



Honesty - Integrity - Character

This material was borrowed from:

Local Government Ethics Programs:

A Resource for Ethics Commission Members, Local Officials, Attorneys, Journalists and Students, and a Manual for Ethics Reform

By: Robert Wechsler, Director of Research, City Ethics, Inc. (www.cityethics.org)

(Additional information and highlights added by Mark Bannon, Executive Director, Palm Beach County Commission on Ethics.)

D. Why Local Government Ethics Is Important in the U.S.

Because the U.S. is considered one of the least corrupt nations on earth, it might appear that government ethics is a waste of time. Yes, people say, there are a few bad apples, but they don't really spoil the pie, or even cost taxpayers all that much. And the reason that politicians aren't trusted isn't that they're corrupt, it's that they're untrustworthy in general, and all they care about is themselves, while acting as if all they care about is the public.

It is this caring more about themselves than the public that is central to government ethics. Out-and-out bribery might be relatively low in the U.S. right now, but there are so many other ways for government officials to use their positions to help themselves and those close to them, often at the public's expense. In fact, it's more difficult to see corruption in the U.S. than it is in a developing country where officials will do nothing unless they are

bribed. Here, everything happens behind the scenes. We don't see manipulations of contract specifications, sweetheart deals with developers, or the pay-for-play hiring of officials' family members by companies doing business with the city. We don't understand how laws and procedures are used to prevent the enforcement of ethics codes. We have no idea whether our local governments are following best practices with respect to ethics advice and financial disclosure. All we know is that things don't feel good or right.

It is important to recognize that corruption ("the abuse of entrusted power for private gain," according to Transparency International) is the norm, the default situation in government historically and internationally. There are and have been many cultures where the principal way to become rich is through political power. The U.S. political culture goes against historical precedent, for the most part, but in some cities and counties the culture is very poor.

Our political culture is precious, something we pride ourselves on and try to keep improving. It is also a beacon for others to follow to get out of their cultures of political corruption.

A hatred for government corruption was central to protests in the Middle East, as it was to the revolutions in Central and Eastern Europe in the late '80s. Government corruption is a serious problem in China and India, and throughout most of the developing world. In most countries, as in the U.S. throughout most of its history, the norm has been to use government office to help oneself, one's family and friends, and one's business associates. When a nation's or city's culture accepts corruption, the whole barrel is bad, even if most of the people in it are good apples simply going along, or too afraid to oppose or disclose what others are doing.

Corruption is not a problem that simply gets better. It doesn't necessarily go away as a country becomes richer or more advanced. In fact, in 2010, the U.S. fell out of the top 20 least corrupt nations, according to Transparency International's Corruption Perceptions Index (by 2012 it was up to 19). Corruption can increase. It cannot simply be assumed that our governments, or those who govern us, will not become more corrupt. And it certainly cannot be assumed that our thousands of local governments have good ethics environments. In fact, people love to argue which is more corrupt, Chicago or Memphis, the local governments of Florida or New Jersey. The local governments of the U.S. are not where their citizens want them to be. Not yet. And backsliding is always a possibility.

The fact is that many more local governments have ethics scandals than have good, comprehensive ethics programs. There is more disclosure and access to damning information, but there is not more professional ethics guidance. And ethics training, where it exists, is still very limited. Most officials do not, therefore, understand government ethics, and they feel it is more a problem than a professional tool.

The result is that there is more to instill a lack of trust than there is to instill trust in local government. This makes it feel like things are getting worse (as polls show) when the reality is that things are getting better, only too slowly and in far too few jurisdictions.

It is important to recognize that poor ethics environments start at the local level. Most state and national elected officials start their careers running for local office. The values and habits they learn early in their career stay with them. Good ethics programs and healthy ethics environments at the local level could go a long way toward improving officials' ethical behavior at all levels of government.

This is also true of those who seek benefits from government. They need to be trained and brought into local government ethics programs in order to learn that they too have obligations as citizens to keep our country from being corrupt.

Finally, it is important to recognize that government ethics is less about individuals than it is about institutions. Government ethics programs seek to create and maintain within our governments the conditions needed to promote the integrity of our democratic process and institutions. Not the integrity of individuals, but rather the effect both individual and institutional corruption have on the way our governments work and the way citizens feel about their governments.

Why Everyone Should Support Government Ethics

Americans tend toward three views of government: they think government is important to managing a community; they think it should be as small as possible; or they have specific problems with it, such as over-regulation. All three groups are naturally supportive of government ethics.

