

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-005 – Ethics Training Compliance (City of Riviera 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 official should be maintained by each municipality.

On May 22, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Riviera Beach (the City) for ethics training compliance. In order to complete this task I contacted Doretha Perry, Human Resources Director for The City of Riviera Beach, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the City's ethics training acknowledgement forms on May 30, 2012. Prior to the start of my review, I was provided with a departmental 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 May 30, 2012 the City had 566 active full-time employees and elected/appointed officials. At the time of the initial review 5 appointed officials were not in compliance. The City was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all City of Riviera 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 training binder alphabetically by last name.

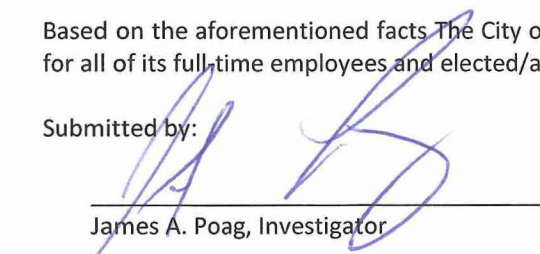
- **Assessment**

On July 31, 2012, a follow-up compliance review of the City of Riviera Beach for ethics training was completed for all full time City employees and elected/appointed officials. The overall assessment indicated the City of Riviera Beach had 566 active full-time employees and elected/appointed officials, all of which have been trained according to the reviewed records. As of this date, the City of Riviera 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 Riviera 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

  
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Date

Reviewed by:

  
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(Initials)

  
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Date