



## INTEROFFICE MEMORANDUM

**TO:** Fulton County Board of Commissioners

**FROM:** Anthony Nicks, County Auditor, Office of Internal Audit 

**DATE:** October 21, 2015

**RE:** Atlanta-Fulton Public Library System – Prime Time Family Reading Time Program Title VI Compliance Site Review Report dated October 21, 2015

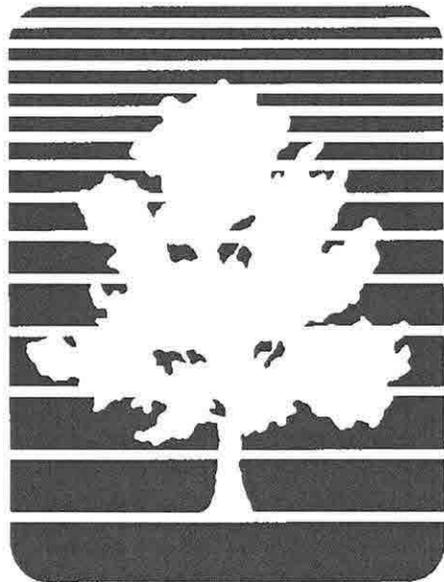
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The Office of Internal Audit has completed the Atlanta-Fulton Public Library System – Prime Time Family Reading Time Program Title VI Compliance Site Review Report dated October 21, 2015.

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-Fulton Public Library System – Prime Time Family Reading Time Program Title VI Compliance Site Review Report dated October 21, 2015

Cc: Richard Anderson, County Manager  
Gayle Holloman, Interim Director  
Denise Barbour, Branch Manager



**FULTON COUNTY**

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

**ATLANTA-FULTON PUBLIC LIBRARY SYSTEM –  
PRIME TIME FAMILY READING TIME PROGRAM  
TITLE VI COMPLIANCE SITE REVIEW REPORT  
OCTOBER 21, 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 Atlanta-Fulton Public Library System (AFPLS) on September 26, 2015 with Gayle Holloman, Interim Director and Denise Barbour, Branch Manager. The site review addressed the Title VI compliance requirements for the federally funded sub-grant for the Prime Time Family Reading Time Program (PTFRTP) Grant in the total amount of \$5,250. Funds were distributed for the period of fiscal year (FY) June 1, 2014 – December 15, 2014.

## **BACKGROUND**

The Atlanta-Fulton Public Library System’s mission is to serve as a cultural and intellectual center that enriches the community and empowers all residents with essential tools for lifelong learning.

The Atlanta-Fulton Public Library System serves the citizens of Fulton County and the City of Atlanta (including the portion of the city in DeKalb County). This system is the largest in the state of Georgia with 34 libraries and a collection of more than 2.5 million items. It offers innovative programs, services and virtual resources tailored to meet the needs of each branch's community.

## **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 AFPLS 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 AFPLS examined the following requirements according to the contractual agreement with the Georgia Public Library Service and the Office of Management and Budget Circulars:

(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, Gayle Holloman, providing notification of the site review. Additionally, an email notification was sent 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 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 Interim Director and four Branch Managers were provided Title VI Basics and Compliance Training on August 31, 2015. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance throughout the public library system.

## **REQUIREMENTS, FINDINGS AND RECOMMENDATIONS**

No findings of Title VI deficiencies.

## **CONCLUSION**

The AFPLS demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout work and service areas, public entrances and also on the departmental website, 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 AFPLS has adopted the County's complaint process and provides the information via signage postage throughout library work and service areas and the departmental website. The agency ensures LEP compliance through the provision of interpreters and the translation of vital documents (system and program brochures) into other languages when needed.

The AFPLS 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 Federal Office of Management and Budget and the Georgia Public Library Service.

The Office of Internal Audit has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools and training, as well as provide 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. 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.