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WASHINGTON, DC 20510

February 14, 2018

The Honorable Carl Risch Assistant Secretary for Consular Affairs Bureau of Consular Affairs 2201 C Street NW Washington, D.C. 20520-0099

Dear Mr. Risch:

Our office has become increasingly concerned with the direction the State Department has taken regarding intercountry adoption. As you are aware, the Office of Children's Issues recently designated the Intercountry Adoption Accreditation and Maintenance Entity, Inc. (IAAME) as the sole accrediting entity for intercountry adoptions. This was done despite objections from the adoption community that the designation did not meet the certain requirements. To that end, adoption agencies have recently filed a complaint with the State Department's Inspector General's Office to determine if, in fact, IAAME qualifies as an accrediting entity. That investigation is underway.

On February 1, 2018, the State Department issued IAAME's approved fee schedule. Since that announcement, many adoption service providers across the country have expressed their deep concerns with the updated fees. In some instances, service providers have claimed an increase of over 1000 percent. These dramatic increases are troubling, and, sadly, some providers have stated they will be forced to close their doors due to these increased fees. At a time when intercountry adoption is decreasing, these added fees are unacceptable.

On top of these increases, adoption service providers are forced to begin collecting maintenance and oversight fees that will be paid to IAAME on February 15, 2018. This is not right. Not only does this small window of time not allow for adjustments to budgets for increased costs, but IAAME is in no position to begin accepting these fees. For example, IAAME has not provided contracts, accreditation policies, or grievance procedures to providers.

The adoption community wants intercountry adoptions and the U.S. accreditation process for providers to be successful. Because it is clear that IAAME is not prepared to become the sole accrediting entity for intercountry adoptions in the United States, we are calling upon the State Department to delay the collection of fees and return the oversight and accreditation process to the Council on Accreditation (COA) through the end of this year. COA has expressed their willingness to continue these operations, and this delay will allow service providers the appropriate amount of time to adjust to the new fee schedule.

Sincerely yours.

Roger F