

COMPLIANCE REVIEW MEMORANDUM

To: Alan S. Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-013 – Ethics Training Compliance (Village of Wellington)

- **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 8, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Wellington (the Village) for ethics training compliance. In order to complete this task I contacted Ms. Awilda Rodriguez, Town Clerk for the Village of Wellington. On May 15, 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/appointed officials, which I used to cross reference each individual Training Acknowledgement Form. As of May 15, 2012, the Village had 391 employees and elected/appointed officials. At the time of the initial review 16 employee and/or elected/appointed 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 Wellington full-time, part-time, seasonal employees and elected/appointed 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.

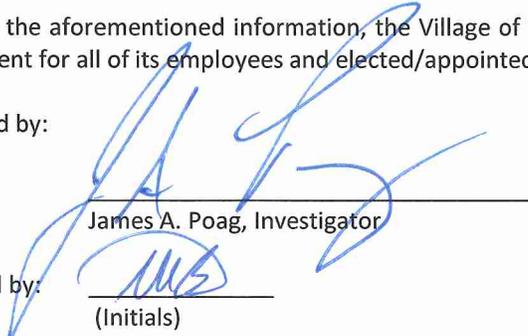
- **Assessment**

On May 31, 2012, a follow-up compliance review of the Village of Wellington Ethics Training Program was completed for all Village employees and elected/appointed officials. The overall assessment indicated the Village of Wellington had a total of 390 employees and elected/appointed officials. It should be noted that a member of the Education Committee has been removed since the initial review. As of this date, all employees and elected/appointed officials of the Village of Wellington 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 Wellington is in full compliance with the ethics training requirement for all of its employees and elected/appointed officials.

Submitted by:


James A. Poag, Investigator


Date

Reviewed by:


(Initials)


Date