

POLICY REVIEW AND COMPLIANCE MEMORANDUM

To: Christie Kelley, Executive Director
From: Abigail Irizarry, Investigator
Re: A22-008 – Village of Royal Palm Beach -Ethics Policy Review and Training Compliance



- **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 also has the responsibility of overseeing participation of their own employees and elected/appointed 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/appointed officials.

The COE last audited the Village of Royal Palm Beach (Village) on November 16, 2017.

- **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 employees and elected/appointed officials required to submit an Ethics Training Acknowledgement Form. Internal tracking and delivery method of ethics training compliance were not part of the scope.

- **Approach and Methodology**

On Monday, April 27, 2022, on behalf of the COE, I initiated a compliance review of the Village for ethics training compliance. In order to complete this task, I emailed Village Clerk Diane DiSanto a request for the ethics training files.

On Monday, May 2, 2022, I received the Ethics Training Acknowledgement Forms and ethics training records for the City employees and elected/appointed officials from Human Resources and Risk Management Director Monika D. Bowles.

Based on their Administrative Policy and Procedure all public elected officials, employees, volunteers, service board members and contracted employees must take the initial Code of Ethics training within thirty (30) days of Village employment or appointment. Additionally, mandatory follow-up training is required of all employees and elected/appointed officials every five (5) years thereafter.

- Findings

At the time of this report, the Village had one hundred thirty one (131) active full-time employees and thirty-three (33) sworn-in elected/appointed officials. Upon review of the records, all employees have been trained. Additionally, all elected/appointed officials completed ethics training.

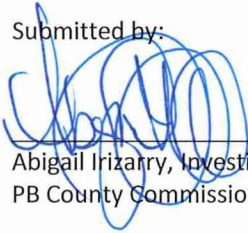
- Recommendations

After reviewing the City's policy, there are no recommendations at this time.

- Conclusion

The Village of Royal Palm Beach is in full compliance with the ethics training requirement for its employees and elected/appointed officials.

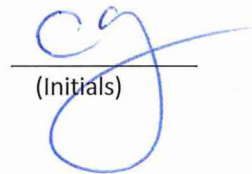
Submitted by:



Abigail Irizarry, Investigator
PB County Commission on Ethics

May 5, 2022
Date

Reviewed by:



(Initials)

5-10-22