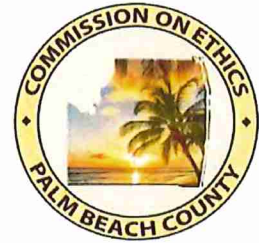


POLICY REVIEW AND COMPLIANCE MEMORANDUM

To: Christie Kelley, Executive Director
From: Abigail Irizarry, Investigator
Re: A22-012 – Village of Golf - Ethics Policy Review and Training
Compliance



Honesty - Integrity - Character

- **Background**

The Palm Beach County Code of Ethics states in part, under Section 2-446(a), that Palm Beach County and each municipality within Palm Beach County 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 Village of Golf (Village) on November 30, 2015.

- **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 Village employees and 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 Friday, August 12, 2022, on behalf of the COE, I initiated a compliance review of the Village for ethics training compliance. In order to complete this task, I emailed Village Clerk Donn Lynn to request the ethics training files. All ethics training records are kept in the Village Clerk's Office.

On Monday, August 15, 2022, I received the Ethics Training Acknowledgement Forms and ethics training records for the Village employees and elected/appointed officials. Upon review, the Village has 16 employees and elected/appointed officials; however, four (4) councilmembers' and one (1) employee's Ethics training was expired¹ and one (1) councilmember had no training on file. After several email attempts to receive updated records, on Tuesday, September 6, 2022, the Village sent newly completed Ethics training for the outstanding six (6) individuals.

The Village's last Administrative Policy and Procedure, which was effective December 1, 2016 and revised on June 14, 2017, stated all public elected officials, non-elected officials, and employees, must take the initial Code of

¹ Three (3) Councilmembers last completed training in 2015 and one (1) in 2016. The employee last completed training in 2017.

Ethics training within 90 days of Village employment, appointment, or taking office. Additionally, mandatory follow-up training is required of all elected officials, non-elected officials, and employees every three (3) years thereafter.

- **Findings**

At the time of this report, the Village had 11 active employees and five (5) elected/appointed officials. Although the Village's Ethics training was initially not in compliance for five (5) councilmembers and one (1) employee, they have since addressed these lapses and currently all employees and elected/appointed officials are up to date with the training.

- **Recommendations**

The following recommendation should be implemented to provide clarification regarding the training cycle and deadlines.

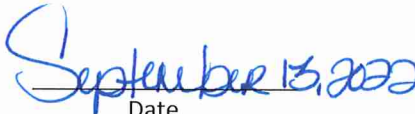
1. The follow-up training for employees and elected/appointed officials should have a specific timeframe to complete ethics refresher training. For example, the suggested follow-up language for employees and elected/appointed officials could be changed to read as follows: **"After initial training, periodic mandatory follow-up ethics refresher training is required for all employees and elected/appointed officials every 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 Village of Golf has trained all employees and elected/appointed officials. Additionally, the review identified one area of the policy that may be updated for practicality, so the requirements are clear.


Submitted by:


Abigail Irizarry, Investigator
PB County Commission on Ethics


Date

Reviewed by:


(Initials)


Date