

COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A12-020 – Ethics Training Compliance (Village of Palm Springs)

- **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 or the municipal Clerk for each municipality.

On July 10, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Palm Springs (the Village) for ethics training compliance. In order to complete this task I contacted Vicky Van Fossen, Human Resources Specialist for the Village. On July 24, 2012, I conducted an on-site compliance review of the ethics training acknowledgement forms for the Village. Prior to the start of my review, I was provided with an alphabetical list of all Village employees and elected officials, which I used to cross reference individual Training Acknowledgement Forms. As of July 24, 2012, the City had 212 employees and elected officials. At the time of the initial review one (1) employee had not yet received ethics training, and was not in compliance with this requirement. 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 Village of Palm Springs full-time and 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 alphabetically by last name.

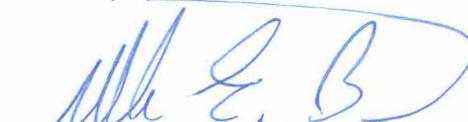
- **Assessment**

On July 27, 2012, Ms. Van Fossen provided me with the Ethics Training Acknowledgment Form for the single employee that had not received ethics training at the time of my initial assessment. This form documented that the employee had completed the required ethics training on July 25, 2012. I reviewed this submission during a follow-up compliance review of the Ethics Training Acknowledgment Forms for the Village. Based on this new submission, the overall assessment indicates that the Village of Palm Springs has a total of 212 employees and elected officials. As of this date, all full-time and part-time employees and elected officials of the Village of Palm Springs are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned information, the Village of Palm Springs is in full compliance with the ethics training requirement for all of its employees and elected officials.

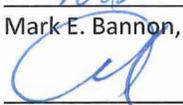
Submitted by:



Mark E. Bannon, Senior Investigator

8/13/2012
Date

Reviewed by:



(Initials)

08/13/2012
Date