

Memorandum, May 14, 2020, Regarding OIRA Meeting, EO 12866, May 15, 2020 Concerning Department of State Proposed Regulations on International Adoption

We thank you very much for the opportunity to meet with you yesterday and express our concerns about the proposed Department of State Office of Children's Issues ("OCI") regulations concerning international adoption. We note that we are basing our comments on the withdrawn 2016 regulations and the brief discussions we have heard with reference to new regulations.

Since 2002 we have supported ethical, transparent, and accountable international adoption based on the belief that international adoption must remain an available option for unparented children. We would welcome new regulations that meet this goal. We believe that the most expeditious method of achieving this goal is for OCI to discuss the substance of any proposed regulations with stakeholders **before** announcing them. Such discussions were established OCI procedure prior to 2014 but were done neither in 2016 nor in 2018-2019 or now.

We would like to emphasize the following issues:

1. We agree that new regulations are necessary to update the existing regulations which were promulgated well over decade ago, in a vastly different environment.
2. We would like to see enhanced training for pre-adoptive parents ("PAP"s) and have long worked with DOS on this issue. We believe that the Covid-19 crisis has improved the ability and comfort level of PAPs and Adoption Service Providers ("ASP"s) with interactive online training such as Zoom and On24. Utilizing virtual technology which monitors for attendance and full participation is an option we now can embrace for both pre-adoption training and post-adoption support for Adoptive Parents ("AP"s). We would ask that enhanced training and support use these methods which will allow far flung PAPs to receive state of the art training for the specific child they are adopting and support thereafter. This hybrid training would also allow adult adoptees to participate in training and support, which will help PAPs/APs and ASPs learn from the experiences of adult adoptees and serve as a bridge between adult adoptees and the adoption community as it exists today.
3. We await the regulations on relative adoptions, which we were told two years ago would be ready for the notice and comment period "shortly." We still have not seen them.
4. We would like to see that any regulations on soft referrals reflect the needs of potential adoptive parents for the maximum amount of information at the earliest possible moment, consistent with U.S. and international law, so that potential adoptive parents can make informed decisions about their ability to parent the particular child they are contemplating adopting.
5. The Covid-19 crisis has gravely affected APs who are stranded in country with full and final adoptions but who lack the necessary paperwork to return home. We would like to see DOS and USCIS utilize virtual technology to serve these citizen parents and soon to be citizen children as well as enhanced communication between DOS and USCIS on these issues.