

DATA BULLETIN:

**AN EXAMINATION OF COUNTY
ETHICS CODES AND ENFORCEMENT ENTITIES**



**MIKE HARMON
AUDITOR OF PUBLIC ACCOUNTS**



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To the People of Kentucky:

The Auditor of Public Accounts (APA) has examined public data regarding county ethics codes and the entities that enforce the codes as a matter of public interest to taxpayers. My motto has been to “Follow the Data,” so to help with that, we intend to highlight data from time to time that is of public interest.

The purpose of this data bulletin is to inform the public about the organization and operation of ethics commissions across the Commonwealth based on publicly available data. The information provided is from agencies or officials other than the APA, unless indicated otherwise. Therefore, the data being made available has not been audited by the APA.

This data bulletin is intended to generate further discussion and public interest in the commissions examined. If you have information related to the commissions or other uses of public funds, please contact our office at 1-800-KY-ALERT.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Harmon".

Mike Harmon
Auditor of Public Accounts

Introduction

Enacted by the 1994 Kentucky General Assembly, Kentucky Revised Statute (KRS) 65.003 directs local governing bodies to create and implement local ethics codes. The code is to apply to all elected officials, appointed officials, and employees. Each code is to contain and address standards of conduct, financial disclosure requirements, nepotism, and enforcement provisions. The KRS is a way to increase public confidence and trust in the county officials and offers a mechanism to address any perceived violations of these codes. A copy of KRS 65.003 may be found in Appendix A.

Within the past five years, the Auditor of Public Accounts (APA) has referred seven findings from our audits and examinations to various local ethics boards to empower the boards both to hold their officials accountable for their actions and to investigate possible violations of their code. In making those referrals, the APA observed several local ethics boards and commissions were inactive and that their appointments had expired. Because the public needs to have faith in their local leaders and a detailed ethics code enforced by an active ethics board can help build such trust, the APA initiated a research project to determine the status of ethics codes and ethics boards and commissions in all 120 counties of the Commonwealth. While KRS 65.003 also applies to cities and special purpose governmental entities, the ethics codes and enforcement entities for these governmental bodies were not reviewed on an individual basis.

After reviewing each ethics code on the Department for Local Government's (DLG) website as of early summer 2020, the APA contacted various officials in all 120 counties asking a series of questions pertaining to their ethics code and the entity that enforces their code. The responses came from county judge executives, deputy judge executives, treasurers, county clerks, board chairs, and assistants to the judge executive. Only one county (Muhlenberg) failed to respond to the survey. While Muhlenberg County's ethics code could be reviewed, county officials repeatedly failed to respond to our request for interviews and follow-up information. As a result, the total population counts for some observations will be reduced to 119 counties. This data bulletin presents a snapshot of the results from the file reviews and inquiries as well as a summary of results by county at Appendix B.

Ethics Code Requirements

KRS 65.003(3) addresses that each ethics code include four components.

First, under (3)(a), the statute requires “[s]tandards of conduct for elected and appointed officials and employees” leaving specifics as to the content of those standards to the discretion of the local governing body. This allows each governing body to express its binding view as to its expectations of conduct as to the officers and employees of that jurisdiction, although a result of this is that differences between the specifics of the standards may be found when comparing different codes. Commonly found in codes are provisions addressing conflicts of interest, receipt of gifts, and the use of public property, equipment, and personnel for private purposes. Conflict of interest controls help ensure that an individual's personal interests do not overshadow the interest of the public, gift

provisions prevent the currying of favor, and the property, equipment, and personnel provisions ensure that public funds are always spent only for a public purpose.

Second, under (3)(b), the statute requires an annual financial disclosure reporting framework for a mayor, county judge/executive, member of the governing body, county clerk, county attorney, sheriff, jailer, coroner, surveyor, and constable, as well as and candidates for those offices, and additionally may include any other officials or employees the governing body may wish to include within the financial disclosure framework. Commonly, a governing body will include all personnel who have decision-making responsibilities, purchasing authority, and influence on decisions. The question of what matters shall be subject to disclosure and with whom the disclosure is to be filed is left to the discretion of the local governing body, except that the entity with which the disclosures are filed shall be the same as the entity responsible for enforcing the code. A code will usually include all personnel within the organization who have decision-making responsibilities, purchasing authority, and influence on decisions.

Third, under (3)(c), the statute requires that the code of ethics address nepotism, or the employment of family members of officials and employees. The question of whether nepotism is allowed or prohibited, and if prohibited, to what extent, is left to the discretion of the local governing body. This issue is discussed further later in the data bulletin.

Fourth, and last, under (3)(d), the statute requires the “designation of a person or group who shall be responsible for enforcement of the code...” This person or group is also responsible for maintenance of financial disclosure statements, receipt of complaints, investigation of those complaints, issuance of opinions, and impositions of any penalties provided by the code.

