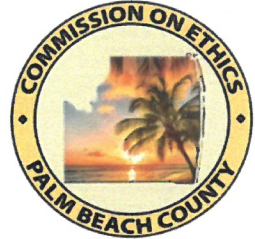


POLICY REVIEW AND COMPLIANCE MEMORANDUM



Honesty - Integrity - Character

To: Mark E. Bannon, Executive Director
From: Gina A. Levesque, Intake and Compliance Manager
A18-002 – Palm Beach County Advisory Boards
Re: Ethics Training Compliance

- **Background**

The Palm Beach County Code of Ethics (Code) states in part under Section 2-446(a) that the county or municipal administrator shall establish by policy a mandatory training schedule for all employees and elected or appointed officials, which shall include mandatory periodic follow-up sessions. Section 2-446(b) states in part that the COE shall develop and deliver training programs and ensure that the training is delivered in a timely manner.

- **Objectives and Scope**

The objectives are:

- To provide assurance that the county has a training policy.
- To provide assurance that the training policy includes enough specific information for officials and employees to determine clear parameters, including initial training and retraining deadlines and grace period definitions.
- To provide reasonable assurance the county is requiring its officials and employees to comply with the training policy.

The scope of this review focused on the policy and proof of training for Palm Beach County (County) appointed officials. The delivery method of the ethics training and internal tracking method of compliance was not part of the scope.

- **Approach and Methodology**

Agenda Coordinator Cindy Beaudreau is responsible for tracking and maintaining all information for appointed officials to any Palm Beach County advisory board. Ms. Beaudreau provided some training information on March 7, 2018. As Ms. Beaudreau was new to the position, and I had several questions about the information provided, and we communicated over the next several months via email.

- **Findings**

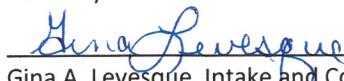
The training policy for the County was issued and became effective on August 5, 2014. The policy requires that appointed officials undergo training and read the Code prior to appointment and upon reappointment. Further, officials who serve an indefinite term must complete training every three years.

At the time of the review, there were 63 boards with approximately 443 appointed officials. Of the 443 appointed officials, 43 did not comply with the training policy.

- **Conclusions**

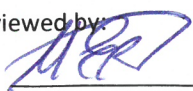
The results of the review found that Palm Beach County is not in full compliance with the Palm Beach County Code of Ethics training policy requirement for all of its appointed officials.

Submitted by:


Gina A. Levesque, Intake and Compliance Manager
Palm Beach County Commission on Ethics

8/24/2018
Date

Reviewed by:


(Initials)

8/24/2018
Date