

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-028 – Ethics Training Compliance (City of South Bay)

- **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 South Bay (the City) for ethics training. In order to complete this task I contacted Ms. Vick Del Bosquez, Human Resources Director, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the Town'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/appointed officials, which I used to cross reference each individual training acknowledgement form. As of August 29, 2012, the City had 41 active full/part-time employees and elected/appointed officials. At the time of the initial review 19 employees and all 15 appointed officials were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. The City requested COE staff to conduct in-person ethics training with its staff in order to facilitate compliance. On-site ethics training was held on October 18, 2012 for the City of South Bay employees and elected/appointed officials.

- **Scope**

The scope included a review of all of the City of South Bay full/part-time employees and elected/appointed officials, required to submit an ethics training acknowledgement form. All forms submitted to the Human Resources were maintained in a central training file folder alphabetically by last name.

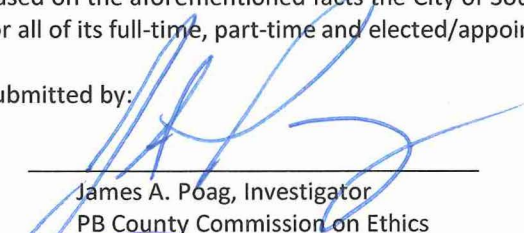
- **Assessment**

On October 19, 2012, a follow-up review of the City of South Bay for ethics training was completed for all full/part-time employees and elected/appointed officials. The overall assessment indicated the City of South Bay had 43 active full/part-time employees and elected/appointed officials. As of this date, (2) two employees, (1) one elected official, and (9) nine appointed officials have not complied with the ethics training requirement. Therefore, the City of South Bay is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of South Bay is in not compliance with the ethics training requirement for all of its full-time, part-time and elected/appointed officials.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date