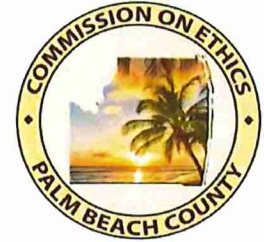


POLICY REVIEW AND COMPLIANCE MEMORANDUM



Honesty - Integrity - Character

To: Christie Kelley, Executive Director
From: Abigail Irizarry, Investigator
Re: A22-003 – City of Belle Glade - Ethics Policy Review and Training Compliance (Employees)

- **Background**

The Code of Ethics (Code) states in part, under Section 2-446(a), that Palm Beach County and each municipality within Commission on Ethics (COE) jurisdiction is required to maintain, by policy, a mandatory training schedule for all employees and elected/appointed officials. Additionally, each municipality also has the responsibility of overseeing participation of their own employees and elected/appointed official's Ethics Training Acknowledgment Form and ethics refresher training.

The COE is required to develop and deliver training programs. Furthermore, the COE coordinates and cooperates with the municipalities to ensure training of employees and elected/appointed officials.

The COE last audited the City of Belle Glade (City) employees on September 16, 2016.

- **Objectives and Scope**

Objectives include:

- Ensuring the agency has an ethics training policy.
- Ensuring the ethics training policy appropriately conveys information to officials and employees so clear parameters are determined, including initial training (with a defined deadline and grace period) and retraining cycle timeline (with a defined deadline and grace period).
- Ensuring the agency is requiring its officials and employees to comply with the training policy.

The scope for this memorandum included a review of all City employees required to submit an Ethics Training Acknowledgement Form. Internal tracking and delivery method of ethics training compliance were not part of the scope.

- **Approach and Methodology**

On Monday, February 7, 2022, on behalf of the COE, I initiated a compliance review of the City for ethics training compliance. In order to complete this task, I called City Clerk Debra Buff to request the ethics training files. Buff advised the City maintains employee ethics training records in the Human Resource's Office. I emailed Buff a written follow-up request for the records.

On Monday, February 28, 2022, I received the Ethics Training Acknowledgement Forms and ethics training records for the City employees.

Based on their Administrative Policy and Procedure all City employees, City commissioners and City board members must take the initial Code of Ethics training subsequent to City employment or appointment. Additionally, mandatory follow-up training is required of all employees and elected/appointed officials every 18 to 24 months thereafter.

- Findings

At the time of this report, the City had one-hundred and two (102) active full-time employees. Upon review of the records, eighty nine (89) out of one-hundred and two (102) employees completed ethics training; however, thirteen (13) did not complete Ethics Training.

- Recommendations

After reviewing the City's policy, the following recommendation should be implemented to provide clarification regarding the training cycle and deadlines.

1. The follow-up training for employees and elected/appointed officials should have a specific timeframe to complete the initial ethics training. For example, the suggested follow-up language for employees and elected/appointed officials could be changed to read as follows: **"All employees and non-elected officials must receive initial Code of Ethics training within sixty (60) days of employment or appointment. Elected officials must receive their initial training within sixty (60) days of taking office."**
2. The follow-up training for employees and elected/appointed officials should have a specific timeframe to complete ethics refresher training. For example, the suggested follow-up language for employees and elected/appointed officials could be changed to read as follows: **"After initial training, periodic mandatory follow-up ethics refresher training is required for all employees and elected/appointed officials every two (2) years during the training cycle. The two-year ethics refresher training cycle is effective January 1, 2023, and all employees who take ethics refresher training and read the Code of Ethics between January 1 – March 1, 2023 will be considered trained and in compliance with this policy."**

- Conclusion

The City of Belle Glade is not in full compliance with the ethics training requirement for its employees. Additionally, the review identified two areas of the policy that may be updated for practicality, so the requirements are clear.

Submitted by:


Abigail Irizarry, Investigator
PB County Commission on Ethics

March 22, 2022
Date

Reviewed by:

CK
(Initials)

3-22-22
Date