

<b>Series:</b>	<b>HR - Practices</b>	<b>COA: FKC 15.02 CFOP: 60-05</b>
<b>Procedure Name:</b>	Conflict of Interest: Foster Home Licensure, Adoption, and Relative/Non-Relative Placement for FPoCF Employees	
<b>Procedure Number:</b>	HR2807	
<b>Reviewed Date:</b>	02/03/2020, 4/16/2024, 12/10/2025	
<b>Revision #/Date:</b>	9/4/19, 11/24/2020, 6/8/23	
<b>Effective Date:</b>	10/2/17	
<b>Applicable to:</b>	All staff members of the Family Partnerships of Central Florida (FPoCF), Board members, volunteers	

**PURPOSE:** This procedure is designed to protect the interests of each employee of the agencies in his or her business and personal relationships as this pertains to their jobs. This procedure also recognizes that employees are not precluded from becoming licensed foster parents, adoptive parents, and/or relative/non-relative caregivers provided that the employee meets those requirements and conflicts of interest are avoided.

**PROCEDURE:**

**References** F.A.C 65C-16.005, 65C-13.025; HR2502

**Definitions**

**Employee** – Any employee of the FPoCF and their immediate family members; employees of subcontracted agencies which provide prevention services, case management, foster home management, adoptions, group care, shelter and independent living providers and their immediate family members.

The potential for conflict regarding foster home licensure, adoption and serving as a relative/non-relative caregiver is evaluated based on the employee's position, ability to access information related to the case, avoidance of preferential treatment, and maintenance of the professional boundaries.

**Foster Home Licensure**

An employee may undergo the process to become a licensed foster home if there is no conflict of interest that could result in preferential treatment concerning the placement and movement of children placed in the potential licensed foster/adoptive home; and no conflict of interest exists that could result in the employee's ability to influence the outcome of the dependency case for personal gain. If the employee seeking licensure is employed at the case management agency providing services to the family, the family is reassigned to a different case management agency.

**Adoptive parent**

An employee may be approved as an adoptive parent if there is no conflict of interest that could result in preferential treatment concerning the placement and movement of children placed in the potential adoptive home; and no conflict of interest exists that could result in the employee's ability to influence the outcome of the dependency case for personal gain. If the pre-adoptive applicant is an employee employed at the adoption agency, the family is reassigned to a different agency.

Pursuant to F.A.C 65C-16.005(n), Employees of the CBC, including subcontractor staff, will be considered as adoptive applicants. In situations where the employee has a close working relationship with the foster care or adoption staff in his or her local area or had such a relationship within the past two (2) years, completion of the applicant's home study process shall be conducted by a licensed child-placing adoption agency outside the local area. The CBC agency will decide if the adoption home study for the employee will be completed by the CBC agency or if the services of another agency will be sought. If the decision is to have the employee's adoption home study and subsequent placement handled by another agency, the CBC agency shall make the necessary arrangements with the chosen agency.

#### **Employee Requests to attend PRIDE training to become a Foster and/or Adoptive Parent**

Prior to enrolling in PRIDE training, the employee is required to notify their immediate supervisor and complete the Conflict of Interest (COI) form. The supervisor shall confirm the COI form has been submitted to the Human Resources Department. The Human Resources Director sends the COI form to the Ethics Committee for review and recommendation. The recommendation is then submitted to the FPoCF Executive Team for review to render final decision.

#### **Relative/ Non-Relative Caregiver/ Kinship caregiver**

An employee may undergo the process of becoming a relative/non-relative caregiver if there is an established personal relationship with the child(ren) and/or caregivers. An employee can become a relative/non-relative caregiver if there is no conflict of interest that could result in preferential treatment concerning the placement and movement of children placed in the caregiver's home; and no conflict of interest exists that could result in the employee's ability to influence the outcome of the dependency case for personal gain. Under no circumstances shall an employee serve as a non-relative placement for child(ren) not personally known to them.

#### **Employee Request to become a Relative/ Non-Relative Provider for a child personally known to them**

When an employee is interested in providing Relative/ Non-Relative Care to a child who is personally known to them, immediate notification to their immediate supervisor is required. The employee must cooperate with standard protocols for Home Study completion. The Home Study must be completed and provisionally approved prior to placement of the child with the employee. The employee is required to complete the COI form as soon as possible, but no later than the next business day. The supervisor shall confirm the COI form has been forwarded to the Human Resources Department. The Human Resources Director sends the COI form to the Ethics Committee for review and recommendation. The recommendation is then submitted to the FPoCF Executive Team for review to render final decision. The case is then transferred to another CMA (different from the CMA the employee is employed with) and the interested employee's FSFN and Mindshare access is removed from said case. The agency shall take any other necessary steps as warranted to avoid a perceived or potential conflict as warranted.

If an employee is interested in pursuing Level 1 Licensure, the care manager sends the request to the Senior Intake Specialist (lcpdata@brevardfp.org) for Out of County assignment.

If an employee is providing services to a child and becomes interested in fostering, adopting, or serving as a caregiver to said child, the employee is required to promptly complete a COI form and report this to their supervisor. The supervisor shall confirm the COI form has been forwarded to the Human Resources Director. The Human Resources Director will send the COI form to the



Ethics Committee for review and recommendation. The recommendation is then submitted to the FPoCF Executive Team for review to render final decision. After the COI request is approved, the employee may explore placement of the child. The case is then transferred to another CMA (different from the CMA the employee is employed with) and the interested employee's FSFN and Mindshare access is removed from said case. The agency shall take any other necessary steps as warranted to avoid a perceived or potential conflict as warranted.

BY DIRECTION OF THE PRESIDENT AND  
CHIEF EXECUTIVE OFFICER:

A handwritten signature in blue ink that reads "Philip J. ScarPELLI".

PHILIP J. SCARPELLI  
President and Chief Executive Officer  
Family Partnerships of Central Florida

APPROVAL DATE: 12/15/2025