

COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-024B – Ethics Training Compliance (Town of Lake Park) Officials-Revised

- **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 and part-time employee and elected/appointed official should be maintained on file by the Human Resources Department for each municipality.

On August 14, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Lake Park (the Town) appointed officials for ethics training. In order to complete this task I contacted Ms. Vivian Mendez Lemley, Town Clerk for the Town of Lake Park. On August 16, 2012, I met with Ms. Mendez Lemley and conducted an on-site compliance review of the Town'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 August 16, 2012, the Town had 20 appointed officials. At the time of the initial review (2) appointed officials were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. The Town was given additional time to comply with the training requirement as prescribed by the code. On September 19, 2012, a follow-up compliance review of the Town of Lake Park Ethics Training Program was completed. The overall assessment indicated the Town of Lake Park had a total of 20 appointed officials. The overall assessment indicated that one appointed official remained non-compliant with ethics training requirement.

- **Scope**

The scope included a review of all Town of Lake Park appointed officials required to submit an Ethics Training Acknowledgement Form. All forms submitted to the Clerks Office were maintained in an electronic training file folder alphabetically by last name.

- **Assessment**

On October 15, 2012, COE staff received additional documentation from the Town indicating that the appointed official who had failed to comply with the ethics training requirement resigned from the board. As a result, the overall assessment was revised as the Town of Lake Park currently has a total of 19 appointed officials. As of this date, all appointed officials have complied with the ethics training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned information, the Town of Lake Park is in full compliance with the ethics training requirement for all of its appointed officials.

Submitted by:



James A. Poag, Investigator



Date

Reviewed by:



(Initials)



Date