People who believe that government is important to managing a community usually believe that the public servants who represent and work for the community cannot legitimately deal with these matters unless they are committed to the public interest rather than to their personal interests.

People who believe that government is a necessary evil, and should be as small as possible, are generally more distrustful of government than pro-government people, and also more concerned with government officials sticking their hands into citizens' pockets. Therefore, they are strongly supportive of efforts to ensure that public servants do not use government power and tax dollars to enrich themselves, their families, and their business associates.

Those who are more specifically anti-government, such as businesses that want less government regulation but support other government roles, generally favor local government ethics, because they want to work with government officials they can trust. The one exception is local businesses that receive favors from a local government run to further its officials' interests and the interests of their business associates and supporters. This is why, although business associations in larger cities are often important supporters, even leaders, of ethics reforms, in smaller cities, towns, and counties they are rarely supporters of effective ethics reform.

II. What a Local Government Ethics Program Consists Of

A local government ethics program is not just an ethics code and an ethics commission. Even in a town or small county, other elements are necessary to have an effective ethics program. The most important elements are training and advice. Without quality training and timely, professional advice, ethics programs are usually ineffective. They can also become (or, more likely, appear to be) the kind of gotcha! enforcement regimes that politicians fear.

Here are the essential elements of a local government ethics program, according to Mark Davies, longtime director of New York City's Conflicts of Interest Board:

(i) clear and comprehensive conflicts of interest code, providing clear guidance to officials, employees, contractors, and citizens;

(ii) three kinds of sensible disclosure of interests: an annual disclosure statement, disclosure when a conflict arises (transactional disclosure), and disclosure when someone bids for business or requests a permit (applicant disclosure); disclosure is the democratic way of letting people know about possible conflicts of interest;

(iii) effective administration, featuring an independent ethics commission with teeth, which gives swift advisory opinions, which has a monopoly on interpreting and enforcing the code, which can give waivers for exceptions, and which provides

training for all officials and employees, as well as for everyone who does business with the local government; and

(iv) whistle-blower protection so that government employees (the people who know what's going on) and others will be able to report violations without endangering their jobs and pensions.

Other important elements of an ethics program include oversight of the disclosure process; jurisdiction over agencies and over those who seek special benefits from or are regulated by the government, such as contractors, developers, and grantees; a hotline; and adequate, guaranteed funding. For larger jurisdictions, there are also lobbyist, campaign finance, and transparency laws, which may be administered by the ethics commission or by another office or body.

Most ethics programs are created or improved after a scandal occurs, often a scandal that has little or nothing to do with government ethics. The approach in such a situation is usually to start from nothing or from a limited program, and add something to it. Another scandal, another addition, without any idea of what a local government ethics program should look like, no vision of how the pieces work together or what the goals are, other than to put out a fire.

A better approach is to consider all the possible elements and laws, and then place the burden on officials to argue why each element and law should not be included, or should be included only in a limited form.

Some people say that an ethics program is an unnecessary increase in government bureaucracy or unnecessary because ethics decisions are obvious. Anyone who skims through this book will quickly realize that government ethics decisions are far from obvious. And government ethics programs are not expensive; in most cases they save money but, more important, they increase citizen trust and participation in government, and improve the reputation of a community, both of which are invaluable. Nor do ethics programs impose requirements other than the responsible handling of conflicts between personal interests and the public interest. The only conduct they regulate is the public conduct of public servants and of people and companies that seek special benefits from or are regulated by the government.

B. Ethics Commission Staff

1. Borrowed Staff

The great majority of ethics commissions have no full-time staff member. They usually depend on the city or county attorney's office for legal help, and for other support they usually depend on either the same office or the clerk's office, the auditor, comptroller, ombudsman, or inspector general's office, or the human resources department.

This often results in serious conflicts, which can undermine the ethics program and, when the conflict leads to withdrawal from participation, force the ethics commission to scramble for help and the funds to pay for outside legal or other services.

These conflicts especially occur with respect to advice and enforcement. With respect to advice, the city or county attorney is an important political position, which means that the office's advice will not be considered neutral. With respect to enforcement, those who are respondents in ethics proceedings are also clients of the local government attorney.

