

COMPLIANCE REVIEW MEMORANDUM

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

- **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 Village 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 for advisory boards, I contacted Village Clerk Virginia Walton. On July 24, 2012, I conducted an on-site compliance review of the ethics training acknowledgment forms for the Village, including all advisory board members. Prior to the start of my review, I was provided with an alphabetical list of all Village appointed officials, which I used to cross reference individual Training Acknowledgement Forms. As of July 24, 2012, the City had 34 appointed members serving on six (6) advisory boards. At the time of the initial review, three (3) appointed officials did not have copies of their ethics training forms available, although they had received training, and one (1) appointed official had not yet received ethics training. The Village 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 appointed members to Village advisory boards, required to submit an Ethics Training Acknowledgement Form. All forms submitted to the Village Clerk were maintained in a central training file alphabetically by last name.

- **Assessment**

On August 28, 2012, Village Clerk Virginia Walton provided me with the Ethics Training Acknowledgment Form for the three (3) officials that had not provided these forms during my initial assessment, as well as for two (2) additional members who had been appointed since that assessment. These forms documented that all five (5) appointed officials had received ethics training as required by the Code of Ethics. Further, Ms. Walton forwarded a copy of the letter to the board member who had not been trained, advising him that he had been removed from this advisory board. I reviewed these submissions during a follow-up compliance review of the Ethics Training Acknowledgment Forms for the Village on August 29, 2012. Based on this new information, the overall assessment indicates that the Village of Palm Springs has a total of 35 appointed members of Village advisory boards, and of this date, all 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:

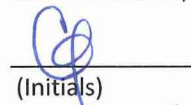


Mark E. Bannon, Senior Investigator

8/28/2012

Date

Reviewed by:



(Initials)

08/29/2012

Date