

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-002 – Ethics Training Compliance (City of Boca Raton)

- **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 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 officials and employees. For verification, a training acknowledgment form for each full-time employee and official should be maintained on file by the Human Resources Department for each municipality.

On February 27, 2012, on behalf of the COE, I initiated an audit of the City of Boca Raton (the City) for ethics training compliance. In order to complete this task I contacted Mr. Mark Buckingham, Director of Human Resources, to schedule an onsite visit to review the training files for full-time employees and elected/appointed officials. Over a two day period spanning February 27, 2012 thru February 28, 2012, I conducted an onsite compliance review of the City's ethics training acknowledgement forms. Prior to the start of my review, I was provided with an alphabetical list of all active full-time City employees and elected/appointed officials, which I used to cross reference each individual training acknowledgement form. As of February 27, 2012, the City had 1,526 active full-time employees and elected/appointed officials. At the time of the initial review, 83% (1327) of the City's employees were in compliance with the ethics training requirement; however, 17% (264) of the employees had not complied with the training requirement. The City was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

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

- **Assessment**

On May 21, 2012, a follow-up review of the City of Boca Raton for Ethics Training Program was completed for all City employees and elected/appointed officials. The overall assessment indicated the City had 1,526 active full-time employees and elected/appointed officials. As of this date, all full-time employees and elected/appointed officials of the City of Boca Raton are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned information, the City of Boca Raton is in full compliance with the ethics training requirement for all of its employees and elected/appointed officials.

Submitted by:



James A. Poag, Investigator
Palm Beach County Commission on Ethics



Date

Reviewed by:



(Initials)



Date