

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-008 – Ethics Training Compliance (Village of Royal Palm Beach)

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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 (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 Village of Royal Palm Beach (the Village) for ethics training compliance. In order to complete this task I contacted Ms. Monika Bowles, Director, Village of Royal Palm Beach Human Resources Department, to schedule an on-site visit to review the training files. On March 29, 2012, I conducted an on-site compliance review of the Villages' Ethics Training Acknowledgement Forms. Prior to the start of my review, I was provided with an Alpha list of all active full-time Village employees and elected/appointed officials, which I used to cross reference each individual Training Acknowledgement Form. My review revealed, as of March 29, 2012, the Village had one-hundred forty one (141) active full-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all the Village of Royal Palm Beach full-time employees and elected/appointed 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 March 29, 2012, a compliance review of the Village of Royal Palm Beach for Ethics Training program was completed for all full-time Village employees and elected/appointed officials. The overall assessment indicated the Village of Royal Palm Beach had one-hundred forty one (141) active full-time employees and elected/appointed officials, all of which have been trained according to the reviewed records. As of this date, the Village of Royal Palm Beach is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

### **Conclusion**

Based on the aforementioned facts, The Village of Royal Palm Beach is in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

  
\_\_\_\_\_  
Date

Reviewed by:

  
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(Initials)

  
\_\_\_\_\_  
Date