

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-029 – Ethics Training Compliance (Town of Loxahatchee Groves)

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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 17, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Loxahatchee Groves (the Town) for ethics training. In order to complete this task Gina Levesque, COE Executive Assistant/Intake Manager contacted Town Clerk Susan Eichorn, via email. Ms. Levesque requested an alphabetical list of all active full-time and regular part-time Town employees and elected/appointed officials, and copies of each individual Ethics Training Acknowledgement Form. On September 14, 2012, Ms. Eichorn provided the COE with all the requested material. I crossed referenced the alpha list of all regular full and part-time Town employees and elected/appointed officials with the individual training acknowledgement forms. As of September 14, 2012, the Town had 42 active regular full and/or part-time employees and elected/appointed officials. At the time of the initial review 11 employees 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.

- **Scope**

The scope included a review of all of the Town of Loxahatchee Grove's regular full-time, regular part-time employees and elected/appointed officials, required to submit an ethics training acknowledgement form. All forms submitted to the Town Clerk's Office were maintained in a central training file folder alphabetically by last name.

- **Assessment**

On October 11, 2012, a follow-up ethics training compliance review of the Town was completed for all regular full- and part-time Town employees and elected/appointed officials. The overall assessment indicated the Town had 42 regular full or part-time employees and elected/appointed officials. As of this date, four (4) contract employees and all five (5) elected officials have not complied with the ethics training requirement. Therefore, the Town of Loxahatchee Groves is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts, the Town of Loxahatchee Groves is not in compliance with the ethics training requirement for all of its full and part-time employees and elected/appointed 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