

COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director
From: Mark E. Bannon, Senior Investigator
Re: A15-008 – Ethics Training Compliance (City of Palm Beach Gardens-Employees and Elected Officials)

- **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 receive 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 employee and elected officials should be maintained for each municipality.

On August 20, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Palm Beach Gardens (the City) for ethics training compliance for all elected officials and employees. In order to complete this task I contacted Ms. Brooke Borden, Human Resources Coordinator for the City of Palm Beach Gardens. Ms. Borden provided an electronic link to an alphabetical list of all active full-time, contracted, and part-time City employees, contracted employees performing a government function, and elected officials. Through the link I was also able to access electronic copies of individual training acknowledgment forms for each City elected official and employee. The City has a policy of ethics retraining for its employees and officials on a three-year rotation, as required by the Code of Ethics, which must be satisfied within 180 days of the November 1st dated set in the policy. This policy also requires all new officials and employees to be trained within 30 days of employment, appointment or election.

- **Scope**

The scope included a review of all City of Palm Beach Gardens full-time, contracted and part-time employees and elected officials required to submit an Ethics Training Acknowledgement Form.


- **Assessment**

After obtaining the necessary information from the City, I completed a compliance review on September 8, 2015. The review revealed that as of September 8, 2015, the City had 450 active full-time employees, or contracted employees performing a government function, 120 active part-time employees, and five (5) elected officials. As of this date, all 570 full-time, contracted, and part-time employees as well as the five (5) elected officials of the City of Palm Beach Gardens are in compliance with the training requirement established by the Palm Beach County Code of Ethics and City policy.

- **Conclusion**

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

Submitted by:



Mark E. Bannon, Senior Investigator

9/10/15
Date

Reviewed by:



(Initials)

9.10.2015
Date