



INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners
FROM: *Anthony Micks*, County Auditor
DATE: July 30, 2015
RE: Title VI Compliance Site Review Report – Department of Aging and Youth Services dated July 30, 2015

The Office of the Internal Audit has completed the compliance review for the Department of Aging and Youth Services. Attached is a copy of the review report.

As outlined in the report, the agency is required to provide a written response pertaining to findings (if any) referenced in the report within 30 days. In the interim, if you have any question or need additional information, please contact me at extension 21019. Thank you.

Attachment: Title VI Compliance Site Review Report – Department of Aging and Youth Services dated July 30, 2015.

Cc: Richard Anderson, County Manager
Kenn Vanhoose, Interim Director



INTEROFFICE MEMORANDUM

TO: Kenn Vanhoose, Interim Director, Aging and Youth Services

FROM:  Anthony Wicks, County Auditor, Office of Internal Audit

DATE: July 30, 2015

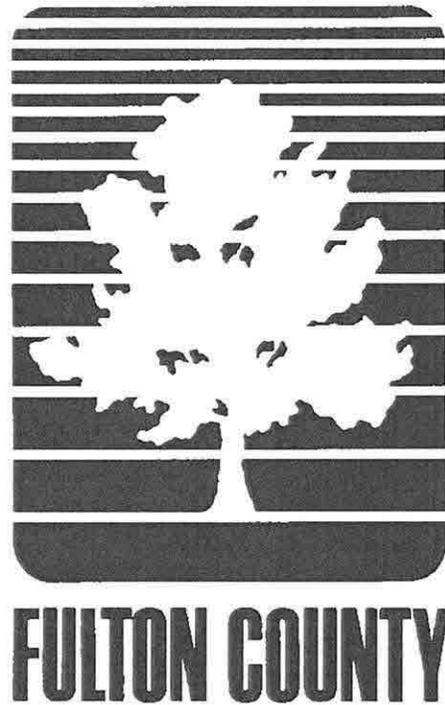
RE: Department of Aging and Youth Services Title VI Compliance Site Review Report dated July 30, 2015

The Office of Internal Audit has completed Department of Aging and Youth Services Title VI Compliance Site Review Report dated July 30, 2015. Attached is a copy of our report.

There were no Title VI deficiencies found during the site monitoring. Your department is "IN COMPLIANCE" with Title VI of the Civil Rights Act of 1964. If you have any questions or need additional information, please contact me at extension 21019. Thank you.

Attachment: Department of Aging and Youth Services Title VI Compliance Site Review Report dated July 30, 2015

Cc: Richard Anderson, County Manager



**FULTON COUNTY, GEORGIA
OFFICE OF INTERNAL AUDIT**

**DEPARTMENT OF AGING AND YOUTH SERVICES
TITLE VI COMPLIANCE SITE REVIEW REPORT**

July 30, 2015

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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 or agency that receives FFA.

The Office of Internal Audit conducted a site review of the Department of Aging and Youth Services on June 19, 2015 with the Program Manager and the Senior Services Manager. The site review addressed the Title VI compliance requirements for the Senior Transportation Services Program sub-grant in the amount of \$201,098.65 and the Aging Services Program sub-grant in the amount of \$1,730,428.00. The ongoing awards are for the period of fiscal year (FY) July 2015 – June 2016.

BACKGROUND

The Department of Aging and Youth Services is responsible for the planning, coordination, implementation, and monitoring of programs and services that assist in the activities of daily living for Fulton County seniors age 55 and older. The comprehensive program and service delivery model assists seniors through the continuum of care to support aging at home with quality and dignity. Through partnerships and contracts with community based organizations, in conjunction with the Older Americans Act Program, the following programs and services are available:

- STARline - Soaring Through Aging Resources
- Adult Day Program
- Case Management
- Community Outreach Programs
- Home Delivered Meal Program
- Home Repair Program
- In-Home Services
- Transportation Services
- Senior Multipurpose Facilities
- Neighborhood Senior Centers & Congregate Meals

OBJECTIVES

The Office of Internal Audit 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 Department of Aging and Youth Services has met its General Reporting and Program-Specific requirements of the state and federal laws, 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 Department of Aging and Youth Services examined the following requirements according to the State of Georgia contractual agreement with the Department Human Services:

(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 compliant 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 the Interim Director, Shelia Benefield, providing notification of the site review. Additionally, an email notification was sent to the Program Manager and the Senior Services Manager about 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 Department'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 agency's Program Manager and Senior Services Manager 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.

REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

No findings of Title VI deficiencies.

CONCLUSION

The Department of Aging and Youth Services demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places, providing Title VI awareness to program participants and employees. Also, the agency provided mandatory assurances/awarded contract agreement signed off by the Fulton County Chairman of the Board of Commission.

The Department of Aging and Youth Services has adopted the County's complaint process and provides the information via signage postage throughout the program areas and to sub-recipients. The agency ensures LEP compliance through the use of an available language line and translating vital documents into other languages when requested.

The Department of Aging and Youth Services 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 the State of Georgia and Federal awarding agencies of the Department of Human Services.

The Office of Internal Audit has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools, and training, as well as provides technical assistance to federal recipient programs county-wide. 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 30 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 Internal Audit at Trina.Alston@fultoncountyga.gov. 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.