PALM BEACH COUNTY COMMISSION ON ETHICS

COMPLIANCE	REVIEW	MEMORANDUM

To:	Steven Cullen, Executive Director
From:	Mark E. Bannon, Senior Investigator
Re:	A15-006 – Ethics Training Compliance (Town of Lantana – elected officials and employees)

Background

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (Code). However, the Town of Lantana voluntarily accepted this jurisdiction on October 19, 2010. 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 employee and elected officials should be maintained for each municipality.

On August 26, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Lantana (Town) for ethics training compliance for all elected officials and employees of the Town. In order to complete this task I contacted Ms. Myila Young, coordinator of Human Resources for the Town. I was provided with an Alpha list of Town elected officials and employees, as well as copies of the Ethics Training Acknowledgement Forms for these individuals. The Town currently has a policy of ethics retraining for its employees and elected officials on a four year rotation, as required by the Code. Town policy also requires that each official or employee be trained within sixty (60) days of election, employment or appointment to any Town board.

Scope

The scope included a review of all Town of Lantana elected officials and employees required to submit an Ethics Training Acknowledgement Form.

<u>Assessment</u>

I completed an on-site ethics training compliance review for the Town of Lantana on August 26, 2015. As of that date, the Town had five (5) elected officials, and 106 full-time or part-time employees required to have ethics training, for a total of 111 individuals. The review revealed that all elected officials and employees of the Town are in full compliance with the training requirement established by the Palm Beach County Code of Ethics and current Town policy.

Conclusion

Based on the aforementioned information, the Town of Lantana is in full compliance with the ethics training requirement for all elected official and employees.

Submitted by:

Mark E. Bannon, Senior Investigator PBC Commission on Ethics

Reviewed by: