



INTEROFFICE MEMORANDUM

TO: Fulton County Board of Commissioners

FROM: Anthony Nicks, County Auditor, *Anthony Nicks*
Office of the County Auditor

DATE: December 21, 2016

RE: Ryan White Sub-Recipient – Grady IDP Title VI Compliance
Site Review Report dated December 21, 2016

The Office of the County Auditor has completed Ryan White Sub-Recipient – Grady IDP Title VI Compliance Site Review Report dated December 21, 2016. Attached is a copy of the final report.

There were no Title VI deficiencies found during the site monitoring. The agency 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: Ryan White Sub-Recipient – Grady IDP Title VI Compliance Site Review Report dated December 21, 2016

Cc: Richard Anderson, County Manager
Jeff Cheek, Director
Troy Scott, Project Officer
Lisa Roland, Executive Director (Grady IDP)



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**FULTON COUNTY, GEORGIA
OFFICE OF THE COUNTY AUDITOR**

**RYAN WHITE SUB-RECIPIENT
GRADY HEALTH SYSTEM,
INFECTIOUS DISEASE PROGRAM
TITLE VI COMPLIANCE SITE REVIEW REPORT**

DECEMBER 21, 2016

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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 Ryan White Agency's sub-recipient, Grady Health System, Infectious Diseases Program (Grady IDP). The site review was conducted on December 15, 2016 with Lisa Roland, Executive Director of Infectious Disease Program and Michele Pirkle, Executive Director of Patient Family Experience. The review addressed the Title VI compliance requirements for the federally funded sub-grant, Ryan White Part A HIV/AIDS, in the total amount of \$8,335,408.19 for the period of March 02, 2016 – February 28, 2017.

BACKGROUND

The Grady IDP - 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.

Grady IDP is Primary medical care for men, women, adolescents and children living with HIV/AIDS. The location is also a transition center for HIV-infected individuals with <200 CD4 cells, subspecialty care in Dermatology, Hepatitis C, Mental Health/Substance Abuse Treatment, Ophthalmology, Oral Health, Case management, adherence counseling, nutrition, on-site radiology, laboratory, pharmacy and peer counseling.

Part of the organization's mission is to reduce the impact of hepatitis, HIV and STDs within the metro Atlanta area and to improve and expand their ability to provide services to clinic patients. The Clinic provides care for the HIV infected patients from preventive and proactive care in the early stages of infection to terminal care as needed. In addition to education, antiretroviral therapy, immunizations and medications to prevent opportunistic infections are also central to their treatment strategy.

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 Grady IDP, as a sub-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 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 Grady IDP was to examine the following requirements according to the contractual agreement with the Ryan White Part A 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.

(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 Jeff Cheek, Fulton County's Director of Ryan White, providing notification of the site review. Additionally, a memorandum and email notification was sent to Lisa Roland, Executive Director of Infectious Disease Program, 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 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 site review participants were 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.

FINDINGS AND RECOMMENDATIONS

Findings

- No findings of Title VI deficiencies

Recommendations

- Posting of “Notice to the Public” flyers
- Posting of “How to File a Complaint” process flyers

CONCLUSION

Grady Health System, Infectious Diseases Program demonstrated Title VI compliance as required. The agency displayed proper Title VI signage in appropriate places throughout service areas, providing Title VI awareness to clients and clinic staff. In addition, the agency’s clients receive Title VI information included along with Grady’s Health System website. Employees receive the information in the employee handbook and during employee annual mandatory CBL training and on GradyNet.

Grady IDP assures Title VI compliance by adopting the County’s complaint process. In addition, the agency ensures LEP compliance through the provision of in-person interpreters with the use of qualified medical interpreters. Additional languages have interpretation provided through telephonic interpretation and translation for non-English languages. The use of video remote interpretation (VRI) services is also provided through Language Line Solutions when requested as well as translation of vital documents into other languages when needed.

Grady IDP is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the Agency is diligent and proactive in complying with Title VI requirements of Fulton County 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.