



**2025  
ETHICS POLICY  
COMPLIANCE AUDIT  
REPORT**

**Cuyahoga County  
Personnel Review Commission**

## INTRODUCTION

Cuyahoga County Charter Article IX, Section 9.02, authorizes the Personnel Review Commission (PRC) to review and audit compliance with federal, state, and local laws regarding personnel matters within the County Executive's organization and departments. This includes the responsibility to submit reports and recommendations to the County Executive and County Council on issues of compliance.

Cuyahoga County Code Title 4: Ethics (the 'Code') includes the County's Ethics Policy and sets forth specific requirements for the PRC, the County's Department of Human Resources (HR), the Agency of the Inspector General (AIG), and County employees. The County's Employee Handbook also includes requirements for new and current employees to receive ethics training. Cuyahoga County Code §407.02 requires the PRC to provide an annual report to County Council detailing HR's compliance with these requirements.

The focus of this audit is the County's compliance with laws governing training, distribution, and posting of ethics laws.

## BACKGROUND

The Code requires the PRC to provide an annual report to County Council detailing HR's compliance with these requirements of the Ethics Policy:

- **Training for newly elected officials, employees, and board members** — Every newly elected official, employee, and board member is required to complete an ethics training program approved by the Inspector General within thirty (30) days of first assuming office (County Code §403.01). This requirement is also included in the County's Employee Handbook (§4.01). The Code requires the Department of Human Resources (HR) to administer ethics training which includes notice to employees of whistleblower rights and responsibilities, and notification to supervisors of their responsibilities to avoid retaliating against any employee who makes a whistleblower complaint pursuant to Section 406 of the Code (County Code §407.03).
- **Training for active employees and elected officials** — Every current employee and elected official is required to participate in annual ethics training administered by HR (Code §403.01). This requirement is also included in the County's Employee Handbook (§4.01).
- **Distribution and recordkeeping** — HR is required to distribute a copy of the County's ethics policy to all elected officials, employees, and board members who are required to receive training under Title 4. HR is also required to furnish a copy of the County Ethics Policy Manual to all elected officials, employees, and board members on or before the date of their first ethics training and to distribute a copy of ethics laws and the County Ethics Policy Manual to all elected officials, employees, and board members who must acknowledge receipt (County Code §§407.03(A), (C), and (E)). The Code requires anyone who completes the required ethics training to acknowledge, electronically or in writing, that they have read,

understood, and agreed to abide by the County's ethics policy. HR is required to receive and maintain training records of those elected officials, employees, and board members who are required to complete the training (County Code §403.01 and §407.03).

## **OBJECTIVE AND SCOPE**

The objective of this audit is to assess the County's compliance with three requirements of ethics laws during calendar year 2025. Specifically, these include:

- Whether HR administered ethics training for newly elected officials, employees, and board members within 30 days of their appointment per the requirements of County Code and the Employee Handbook;
- Whether HR administered ethics training to all elected officials and active employees per the requirements of County Code and the Employee Handbook; and
- Whether HR either made available or distributed a copy of ethics laws and the County Ethics Policy Manual to all elected officials, employees, and newly appointed board members required to complete training; obtained an acknowledgment of their receipt and understanding of these documents; and maintained records of their completion of the required training.

## **METHODOLOGY**

The PRC relied on information provided by HR to conduct this audit. Information necessary to conduct this audit is maintained in the Learning Management System (LMS). The LMS is an online training platform which includes training and maintains training completion records. On January 21, 2026, and May 1, 2026, the County's Training Manager, Kathy Jackson, provided the PRC with a report of the employees under the County Executive who completed ethics training in 2025 and 2026. On January 22, 2026, the Prosecutor's Office's Director of Human Resources, Jason Sobczyk, provided the report of the employees who completed ethics training in 2025 and 2026 at the Prosecutor's office.

## **FINDINGS**

The County's ethics training was made available to employees beginning in early November 2025. From November 17 to December 31, 2025, the County sent multiple communications to inform County employees that the mandatory ethics training was available and needed to be done by year's end. Notices were included in the County's electronic weekly newsletters and podcasts, and in the INFOR homepage accessible to all County employees. The notices informed employees that training would be available both through the LMS and through in-person sessions for those employees without easy access to a County computer. HR held in-person training sessions at centralized County locations, including the Harvard Garage and Justice Center. At Harvard Garage, sessions were held once a day on the following dates: December 4, 8, 10, 14, 19, and 23 of 2025, and January 21, 2026. At the Justice Center, sessions were held morning, afternoon, and evening from November 6, 2025, through January 21, 2026. Weekly compliance reports were sent to managers starting the week of December 1, 2025, and continued through

January 23, 2026. The dates and times of the in-person training sessions were announced at roll call for jail employees and via signs posted at the Harvard Garage for Public Works employees.