The APA confirmed that each of the 120 counties within the Commonwealth has adopted a code of ethics. APA research further identified 52 counties had made no revisions or updates to their code of ethics since initially adopting the code in late 1994 or early 1995. In comparison, 43 counties have updated their codes within the last ten years, 14 of those occurring in 2020. Additionally, 23 counties made amendments to their codes between 1994 and 2009. While Floyd County indicated that its ethics code had been updated in the last five years, it was unable to supply auditors with a copy of their updated code of ethics. Figure 1 identifies each of the 120 counties by these categories.

Figure 1: Updates to Local Ethics Codes

Issues/Observations	Counties
Did not respond to survey.	Muhlenberg
Could not provide a copy of their updated local ethics code.	Floyd
Have made no updates to their local ethics code since originally adopted.	Adair, Allen, Bath, Bell, Bourbon, Breckinridge, Butler, Carlisle, Carter, Christian, Clinton, Cumberland, Edmonson, Estill, Fulton, Graves, Grayson, Hancock, Hart, Henderson, Henry, Hopkins, Jackson, Jessamine, Knox, Lee, Lewis, Lincoln, Livingston, Logan, Lyon, Marion, Marshall, McCreary, McLean, Mercer, Metcalfe, Monroe, Montgomery, Morgan, Nicholas, Oldham, Owsley, Pendleton, Robertson, Shelby, Trigg, Warren, Washington, Whitley, Wolfe, and Woodford
Have updated local ethics code between 1994 and 2009.	Anderson, Boyd, Boyle, Breathitt, Caldwell, Clark, Elliott, Fleming, Garrard, Grant, Hardin, Harlan, Johnson, Kenton, LaRue, Lawrence, McCracken, Ohio, Owen, Perry, Rockcastle, Wayne, and Webster
Have updated local ethics code within last ten years between 2010 and 2019.	Ballard, Barren, Boone, Bracken, Bullitt, Campbell, Casey, Daviess, Fayette, Franklin, Gallatin, Greenup, Harrison, Hickman, Laurel, Leslie, Letcher, Mason, Meade, Nelson, Pike, Powell, Russell, Scott, Spencer, Taylor, Todd, Trimble, and Union
Updated local ethics code during 2020.	Calloway, Carroll, Clay, Crittenden, Green, Jefferson, Knott, Madison, Magoffin, Martin, Menifee, Pulaski, Rowan, and Simpson

Source: APA, based on survey responses and local ethics codes.

Types of Ethics Codes and Enforcement Entities

Counties took several approaches to creating codes and establishing enforcement entities. These approaches included codes and/or entities that applied to only the county (county only), to the county and other government entities within the same county (countywide), or to the county and other government entities outside the county (regional). County only enforcement entities are boards or commissions that address the ethics codes requirements of a single county’s officials and employees. The majority of counties have a county only code and operate a county only ethics board or commission, with 92 of 120 counties across the Commonwealth taking this approach. Figure 2 provides a listing of the counties operating unilaterally.

Figure 2: County Only Ethics Codes and Enforcement Entities

Observation	Counties
Ethics code and enforcement entity relate to only one county	Adair, Anderson, Ballard, Barren, Bath, Boone, Bourbon, Boyd, Boyle, Bracken, Breathitt, Bullitt, Caldwell, Calloway, Campbell, Carlisle, Carter, Casey, Christian, Clark, Clay, Clinton, Crittenden, Cumberland, Elliott, Estill, Floyd, Franklin, Fulton, Garrard, Grant, Graves, Grayson, Green, Greenup, Hancock, Harrison, Henry, Hickman, Hopkins, Jessamine, Johnson, Kenton, Knott, LaRue, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Lincoln, Livingston, Lyon, Madison, Magoffin, Marion, Marshall, Martin, Mason, McCracken, McCreary, Meade, Menifee, Morgan, Muhlenberg, Nicholas, Ohio, Oldham, Owen, Owsley, Perry, Pike, Powell, Pulaski, Robertson, Rockcastle, Rowan, Russell, Scott, Shelby, Spencer, Taylor, Todd, Trigg, Trimble, Union, Warren, Washington, Wayne, Webster, and Wolfe

Source: APA, based on survey responses and local ethics codes.

Countywide boards enforce ethics for county government, as well as one or more cities within the county or for each of the two of the biggest cities in the state operating as merged governments. KRS 65.003(2) allows a city or county to enter into an agreement with one or more other cities or counties pursuant to requirements of the Interlocal Cooperation Act in KRS 65.210 to KRS 65.300. KRS 65.240(2) specifically requires governing bodies to take appropriate action by ordinance or resolution before entering a joint or cooperative agreement. Twelve counties have countywide ethics boards, with six of those operating under interlocal agreements as authorized by the Interlocal Cooperation Act. Additionally, Kentucky's two largest local governments, Lexington-Fayette Urban County Government and Louisville-Jefferson County Metro Government, an urban county government and a consolidated local government, respectively, both include elected county officials in each of their codes. The following two figures provide a break out of the counties following each variation of this approach to countywide codes and enforcement entities.

Figure 3: Counties with Countywide Ethics Codes but No Interlocal Agreement

County	Cities			
Breckinridge	Cloverport	Irvington		
Fleming	Ewing	Flemingsburg		
Gallatin	Glencoe	Sparta	Warsaw	
Hardin	Elizabethtown	Radcliff	Vine Grove	West Point
Mercer	Burgin	Harrodsburg		
Montgomery	Mount Sterling			

Source: APA, based on survey responses and local ethics codes.

