>nd</sup> Floor  
Atlanta Georgia 30331
3. 7741 Roswell Rd, #205  
Sandy Springs, Georgia 30350

## 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 Workforce Development Division 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 Division of Workforce Development examined the following requirements according to the agreement with the Georgia Emergency Management and Homeland Security Agency:

### (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. (Meaning 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**

A memorandum was sent to Frankie Atwater, Director of Community Development, providing notification of the site review. In addition, an email was sent to Mia Redd, Operations Manager, 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 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 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**

### **Findings**

No findings of Title VI deficiencies.

### **Recommendations**

Although there were no finding; however, we recommend that the division translates vital documents for LEP participants in efforts to provide equal access to the program participants. We are recommending this action as the division has a large, diverse service area.

## **CONCLUSION**

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

The Workforce Development Division has adopted the County's complaint process. It has been recommended to provide the information via signage postage throughout the career center facilities' common areas, employee breakrooms and administration offices. The department ensures LEP compliance through the use of a translation vendor when needed at the career centers.

Although the division is in compliance with the Title VI requirements in providing adequate LEP resources, it is our recommendation to provide translation of vital documents to increase efforts of taking reasonable steps to provide "meaningful access" to the division's federally funded programs and activities to LEP persons.

The Workforce Development Division is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Division is diligent in complying with Title VI requirements of the Federal Workforce Innovation & Opportunity Act.

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.