

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-001 – Ethics Training Compliance (City of West Palm Beach)

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- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (the Code). Pursuant to Section 2-446 of the Code, each municipal administrator is required to establish by policy a mandatory training schedule for all employees and elected/appointed officials to provide them with training on their ethical responsibilities as prescribed by the code. The Commission on Ethics is required to develop and deliver training programs and to coordinate and cooperate with the municipalities to ensure effective and meaningful training of elected/appointed officials and employees. For verification, a training acknowledgment form for each full-time employee and elected/appointed officials should be maintained on file by the Human Resources Department for each municipality.

On February 22, 2012, on behalf of the Commission on Ethics (COE), I initiated an audit of the City of West Palm Beach (City) for ethics training compliance. In order to complete this task I contacted Mr. Patrick Cooney, Director, City of West Palm Beach Human Resources Department to schedule an on-site visit to review the training files. Over a two day period spanning from February 22, 2012 thru February 23, 2012, I conducted an on-site compliance review of the City's Ethics Training Acknowledgement Forms. Prior to the start of my review, I was provided with an Alpha list of all active full-time City employees and elected/appointed officials, which I used to cross reference each individual Training Acknowledgement Form. My review revealed, as of February 23, 2101, the City had one-thousand five hundred thirty seven (1537) active full-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all City of West Palm Beach full-time employees and elected/appointed officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were maintained in a central training file folder alphabetically by last name.

- **Assessment**

On February 23, 2012, a compliance review of the City of West Palm Beach for Ethics Training program was completed for all full-time City employees and elected/appointed officials. The overall assessment indicated the City of West Palm Beach had a total of one thousand five hundred thirty seven (1537) full-time employees and elected/appointed officials. As of this date, the City of West Palm Beach is in compliance with the training requirement established by the Palm Beach County Code of Ethics

### **Conclusion**

Based on the aforementioned facts The City of West Palm Beach is in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

3/27/12  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

3/27/2012  
Date