

# POLICY REVIEW AND COMPLIANCE MEMORANDUM



To: Christie Kelley, Executive Director  
From: Abigail Irizarry, Investigator  
Re: A22-013 – City of Palm Beach Gardens -Ethics Policy Review and Training Compliance

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- **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 Palm Beach Gardens (City) on September 10, 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 City 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 Wednesday, October 12, 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 emailed City Clerk Patricia Snider a request for the ethics training files.

On Wednesday, December 7, 2022, I received the Ethics Training Acknowledgement Forms and ethics training records for the City employees and elected/appointed officials from City Clerk Patricia Snider.

Based on their Administrative Policy and Procedure all employees and officials must take the initial Code of Ethics training within thirty (30) days of City employment, appointment, or taking office. Additionally, periodic mandatory follow-up training is required of all employees and elected/appointed officials every three (3) years after November 1, 2016. Each additional training requirement must be satisfied within 180 days before or after each November 1 deadline.

- **Findings**

At the time of this report, the City had 526 active full-time employees, 96 part-time employees, 43 appointed officials and 5 elected officials. Upon review of the records, all employees<sup>1</sup> have been trained for the 2022 training cycle. Additionally, all elected/appointed officials completed ethics training.

- **Recommendations**

After reviewing the City's policy, there are no recommendations at this time.

- **Conclusion**

The City of Palm Beach Gardens is in full compliance with the ethics training requirement for its employees and elected/appointed officials.

Submitted by:

  
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Abigail Irizarry, Investigator  
PB County Commission on Ethics

12/19/2022  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

12/19/2022  
Date

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<sup>1</sup> Three employees were not up to date on re-training; one employee is on FMLA and one is on military leave. As per the City's ordinance, all three have 180 days after November 1 to be in compliance.