

COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director
From: Anthony C. Bennett, Investigator
Re: A15-004 – Ethics Training Compliance (Town of Cloud Lake)

- **Background**

As of June 1, 2011, all municipalities within Palm Beach County are under the jurisdiction of the Palm Beach County Commission on Ethics and subject to the 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 participate in refresher 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.

- **Scope**

The scope included a review of all Town of Cloud Lake employees and elected/appointed officials required to submit an ethics training acknowledgement form. According to the Town Clerk, all forms were maintained in a central training file folder alphabetically by last name and they were also kept electronically in a Microsoft Word based file.

- **Assessment**

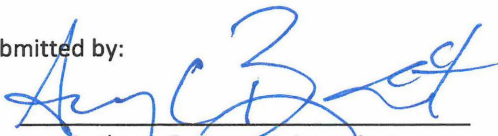
On June 15, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Cloud Lake (the Town) for ethics training compliance. In order to complete this task I contacted Ms. Dorothy Gravelin, Town Clerk, to schedule a review of the ethics training files. Ms. Gravelin advised the town now keeps an electronic record of all ethics training. She stated she would review the electronic records to ensure all employees and public officials were listed.

On June 30, 2015, I received an email from Ms. Gravelin of the complete ethics training spreadsheet which listed all employees and officials. As of that date, the Town of Cloud Lake had twelve (12) active full-time employees and elected/appointed officials. Upon review of the records, all employees and elected/appointed officials have been trained.

- **Conclusion**

The Town of Cloud Lake is in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:

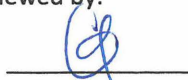


Anthony C. Bennett, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date