

# POLICY REVIEW AND COMPLIANCE MEMORANDUM



*Honesty - Integrity - Character*

To: Christie E. Kelley, Executive Director  
From: Gina A. Levesque, Intake and Compliance Manager  
Re: A22-017 – Palm Beach County Ethics Training Compliance (Fire Rescue)

- **Background**

The Palm Beach County 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 and elected or appointed officials, which shall include mandatory periodic follow-up sessions. Section 2-446(b) states in part that the Commission on Ethics (COE) shall develop and deliver training programs and ensure that the training is delivered in a timely manner.

The last compliance review of Palm Beach County Fire Rescue (PBCFR) was performed in February 2018. In the 2018 audit, PBCFR employees were included in the report with Palm Beach County (County) employees. However, as PBCFR maintains their own records and training-tracking program, this compliance review was performed separately from the County employees.

- **Objectives and Scope**

The objectives are:

- To ensure the agency has an ethics training policy.
- To provide assurance that the ethics training policy includes enough specific information for officials and employees to determine clear parameters, including initial training and retraining deadlines and grace period definitions.
- To provide reasonable assurance the PBCFR is requiring its employees to comply with the training policy.

The scope of this review focused on the policy and proof of training for PBCFR employees.

- **Approach and Methodology**

PBCFR utilizes Target Solutions, which is a program that will notify all personnel of training requirements. As ethics training is published as a video, it was embedded within the Target Solutions program allowing real-time tracking of training completion. Training & Safety Division Captain Jason Torlucci is responsible for tracking and maintaining all training information for PBCFR employees. On October 18, 2022, I contacted Captain Torlucci to obtain training information for PBCFR employees who completed the ethics training between June 1, 2020 and December 31, 2020. As PBCFR Payroll & LTD Coordinator Mary Miller is responsible for Human Resources at PBCFR, I contacted her on October 18, 2022, to obtain a roster of employees who were employed on October 1, 2020.

- **Findings**

The Palm Beach County Ethics Training policy was issued and became effective on August 5, 2014. The policy applies to PBCFR and requires that employees undergo initial training and read the Code within ninety (90) days of employment. Thereafter, all employees must re-read the Code and complete retraining every three (3) years between July 1 and December 31 of the training cycle year.<sup>1</sup> However, PBCFR requires its employees to complete ethics training yearly.

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<sup>1</sup> CW-P-079 states in relevant part: "Thereafter, all employees must complete required training every three years on October 1, beginning October 1, 2014. Each additional training requirement must be satisfied within ninety days before or after each October 1 deadline."

During the 2020 training cycle, PBCFR had 1,565 employees. Eleven (11) employees did not take the training due to extended leave, but all other employees watched the ethics training video.

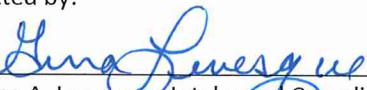
- Recommendations

Although PBCFR is a County department and, therefore, must abide by the Palm Beach County Ethics Training policy, they have been participating in training every year rather than every three years. Therefore, it is recommended that PBCFR create its own Ethics Training Policy with specific deadlines and grace periods so their employees know exactly what is expected of them.

- Conclusions

The results of the review found that Palm Beach County Fire Rescue was **in full compliance** with the Palm Beach County Code of Ethics training policy requirement for all of its employees during the 2020 training cycle.

Submitted by:

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

11/15/2022  
Date

Reviewed by:

CK  
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(Initials)

11-15-22  
Date