Figure 4: Counties with Countywide Ethics Codes and Interlocal Agreement

County	Cities				
Carroll	Carrollton	Ghent	Prestonville	Sanders	Worthville
Daviess	Owensboro				
Henderson	Corydon	Henderson			
McLean	Calhoun	Island	Livermore	Sacramento	
Nelson	Bardstown	Fairfield			
Woodford	Midway	Versailles			

Source: APA, based on survey responses and local ethics codes.

Regional boards are most often created through a Memorandum of Agreement with an Area Development District (ADD). Regional boards can oversee several counties, as well as cities within a defined region that choose to join and are responsible for enforcing the ethics codes enacted by each of the participating local governments. Across Kentucky, two ADD-affiliated regional ethics boards operate under Memorandum of Agreements with a total of 13 counties as well, as various cities. In contrast, one regional ethics board operates under an interlocal agreement with just one county and multiple cities. See Figure 5 for counties utilizing such an agreement.

Figure 5: Counties with Regional Enforcement Boards

Regional Board	Barren River ADD	Cumberland Valley ADD	Northern Kentucky Regional Ethics Authority
Counties	Allen, Butler, Edmonson, Hart, Logan, Metcalfe, Monroe, and Simpson	Bell, Harlan, Jackson, Knox, and Whitley	Pendleton

Source: APA, based on survey responses, local ethics codes, and agreements between entities.

Financial Disclosures

Not all counties are in compliance with the state statute, which requires the annual filing of financial disclosure statements, at a minimum, by elected officers and candidates for elected office. Local governments have the discretion to require additional officials or employees to file annual financial disclosure statements beyond those required by KRS. Some counties have chosen to expand on KRS 65.003 to dictate when the statements are to be submitted annually and who collects and maintains the statements. Responses vary by county as to the level of use for this discretionary power and whether or not the variances are reflected in their respective ethics codes.

KRS 65.003(3)(b) states that a code of ethics shall include:

Requirements for creation of financial disclosure statements, which shall be filed annually by all candidates for the city, county, or consolidated local government elective offices specified in subsection (1) of this section, elected officials of each city, county, or consolidated local government, and other officials or employees of

the city, county, or consolidated local government, as specified in the code of ethics, and which shall be filed with the person or group responsible for enforcement of the code of ethics.

Despite the requirement for both elected officials and candidates for elected office to file financial disclosures, the ethics codes of 10 counties do not require candidates to file a financial disclosure statement. This excludes the three counties, whose ethics codes do not address financial disclosure, as this section is omitted entirely from their respective ethics codes. In addition, 26 counties confirmed disclosure statements are not filed annually, despite their codes having this requirement. The following chart provides a breakdown of noncompliant counties by the issue of noncompliance relating to financial disclosure statements.

Figure 6: Financial Disclosure Statement Observations

Issues/Observations	Counties
Ethics Codes do not require candidates to file financial disclosure statements.	Bath, Carter, Fleming, Hancock, Jefferson, Lawrence, Lee, Nelson, Ohio, and Owsley
Ethics Codes do not include a financial disclosure section.	Clay, Laurel, and Powell
Financial disclosure statements are not filed annually.	Bullitt, Calloway, Carlisle, Clay, Clinton, Cumberland, Floyd, Grayson, Henderson, Knott, Laurel, Lawrence, Lee, Leslie, Letcher, Lincoln, Magoffin, Martin, McCreary, Meade, Menifee, Powell, Robertson, Taylor, Trimble, and Webster

Source: APA, based on survey responses and local ethics codes.

Auditors made the following additional observations regarding noncompliant counties.

- A Clay County appointed official stated financial disclosure statements are not needed based on the belief that elected officials' personal business or employment is public knowledge, as they are a small rural county.
- According to several elected officials in Clinton County, because the ethics board no longer exists, financial disclosures are not required to be submitted.
- The Code of Ethics of Floyd County states the Ethics Commission will annually notify those required to file of their duty to file the financial disclosure statement; however, the board is not active to do so.
- Grayson County's Code of Ethics designates the Board of Ethics as the custodian of the financial disclosures consistent with KRS 65.003(4)(b). However, the board is not active, and according to an appointed county official, no financial disclosure statements have been filed or maintained, as it is the Board of Ethics' responsibility to do so.

- A Powell County appointed official indicated there was no record of financial disclosure forms ever being filed, submitted, or maintained, and the ethics policy provided by the county does not include a provision for financial disclosure statements required by KRS 65.003(3)(b).

Counties may require other officials or employees beyond those noted in KRS 65.003(3)(b) to file annual financial disclosure statements. Eighteen ethics codes require members of the ethics board to file a financial disclosure statement, and 69 codes require additional employees/officers, such as those with procurement authority, managers, chiefs, or department heads, to file statements. However, this additional requirement may not translate to practice, as one county confirmed in their survey response that the additional individuals identified in their Code of Ethics did not actually file a disclosure.