Further, while it seems reasonable for an attorney to give advice concerning ethics codes to the individuals they usually advise, there are two important differences. One is that ethics advice is not limited to the words in an ethics code. Ethics and law are two different things. Two, an official who seeks legal advice is seeking advice that's best for the local government. An official who seeks ethics advice is often looking for an answer that is best for him, not for the government. An attorney can, of course, refuse to give the official the answer he is seeking, but it is hard for an attorney to say to a client that certain conduct (such as voting on a grant to an organization run by a close friend and campaign manager) may be legal, but that it shouldn't be done. Or that certain conduct (such as withdrawing from a matter involving a former business partner) is not legally necessary, but an official should do it anyway. That's not how attorneys usually provide advice. But it is the way government ethics professionals provide advice.

When it comes to investigations, how can an official's attorney be expected to convince the public that she is doing a full investigation of someone she relates to in a lawyer-client manner? The same goes for settlement negotiations and advice to an ethics commission from someone who also represents the respondent and the respondent's boss and colleagues.

There are so many conflicts, it makes no sense to have a local government attorney involved in any way in an ethics program. A city or county attorney's office should not be

staff to an ethics commission, nor should it give ethics advice to officials [at least not advice concerning a local ethics code when an independent ethics commission and staff are available. But they should be tasked with advising local officials about state and federal issues in the ethics area]. *(Bracketed information added to this document by Mark Bannon)*

And yet it is common that such attorneys are involved in everything from training and advising officials to investigating officials and advising the ethics commission.

A city or county clerk is also an important political position, so the clerk's involvement in ethics matters will also not be considered neutral. Secretarial help from the clerk's office, however, is usually appropriate.

But it is better that the help come from a relatively independent office, such as that of an auditor, comptroller, ombudsman, or inspector general. One thing these offices can offer, besides secretarial help, is investigatory help. In some jurisdictions, it is the inspector general's office, or an equivalent, that does ethics investigations. This means professional investigators that the ethics commission would have to pay top dollar for are available to do the work on a salary basis. As long as ethics investigations are not put at the bottom of the pile, this is a great solution. Auditors and ombuds often have investigators, as well.

The human resources department is not a good place to get anything other than secretarial help. When an ethics program is based in a human resources department, which is reasonably common in towns, government ethics is usually broadened to include all sorts of employee conduct. Ethics matters are treated just like disciplinary problems, and government ethics advice and training are not usually available, and disclosure is not required.

Most important, officials are generally not included in an HR-based ethics program. This is a good way to undermine both government employees' and the public's trust in the ethics program. It also points to an important difference between ethics and conduct codes. Conduct codes usually apply only to employees, and ethics codes usually apply to both officials and employees, as well as others. But with ethics codes, it is usually officials who cause the biggest problems, because to abuse one's position in a harmful way, one must have a position with authority. The average employee usually can't do more than misuse government property.

2. Self-Staffing

Usually at least one ethics commission member is an attorney. In fact, some ethics codes require this. Therefore, some officials believe that the best, cheapest solution is to have an attorney on the ethics commission act as its attorney or even as its ethics officer.

There are three problems with this clever money-saving solution. One is that this is a large burden to place on a volunteer. Two is that it is unlikely that the attorney has any expertise in government ethics. Three is that it is inappropriate for a board or commission attorney to sit on the board or commission. Would a council allow the city attorney to be elected to council and continue to represent it? For a member to represent his colleagues creates a conflict situation, and any lawyer who understands legal ethics will be careful not to accept such a role.

On the other hand, in a small town or county that is unwilling to spend a penny on staffing an ethics commission, it's better to have an ethics commission member obtain sufficient expertise and handle ethics advice, than it is to have this done by the town or county attorney.

3. Contracted Staff

For less populous towns, cities, and counties that choose to have their own ethics program, the best way to have an independent staff is to contract out most or all of the ethics commission's staff needs to a government ethics professional or a lawyer or public administrator who is trained in government ethics and who rarely, if at all, represents anyone in matters before the particular local government. The contracted ethics officer could work for another local government, or be retired from another government, or be a municipal law specialist who does work for or before area local governments, but not for or before the particular government.

The contracted ethics officer should oversee ethics training, provide informal ethics advice, review disclosures and make sure they are made on a timely basis, investigate allegations, and advise the ethics commission on formal advisory opinions, ethics proceedings, and other matters. Where an investigation or legal issue is beyond the ethics officer's knowledge and skills, the ethics commission should be permitted to hire an outside investigator or attorney.

There are often two obstacles to such a situation. One is that most ethics commissions are given a very minimal budget, or none at all. They cannot afford to hire an ethics officer, an investigator, or an attorney. It is important to have a budget sufficient to

at least pay a part-time ethics officer. Otherwise, when a matter arises, the commission has to go begging for funds, often to the respondent, the respondent's colleagues, or the respondent's appointing authority. If the commission is not given the necessary funds, it looks like the mayor or legislative body is protecting himself or its members. This situation should not arise, because it seriously undermines public trust in the government and in its ethics program.

