



FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR
RYAN WHITE SUB-RECIPIENT – POSITIVE
IMPACT HEALTH CENTERS
TITLE VI COMPLIANCE SITE REVIEW REPORT

June 20, 2018

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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 site review of the sub-recipient, Positive Impact Health Center (PIHC) on May 01, 2018 with Karen Cross, Director of Client Services. The site review addressed the Title VI compliance requirements for the PIHC Part A Ryan White Program for the period of March 1, 2018 – February 28, 2021 in the total amount of \$3,570,546.46.

BACKGROUND

Positive Impact Health Centers provides HIV specialty care and support services, behavioral health including substance abuse treatment, HIV testing and prevention 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 PIHC Program 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 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 PIHC Program examined the following requirements according to the agreement with Part A of the Ryan White federal program:

(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

- 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

An initial email was sent to Dr. Davies, Director of Positive Impact Health Centers, Jeff Cheek, Director of Ryan White and Ulicia Bolton, Ryan White Community Program Manager providing notification of the site review. In addition, an email was sent to Karen Cross, Director of Client Services for Positive Impact Health Centers, providing the same notification information 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 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)).

In addition, the sub-recipient’s Title VI Liaison was provided Title VI Basics and Compliance Training and law updates during the site review. This training assists with the efforts of understanding, obtaining and maintaining continuous, non-discrimination compliance.

REQUIREMENTS, FINDINGS AND RECOMMENDATIONS

Findings

No findings of Title VI deficiencies.

CONCLUSION

The PIHC Program demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to clients and employees. Also, the sub-recipient provided copies of the mandatory assurances/awarded contract agreement signed off by the agency’s director.

The PIHC Program has adopted the County's complaint process; however, a recommendation was made to provide the information via signage postage throughout the health center facilities' common areas (waiting areas, check-in and check-out areas), employee breakrooms, exam rooms, and pharmacy and clinic offices. The agency ensures LEP compliance through the use of a translation vendor and bi-lingual staff when needed at the health centers.

The PIHC Program is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Program is diligent in complying with Title VI requirements of the Part A Ryan White Program.

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 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 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 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.