

REVISED COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-009 – Ethics Training Compliance (City of Palm Beach Gardens)

- **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 officials 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 City of Palm Beach Gardens (the City) for ethics training compliance. In order to complete this task I contacted Ms. Sheryl Stewart, Human Resources Administrator for the City of Palm Beach Gardens. Ms. Stewart provided me with an electronic link to an Alpha list of all active full-time City employees and elected/appointed officials. Through the link I was also able to access electronic copies of individual training acknowledgement forms for each City official and full-time employee. My review revealed, as of March 27, 2012, the City had 582 active full-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all City of Palm Beach Gardens full-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 March 28, 2012, a compliance review of the City of Palm Beach Gardens Ethics Training program was completed for all full-time City employees and elected/appointed officials. The overall assessment indicated the City of Palm Beach Gardens had a total of 582 full-time employees and elected/appointed officials. As of this date, all full-time employees and elected/appointed officials of the City of Palm Beach Gardens are in compliance with the training requirement established by the Palm Beach County Code of Ethics with one exception. Despite being advised of this requirement on several occasions by Ms. Patricia Snider, City Clerk, an alternate member of the Parks and Recreation Advisory Board had yet to complete ethics training since his appointment in October 2011.

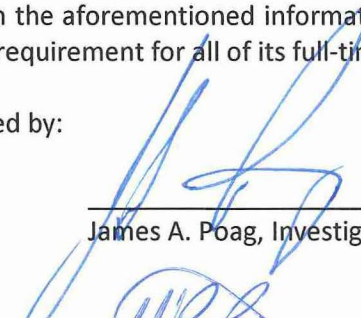
On June 8, 2012, additional information was received by the Commission on Ethics from the City of Palm Beach Gardens indicating that the first alternate on the Parks and Recreation Advisory Board was removed from the board for failure to comply with the Ethics Training requirement as prescribed by the Code. On June 13, 2011, a

follow-up review of City of Palm Beach Gardens for Ethics Training Program was completed for all City employees and elected/appointed officials. The overall assessment indicated the City had 581 active full-time employees and elected/appointed officials. As of this date, all full-time employees and elected/appointed officials of the City of Palm Beach Gardens 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 Palm Beach Gardens is in full compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:




James A. Poag, Investigator



Date

Reviewed by:



(Initials)



Date