

COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A15-010 – Ethics Training Compliance (Town of South Palm Beach)

- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (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 receive 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 employee and elected officials should be maintained for each municipality.

On August 26, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of South Palm Beach (Town) for ethics training compliance for all employees, elected and appointed officials serving on Town advisory and other boards. In order to complete this task I contacted Ms. Yudelkys Alvarez, Town Clerk. She provided a list of all officials and employees of the Town, as well as individual Ethics Training Acknowledgement Forms that were available. The Town currently has a policy of ethics retraining for its employees and elected officials on a two year rotation, as required by the Code of Ethics, or within 30 days of election, appointment or employment.

- **Scope**

The scope included a review of all Town of South Palm Beach employees, elected and appointed officials who are required to submit ethics training acknowledgement forms pursuant to the Code of Ethics.

- **Assessment**

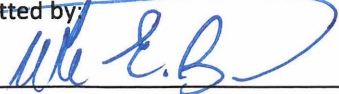
As of August 26, 2015, the Town of South Palm Beach had twelve (12) employees, five (5) elected officials and thirty-six (36) appointed officials, for a total of fifty-three (53) individuals required to complete ethics training pursuant to the Code of Ethics and Town policy.

Of the fifty-three (53) individuals required to complete ethics training, all twelve (12) employees and four (4) elected officials have complied with the ethics training requirements. However, one (1) elected official and nineteen (19) appointed officials have not complied with the mandatory ethics training requirement pursuant to the Code of Ethics and Town policy.

- **Conclusion**

Based on the aforementioned information, the Town of South Palm Beach is not in compliance with the ethics training requirements for all employees and officials. The Town of South Palm Beach is only 62% compliant with this requirement.

Submitted by:



Mark E. Bannon, Senior Investigator
PB County Commission on Ethics

9/10/15

Date

Reviewed by:



(Initials)

9.10.2015

Date