

## COMPLIANCE REVIEW MEMORANDUM

To: Mark E. Bannon, Executive Director  
From: Anthony C. Bennett, Investigator  
Re: A15-022 – Ethics Training Compliance – Elected Officials and Boards (Town of Palm Beach)

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- **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 elected/appointed official should be maintained by each municipality.

- **Scope**

The scope included a review of all Town of Palm Beach (Town) elected/appointed officials required to complete ethics training. Based on the Administrative Policy and Procedure (Appendix 7) newly appointed board, commission and/or committee members must complete ethics training within their first thirty (30) days of their appointment. Retraining will be required by all employees, elected officials and advisory board members every three (3) years on June 1<sup>st</sup> and must be satisfied before or after the June 1<sup>st</sup> deadline. Appointed board, commission and/or committee members are required to complete and sign the Ethics Training Acknowledgement Form and forward the form to the Town Manager for filing. The Town Manager will maintain the forms in a centralized training folder as verification of ethics training.

- **Assessment**

On Friday, January 21, 2016, on behalf of the Commission on Ethics (COE), I initiated a compliance review of Town elected/appointed officials for ethics training compliance. In order to complete this task I contacted Ms. Cheryl Kleen, Executive Assistant to the Mayor and Town Council, to schedule a review of the ethics training files. I was advised that all Ethics Training Acknowledgement Forms noting ethics training are kept in a centralized folder in the council administrative office.

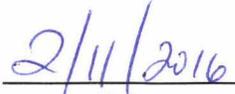
As of that date, the Town of Palm Beach had ninety-four (94) active elected/appointed officials. Of the ninety-four (94) members, sixty-eight (68) have met the retraining requirement. Twenty-six (26) employees have not completed the retraining.

- **Conclusion**

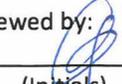
Based on the aforementioned facts, the Town of Palm Beach is not in full compliance with the ethics training requirement for all of its elected/appointed officials. The Town is 72% compliant with this requirement.

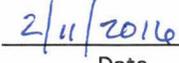
Submitted by:

  
\_\_\_\_\_  
Anthony C. Bennett, Investigator  
PB County Commission on Ethics

  
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Date

Reviewed by:

  
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(Initials)

  
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Date