#### PALM BEACH COUNTY COMMISSION ON ETHICS

# COMPLIANCE REVIEW MEMORANDUM

To:

Alan Johnson, Executive Director

From:

James A. Poag, Investigator

Re:

A12-026 - Ethics Training Compliance (Village of Tequesta)

#### 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 9, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Tequesta (the Village) for ethics training. In order to complete this I contacted Ms. Marlene Reid, Human Resources Director, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the Village's ethics training acknowledgement forms on September 11, 2012. Prior to the start of my review, I was provided with an alpha list of all active full/part-time Village employees, which I used to cross reference each individual training acknowledgement form. As of September 11, 2012, the Town had 95 active full/part-time employees.

#### Scope

The scope included a review of all of the Village of Tequesta regular full-time regular and part-time employees required to submit an ethics training acknowledgement form. All forms submitted to Human Resources were maintained in a central training file folder alphabetically by last name.

## Assessment

On September 11, 2012, an ethics training compliance review of the Village was completed for all regular full-time and regular part-time Village employees. The overall assessment indicated the Village had 95 regular full-time and regular part-time Village employees, all of which have been trained according to the reviewed records. As of this date, the Village of Tequesta is in compliance with the training requirement established by the Palm Beach County Code of Ethics for all Village employees.

### Conclusion

Based on the aforementioned facts the Village of Tequesta is in full compliance with the ethics training requirement for all of its full and part-time employees.

Submitted by:

James A. Poag, Investigator

PB County Commission on Ethics

Reviewed by:

(Initials)

Date

Date