The second obstacle is that many city and county attorneys believe they have a monopoly on representation of all boards and commissions. For example, in 2010 the El Paso County Attorney argued that she had a constitutional and statutory *duty* to represent county entities, and that because an officer cannot "be ousted from his legal duties," the ethics commission may not hire outside counsel "without the express consent of and within the sole discretion of [the county attorney] to determine if she is unable or unwilling to provide said legal services."

This county attorney, and those who agree with her, do not seem to understand the difference between a duty and a right. A duty means that you are required to provide services upon request, not that you have a right to prevent others from providing these services upon request. And yet the state's attorney general agreed with the county attorney. The chair of the ethics commission, himself an attorney, immediately resigned in protest. But other local government attorneys will likely use the attorney general's opinion to support their view that, despite the conflicts it creates, they have some sort of "right" to represent the ethics commission as well as those who come before it.

A question that is often asked is, where do you find someone with expertise in local government ethics? The fact is that there are currently few people with this expertise, for the simple reason that it is not much in demand. In most states, there *are* a few individuals who have worked in the state's and some cities' ethics programs, and a few professors have some expertise in the field. There are also people all over who have worked in the huge federal government ethics program. Former ethics commission staff might be practicing law or doing something else that would allow them to act as part-time ethics officer.

In most cases, however, someone (most likely, but not necessarily, an attorney) will have to develop the expertise. The local government might be willing to pay for training, but this is hard to find, as well (a nearby professor with expertise or a state or city ethics program are the best places to try).

But for the most part, a part-time ethics officer (even a new full-time ethics officer) will have to educate herself (I, for example, am self-taught). Fortunately, this is much easier now than it ever was. There is this book, as well as the books in the bibliography. There is my blog. And there are hundreds of advisory opinions and decisions available online, which will provide a new ethics officer with a great deal of experience analyzing particular conflict situations.

The problem is that when an individual spends only a small part of her time on government ethics, there is insufficient incentive to do the research necessary to obtain the expertise. This is why it's best that a part-time ethics officer work for multiple local governments' ethics programs, or that a local government reaches out to nearby towns to bring them into its ethics program or to create a regional ethics program that can afford a full-time ethics officer or a part-time ethics officer for whom ethics work is a substantial percentage of her work.

4. Full-Time Staff

A full-time staff member ensures continuity and the daily focus of an individual on a local government's ethics needs, including training, advice, disclosure, enforcement, and code reform. If there is not enough work or funds for a full-time staff member, the individual could also deal with the other areas of local government ethics, that is, campaign finance and transparency. Even if these matters are handled at the state level, there is usually not enough training, advice, and information online in these areas. During elections, the staff member could advise local candidates, and having someone available to advise boards and agencies on how to deal with document requests and meeting issues can be extremely helpful.

Jurisdictions that cannot afford a full-time staff member can share one with other towns. This is easier and less expensive than each of them contracting out the work. This can be done even if the towns have separate ethics commissions, but it might lead the participating towns to consolidate their ethics programs.

Cities and larger counties often have more than one full-time staff member. The more staff there is, the more the staff members can specialize in areas, such as training and advice, investigation, enforcement, information technology, and the areas of transparency, campaign finance, and lobbying.

5. Staff Without an Ethics Commission

There is an alternative to an ethics commission without a staff: a staff without an ethics commission. This is, effectively, the inspector general approach to ethics. An individual, who might or might not have staff, either hired or under contract, trains, advises, investigates, and makes recommendations to the legislative body.

There are four problems with this approach, in the ethics context. One is that it allows the legislative body to remain in control of ethics enforcement. Two is that, when this approach is taken, the role of ethics officer is usually given to an important official, such as a city or county attorney, clerk, or auditor. Sometimes the role is given to a close associate of the mayor or council president. Rarely is the individual independent, or seen as independent.

The third problem is that an ethics commission brings the community into the ethics process. Since the purpose of an ethics program is to maintain the public's trust in government, it does not seem appropriate to exclude the public from the program.

The fourth problem is that an inspector general or auditor deals primarily with issues such as waste, fraud, and mismanagement. IGs and auditors aren't trained in government ethics. Therefore, financial management and criminal matters generally take precedence over conflicts of interest. Ethics is a poor relative that usually gets ignored. In addition, Igs' criminal frame of mind is inappropriate to government ethics.

