



INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners

FROM: *Anthony Wicks* County Auditor

DATE: August 20, 2015

RE: Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review Report dated August 20, 2015

The Office of Internal Audit has completed the Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review dated August 20, 2015. 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: Office Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review Report dated August 20, 2015

Cc: Richard Anderson, County Manager
Omotayo Ali, Director
Thomas O'Connor, Public Affairs Officer II



INTEROFFICE MEMORANDUM

TO: Omotayo Ali, Director, Juvenile Court

FROM: Anthony Nicks, County Auditor, Internal Audit

DATE: August 20, 2015

RE: Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review Report dated August 20, 2015

The Office of Internal Audit has completed the Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review Report dated August 20, 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: Office Fulton County Juvenile Court – Project Higher Hope Title VI Compliance Site Review Report dated August 20, 2015

Cc: Richard Anderson, County Manager
Thomas O'Connor, Public Affairs Officer II



FULTON COUNTY

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

**FULTON COUNTY JUVENILE COURT – PROJECT
HIGHER HOPE**

TITLE VI COMPLIANCE SITE REVIEW REPORT

AUGUST 20, 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 Fulton County Juvenile Court on August 06, 2015 with Thomas O'Connor, the Public Affairs Officer II. The site review addressed the Title VI compliance requirements for the federally funded sub-grant, Project Higher Hope, in the total amount of \$29,500 for the period of fiscal year (FY) July 2014 – June 2015.

BACKGROUND

Fulton County Juvenile Court's mission is to protect children and the community in matters brought before the court, to rehabilitate children, and to restore families; and second, to create opportunities for the community, partners, and stakeholders to actively engage in this mission.

Juvenile Court serves the residents of Fulton County by hearing all cases involving allegations of dependency of children under the age of 18, children in need of services (CHINS) under the age of 18, and delinquency and traffic violations concerning children under the age of 17.

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 Fulton County Juvenile Court 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 Fulton County Juvenile Court examined the following requirements according to the contractual agreement with the Criminal Justice Coordinating Council:

- (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 Director, Omotayo Ali, providing notification of the site review. Additionally, an email notification was sent to the Public Affairs Officer II, Thomas O'Connor, 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 Public Affairs Officer II was 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 Fulton County Juvenile Court demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout work 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. Site visits are also conducted by Probation Division staff to ensure Title VI compliance by service providers.

The Fulton County Juvenile Court has adopted the County's complaint process and provides the information via signage postage throughout the court work areas, program areas and to service providers. The agency ensures LEP compliance through the provision of contract interpreters and the translation of vital documents (court records, legal documents, intake and mediations forms as well as probation forms and agreements) into other languages when needed.

The Fulton County Juvenile Court 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 criminal justice and victim service agencies and the State established Executive Branch awarding agency, the Criminal Justice Coordinating Council.

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.