

# NWF Health Network Policy & Procedure

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<b>Series:</b>	1100		
<b>Policy Name:</b>	Foster Home Conflicts of Interest		
<b>Policy Number:</b>	1129		
<b>Origination Date:</b>	09/22/09	<b>Revision:</b>	Board Meeting of 6/22/2023
<b>Regulation:</b>	65C-45.013 Conflict of Interest for all Levels of Licensure, F.A.C.		
<b>Attachment:</b>	1100-1129 x 1 Conflict Review Committee Staffing Form		

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## Policy

NWF Health Network (NWFHN) recognizes the importance of recruiting and retaining quality foster parents for children in care. As they already work in the social services field, employees of NWFHN, NWFHN's subcontracted provider agencies and other partner and community stakeholders may possess knowledge and skills that would make them strong candidates for foster parenting. However, there may be an inherent conflict of interest for these individuals in seeking to foster children in NWFHN's custody.

It is the policy of NWFHN that employment in the field should not, in and of itself, preclude an individual from becoming a foster parent, given that the person meets all other standards required for licensure pursuant to Chapter 65C-45, F.A.C., and that conflict of interest can be avoided given careful consideration and approval of placements into the home. The procedure outlined in this section should be followed in order to mitigate any conflict of interest that may arise when individuals seek to become Licensed Out-of-Home Caregivers.

## Procedure

### A. General Principles

1. Applicability. This policy is applicable to:
  - a. Employees of NWFHN
  - b. Employees of NWFHN subcontracted provider agencies
  - c. Employees of other child welfare partner and community stakeholders (such as the Department of Children and Families, county sheriff's offices, Children's Legal Services, Guardians ad Litem, the Judiciary) and
  - d. Immediate family members of NWFHN employees and any of the agencies included above. Immediate family members are defined as a parent, sibling or child, and/or any current household members.
2. Requirement for Review: If an employee, or any individual identified as having a potential conflict of interest, applies to become a licensed (Level I-V) foster parent – or – a licensed foster parent is hired by an applicable agency, a Conflict Staffing is required.
3. NWFHN Employees Only:
  - a. Traditional Foster Care (Levels II-V):

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- i. Children from outside Circuits 1, 2 and 14 may be placed with employees upon the successful completion and approval of a Conflict Staffing finding that no conflict of interest exists or that such conflicts can be sufficiently mitigated.
    - ii. Children from Circuits 1, 2 or 14 are not eligible for placement with any NWFHN employee or immediate employee family member Level II-V foster home.
  - b. Relative/Non-Relative Care (Level 1):
    - i. NWFHN employees or immediate employee family members are eligible to accept placement of Circuit 1, 2 or 14 children with whom they are related or they have a clear, established relationship that does not stem from their professional capacity.
    - ii. Relative/Non-Relative Placements of Circuit 1, 2 or 14 children with NWFHN employees or immediate employee family members will be staffed by the Conflict Staffing Committee to assure any potential conflicts of interest are properly mitigated.
    - iii. These homes are eligible for licensure as a Level I foster home contingent upon successful mitigation of potential conflicts of interest address by the Foster Home Licensure Conflict Staffing Committee.
4. Foster Home Licensure Conflict Staffing Committee: NWFHN has established a Committee address potential conflicts of interests related to Employee (and immediate family), subcontractor or stakeholder fostering and make subsequent recommendations for approval by NWFHN's Chief Operations Officer and/or designee. The Conflict Staffing Committee may include applicable NWFHN Circuit Administrators, Operations Managers, Placement Manager, Licensing Attestation staff, Program Directors, Program Managers, Licensing/Kinship Supervisor(s) and Licensing/Kinship Counselor(s), Case Management representative(s), GAL representative(s), DCF representative(s).
5. Foster Home Licensure Conflict Review: Recommendations of the Conflict Staffing Committee must be approved by the applicable NWFHN Circuit Administrator prior to submission to the Northwest Region (NWR) Licensing Office for final approval.

## B. Administrative Code Requirements

1. Employees may be licensed as out-of-home caregivers as long as the following are met:
  - a. No actual or perceived conflict of interest exists that could result in preferential treatment concerning the licensing process or the placement and movement of children placed in the potential licensed family foster home.
  - b. All initial, relicensing, and ongoing maintenance of the licensed foster home activities shall be completed by a licensed child-placing agency outside of the (NWFHN) employee's service area and submitted to the Regional Licensing Authority for approval.
    - 1) or by an outside licensing child-placing agency
  - c. The executive director or designee in upper level management of the community-based care lead agency or supervising agency responsible for submitting the employee, relative, or subcontractor licensing file to the Department (NWFHN's Chief

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Operations Officer or Contracts Administrator) has reviewed and approved the submission of the application to the Department.

The Regional Licensing Authority obtains approval of the application from the Regional Managing Director or designee prior to issuing a family foster care license for an employee, relative, or subcontractor.

Foster Home Conflict Staffing Procedure:

1. NWFHN's Conflict Staffing Committee maintains a standing conference call date every two weeks to address potential conflicts of interests in fostering.
2. Foster Family Support Service Program or Kinship Program will notify the Licensing Attestation unit within 48 business hours when a potential conflict is identified by submitting a Conflict Staffing Request to [Attestation@nwfhealth.org](mailto:Attestation@nwfhealth.org). The request will include a brief summary of the reason the case is considered a conflict.
3. The Attestation Supervisor will schedule the request to be addressed at the next standing Conflict Staffing Committee conference call.
4. The Conflict Staffing Committee will address potential conflicts related to the licensing of the identified home and collaboratively develop strategies and follow-up actions needed to mitigate areas of concern during its standing conference call.
  - a. Foster Family Support Services/Kinship Program (or other partner Licensing unit) will provide specific training on conflict of interest *and* confidentiality so that applicant(s) understand how to practice ethically and maintain professional boundaries. The foster parents will be informed of any restrictions identified by the Licensure Conflict Staffing process.
5. All strategies, follow-up actions and recommendations will be documented by the Attestation Supervisor on the Conflict Review Committee Staffing Form and signed by the appropriate Circuit's Operations Manager.
6. Upon signature by the Circuit's Operations Manager, the Attestation Supervisor/Manager will submit the completed Conflict Review Committee Staffing Form to the applicable NWFHN Circuit Administrator for approval.
7. Upon receipt of approval, the Attestation Manager will submit the approved Conflict Review Committee Staffing Form to the NWR Licensing Office for final approval.
8. Upon receipt of DCF/NWR final approval, the Conflict Review Committee Staffing Form and approval documentation (typically the email chain) are:
  - a. Uploaded into FSFN by the DCF/NWR Licensing staff, and
  - b. Provided to NWFHN's Attestation Unit and the applicable Foster Family Support, Kinship and Placement, and/or other partner Licensing unit staffs, as applicable for inclusion with initial and all subsequent licensing-related packets.