



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
FULTON COUNTY DEPARTMENT OF
HIV ELIMINATION SUB-RECIPIENT – GRADY
HEALTH SYSTEM
TITLE VI COMPLIANCE SITE REVIEW REPORT**

June 03, 2026

“Protecting your civil rights is good business”

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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 Title VI Compliance review of the Department of HIV Elimination's sub-recipient Grady Health System on May 31, 2026, with Melissa Beaupierre, Director of Business Operations. The review addressed the Title VI compliance requirements for the Ryan White grant in the total amount of \$10,605,078 for the period of March 01, 2026 – February 27, 2027, for program and services.

BACKGROUND

Fulton County's Department of HIV Elimination administers the Atlanta area Ryan White Part A and Ending the HIV Epidemic (EHE) grants, which collectively represent millions of dollars in annual federal funding. Ryan White Part A funds are utilized to enhance the availability, accessibility, and quality of comprehensive HIV care for low-income, uninsured, and underinsured individuals and families residing within the 20-county Atlanta Eligible Metropolitan Area.

Ending the HIV Epidemic (EHE) funding supports targeted strategies to identify, link, and re-engage people living with HIV in medical care. This includes individuals who are newly diagnosed as well as those previously diagnosed but not currently receiving care. EHE-funded activities also include the provision of essential support services, workforce development initiatives, and technical assistance aimed at strengthening the regional HIV care infrastructure and improving health outcomes.

The Grady Infectious Disease Program (IDP), located at the Ponce De Leon Center, is one of the largest, most comprehensive facilities dedicated to the treatment of advanced HIV/AIDS in the United States. Founded in 1986, the Ponce Center and its onsite affiliates provide various medical and support services to approximately 5000 eligible men, women, adolescents and children living with HIV/AIDS.

Grady IDP integrates primary internal medicine and Infectious Disease subspecialty care in the Main, Family and Transition Clinics. The location is staffed by doctors, nurse practitioners and physician assistants, nurses and more than 100 interagency employees. The care staff seamlessly provide onsite medical, support and community services.

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 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 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 vital material language translation, proper Title VI awareness/access signage placement and recommendations regarding corrective actions as deemed necessary and appropriate.

SCOPE

The scope of this Title VI Compliance Site Review examined the following requirements according to the agreement with the Eligible Metropolitan Area (EMA), HIV/AIDS Bureau (HAB) of the Health Resources and Services Administration (HRSA) of the US Department of Health and Human Services (HHS) and the Fulton County Department for HIV Elimination:

(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. (Notification of translation services provided at no additional cost to participants)

(2) Program-Specific Requirements

- f. A description of how the agency monitors its sub-recipients for compliance with Title VI (if applicable).
- g. A copy of sub-recipients' Annual Title VI Certifications and Assurances (if applicable).
- h. Ensure meaningful access to programs and activities by persons with limited English proficiency.
- i. Promote the full and fair participation of all affected populations of programs and activities through public outreach strategies.

METHODOLOGY

An initial email was sent to Melissa Beaupierre providing notification of the site review. In addition, an electronic copy of the Title VI Compliance Site Review Tool was sent, via email, used to conduct 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)).

REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

Findings

No findings of Title VI deficiencies.

CONCLUSION

The Grady Health System demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to program participants and employees. The clinic also presents language access rights in new hire orientation, on the organizational website and intake locations.

The agency has adopted Fulton County's Title VI complaint process and provides Fulton's complaint process via signage postings throughout its service area, reception area, and employee common areas. In addition, the recipient provided a copy of mandatory assurances/awarded contract agreement signed by the County's authorized certifying official, Sharon Whitmore, Chief Financial Officer.

The Grady Health System also provided public notification of rights and accessibility of Title VI. The recipient ensures LEP compliance through the use of interpretation and translation services of vital

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documents and the use of a Foreign Language Translation Service and bilingual staff, when applicable, at no additional cost to clients.

The agency is compliant with Title VI Civil Rights policies, mandates, regulations, procedures, and contract agreements. The compliance site review demonstrated that the department is thorough in complying with Title VI requirements.

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's 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 business days if findings and/or concerns are listed in this report. You may email your written response to the County Manager, Dick Anderson, 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.