

## AMENDED COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Gina Levesque, Intake Manager  
Re: A15-001 – Ethics Training Compliance (Palm Beach County)

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- **Background**

On May 17, 2011 the Palm Beach County (PBC) Board of County Commissioners adopted the revised Code of Ethics (Code). The revision required all employees and elected/appointed officials to receive training on the revisions to the code and sign training acknowledgment forms to be maintained by the Palm Beach County Human Resources Division.

According to PBC Policy, Ethics Training for Employees and Officials (CW-P-079), all employees must complete required ethics re-training every three (3) years by the established October 1<sup>st</sup> deadline. The policy also provides for a ninety (90) day grace period. Therefore, everyone who completes re-training between July 1 and December 31 will be considered compliant. Elected officials must complete training and/or retraining for each term served no later than sixty (60) days after taking office.

- **Scope**

The scope included a review of all full-time Palm Beach County employees and elected officials required to submit ethics training acknowledgement forms pursuant to the Code of Ethics. The review did not include on-call, temporary, or seasonal employees. A review of all PBC advisory board members will be addressed in a different memorandum. All forms submitted to Human Resources were electronically scanned into the personnel file for all employees and maintained in the HRIS database.

- **Assessment**

On May 26, 2015, the Palm Beach County Commission on Ethics (COE) initiated a compliance review of county departments for ethics training compliance. Ms. Maria Maldonado, PBC Human Resources, was contacted to obtain an audit report from the Human Resources Information System (HRIS) database. On June 5, 2015, the report indicated that PBC had five thousand four hundred twenty-three (5,423) active full-time employees and elected officials at that time.

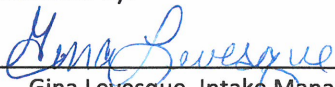
As of June 5, 2015, of the five thousand four hundred twenty-three (5,423) full-time employees and elected officials, five thousand four hundred seventeen (5,417) have met the re-training requirement. Six (6) full-time employees were not in compliance with the re-training requirement.

After publishing the initial report on August 20, 2015, that indicated there were twenty-five full-time employees not in compliance, there was a glitch detected in the system used to track fulfillment of the re-training requirement. Training forms were located and forwarded to the COE for consideration for 19 of the 25 employees who were initially determined to be out of compliance.

- **Conclusion**

Therefore, based on all of the information gathered, Palm Beach County is not in full compliance with the ethics training requirement for all of its full-time employees. However, the county is 99.9% compliant, and all elected County Commissioners are in compliance with the training requirement.

Submitted by:

  
Gina Levesque, Intake Manager  
PB County Commission on Ethics

9.2.2015  
Date

Reviewed by:

SR  
(Initials)

9/2/2015  
Date