

# POLICY REVIEW AND COMPLIANCE MEMORANDUM



To: Christie Kelley, Executive Director  
From: Abigail Irizarry, Investigator  
Re: A22-007 – Village of Wellington - Ethics Policy Review and Training Compliance (Appointed Officials)

- **Background**

The Code of Ethics (Code) states in part, under Section 2-446(a), that Palm Beach County and each municipality within Commission on Ethics (COE) jurisdiction is required to maintain, by policy, a mandatory training schedule for all employees and elected/appointed officials. Additionally, each municipality has the responsibility of overseeing participation of their own employees and elected official's Ethics Training Acknowledgment Form and ethics refresher training.

The COE is required to develop and deliver training programs. Furthermore, the COE coordinates and cooperates with the municipalities to ensure training of employees and elected officials.

The COE last audited the Village of Wellington (Village) appointed officials on September 10, 2015.

- **Objectives and Scope**

Objectives include:

- Ensuring the agency has an ethics training policy.
- Ensuring the ethics training policy appropriately conveys information to officials and employees so clear parameters are determined, including initial training (with a defined deadline and grace period) and retraining cycle timeline (with a defined deadline and grace period).
- Ensuring the agency is requiring its officials and employees to comply with the training policy.

The scope for this memorandum included a review of all Village appointed officials required to submit an Ethics Training Acknowledgment Form. Internal tracking and delivery method of ethics training compliance were not part of the scope.

- **Approach and Methodology**

On Thursday, March 10, 2022, on behalf of the COE, I emailed Village City Clerk Chevelle Addie to request the ethics training files for appointed officials. Addie is the correct contact person for the Village's appointed official's ethics training records.

On Monday, March 28, 2022, I followed up with Addie due to not receiving the requested records. She explained that she sent them on March 11, 2022 and although on her end it said 'delivered', it was never received by the COE. This is presumably due to the size of the email attachments. Later that same day (March 28), I received the Ethics Training Acknowledgment Forms and ethics training records for all of the Village appointed officials.

Based on their Administrative Policy and Procedure, which was amended in 2015, all appointed officials are appointed for two (2) year terms. They are required to take the Code of Ethics training prior to their first scheduled meeting. Upon any subsequent reappointment, follow-up training is required before they may attend the first scheduled meeting following their reappointment.

- Findings

At the time of this report, the Village had sixty three (63) active appointed officials. Upon review of the records, all appointed officials have been trained.

- Recommendations

After reviewing the Village's 2015 policy, the following recommendation should be implemented to provide clarification regarding the training cycle and deadlines.<sup>1</sup>

1. The follow-up training for employees and elected/appointed officials should have a specific timeframe to complete ethics refresher training. For example, the suggested follow-up language for employees and elected/appointed officials could be changed to read as follows: **"After initial training, periodic mandatory follow-up ethics refresher training is required for all employees and elected/appointed officials every two (2) years during the training cycle. The two-year ethics refresher training cycle is effective January 1, 2023, and all employees and elected/appointed officials who take ethics refresher training and read the Code of Ethics between January 1 – March 1, 2023 will be considered trained and in compliance with this policy."**

- Conclusion

The Village of Wellington is in full compliance with the ethics training requirement for its appointed officials. Additionally, the review identified one area of the policy that may be updated for practicality, so the requirements are clear.


Submitted by:

  
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Abigail Trizarry, Investigator  
PB County Commission on Ethics

  
\_\_\_\_\_  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

  
\_\_\_\_\_  
Date

<sup>1</sup> The following recommendation was addressed by Village on March 21, 2022 (Policy #VW-H-017).