

POLICY REVIEW AND COMPLIANCE REVIEW MEMORANDUM

To: Mark E. Bannon, Executive Director
From: Gina A. Levesque, Intake and Compliance Manager
Re: A19-005 – Town of Palm Beach Ethics Policy Review and Training Compliance (Employees)

- **Background**

The 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, 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 agency has a training policy.
- To provide assurance that the training policy includes enough specific information to employees that they can determine clear parameters, including initial training with deadline and grace period defined, and retraining cycle timeline with deadlines and grace periods defined.
- To provide reasonable assurance the agency is requiring its employees to comply with the training policy.

The scope of this review focused on the policy and acknowledgement forms for employees within the Town of Palm Beach (Town). A separate review was conducted for Town elected and appointed officials. The delivery method of the ethics training and internal tracking method of compliance were not part of the scope.

Based on the Administrative Policy and Procedure newly hired employees are offered training during New Hire Orientation and shall complete ethics training within their first ninety (90) days of employment. All employees will require retraining every three (3) years on June 1, beginning June 1, 2016. Each retraining requirement must be satisfied within ninety days before or after the June 1 deadline. Signed training acknowledgement forms are maintained in a centralized training binder as verification of ethics training.

- **Approach and Methodology**

I sent an email to Jody Justice, Human Resources Analyst requesting time to perform an on-sight review of a list of current employees including their hire dates and training acknowledgement forms. I met with Ms. Justice and Human Resource Specialist Kiki Piscitelli, on May 7 to perform the review. At that time, I was provided a list of all current employees including their start date and binders containing their training acknowledgement forms.

- **Findings**

The training policy for the Town was revised in 2016 and remains the guiding policy. The policy requires the completion of training for new hires within 90 days of employment. All employees are required to complete ethics retraining every 3 years on June 1, 2016. Each retraining requirement must be satisfied within ninety days before

or after the June 1 deadline. Signed training acknowledgement forms are maintained in a centralized training binder as verification of ethics training.

At the time of the review, the Town consisted of 347 employees, and all of the employees were trained or retrained within the guidelines stated in their ethics training policy.

- **Recommendations**

After reviewing the policy and completing the compliance review, there are no recommendations for the Town regarding the policy or training compliance regarding the employees.

- **Conclusions**

The results of the review found that the employees the Town of Palm Beach are in compliance their policy. Further, the review identified no areas of the policy that changes are recommended.

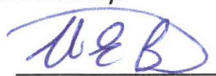
Submitted by:



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

5/16/2019
Date

Reviewed by:



(Initials)

5/17/2019
Date