

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
 From: Mark E. Bannon, Senior Investigator
 Re: A12-019B – Ethics Training Compliance (City of Lake Worth-Advisory Boards)

- **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 by the Human Resources Department or the municipal Clerk for each municipality.

On July 17, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Lake Worth appointed officials/advisory board members for ethics training. In order to complete this task I contacted City Clerk Pamela J. Lopez to schedule an on-site visit to review the officials Ethics Training Acknowledgment Forms. I conducted an on-site compliance review of the City's Ethics Training Acknowledgement Forms on July 25, 2012. Prior to the start of my review, I was provided with a list of all active appointed officials/advisory boards and members, which I used to cross reference each individual training acknowledgement form. As of July 31, 2012, when the compliance review was conducted, the City had 17 advisory or other boards to which officials were appointed by City government. Within these boards, the City had 93 available slots for appointed officials, including 4 alternate officials. 84 of the appointed official slots and alternates were filled, with 9 slots being vacant. Of the 84 appointed officials, 63 had been trained and documented with a copy of their Ethics Training Acknowledgment Form, 21 were untrained. Of the 21 untrained appointed officials and advisory board members, 18 were appointed as officials within 60 days of the audit, and 3 had been appointed more than 60 days prior to the audit. The City was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of the eighty four (84) City of Lake Worth appointed officials required to submit an Ethics Training Acknowledgement Form. All forms submitted are also maintained by the City Clerk's Office.

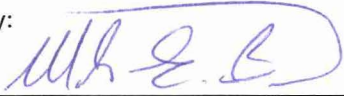
- **Assessment**

On September 6, 2012, a follow-up compliance review of the City of Lake Worth for ethics training was completed for all appointed officials. All twenty-one of the missing Ethics Training Acknowledgement Forms were sent by this date to COE staff via email. The overall assessment including these additional documents indicated that the City of Lake Worth had eighty four (84) appointed officials, all of which have been trained according to the reviewed records. As of this date, the City of Lake Worth is in compliance with the training requirement established by the Palm Beach County Code of Ethics for its appointed officials.

- **Conclusion**

Based on the aforementioned facts the City of Lake Worth is in full compliance with the ethics training requirement for all appointed officials.

Submitted by:


 Mark E. Bannon, Senior Investigator
 PB County Commission on Ethics


 Date

Reviewed by:


 (Initials)


 Date