Although required to be filed annually, the specific due date for filing financial disclosure statements is not noted in statute. Typically, this detail is included in the counties' codes of ethics; however, six counties did not specify a filing deadline or state how often disclosures are to be filed. These six counties include Bath, Calloway, Clark, Lyon, Owsley, and Webster.

Counties have designated that statements be filed with various offices or individuals despite the requirement in KRS 65.003(3)(b) that statements be filed with the "person or group responsible for enforcement of the code of ethics." While 93 counties responded that they file their disclosures annually, 18 of these counties file only a related party questionnaire with their auditor or CPA, despite their ethics code naming another party as the intended receiver. These 18 counties include Bath, Boyd, Breathitt, Christian, Elliott, Fleming, Garrard, Henry, Hopkins, Johnson, LaRue, Nicholas, Owsley, Perry, Rockcastle, Russell, Trigg, and Wolfe.

While one County Clerk indicated there is no way to enforce requiring individuals to file financial disclosures, many local ethics codes allow the imposition of penalties for not filing. Ninety-four codes indicated that penalties ranging from fines up to \$500 or the withholding of all pay and benefits could be assessed for noncompliance. Although the survey did not determine if penalties had been imposed and collected by these boards, the inclusion of such measures should act as encouragement for all relevant individuals to follow the code.

Nepotism

According to KRS 65.003(3)(c), an entity's code of ethics must include a policy addressing the potential employment of officials' or employees' family members, a practice known as nepotism. Although this statute requires nepotism to be addressed, each city, county, and consolidated local government has the discretion both to create specific guidance defining what constitutes nepotism and to decide if nepotism as a practice is acceptable, prohibited or somewhere in between within their jurisdiction.

Nepotism, or even the perception, can have an adverse effect in the workplace. While KRS 65.003(3)(c) does not specifically prohibit hiring relatives, it poses risks in the workplace due to matters of public perception, including that relatives are not as closely supervised as other

employees are. Diminished supervision may result in an inferior work product, tarnishing the reputation of the administration. As public servants, operating with the premise of principles promoting equality and fairness, as opposed to private interests, is important.

A review of ethics codes for all counties identified four codes (for the counties of Clay, Laurel, Leslie, and Powell) that did not include a section or policy on nepotism. This is a direct violation of KRS 65.003(3)(c) and should be addressed by the relevant county governments immediately. A revision of these codes to include a nepotism policy would ensure compliance with KRS 65.003(3)(c) and provide direct guidance when hiring new employees.

In addition, the ethics codes for Allen and Monroe counties do not prohibit the hiring of any individual related to an official. The nepotism section of both codes consists of a single sentence stating, “The employment of members of families of officials or employees of the county will be allowed.” While meeting the statutory requirement to have a section on nepotism, these two counties do not appear to have met the spirit behind that requirement, as no further explanation defending their decision to allow nepotism in all forms was offered.

Nepotism policies incorporated within the remaining 114 ethics codes typically included stipulations such as family hires must meet job qualifications and cannot receive excess compensation compared to those with similar duties. The policies also defined immediate family and identified specific relationships that were permissible or prohibited between new hires and officials or employees. For example, both policies for Trimble and Union County dictate stipulations regarding the hiring of immediate family members. Union County defines an immediate family member as a spouse or child only. However, Trimble County includes not only a spouse or child, but also siblings, stepchildren, parents, parents-in-law, brother-in-law, sister-in-law, and any spouses of the aforementioned individuals. A direct comparison of these policies proved difficult as definitions of family members and immediate family members varied from county to county; however, auditors made the following observations:

- Elected officials in nine counties are limited to allow one relative on the county payroll. Those counties include Boyd, Floyd, Lawrence, Lewis, Lincoln, Martin, Morgan, Rockcastle, and Whitley.
- Butler County’s nepotism policy prohibits officials from hiring members of their immediate family; however, spouses are not included in their definition of immediate family members.
- Estill County prohibits officials, except for the Judge Executive, from employing immediate family members.
- The nepotism policy in nine counties prohibit or limit the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside the official’s household. These nine counties include Boone, Bourbon, Edmonson, Green, Hopkins, Lincoln, McCreary, Pendleton, and Todd.
- Both Magoffin and Ohio counties prohibit the supervision of relatives; however, a relative employed by an elected official is excluded from this prohibition.

Enforcement

KRS 65.003(3)(d) requires each ethics code to designate a person or group for the enforcement of the code of ethics. The enforcement entities are most often referred to as the local Board of Ethics or Ethics Commission. The appointment process varies by entity, with some members being appointed by various elected officials, while others are appointed by organizations or by virtue of their position in certain other entities. Responsibilities of the enforcement entity are set in state statute and include maintenance of financial disclosure statements, receiving complaints alleging possible violations of the code, issuing of opinions, investigations of potential violations of the code, and imposing those penalties outlined in the code of ethics. Based on their ethics codes, the majority of enforcement entities are not required to meet on a periodic basis, although some do.

