

POLICY REVIEW AND COMPLIANCE MEMORANDUM

To: Christie Kelley, Executive Director
From: Abigail Irizarry, Investigator
Re: A22-006 – City of Boca Raton (Officials) - Ethics Policy Review and Training Compliance



- **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 Boca Raton (City) officials on January 17, 2017.

- **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 elected/appointed officials 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 Thursday, February 10, 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 Mary Siddons to request the ethics training files. Siddons advised the City maintains all ethics training records for employees in the City Clerk's Office. I emailed a written follow-up request for the records.

On Tuesday, February 15, 2022, I received City employee ethics training records. I also received additional audit records on Monday, February 28, 2022.

Based on their Administrative Policy and Procedure dated February 13, 2013, all employees and City officials must take the initial Code of Ethics training within sixty (60) days of City employment,

appointment, or start of their term of office. Additionally, mandatory follow-up training is required of all employees and elected/appointed officials every three (3) years thereafter.

- Findings

At the time of this report, the City had 117 elected/appointed officials. Upon review of the records, all have been trained.

- 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 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 three (3) years during the training cycle. The three-year ethics refresher training cycle is effective January 1, 2023, and all employees and elected/appointed officials 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.”**

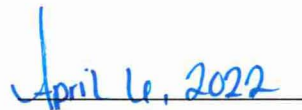
- Conclusion

The City of Boca Raton is in compliance with the ethics training requirement for its elected/appointed officials, as all 117 are compliant with the training.

Submitted by:




Abigail Irizarry, Investigator
PB County Commission on Ethics

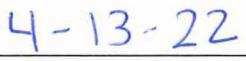


Date

Reviewed by:



(Initials)



Date