In January 2026, employees who had not taken the course were reminded of the requirement to take the ethics training and that they must have completed it no later than January 31. If the employee was on a leave of absence, they were required to take the training the first week they returned.

The ethics training available through the LMS was a 20-minute virtual video presentation which included the required notice to employees of whistleblower rights and responsibilities, and notification to supervisors of their responsibilities to avoid retaliating against any employee who makes a whistleblower complaint pursuant to Section 406 of the Code. The pass rate for the training was set at 70%. For those employees who completed the training through the LMS, the system created and maintains a digital record of the participant's completion of the training; employees taking the in-person training signed an attendance sheet to verify their completion of the training.

#### **Training for newly elected officials, employees, and board members**

The County hired 404 new employees and appointed 1 new board member in 2025. Of that total group of new employees and board members, 405 of 405 (100%) completed the required training within 30 days of hire.

#### **Training for active employees and elected officials**

In 2025, a total of 4,660 County employees and elected officials were required to complete the annually required ethics training. Of that group, 4,305 (92%) completed the required training by the end of 2025; a total of 355 employees did not complete the required training.

Two hundred eighty-five (285) of the 355 employees who did not complete training had the employment status of 'Active', and 70 of the 355 employees who did not complete training were on a leave of absence.

As of May 1, 2026, 306 of the 355 employees who did not complete training in 2025 had completed it in 2026. Of the remaining 49 employees who did not complete training, 25 employees were still on a leave of absence.

#### **Distribution and Recordkeeping**

To comply with Section 407.01(M) of the Ethics Policy, the AIG has prepared a comprehensive County Ethics Policy Manual titled, "A Plain Language Guide to the Cuyahoga County Ethics Code." This manual is made available to training participants, and it is also published on the AIG's website (<https://www.cuyahogacounty.gov/inspector-general/publications>) and the County intranet for all employees to access.

In addition, the Code requires elected officials, employees, and board members to acknowledge that they have read, understood, and agreed to abide by the County's ethics policy, including provisions of Title 4 of the Code, Ohio Revised Code Chapter 102, and Ohio Revised Code sections 2921.42 and 2921.43. During training, employees are provided with a link to the County's Ethics Policy Manual and these ethics laws on the AIG's website. HR has confirmed the website link was distributed to all ethics training participants who completed the training in 2025, and all participants signed the acknowledgement form to confirm receipt.

## **CONCLUSION AND RECOMMENDATIONS**

The County achieved an overall ethics training compliance rate of 93%. A total of 5,065 active employees and elected officials, newly hired employees, and newly appointed board members were subject to ethics training requirements in 2025; of those, 4,710 met the training requirements. A total of 355 (7%) of the 5,065 did not complete the required training in 2025. The County was also fully compliant with the distribution of the ethics laws to trainees and the recordkeeping of training.

The County has established procedures to address employees who failed to complete the required ethics training. Starting December 1, 2025, and concluding on January 23, 2026, HR sent weekly reports to HR Managers who in turn directed supervisors of noncompliant employees to advise them of the required training. HR also issued verbal reprimands to employees who do not complete the required training by January 23, 2026. Of the 355 employees/officials who did not complete the required training in 2025, 306 employees/officials completed the required training by May 2026. This was largely due to the diligence of the Department of Human Resources to monitor participation in the required training and take steps to ensure the training was completed even past the deadline for completion.

To improve the County's compliance with the training requirements in the ethics laws, the PRC recommends offering training earlier in the year. Being able to provide training earlier in the year would likely help all employees meet the training requirement, including those who are on a leave of absence at some point during the year.

The PRC also recommends the County implement further corrective measures for employees who fail to complete the training well into the following calendar year. In addition to the verbal reprimand issued to employees who did not complete the training by the second deadline in January, the PRC recommends that HR consider progressive discipline at periodic intervals for those employees failing to comply.

The PRC recognizes and thanks the Department of Human Resources, specifically the Training Manager, Kathy Jackson, and the Director of Human Resources for the Prosecutor's Office, Jason Sobczyk, for their assistance with this audit.

A summary of this report will be posted on the PRC's website at <https://www.cuyahogacounty.gov/personnel-review-commission/about-us/compliance->

[reporting](#). Full copies of this report and the data that support it are available through a public records request to the Personnel Review Commission.