

## COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Anthony C. Bennett, Investigator  
Re: A15-002 – Ethics Training Compliance (Palm Beach County Advisory Boards)

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- **Background**

On May 17, 2011 the Palm Beach County (PBC) Board of County Commissioners adopted the revised Code of Ethics (Code). The revision required all employees and elected/appointed officials to receive training on the revisions to the code and sign training acknowledgment forms to be maintained by the Palm Beach County Human Resources Division.

According to PBC Policy Ethics Training for Employees and Officials (CW-P-079), all Officials, other than Board of County Commissioners (BCC), must complete ethics training required by the Palm Beach County Code of Ethics and the Commission on Ethics prior to appointment. Officials other than the BCC who serve an indefinite term must complete ethics training every three (3) years. It is the responsibility of each Official other than members of the BCC to comply with this requirement.

- **Scope**

The scope included a review of all Palm Beach County Advisory Board members required to submit ethics training acknowledgement forms pursuant to the Code of Ethics. The review only included those individuals appointed by the BCC.

- **Assessment**

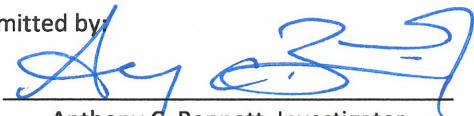
On August 20, 2015, the Palm Beach County Commission on Ethics (COE) initiated a compliance review of all county advisory board members for ethics training compliance. Ms. Patty Hindle, PBC Agenda Coordinator, was contacted to obtain a report listing the name, board, appointment date and training date for each board member. On August 27, 2015, I received an electronic copy of the report. The report indicated that PBC has a total of five hundred forty-one (541) advisory board members that have been appointed by the BCC.

As of August 27, 2015, of the five hundred forty-one (541) appointed officials, four hundred eight (408) have met the re-training requirement. One hundred thirty-three (133) Officials were not in compliance with the re-training requirement.

- **Conclusion**

Based on the aforementioned facts, Palm Beach County Advisory Boards are not in full compliance with the ethics training requirement for all of its appointed Officials.

Submitted by:

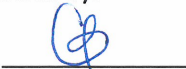


Anthony C. Bennett, Investigator  
PB County Commission on Ethics

8/31/2015

Date

Reviewed by:



(Initials)

8/31/2015

Date