

## COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Mark E. Bannon, Senior Investigator  
Re: A15-015 – Ethics Training Compliance (City of Palm Beach Gardens-Advisory and Other Boards)

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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 (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 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 for elected/appointed officials and employees. For verification, a training acknowledgment form for each employee and elected official should be maintained for each municipality.

On September 8, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Palm Beach Gardens (the City) for ethics training compliance for all appointed officials. In order to complete this task I contacted Ms. Patty Snider, City Clerk, for the City. Ms. Snider provided an electronic link to an alpha list of all active appointed officials serving on advisory and other boards. Through the link, I was also able to access electronic copies of individual training acknowledgement forms for each City appointed official. The City has a policy of ethics retraining for its employees and officials on a three-year rotation, as required by the Code of Ethics, which must be satisfied within 180 days of the November 1<sup>st</sup> dated set in the policy. This policy also requires all new officials and employees to be trained within 30 days of employment, appointment or election.

- **Scope**

The scope included a review of all active City of Palm Beach Gardens appointed officials who serve on City advisory and other boards, required to submit an Ethics Training Acknowledgement Form.

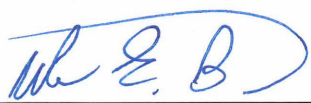
- **Assessment**

After obtaining the necessary information from the City, I completed the ethics compliance review on September 8, 2015. This review revealed that as of September 8, 2015, the City had a total of 47 appointed positions on seven (7) boards. Three (3) of the boards had vacancies for a total of five (5) positions that were unfilled. As of this date, all 41 appointed officials of the City (including eight (8) full-time employees appointed to serve on City pension boards), are in compliance with the training requirement established by the Palm Beach County Code of Ethics and City policy.

- **Conclusion**


Based on the aforementioned information, the City of Palm Beach Gardens is in full compliance with the ethics training requirement for all appointed officials.

Submitted by:

  
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Mark E. Bannon, Senior Investigator

9/10/15  
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Date

Reviewed by:

  
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(Initials)

9.10.2015  
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Date