The consequences of these problems can be seen in the stark contrast between the ethics programs of neighboring counties in southern Florida. At about the same time, Broward County set up an ethics programs that runs out of an inspector general's office, and Palm Beach County set up an ethics commission. As of August 2012, the Broward IG had not investigated a single ethics matter, while the Palm Beach EC had "vetted almost 100 possible ethics violations [and] punished a few people," according to Brittany Wallman of the *Sun-Sentinel*.

Even more serious, whereas the Palm Beach County ethics program had given ethics advice in 225 matters, and has many of these advisory opinions on its website, there is nothing about ethics advice on the Broward County IG website.

[The Palm Beach County COE has as January 2020, given over 400 advisory opinions on ethics issues to county and municipal officials and employees - Mark Bannon]

6. The Hearing Officer

Many officials believe it is better at the public hearing stage of an ethics proceeding to have a hearing officer, often a former judge, hear and decide the case than to have the ethics commission, or a hearing panel of the ethics commission, do this. Having a hearing officer makes it unnecessary for the commission to hire counsel to make sure the rules of evidence and procedure are correctly followed. This frees an ethics officer to present the case, while someone else oversees the procedural matters.

But should the hearing officer also decide the case? Is an ethics case appropriate for what is essentially a jury to hear the matter and reach a decision? It is the common view that this is preferable. As in a criminal case, it presents the decision as one made by citizens, not by the government or by a judge. However, if these citizens have been chosen by officials, a hearing officer obtained randomly from a panel may appear more unbiased. If the commission members have been chosen independently of the government, then there would appear to be no strong argument for having a hearing officer make the decision.

One problem I have with the hearing officer approach, which is used at the state level in Louisiana and Connecticut (the Louisiana ethics program has jurisdiction over local officials), is that while a former judge is unbiased, there is no reason to believe that a former judge is knowledgeable about government ethics. I have read a lot of judicial decisions relating to government ethics, and I've found that many judges do not appear to understand government ethics, and often are confused about the way it differs from judicial or legal ethics. For example, judges often talk as if government officials were supposed to be impartial, the way judges are. But officials are often elected precisely to *be* partial, that is, due to their support or opposition to, say, a development project or privatizing government services. Also, a former judge, especially if not an administrative judge, can make ethics hearings more complex and, therefore, more expensive.

I think that the combination of a hearing officer and an ethics commission hearing panel is the optimal way to employ a hearing officer, especially for an ethics commission without a staff.

7. Hiring and Managing Staff

As with the selection of ethics commission members, the most important decision with respect to staff is who hires staff (and manages and fires staff). This should be one of the ethics commission's most important duties. **No one should be involved in the hiring of staff**

members, other than an executive director or ethics officer who are themselves hired by the ethics commission.

The reason this is so important is that ethics staff should be beholden to no one but the commission itself. Ethics staff should have no conflicts, real or apparent. Staff's priorities should be the commission's. Staff should fight for the commission's budget, and the commission should determine what the ethics officer or executive director, and other staff, are paid.

In League City, Texas, which amended its ethics code in 2009 and 2011, the city attorney selects the Ethics Compliance Officer. This selection had not been made before the first ethics complaint was filed ... against the city attorney. An ethics officer cannot be selected by someone over whom she will have jurisdiction, not only for the purpose of enforcement, but also with respect to advice, disclosure issues, and waivers.

Government officials must know that they can have no authority over ethics staff. If there is any doubt about this, the commission will not be able to trust its staff, nor will the public. Every recommendation made by staff will be questioned, as will every one of its acts and omissions.

[While the Palm Beach County COE is funded by county ad valorem tax dollars, the County Administrator has no authority over the operation itself, including over the hiring of the Executive Director and staff. The COE as a body hires (and can fire) the Executive Director, and the Executive Director hires staff. – Mark Bannon]

Nearly all cities and counties that have an ethics officer or executive director do allow the ethics commission to hire and fire her. In 2011, Jacksonville's charter was revised so that the city's ethics officer would be appointed by the ethics commission. The principal holdout is Chicago, where the mayor appoints the executive director.

In Atlanta and Seattle, the ethics commission's selection must be confirmed by the council (and in Atlanta also approved by the mayor). This may not seem problematic. However, in 2012, Atlanta's council did not quickly confirm the ethics board's selection. Instead, there was a failed attempt to change the selection process so that the council would have the final choice of who was selected as ethics officer. This led the woman selected by the ethics board to take herself out of the running.

