

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-031 – Ethics Training Compliance (City of Boynton 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 and part-time employee and elected/appointed official should be maintained by each municipality.

On August 21, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of the Boynton Beach (the City) for ethics training. In order to complete this I contacted Mr. Matt Graham, Human Resources Generalist, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the City's ethics training acknowledgement forms on August 30, 2012. Prior to the start of my review, I was provided with an alpha list of all full/part-time City employees, which I used to cross reference each individual training acknowledgement form. As of August 30, 2012, the City had 818 active regular full-time and regular part-time employees. At the time of the initial review, 253 full/part-time employees had not received training. 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 818 of the City of Boynton Beach full/part-time City employees 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.

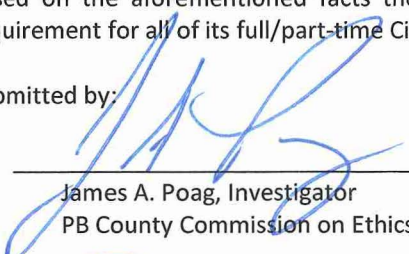
- **Assessment**

On October 9, 2012, a follow-up compliance review of the City of Boynton Beach Ethics Training Program was completed for all City full/part-time City employees. The overall assessment indicated the City of Boynton Beach had a total of 818 full/part-time City employees. As of this date, all full/part-time City employees of the City of Boynton Beach are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of Boynton Beach is in full compliance with the ethics training requirement for all of its full/part-time City employees.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date