

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A12-019 – Ethics Training Compliance (City of Lake Worth)

- **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 the Human Resources Department for each municipality.

On July 17, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Lake Worth (the City) elected officials and employees for ethics training. In order to complete this task I contacted Lasandra Harris, Human Resource Analyst, to schedule an on-site visit to review the elected official and employee Ethics Training Acknowledgment Forms. I conducted an on-site compliance review of the City's Ethics Training Acknowledgement Forms on July 25, 2012. Prior to the start of my review, I was provided with a departmental alphabetical list of all elected officials and active full/part-time City employees, which I used to cross reference each individual training acknowledgement form. As of July 31, 2012, the City had 5 elected officials and 295 active full/part-time employees. At the time of the initial review all 5 elected officials were in compliance with the ethics training requirement, and 283 employees were in compliance, leaving 12 employees not in compliance. Of these, 2 were on medical leave and unavailable, 3 were seasonal part-time employees who had not yet received training, and 7 were new employees hired within 60 days of the audit. The Town was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all of the City of Lake Worth full/part-time employees and elected officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were maintained in a central training file folder alphabetically by last name and department.

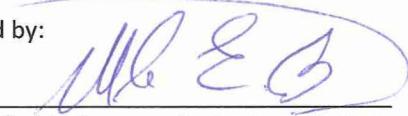
- **Assessment**

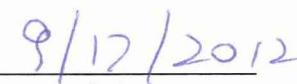
On August 29, 2012, a follow-up compliance review of the City of Lake Worth for ethics training was completed for all full/part-time City employees. All of the missing Ethics Training Acknowledgement Forms had been submitted by email to COE staff by this date. The overall assessment indicated the City of Lake Worth had 300 active full/part-time employees and elected officials, all of which have been trained according to the reviewed records. As of this date, the City of Lake Worth is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

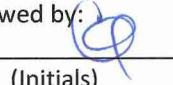
As of July 29, 2012, the City of Lake Worth is in compliance with the training requirement established by the Palm Beach County Code of Ethics for all employees and elected officials.

Submitted by:


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


Date

Reviewed by:


(Initials)


Date