While all but three ethics codes reviewed designated an enforcement entity, as of August 11, 2020, 35 counties did not have members appointed to the enforcement entities, otherwise known as ethics boards or commissions, and an additional eight other counties had taken action to appoint members to their ethics boards or commissions as a result of our inquiry. The chart below illustrates where each issue was observed.

Figure 7: Enforcement Entity Observations

Issues/Observations	Counties
No enforcement entity designated in ethics code.	Clay, Laurel, and Powell
No members currently appointed to board/commission.	Adair, Anderson, Bourbon, Boyd, Breathitt, Clay, Clinton, Crittenden, Elliot, Estill, Floyd, Green, Hancock, Henry, Hopkins, Johnson, Knott, Lee, Leslie, Letcher, Lincoln, Livingston, Magoffin, Marion, Martin, Meade, Nicholas, Owsley, Perry, Powell, Rockcastle, Shelby, Taylor, Wayne, and Webster
Members appointed in response to APA inquiry.	Bracken, Graves, Grayson, Harrison, Menifee, Ohio, Pulaski, and Robertson

Source: APA, based on survey responses and local ethics codes.

Elected officials other than the County Judge Executive and Fiscal Court sometimes make membership appointments to the enforcement entities. The County Clerk, County Attorney, Jailer, and Sheriff may submit a list from which the fiscal court then appoints members. Additionally, appointments may result from associations or virtue of a position as president of an area club. For example, the Union County Ethics Commission consists of three members, who may be the President or his/her appointee of area associations and clubs. However, upon the Union County Attorney’s contact with one member, he was not aware he was a member of the Commission, and the County Attorney did not know how to contact another member.

Maintenance of financial disclosure statements is one responsibility of the enforcement entity. KRS 65.003(3)(b) requires that financial disclosure statements be filed with the “person or group responsible for enforcement of the code of ethics.” As discussed in the Financial Disclosures section, many counties have designated various offices or individuals to be responsible for the maintenance of the statements despite the state statute.

As state law is nonspecific on the matter, the level of activity by the enforcement entities varies for the 84 counties currently with members appointed to their ethics boards or commissions. Forty-five enforcement entities provided minutes from the last ethics board or commission meeting to the APA, while 39 did not. As there is no requirement that boards must meet regularly, some have never met due to a history of not receiving complaints, while others have met, at a minimum, annually to review financial disclosure statements. For example, the Lewis County Ethics Commission has never met, as their code of ethics does not require the Commission to meet unless there is an issue to discuss, while the Boone County Ethics Commission meets annually to review financial disclosure statements.

Ethics Board Training

Serving on an enforcement entity board carries responsibilities and expectations of service; however, auditors observed statewide that individuals serving on ethics enforcement entities are not provided adequate training. Of the 84 active boards or commissions across the state, only members from 18 entities receive training.

Members can only adequately perform their duties when it is made clear to them what those duties entail. Without proper training, individuals may be appointed to the enforcement entities without a full understanding of the duties and expectations that come with the appointment. Many of the boards are only active on an as needed basis, meaning if no complaints or issues arise, there is no meeting. These individuals can serve for years and never be called to consider an issue. Ethics training can help members understand the types of situations that may arise and learn how to navigate difficult ethical situations.

Our research shows a vast need for training of enforcement entities. Roughly, 79% of active ethics boards across the state do not receive formal training in reference to the job tasked of them by their local governments. The enforcement entities for sixteen of the eighteen counties receiving some type of training are cooperative or joint boards, including those with regional boards and those having countywide boards serving both the county and cities within the county. The following table shows counties where enforcement entity members receive training.

Figure 8: Counties Receiving Training by Type of Enforcement Entity

Type of Enforcement Entity	Counties
County Only	Boyle and Rowan
County Wide	Jefferson, Montgomery, and Woodford
Regional	Allen, Bell, Butler, Edmonson, Harlan, Hart, Jackson, Knox, Logan, Metcalfe, Monroe, Simpson, and Whitley

Source: APA, based on survey responses.

Those counties who do receive training often do so in various formats. Cumberland Valley ADD provides its members with training through a workshop setting, while Barren River ADD members participate in a peer member training, commit to self-study, and meet as a committee for training when necessary. While the majority of counties do not currently provide training to their ethics board members, several county officials interviewed both understood the value of offering training and expressed eagerness to provide their boards with training.

Upon completion of its research, the APA inquired with the Kentucky Association of Counties (KACo) regarding possible training opportunities available for ethics board members. KACo staff indicated that the widespread use of online classes could allow KACo to offer training this calendar year to county governments as well as their ethics boards. KACo has since developed new classes to discuss ethics board requirements and procedures and plans to offer the classes later this year. The classes will be open to both elected and appointed officials, including members of county ethics boards.

Role of DLG

KRS 65.003(5)(a) requires counties to submit a copy of their ethics code within 21 days of adoption to DLG to maintain as public records. If amendments are made to an ethics code, a county is required by KRS 65.003(5)(b) to submit the amended ethics code to DLG within 21 days.

