

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-038 – Ethics Training Compliance (Town of South 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 by each municipality.

On September 19, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of South Palm Beach (the Town) for ethics training. In order to complete this I contacted Ms. Janet Whipple, Town Clerk via email. I requested an alphabetical list of all active full/part-time Town employees and elected/appointed officials, and copies of each individual Ethics Training Acknowledgement Form. Ms. Whipple provided the COE with all the requested material. I cross referenced the alpha list of all active full/part-time Town employees and elected/appointed officials with the individual training acknowledgement forms. As of September 19, 2012, the Town had 42 active full/part-time employees and elected/appointed officials. At the time of the initial review (15) appointed officials were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. The Town was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all of the Town of South Palm Beach full/part-time employees and elected/appointed officials, required to submit an ethics training acknowledgement form. All forms submitted to the Town Managers Office were maintained in a central training file folder alphabetically by last name.

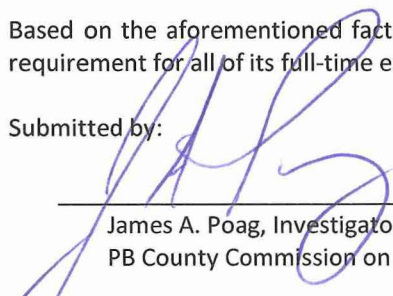
- **Assessment**

On October 23, 2012, a follow-up review of the Town of South Palm Beach for ethics training was completed for all Town full/part-time employees and elected/appointed officials. The overall assessment indicated the Town of South Palm Beach had 42 active full/part-time employees and elected/appointed officials. As of this date, 11 appointed officials have not complied with the ethics training requirement. The Town of South Palm Beach is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the Town of South Palm Beach is not in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date