



Introduction:

Thank you for the opportunity to comment on proposed changes to the USCIS forms impacting intercountry adoption. These comments are in response to the following public notice:

OMB Control Number: 1615-0028,

Agency: U.S. Citizenship and Immigration Services (USCIS)

Docket ID: USCIS-2008-0020

Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Petition To Classify Orphan as an Immediate Relative; Application for Advance Processing of an Orphan Petition; Supplement 1, Listing of an Adult Member of the Household; Supplement 2, Consent To Disclose Information. ID USCIS-2008-0020-0099.

About National Council For Adoption:

These comments are being submitted by the National Council For Adoption (NCFA), an organization passionately committed to the belief that every child deserves to thrive in a nurturing, permanent family. NCFA serves children, birth parents, adopted individuals, adoptive families, and adoption professionals. In addition, we work tirelessly to educate U.S. and foreign government officials and policymakers, members of the media, and all those in the general public with an interest in adoption. NCFA has been actively working on intercountry adoption policy issues for decades, including work to help implement the Hague Convention in the United States.

NCFA's Comments on Proposed Changes:

Proposed change to Instructions for I-600A

1. We suggest adding clarity regarding I-600A Part 3, question 6 so that applicants know the differences/merits of filing stateside vs. filing at a foreign consulate.
2. On page 10, the instructions indicate that two separate checks or money orders are required for the filing and biometric fees. This seems to be unnecessarily burdensome.

We suggest allowing applicants to submit just one check or one money order to pay for these services.

3. Also on page 10, the proposed changes include information about paying via credit card. NCFA welcomes this change in the instructions and supports the concept of more options and electronic options for prospective adoptive parents. We suggest adding more to the instructions here for users, instead of just sending them to a link for form G-1450.

Specifically, we suggest:

- a) Making it clear if they need to do two separate forms (one for biometrics, one for the filing fee) or if they can just do one form G-1450 to cover all expenses.
- b) Making it explicit how they submit G-1450 with the I-600A (e.g. included completed form G-1450 as supplemental documentation when mailing I-600A application to the USCIS Lockbox facility).

Changes to Form I-600A

In Part 10, Question 7b we suggest adding clarity to this to indicate if “does not extend” includes or does not include USCIS issuing a Request for Evidence (RFE) or Notice of Intent to Deny (NOID). If they do not, can clarity be given if in such situations, the Hague-accredited Primary Provider would then have responsibility of responding?

One suggested solution would be to eliminate the option of partial representation. This would be consistent with USCIS Form G28 which does not allow attorneys to limit their representation to just completing the I-600A application.

Changes to Instructions for Form I-600

1. We welcome the change regarding the validity of signatures in the general instructions and believe this will enable prospective adoptive families and USICS to utilize commonplace technology (e.g. scanning) while still ensuring the authenticity of the original signature (i.e. by requiring it to be a scan/photocopy of the original).
2. On page 7 of the proposed changes, under the section “Initial Evidence” under “1. Proof of Petitioner’s U.S. Citizenship” under point A. (5) we suggest clarifying that this does not require the passport to have 10 years of validity at time of displaying as evidence, but rather that it had 10 years of validity at the time of issuance. This could be clarified by adding the word “originally” between the words “passport” and “issued”.
3. In the WARNING section, please add “Primary Provider” so that they are listed in addition to Home Study Preparers and USCIS.

Addition of new Supplement 2, Consent to Disclose Information

We welcome the new addition of the Supplement 2 for forms I-600A/I-600 and hope it will allow USCIS and adoption services providers to communicate in a more efficient manner in their joint service to prospective adoptive families.