

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-033 – Ethics Training Compliance (Village of Golf)

- **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 16, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Golf (the Village) for ethics training. In order to complete this task Gina Levesque, COE Executive Assistant/Intake Manager contacted Village Manager Laura Hannah, via email. Ms. Levesque requested an alphabetical list of all active full-time and regular part-time employees Village employees and elected/appointed officials, and copies of each individual Ethics Training Acknowledgement Form. Ms. Hannah provided the COE with all the requested material. I cross referenced the alpha list of all regular full-time, regular part-time Village employees and elected/appointed officials with the individual training acknowledgement forms. As of August 16, 2012, the Village had 29 active regular full-time, regular 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 Village 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 Village of Golf'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 Village Clerk's Office were maintained in a central training file folder alphabetically by last name.

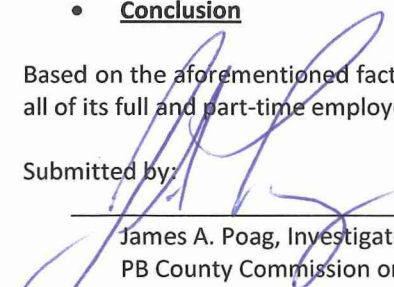
- **Assessment**

On September 19, 2012, an ethics training compliance review of the Village was completed for all regular full-time, regular part-time Village employees and elected/appointed officials. The overall assessment indicated the Village had 29 regular full-time, regular part-time employees and elected/appointed officials. As of this date, 11 employees have not complied with the ethics training requirement. The Village of Golf is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the Village of Golf is not in compliance with the ethics training requirement for all of its full and part-time employees and elected/appointed officials.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date