

## COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-007B – Ethics Training Compliance (City of Delray Beach-Boards)

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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 April 16, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Delray Beach (the City) for ethics training. In order to complete this task I contacted Ms. Dot Bast, Training and Development Manager for the City of Delray Beach. On April 25, 2012, I conducted an on-site compliance review of the City's ethics training acknowledgement forms for all appointed officials. Prior to the start of my review, I was provided with an alphabetical list of all appointed officials, which I used to cross reference individual Training Acknowledgement Forms. As of April 25, 2012, the City had 181 appointed officials. At the time of the initial review 82 appointed officials were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. 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 Delray Beach appointed officials required to submit an Ethics Training Acknowledgement Form. All forms submitted to the Clerks Office were maintained in a central training file folder alphabetically by last name.

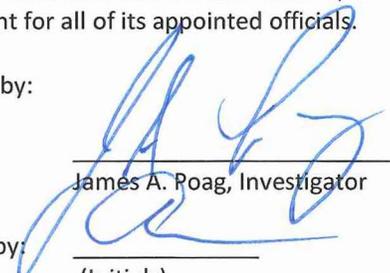
- **Assessment**

On June 15, 2012, a follow-up compliance review of the City of Delray Beach Ethics Training Program was completed for all appointed officials. The overall assessment indicated the City of Delray Beach had a total of 181 appointed officials. As of this date, 34 appointed officials have not complied with the ethics training requirement. The City of Delray Beach is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned information, the City of Delray Beach is not in compliance with the ethics training requirement for all of its appointed officials.

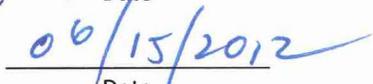
Submitted by:

  
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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