

COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-010 – Ethics Training Compliance (Village of North Palm Beach)

- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (the Code). Pursuant to Section 2-446 of the Code, each municipal administrator is required to establish by policy a mandatory training schedule for all employees and elected/appointed officials to provide them with training on their ethical responsibilities as prescribed by the Code. The Commission on Ethics is required to develop and deliver training programs and to coordinate and cooperate with the municipalities to ensure effective and meaningful training of elected/appointed officials and employees. For verification, a training acknowledgment form for each full-time employee and elected/appointed official should be maintained on file by the Human Resources Department for each municipality.

On May 16, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of North Palm Beach (the Village) for ethics training compliance. In order to complete this task I contacted Ms. Loren Slaydon, Human Resources for the Village of North Palm Beach. On May 22, 2012, I conducted an on-site compliance review of the Village's ethics training acknowledgement forms. Prior to the start of my review, I was provided with an alphabetical list of all Village employees and elected officials, which I used to cross reference each individual Training Acknowledgement Form. As of May 22, 2012, the Village had 227 full/part time employees and elected officials. At the time of the initial review 43 full/part-employees and/or elected officials were not in compliance. The Village was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all Village of North Palm Beach full-time, part-time, employees and elected officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were electronically scanned into a specified ethics training folder and maintained through an automated human resources database.

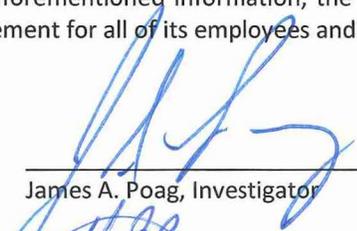
- **Assessment**

On June 6, 2012, a follow-up compliance review of the Village of North Palm Beach Ethics Training Program was completed for all Village employees and elected officials. The overall assessment indicated the Village of North Palm Beach had a total of 227 employees and elected officials. As of this date, all employees and elected officials of the Village of North Palm Beach are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

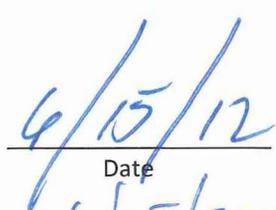
- **Conclusion**

Based on the aforementioned information, the Village of North Palm Beach is in full compliance with the ethics training requirement for all of its employees and elected officials.

Submitted by:

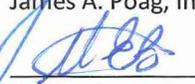


James A. Poag, Investigator

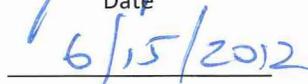


Date

Reviewed by:



(Initials)



Date