

POLICY REVIEW AND COMPLIANCE MEMORANDUM



To: Christie E. Kelley, Executive Director
From: Gina A. Levesque, Intake and Compliance Manager
Re: A22-018 – Palm Beach County Ethics Training Compliance (Appointed Officials)

Honesty - Integrity - Character

- **Background**

The Palm Beach County Code of Ethics (Code) states in part under Section 2-446(a) that the county or municipal administrator shall establish by policy a mandatory training schedule for all employees and elected or appointed officials, which shall include mandatory periodic follow-up sessions. Section 2-446(b) states in part that the Commission on Ethics (COE) shall develop and deliver training programs and ensure that the training is delivered in a timely manner.

The last compliance review of Palm Beach County (County) appointed officials was performed in February 2018.

- **Objectives and Scope**

The objectives are:

- To provide assurance that the ethics training policy includes enough specific information for officials and employees to determine clear parameters, including initial training and retraining deadlines and grace period definitions.
- To provide reasonable assurance the county is requiring its appointed officials to comply with the training policy.

The scope of this review focused on the policy and proof of training for Palm Beach County (County) appointed officials. The delivery method of the ethics training and internal tracking method of compliance was not part of the scope.

- **Approach and Methodology**

Agenda Coordinator Cindy Beaudreau is responsible for tracking and maintaining all information for appointed officials to any Palm Beach County advisory board. I asked Ms. Beaudreau to provide a list of all appointed officials with their appointment and training dates. Ms. Beaudreau provided the requested information that included several names with no training information. Although on a board and noted by Ms. Beaudreau, the names on the list with no training information were individuals not appointed by the BCC. Therefore, they are exempt from our jurisdiction and not included in this review.

- **Findings**

The training policy for the County was issued and became effective on August 5, 2014. The policy requires that appointed officials undergo training and read the Code prior to appointment and upon reappointment. Further, officials who serve an indefinite term must complete training every three years.

At the time of the review, there were 61 boards with approximately 384 appointed officials, who were under the jurisdiction of the COE. Of the 384 appointed officials, 90 did not comply with the training policy.

- **Recommendations**

Although the policy requires that appointed officials undergo training and read the Code prior to appointment and upon reappointment, there is no grace period specified, which leaves the timeframe for the training open to interpretation. Therefore, it is recommended that the policy be updated to include a 30 or 60-day grace period from the date of appointment/reappointment.

- Conclusions

The results of the review found that Palm Beach County was not in full compliance with the Palm Beach County Code of Ethics training policy requirement for all of its appointed officials for the 2020 training cycle period. Additionally, the review identified one area of the policy that should be updated so there is no ambiguity regarding the training deadlines.

Submitted by:



Gina A. Levesque, Intake and Compliance Manager
Palm Beach County Commission on Ethics

12/15/2022
Date

Reviewed by:



(Initials)

12-15-22
Date