

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-006 – Ethics Training Compliance (Town of Palm Beach)-Revised

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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 on file by the Human Resources Department for each municipality.

On March 27, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Palm Beach (the Town) for ethics training compliance. In order to complete this task I contacted Ms. Kennie Wells, Assistant Human Resources Director, to schedule an on-site visit to review the training files. On April 4, 2012, I conducted an on-site compliance review of the Town's ethics training acknowledgement forms. Prior to the start of my review, I was provided with an alphabetical list of all regular full-time, regular part-time Town employees and elected/appointed officials, which I used to cross reference each individual Training Acknowledgement Form. My review revealed, as of March 29, 2012, the Town had a total of 422 regular full and part-time employees, and elected/appointed officials. On July 31, 2012, a follow-up compliance review of the Town of Palm Beach's Ethics Training program was completed. The overall assessment indicated that all full and part-time employees and elected/appointed officials of the Town of Palm Beach were in compliance with the training requirement established by the Palm Beach County Code of Ethics with one exception.

- **Scope**

The scope included a review of all Town of Palm Beach full-time and regular part-time employees and elected/appointed officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were electronically scanned into a specified ethics training folder and maintained through an automated human resources database.

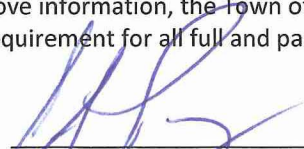
- **Assessment**

On August 21, 2012, COE staff received additional documentation from the Town. As a result, an additional compliance review of the Town of Palm Beach's Ethics Training program was completed for all full and part-time Town employees and elected/appointed officials. The overall assessment indicated the Town had 422 regular full and part-time employees and elected/appointed officials. As of this date, all are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the above information, the Town of Palm Beach is in full compliance with the Palm Beach County Code of Ethics training requirement for all full and part-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