



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR  
SHERIFF'S OFFICE – PROTECTING RAPE  
ELIMINATION ACT (PREA) GRANT  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**August 22, 2023**

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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 Fulton County Sheriff's Office on July 01, 2023, with Dr. Vinyl Baker, Financial Systems Manager. The compliance review addressed the Title VI compliance requirements for the Standards, Protecting Inmates, and Safeguarding Communities funds to implement the Prison Rape Elimination Act (PREA) programs and services for the period of October 01, 2021 – March 31, 2024, in the total amount of \$249,999.00.

## **BACKGROUND**

The Sheriff's Office is responsible for the administration and operation of the Fulton County Jail (FCJ), provides security for all Fulton County courtrooms and judges and render Warrant Service/Civil Process, Special Operations, and Investigative Units. The office also delivers expanded Substance Abuse and Mental Health Services Administration (SAMHSA) programs and services to FCJ inmates through the use of the PREA grant.

On September 4, 2003, the Prison Rape Elimination Act of 2003 (P.L. 108-79) was signed into law by President George W. Bush. The goal of PREA is to eradicate prisoner rape in all types of correctional facilities in the United States. The PREA Program provides funding to state and local governments and federally recognized tribes for demonstration projects within confinement settings including, adult prisons and jails, juvenile facilities; community corrections facilities; law enforcement lockups and other temporary holding facilities, and tribal detention facilities.

## **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 of Sheriff's Office examined the following requirements according to the agreement with the State of Georgia – Accountability Courts and United States Department of Justice (DOJ):

### (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 Sheriff Patrick Labat, providing notification of the site review and an electronic copy of the Title VI Compliance Site Review Tool used to conduct monitoring.

The review tool was utilized to assess the various areas of the Office'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 provided Fulton County, newly branded, Title VI awareness flyers and notices, to replace the Title VI awareness information currently posted in their locations as well as other supported locations. In addition, it was recommended that the office provide additional Title VI complaint process information and “babel” notice postings of language services at no additional cost, to inform program participants and staff of LEP resources.

## **CONCLUSION**

The Sheriff’s Office demonstrated Title VI compliance as required. The recipient displayed proper Title VI signage in appropriate places, providing Title VI awareness to citizens and employees. In addition, the recipient provided a copy of mandatory assurances/awarded contract agreement signed by the authorized certifying official, Chairman Rob Pitts.

The office has adopted the Fulton County’s Title VI complaint process and provides Fulton’s complaint process information via signage postings throughout its service areas, waiting areas, check-in and check-out areas, websites, and employee common areas

The office also provided public notification of rights and accessibility of Title VI. In addition, the recipient ensured LEP compliance through the use of interpretation and translation services of vital documents and through the use of its Foreign Language Line service at no additional cost to citizens. The agency also provided a copy of its language access communication plan and had “We Speak” posters placed at service entrances, check-in and check-out windows and common employee work areas.

The Sheriff’s Office is compliant with Title VI Civil Rights policies, mandates, regulations, procedures, and contract agreements. The compliance site review demonstrated that the Sheriff’s Office and each FCJ facilities are thorough in complying with Title VI requirements of U.S. DOJ.

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.