There is no good reason for a council or mayor to confirm or approve an ethics commission's selection. This power can be abused when the council or mayor has had

problems with the ethics commission or with the person the commission selects, or simply wants to hamper the ethics commission by delaying the hiring of a new ethics officer.

When party leaders have a role in the selection process, serious problems can arise. Take the selection of Montana's Political Practices Commissioner (effectively the ethics officer for a state with as many people as a small city) in 2011. The legislative party leaders each selected two individuals, with the governor to make the final choice. The party leaders selected a former secretary of state who had had legal problems, an ex-lawyer who had been disbarred in two states, a woman just completing law school, and the spouse of a state senator, an active campaigner and legislative aide, and a member of her party's state committee (the last was the one selected by the governor).

These choices send a message to the public that the legislative leadership does not care about appearances of impropriety or, in the case of the law student, in having an ethics officer with experience. It was not surprising when the party in power refused to approve the nomination of an active political figure from the other party. It rejected the governor's choice, and the process had to start all over again. This is no way to run an ethics program.

8. The Ethics Officer's Duties

The most important administrative duties are training and advice. The least expensive approach to training, in a small town or county, is to have one or two ethics commission members trained in government ethics, and have them train the most important officials and employees, using materials they used in their course and others they find online or get from cities and larger counties. The best thing about doing this is that, if the members get a good deal of training, and take advantage of the educational opportunities online, the same individual can handle most informal ethics advice, as well.

This sounds like a great, inexpensive solution if there is an ethics commission member or two with the time, desire, and ability to do it. And yet this is not generally done. The city or county attorney's office does the training and/or provides informal advice, instead. Or no training or informal advice is available at all.

The best approach for smaller jurisdictions is for an ethics commission to contract for a part-time ethics officer or a full-time ethics officer along with nearby local governments. If the legislative body is willing to invest the funds, a city or large county should hire its own full-time ethics officer.

The ethics officer's principal duties are to provide ethics advice and to provide training through classes and on-line materials. The ethics officer also ensures that disclosures are made on a timely basis, and checks to make sure that the disclosures are complete.

The ethics officer also works for the ethics commission, preparing the agendas, memos, and advisory opinions for its meetings, presenting tips, media articles, and complaints, and recommending whether to dismiss or investigate the allegations (or turn them over to other authorities), investigating where she has the appropriate skills and resources, and working with the ethics commission on all the aspects of an ethics proceeding.

One of the advantages of having a full-time ethics officer is that she will be able to go beyond the required and reactive aspects of the job to consider such things as improvements to the ethics code and program, transparency in the local government, procurement issues, and the like. The ethics officer can work with human resources to coordinate conduct and ethics issues; with unions to get support for ethics training and to increase advice; with procurement professionals to get contracts to reflect the local government's ethics laws and to get contractors and prospective contractors on board to better ensure the integrity of the contract process; with land use professionals and board members to focus on special land-use related ethics issues and to get developers and their agents, including realtors and attorneys, on board to better ensure the integrity of the approval process; with those who deal with grants to focus on grant-related ethics issues and to let those who seek and receive grants know that with the grants come obligations to help officials and employees deal responsibly with their conflicts; with information technology professionals to improve access to budget and other government information; and, of course, with the top elected and executive officials to help them gain a deeper understanding of the value of an ethics program to the local government, in terms of public trust, the lack of disruptive scandals, and financial savings.

A full-time ethics officer can also supplement ethics classes by drafting regular e-newsletters, guidelines on particular issues, and answers to frequently asked questions. The ethics officer can also make presentations to community groups in order to educate the public about government ethics, to better ensure the effectiveness and continuity of the program.

Finally, a full-time ethics officer can become an important role model with respect to government transparency by creating a website where all information is available on a timely basis, and easy to find (e.g., documents are searchable and indexed).

[Our website (www.palmbeachcountyethics.com) is fully searchable for published advisory opinions, as well as any forms (state or local) filed with the COE (i.e., gift disclosures, voting conflicts, outside employment conflict waivers and charitable solicitation logs), as well as any complaint investigations conducted by the COE that are completed. - Mark Bannon]

Mark E. Bannon
Executive Director
PBC Commission on Ethics
300 N. Dixie Hwy., Ste 450
West Palm Beach, FL 33401
Ph 561-355-1946

Email: mebannon@pbcgov.org
website: www.palmbeachcountyethics.com