

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A11-001 – Ethics Training Compliance (Palm Beach County employees)-Revised

- **Background**

On May 17, 2011 the Palm Beach County Board of County Commissioners (PBC) adopted the revised Code of Ethics (Code). The revision required all Palm Beach County employees and elected/appointed officials to receive training on the revisions to the code and sign training acknowledgment forms to be maintained by the Palm Beach County Human Resources Division. On November 2, 2011, the Palm Beach County Commission on Ethics (COE) initiated a compliance review of several different county departments for ethics training compliance. Based on the results of the initial inquiry, the COE suspended its initial review and contacted Mr. Wayne Condry, Director, PBC Human Resources (HR), who in turn issued a follow-up email on November 7, 2011, to all department heads reiterating the requirements as contained in his initial compliance e-mail dated September 13, 2011, specifically the requirement that completed, original training acknowledgment forms needed to be sent to HR/Records for inclusion into all employees' permanent records. At that time, according to the audited departments, ethics training acknowledgement forms had been held within the individual county departments pending 100% compliance. Therefore, HR had not received these forms.

On March 13, 2012, I reopened the training compliance review of the County. In order to complete this task I contacted Ms. Erica Torres, Human Resources Technician, to obtain an audit report from the HRIS database. My review revealed, as of March 14, 2012, PBC had five thousand four hundred sixteen (5416) active full-time employees and seven (7) elected officials. At the time of the initial review Palm Beach County (the County) had a total of five-thousand four hundred sixteen (5416) full-time employees and seven (7) elected officials. As of that date, five thousand eighty two (5082) full-time employees and elected officials (94%) were in compliance with the ethics training requirement. However, three hundred forty one (341) full-time employees (6%) had yet to comply with the training requirement, or submit their acknowledgement forms to Human Resources. The County was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all full-time Palm Beach County employees and elected officials required to submit Ethics Training Acknowledgement Forms pursuant to the Code of Ethics. This review does not include on-call, temporary, or seasonal employees or volunteer advisory board members or officials. All forms submitted to Human Resources were electronically scanned into the employees' personnel file maintained in the automated HRIS database.

- **Assessment**

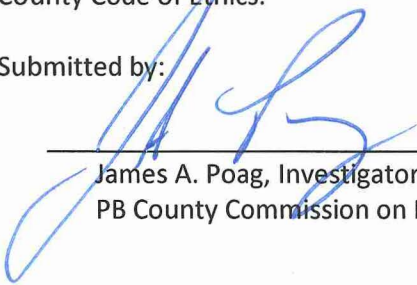
On October 19, 2012, a follow-up review of Palm Beach County for ethics training was completed for all County full-time employees and elected/appointed officials. The overall assessment indicated the

County had a total of 5749 full-time employees/elected officials. As of this date, all Palm Beach County full-time employees and elected officials are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts Palm Beach County is in compliance with the ethics training requirement for all of its full-time employees and elected officials as prescribed by the Palm Beach County Code of Ethics.

Submitted by:

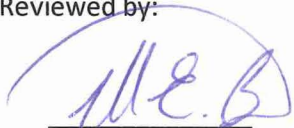


James A. Poag, Investigator
PB County Commission on Ethics




Date

Reviewed by:



(Initials)



Date