



**FULTON
COUNTY**

**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
FULTON COUNTY DEPARTMENT OF
BEHAVIORAL HEALTH AND
DEVELOPMENTAL
DISABILITIES SUB-RECIPIENT – POLICING
ALTERNATIVES AND DIVERSION INITIATIVE
(PAD)
TITLE VI COMPLIANCE SITE REVIEW REPORT**

June 30, 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 Behavioral Health and Developmental Disabilities sub-recipient Policing Alternatives & Diversion Initiative (PAD) on June 22, 2026, with Bec Cranford, Development Director, Denise White, Deputy Director and Letisha McCall, Director of Social Services. The review addressed the Title VI compliance requirements for the Health and Human Services grant in the total amount of \$1,500,000 for the period of September 30, 2023 – September 20, 2028, for program and services.

Grant awards were allocated to the organization for the following initiatives:

PROGRAMS/SERVICES	FUNDING AMOUNT
Mental Health Services and Data Services	\$38,522
Case Management and Outreach- Employment	\$336,674
Training and Hygiene	\$16,000
Employee Coverage Fringe	\$107,096
Indirect Services	\$52,500

BACKGROUND

Fulton County’s Department of Behavioral Health and Developmental Disabilities administers high quality and culturally competent behavioral health care services to the most-in-need citizens of Fulton County through a variety of treatment and rehabilitation services models.

The Policing Alternatives & Diversion Initiative is an Atlanta-based non-profit organization that provides an alternative to police response and diversion from jail for people experiencing extreme poverty, problematic substance use, or mental health concerns.

Atlanta PAD utilizes grant funding to support Care Navigation efforts to support individuals experiencing homelessness in metro Atlanta. The project expects to serve approximately 750 individuals during the five-year grant period. PAD provides outreach and case management for people who are experiencing extreme poverty, problematic substance use, or mental health concerns.

Through proactive outreach to individuals referred through the City of Atlanta 311 line as well as pre-arrest diversion from law enforcement, PAD engages people who are disconnected from community support, vulnerable to criminal legal system contact and often excluded from traditional s services. The overwhelming majority (95%) of people who PAD serve are

experiencing homelessness at the time of initial engagement. PAD works with each person enrolled into Care Navigation services to develop Individual Service Plans (ISPs) that support their goals using a trauma-informed, harm-reduction-based framework. While the agency works alongside its participants through community-based case management, they also provide direct services including emergency housing and facilitate warm connections to treatment, healthcare, and other services. Their services do not exclude people with prior criminal convictions, active substance use, or untreated mental health conditions and are not time limited.

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 Fulton County Department for Behavioral Health and Developmental Disabilities and the U.S. Department of Health and 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 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 Bec Cranford 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.

Recommendations

The agency was encouraged to provide additional Title VI awareness program signage related to LEP resources and how to file a complaint.

CONCLUSION

PAD 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 center also presents language access rights in new hire orientation, on the organizational website and program intake and service 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.

Policing Alternatives and Diversion Initiative 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 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.