KRS 65.003(6) states that, should local government entities fail to comply with the requirements of this section, DLG “shall notify all state agencies, including area development districts, which deliver services or payments of money” from the Commonwealth to the noncompliant entity to suspend such services and payments until the entity comes into compliance. DLG’s interpretation of this language is that the filing of an ethics code is sufficient to comply with the requirements. The statute does not provide any specific process for monitoring of county ethics codes on an ongoing basis.

It is the responsibility of the local government to file its updated code with DLG. A review of the ethics codes on DLG’s website found 55 counties’ amended ethics codes were not available. Additionally, ethics codes of ADDs were on DLG’s website for three counties instead of the ethics code of the respective counties. Those three counties include Barren, Bourbon, and Boyle. As noted previously in this data bulletin, numerous observations were made regarding the absence of key components within certain counties’ ethics codes. These observations included lack of a

financial disclosure section, omission of candidates from the list of individuals required to file financial disclosure statements, lack of a nepotism section, and no designation of enforcement entity.

Appendix A: KRS 65.003

65.003 Codes of ethics for city, county, charter county, urban-county government, and consolidated local government officials and employees -- Codes of ethics for boards, officers, and employees of special purpose governmental entities -- Interlocal agreements -- Delegation of council's subpoena power to investigate code of ethics violations.

- (1) (a) The governing body of each city, county, urban-county, consolidated local government, and charter county, shall adopt, by ordinance, a code of ethics which shall apply to all elected officials of the city, county, urban-county, consolidated local government, or charter county, and to appointed officials and employees of the city, county, urban-county, consolidated local government, or charter county government, or agencies created jointly, as specified in the code of ethics. The elected officials of a city, county, or consolidated local government to which a code of ethics shall apply include the mayor, county judge/executive, members of the governing body, county clerk, county attorney, sheriff, jailer, coroner, surveyor, and constable but do not include members of any school board. Agencies created jointly may include planning or administrative commissions or boards. Candidates for the local government elective offices specified in this subsection shall comply with the annual financial disclosure statement filing requirements contained in the code of ethics.
- (b) The boards, officers, and employees of special purpose governmental entities shall be subject to a code of ethics as provided in KRS 65A.070. As used in this section, special purpose governmental entity has the same meaning as in KRS 65A.010.
- (2) Any city, county, or consolidated local government may enter into a memorandum of agreement or an interlocal agreement with one (1) or more other cities, counties, or consolidated local governments for joint adoption of a code of ethics which shall apply to all elected officials of the cities, counties, or consolidated local governments, and to appointed officials and employees as specified by each of the cities, counties, or consolidated local governments which enters into the agreement. Interlocal agreements shall be executed pursuant to the Interlocal Cooperation Act in KRS 65.210 to 65.300. The interlocal agreement or memorandum of agreement may provide for but shall not be limited to:
 - (a) The provision of administrative services relating to the implementation of a code of ethics;
 - (b) The creation of a regional ethics board which serves independently to provide advice to member governments and their officials and provides for the enforcement of locally adopted codes of ethics; and
 - (c) Contracting by a memorandum of agreement with an area development district for the provision of administrative services relating to the implementation of a code of ethics.

Candidates for the city, county, or consolidated local government elective offices specified in this subsection shall comply with the annual financial disclosure statement filing requirements contained in the code of ethics.

- (3) Each code of ethics adopted as provided by subsection (1) or (2) of this section, or amended as provided by subsection (4) of this section, shall include but not be limited to provisions which set forth:
 - (a) Standards of conduct for elected and appointed officials and employees;
 - (b) Requirements for creation of financial disclosure statements, which shall be filed annually by all candidates for the city, county, or consolidated local government elective offices specified in subsection (1) of this section, elected officials of each city, county, or consolidated local government, and other officials or employees of the city, county, or consolidated local government, as specified in the code of ethics, and which shall be filed with the person or group responsible for enforcement of the code of ethics;
 - (c) A policy on the employment of members of the families of officials or employees of the city, county, or consolidated local government, as specified in the code of ethics; and
 - (d) The designation of a person or group who shall be responsible for enforcement of the code of ethics, including maintenance of financial disclosure statements, all of which shall be available for public inspection, receipt of complaints alleging possible violations of the code of ethics, issuance of opinions in response to inquiries relating to the code of ethics, investigation of possible violations of the code of ethics, and imposition of penalties provided in the code of ethics.
- (4) The code of ethics ordinance adopted by a city, county, or consolidated local government may be amended but shall not be repealed.
- (5)
 - (a) Within twenty-one (21) days of the adoption of the code of ethics required by this section, each city, county, or consolidated local government shall deliver a copy of the ordinance by which the code was adopted and proof of publication in accordance with KRS Chapter 424 to the Department for Local Government. The Department for Local Government shall maintain the ordinances as public records and shall maintain a list of city, county, or consolidated local governments which have adopted a code of ethics and a list of those which have not adopted a code of ethics.
 - (b) Within twenty-one (21) days of the amendment of a code of ethics required by this section, each city, county, or consolidated local government shall:
 1. Deliver a copy of the ordinance by which the code was amended and proof of publication in accordance with KRS Chapter 424 to the Department for Local Government, which shall maintain the amendment with the ordinance by which the code was adopted; and
 2. Deliver a copy of the ordinance by which the code was amended to the governing body of each special purpose governmental entity

that follows that establishing entity's code of ethics pursuant to KRS 65A.070.

