



**FULTON  
COUNTY**

**FULTON COUNTY, GEORGIA  
OFFICE OF THE COUNTY AUDITOR  
DEPARTMENT FOR HIV ELIMINATION – SUB-  
RECIPIENT – POSTIVE IMPACT HEALTH  
CENTERS  
TITLE VI COMPLIANCE SITE REVIEW REPORT**

**April 24, 2024**

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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 Positive Impact Health Centers (PIHC), a sub-recipient of the Department for HIV Elimination, on April 16, 2024, with Heather Wademan, Quality and Compliance Manager and Joey Helton, Chief Operating Officer. The compliance review addressed the Title VI compliance requirements for the grant for the period of March 01, 2022 – February 28, 2025, in the total amount of \$4,273,539.00 for programs and services essential to the Part A award.

The program received FFA for the following programs and/or services:

PROGRAMS/SERVICES	FUNDING AMOUNT
OAHS	\$2,263,300
OAHS – Stop Gap	\$130,637
Oral Health	\$186,559
Health Insurance Premium and Cost Sharing	\$45,000
Mental Health	\$458,073
Substance Abuse	\$451,514
Medical Case Management	\$228,808
Food Bank/Home Delivered Meals	\$74,710
Linguistics	\$18,000
Medical Transportation	\$56,571
Non-Medical Case Management	\$59,877
Non-Medical Management – Patient Navigation	\$38,126
Psychosocial Support	\$74,534
Referral – General	\$41,413
Referral – Insurance Navigation	\$66,133
Quality Management	\$80,278

**BACKGROUND**

The Ryan White Comprehensive AIDS Resources Emergency (CARE) Act of 1990 was established to help cities, states, and local organizations to provide services to persons

living with HIV. The legislation was reauthorized in 1996, 2000, 2006, and 2009 and is now known as the Ryan White Treatment Extension Act of 2009. The Ryan White Program is the federal government’s most comprehensive effort to improve the quality and availability of care for medically underserved individuals and families affected by HIV. The U.S. Department of Health and Human Services (HHS), Health Resources and Services Administration (HRSA) and HIV/AIDS Bureau (HAB) administers the Ryan White Program. The majority of funds are used to address core medical services and essential supportive services. There are a variety of Parts to the legislation which serve the needs of different communities and populations. Part A, which Fulton County receives, targets funds to the locales that have been most severely affected by the HIV epidemic.

Positive Impact Health Centers (PIHC) provides comprehensive care through medical services, emotional wellness and recovery programs, pharmacy services, support programs, prevention, screenings, immunizations, and testing services. PIHC provides its comprehensive services and administration in multiple locations:

- Chamblee – Administrative Offices Only  
2800 Century Parkway  
Suite 500  
Chamblee, GA 30345
  
- Decatur – Service Location  
523 Church Street  
Decatur, GA 30030
  
- Duluth – Service Location  
3350 Breckinridge Boulevard  
Suite 220  
Duluth, GA 30096
  
- Marietta – Service Location  
1650 County Services Parkway  
Marietta, GA 30008

## **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 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 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

- 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 Heather Wademan providing notification of the site review. In addition, an email was sent providing an electronic copy of the Title VI Compliance Site Review Tool used to conduct monitoring. As well as a copy of Fulton County’s Title VI Non-Discrimination and Limited English Proficiency Policy/Procedure. 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**

PIHC demonstrated Title VI compliance as required. The sub-recipient displayed proper Title VI signage in appropriate places (entrance of clinic and employee breakroom), providing Title VI awareness to program participants and employees. In addition, the sub-recipient provided a copy of mandatory assurances/awarded contract agreement signed by the authorized certifying official, Chairman Robb Pitts.

The agency has adopted the Fulton County’s Title VI complaint process and provides Fulton’s complaint process information via signage postings throughout the agency’s common areas.

PIHC also provided public notification of rights and accessibility of Title VI. The sub-recipient ensured LEP compliance through the use of interpretation and translation services of vital documents and through the use of its Translation Line service at no additional cost to citizens. In addition, the agency also utilizes its bilingual employees to assist with translation services, when needed.

The agency is compliant with Title VI Civil Rights policies, mandates, regulations, procedures, and contract agreements. The compliance site review demonstrated that the Positive Impact Health Centers’ locations are thorough in complying with Title VI requirements of the EMA.

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.