

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, August 09, 2016 2:32 PM
To: Sanchez, Rodzandra (COE)
Subject: Sandra Williams, HR Director, Vizcaya Museum and Gardens, (Ethics Code and Ethics Training) INQ 16-198
Attachments: Vizcaya Museum and Gardens Code of Ethics - amended 03.10.10.pdf

[INQ 16-198 Williams](#)

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, August 09, 2016 2:32 PM
To: Williams, Sandra (Vizcaya) <Sandra.Williams@vizcaya.org>
Cc: Centorino, Joseph (COE) <CENTORI@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: Sandra Williams, HR Director, Vizcaya Museum and Gardens, (Ethics Code and Ethics Training) INQ 16-198

Dear Ms. Williams:

Congratulations on your new position as HR Director at Vizcaya Museum and Gardens. It was a pleasure to speak with you to discuss Vizcaya's Ethics Code (VEC) and Ethics training requirements for employees and board members under the County Ethics Code and County resolutions.

The VEC states that its purpose is to supplement existing State and County ethics requirements and ordinances. As such, it extends the coverage of the VEC not just to the Vizcaya Trust members and employees, but also to Vizcaya interns and volunteers. I have reviewed the VEC and do not find that any of its requirements are in conflict with the County Ethics Code. It has a broader coverage and addresses a number of ethical issues that are specifically relevant to Museums. No conflict exists with the County Ethics Code because the VEC clearly states that its purpose is not to replace State laws and County ordinances, but rather to supplement them. The Ethics Commission has previously opined that County departments are not prohibited from setting broader or stricter standards than those set out in the County Ethics Codes. *See* RQO 16-03(County departments, boards, or agencies may adopt stricter standards than those contained in the County Ethics Code).

With respect to required Ethics training for employees and board members:

- Ethics Training requirements for County employees; Miami-Dade Code Section 2-11.1(bb) provides in relevant part that:
 - "Each employee of the County... shall within sixty (60) days after being hired by the County, submit to the Clerk of the Board a certificate of completion of an Ethics Course offered by the Miami-Dade County Commission on Ethics and Public Trust. Employees shall be required to complete a refresher Ethics Course every two years thereafter. Each employee who has completed a refresher Ethics Course shall submit to the Clerk of the Board a certificate of completion."
- Ethics Training requirements for County employees; Miami-Dade Resolution R-189-05 provides in relevant part that:
 - "...the members of all County boards shall be required to complete an ethics training course ...All current and future board members shall be required to complete the ethics training course."

The dates for Board training can be found on the Ethics Commission website at:
http://ethics.miamidade.gov/library/2016-publications-rqo/2016_advisory_bd_training_reg.pdf.

I hope this information is useful. Please contact me if I may be of further assistance.

Best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Williams, Sandra (Vizcaya)
Sent: Wednesday, July 20, 2016 5:22 PM
To: Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>
Subject: Vizcaya Code of Ethics

Ms. Diaz-Greco:

Thanks for returning my call earlier today. The information you provided was very helpful. Per your request, I have attached a copy of the Vizcaya Code of Ethics. This document was approved by the Vizcaya Trust.

After you have reviewed it, please give me a call. Again, thanks for your assistance.

Regards,
Sandra

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