- (c) For ordinances adopting or amending a code of ethics under this section, cities of the first class and consolidated local governments shall comply with the publication requirements of KRS 83A.060(9), notwithstanding the exception contained in that statute.
- (6) If a city, county, or consolidated local government fails to comply with the requirements of this section, the Department for Local Government shall notify all state agencies, including area development districts, which deliver services or payments of money from the Commonwealth to the city, county, or consolidated local government. Those agencies shall suspend delivery of all services or payments to the city, county, or consolidated local government which fails to comply with the requirements of this section. The Department for Local Government shall immediately notify those same agencies when the city, county, or consolidated local government is in compliance with the requirements of this section, and those agencies shall reinstate the delivery of services or payments to the city, county, or consolidated local government.
- (7) Notwithstanding KRS 67C.103(14)(e), a simple majority of the legislative council of a consolidated local government may delegate its authority to issue administrative subpoenas for the attendance and testimony of witnesses and the production of documents relevant to possible violations of the code of ethics to the person or a majority of the group responsible for enforcement of a code of ethics. Subpoenas shall be served in the same manner as subpoenas for witnesses in civil cases. Compliance with the subpoenas shall be enforceable by the Circuit Court. Any failure to obey an order of the court may be punished by the court as contempt thereof.

Effective: June 29, 2017

History: Amended 2017 Ky. Acts ch. 150, sec. 7, effective June 29, 2017. - Amended 2015 Ky. Acts ch. 17, sec. 4, effective June 24, 2015. -- Amended 2013 Ky. Acts ch. 40, sec. 10, effective March 21, 2013. -- Amended 2010 Ky. Acts ch. 117, sec. 46, effective July 15, 2010. -- Amended 2007 Ky. Acts ch. 47, sec. 40, effective June 26, 2007. -- Amended 2002 Ky. Acts ch. 291, sec. 1, effective July 15, 2002; and ch. 346, sec. 22, effective July 15, 2002. - Amended 1998 Ky. Acts ch. 69, sec. 29, effective July 15, 1998. -- Amended 1996 Ky. Acts ch. 214, sec. 1, effective July 15, 1996. -- Created 1994 Ky. Acts ch. 16, sec. 1, effective July 15, 1994.

Legislative Research Commission Note (3/21/2013). Under the authority of KRS 7.136, the Reviser of Statutes has corrected a manifest clerical or technical error in this statute. In subsection (1)(b), the word "have" has been changed to read "has."

Appendix B: County-by-County Summary of Issues Observed Regarding County Ethics Codes and Enforcement Entities

All 120 counties across the Commonwealth adopted a Code of Ethics in late 1994 or early 1995. Since then, some have made amendments to that code, while others have not. The following table summarizes, by county, the issues noted in this data bulletin.

County	Summary of Observations
Adair	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Allen	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism section of Ethics Code consists of a single sentence stating, “The employment of members of families of officials or employees of the county will be allowed.” Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Anderson	Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. No members currently appointed to board/commission.
Ballard	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.

Barren	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Bath	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Bell	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Cumberland Valley ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Boone	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Bourbon	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. No members currently appointed to board/commission.

Boyd	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Elected officials are limited to one relative on the county payroll. No members currently appointed to board/commission.
Boyle	Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Bracken	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Breathitt	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Breckinridge	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with no interlocal agreement. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Bullitt	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Butler	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits officials from hiring members of their immediate family; however, spouses are not included in their definition of immediate family members. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Caldwell	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Calloway	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Campbell	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Carlisle	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Carroll	Updated local Ethics Code during 2020. Countywide Ethics Code with interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Carter	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Did not provide minutes from last ethics board/commission meeting.
Casey	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Christian	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Clark	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission.
Clay	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Ethics Code does not include a financial disclosure section. Financial disclosure statements are not filed annually. Ethics Code does not include a section or policy on nepotism. No enforcement entity designated in Ethics Code. No members currently appointed to board/commission.
Clinton	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. No members currently appointed to board/commission.
Crittenden	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.

Cumberland	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Daviess	Have updated local Ethics Code within last ten years between 2010 and 2019. Countywide Ethics Code with interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Edmonson	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Elliott	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Estill	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits officials, except for the Judge Executive, from employing immediate family members. No members currently appointed to board/commission.

Fayette	Have updated local Ethics Code within last ten years between 2010 and 2019. Countywide Ethics Code with no interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Fleming	Countywide Ethics Code with no interlocal agreement. Ethics Code does not require candidates to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Floyd	Could not provide a copy of their updated local ethics code. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. No members currently appointed to board/commission.
Franklin	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Fulton	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Gallatin	Have updated local Ethics Code within last ten years between 2010 and 2019. Countywide Ethics Code with no interlocal agreement. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.

