

COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A15-007 – Ethics Training Compliance (Town of Lantana – advisory and other Town boards)

- **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 appointed officials of the Town. In order to complete this task I contacted Ms. Crystal Gibson, Town Clerk. I was provided with an Alpha list of Town appointed officials serving on advisory or other Town boards, as well as copies of the Ethics Training Acknowledgement Forms. The Town currently has a policy of ethics retraining for its employees, as well as elected and appointed officials on a four year rotation, as required by the Code, which also requires that each official be trained within sixty (60) days of election, employment or appointment to any Town board.

- **Scope**

The scope included a review of all officials and appointed to advisory or other boards for the Town of Lantana, who are required to submit an Ethics Training Acknowledgement Form.

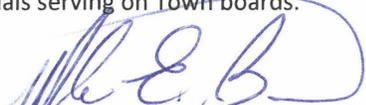
- **Assessment**

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) appointed boards, and a total of thirty-seven (37) appointed officials serving on boards that were required to have periodic ethics training. The boards also have two (2) vacancies. The review revealed that all appointed officials of the Town are in full compliance with the training requirement established by the Palm Beach County Code of Ethics and current Town policy.

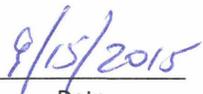
- **Conclusion**

Based on the aforementioned information, the Town of Lantana is in full compliance with the ethics training requirement for all appointed officials serving on Town boards.

Submitted by:



Mark E. Bannon, Senior Investigator
PBC Commission on Ethics

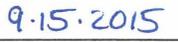


Date

Reviewed by:



(Initials)



Date