

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-027 – Ethics Training Compliance (City of Pahokee)

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- **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 each municipality.

On August 22, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Pahokee (the City) for ethics training. In order to complete this task I contacted Ms. Christine Waugh, Human Resources Director to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the City's ethics training acknowledgement forms on August 29, 2012. Prior to the start of my review, I was provided with an alpha list of all active full/part-time City employees and elected officials, which I used to cross reference each individual training acknowledgement form. As of August 29, 2012, the City had 49 active regular full-time, regular part-time employees and elected officials. At the time of the initial review 9 employees were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. 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 of the City of Pahokee 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.

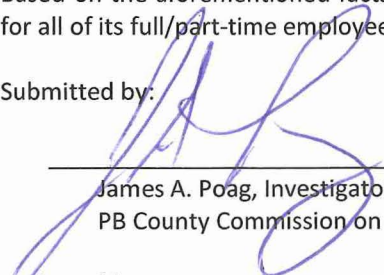
- **Assessment**

On September 28, 2012, a compliance review of the City of Pahokee for ethics training was completed for all full/part-time City employees and elected officials. The overall assessment indicated the City of Pahokee had 49 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 Pahokee is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of Pahokee is in full compliance with the ethics training requirement for all of its full/part-time employees and elected officials.

Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

  
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Date

Reviewed by:

  
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(Initials)

  
\_\_\_\_\_  
Date