Garrard	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Grant	Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Graves	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Grayson	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Green	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. No members currently appointed to board/commission.
Greenup	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Hancock	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Responded that financial disclosure statements are filed annually. No members currently appointed to board/commission.

Hardin	Countywide Ethics Code with no interlocal agreement. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Harlan	Regional Ethics Board through Memorandum of Agreement with Cumberland Valley ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Harrison	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Hart	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Henderson	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with interlocal agreement. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Henry	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.

Hickman	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Hopkins	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. No members currently appointed to board/commission.
Jackson	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Cumberland Valley ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Jefferson	Updated local Ethics Code during 2020. Countywide Ethics Code with no interlocal agreement. Ethics Code does not require candidates to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Jessamine	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Johnson	Ethics Code and enforcement entity relate to only one county. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Kenton	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.

Knott	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Knox	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Cumberland Valley ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
LaRue	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Laurel	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code does not include a financial disclosure section. Financial disclosure statements are not filed annually. Ethics Code does not include a section or policy on nepotism. No enforcement entity designated in Ethics Code. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Lawrence	Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Lee	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.

Leslie	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Ethics Code does not include a section or policy on nepotism. No members currently appointed to board/commission.
Letcher	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Lewis	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Elected officials are limited to one relative on the county payroll. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Lincoln	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. No members currently appointed to board/commission.
Livingston	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.

Logan	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Lyon	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not respond to the request to provide minutes from the last ethics board/commission meeting.
Madison	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Magoffin	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Prohibits the supervision of relatives; however, a relative employed by an elected official is excluded from this prohibition. No members currently appointed to board/commission.
Marion	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. No members currently appointed to board/commission.
Marshall	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Martin	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. No members currently appointed to board/commission.
Mason	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
McCracken	Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
McCreary	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
McLean	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Meade	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission. Did not respond to the request to provide minutes from the last ethics board/commission meeting.
Menifee	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Mercer	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with no interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Metcalf	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Monroe	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism section of Ethics Code consists of a single sentence stating, "The employment of members of families of officials or employees of the county will be allowed." Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.

Montgomery	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with no interlocal agreement. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Morgan	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Muhlenberg	Did not respond to the survey. Ethics Code and enforcement entity relate to only one county. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements.
Nelson	Have updated local Ethics Code within last ten years between 2010 and 2019. Countywide Ethics Code with interlocal agreement. Ethics Code does not require candidates to file financial disclosure statements. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Nicholas	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Ohio	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Prohibits the supervision of relatives; however, a relative employed by an elected official is excluded from this prohibition. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Oldham	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Owen	Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Owsley	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code does not require candidates to file financial disclosure statements. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Pendleton	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Interlocal Agreement with Northern Kentucky Regional Ethics Authority. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Perry	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Pike	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.

Powell	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code does not include a financial disclosure section. Financial disclosure statements are not filed annually. Ethics Code does not include a section or policy on nepotism. No enforcement entity designated in Ethics Code. No members currently appointed to board/commission.
Pulaski	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Robertson	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Members appointed in response to APA inquiry. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Rockcastle	Ethics Code and enforcement entity relate to only one county. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. No members currently appointed to board/commission.
Rowan	Updated local Ethics Code during 2020. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting. Training provided to ethics board/commission members.
Russell	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Scott	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Shelby	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Simpson	Updated local Ethics Code during 2020. Regional Ethics Board through Memorandum of Agreement with Barren River ADD. Ethics Code requires members of the ethics board/commission to file financial disclosure statements. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Spencer	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Taylor	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Todd	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Nepotism policy prohibits or limits the number of immediate family members elected officials employ; however, the definition of immediate family members does not include children living outside of the official's household. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.

Trigg	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Trimble	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code requires additional employees/officers to file financial disclosure statements. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Union	Have updated local Ethics Code within last ten years between 2010 and 2019. Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Warren	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting.
Washington	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Wayne	Ethics Code and enforcement entity relate to only one county. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.
Webster	Ethics Code and enforcement entity relate to only one county. Financial disclosure statements are not filed annually. Ethics Code does not specify a filing deadline or how often financial disclosure statements are to be filed. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. No members currently appointed to board/commission.

Whitley	Have made no updates to local Ethics Code since originally adopted. Regional Ethics Board through Memorandum of Agreement with Cumberland Valley ADD. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Elected officials are limited to one relative on the county payroll. Members currently appointed to board/commission. Provided minutes from the last ethics board/commission meeting. Training provided to ethics board/commission members.
Wolfe	Have made no updates to local Ethics Code since originally adopted. Ethics Code and enforcement entity relate to only one county. Files only a related party questionnaire with auditor or CPA. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting.
Woodford	Have made no updates to local Ethics Code since originally adopted. Countywide Ethics Code with interlocal agreement. Ethics Code requires additional employees/officers to file financial disclosure statements. Responded that financial disclosure statements are filed annually. Ethics Code indicates penalties could be assessed for noncompliance with filing requirements. Members currently appointed to board/commission. Did not provide minutes from last ethics board/commission meeting. Training provided to ethics board/commission members.

Source: APA, based on survey responses and local ethics codes.

