

COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-007 – Ethics Training Compliance (City of Delray 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 (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 provide them with 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 full-time employee and elected/appointed official should be maintained on file by the Human Resources Department for each municipality.

On March 27, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Delray Beach (the City) for ethics training compliance. In order to complete this task I contacted Mr. Bruce Koeser, Human Resources Director for the City of Delray Beach. On March 30, 2012, I conducted an on-site compliance review of the City's ethics training acknowledgement forms. Prior to the start of my review, I was provided with an alphabetical list of all City employees and elected/appointed officials, which I used to cross reference individual Training Acknowledgement Form. As of March 30, 2012, the City had 801 employees and elected officials. At the time of the initial review 5 employees were not in compliance. The City was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all City of Delray Beach full-time, part-time, and elected officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were maintained in a central training file folder alphabetically by last name.

- **Assessment**

On April 10, 2012, a follow-up compliance review of the City of Delray Beach Ethics Training Program was completed for all City employees and elected officials. The overall assessment indicated the City of Delray Beach had a total of 801 employees and elected officials. As of this date, all full-time employees and elected officials of the City of Delray Beach are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned information, the City of Delray Beach is in full compliance with the ethics training requirement for all of its employees and elected officials.

Submitted by:


James A. Poag, Investigator

Reviewed by:


(Initials)


Date


Date