

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A12-002B – Ethics Training Compliance (Boca Raton Airport Authority)

- **Background**

As of October 4, 2011, the appointed members of the Boca Raton Airport Authority (BRAA) came under the jurisdiction of the Palm Beach County Code of Ethics (the Code) by entering into a Memorandum of Understanding with the PBC Commission on Ethics (COE). Pursuant to Section 2-446 of the Code, each public entity within COE jurisdiction is required to establish by policy a mandatory training schedule for all persons under the jurisdiction of the COE, 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 these entities to ensure effective and meaningful training of persons under COE jurisdiction. For verification, a training acknowledgment form for each person under COE jurisdiction should be maintained by the public entity. Under the terms of the Memorandum of Understanding, COE jurisdiction includes only actual members of the BRAA, and does not apply to BRAA employees, or to any committee members reporting to the BRAA, that are not members of the BRAA.

On September 28, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Boca Raton Airport Authority (BRAA) concerning appointed board members for ethics training. In order to complete this task I contacted BRAA Office Manager Kim Singer to schedule a review of the Ethics Training Acknowledgment Forms. Prior to the start of my review, I obtained a list all active Board Members from their website (www.bocairport.com), which listed seven (7) BRAA Board Members. BRAA Office Manager Kim Singer verified the appointed BRAA members. Copies of all training acknowledgement forms were provided to COE staff on October 3, 2012. On this same date, I used the BRAA member list to cross reference each individual training acknowledgement form supplied to me. The overall assessment indicated that all seven (7) BRAA board members had been trained, and submitted a signed Ethics Training Acknowledgement Form.

- **Scope**

The scope included a review of all seven (7) appointed members of the Boca Raton Airport Authority required to submit an Ethics Training Acknowledgement Forms.

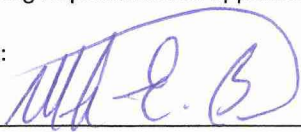
- **Assessment**

On October 3, 2012, a compliance review of the Boca Raton Airport Authority for ethics training was completed for all appointed BRAA members. The overall assessment indicated that the Boca Raton Airport Authority had seven (7) appointed members, all of which have been trained according to the reviewed records.

- **Conclusion**

Based on the above information, the Boca Raton Airport Authority is in full compliance with the Palm Beach County Code of Ethics training requirement for appointed BRAA members.


Submitted by:



Mark E. Bannon, Senior Investigator
PB County Commission on Ethics

10/12/2012
Date

Reviewed by:



(Initials)

10/12/2012
Date