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AAi
Adoptions & Aid International

To: U. S. Department of State
CA/ OCS/PRI
Adoption Regulations Docket Room
SA-29
2201 C Street , NW
Washington, D.C. 20520
Electronically emailed to : adoptionsregs@state.gov

Re: State/ AR-01/ 96

Adoptions & Aid International Comments on 22 CFR Parts 96
Hague Convention on Intercountry Adoption; Intercountry Adoption Act of 2000;
Accreditation of Agencies; Approval of Persons; Proposed Rules

Table of Contents — Starting on Page Number

1. Profile of Adoptions & Aid International 2

2. Summary of AAi Concerns 3

3. Comments and Recommendations on the Regulations 3

a. Subpart C – 96.13 3
b. Subpart F – 96.30 4
c. Subpart F – 96.33 4
d. Subpart F – 96.37 5
e. Subpart F – 96.38 7
f. Subpart F – 96.39 7
g. Subpart F – 96.40 8
h. Subpart F – 96.48 9

4. Closing Remarks 9

5. Appendixes

Profile of Adoptions & Aid International

Adoptions & Aid International (AAi) is a non-profit charitable child placing agency licensed since 1999 by the State of Texas. AAi currently provides adoption services including home study, adoption education, placement and post-placement services to United States citizens in the US and abroad. Our current intercountry programs include The Russian Federation, The Republic of Georgia, Ukraine and Armenia. AAi provides humanitarian aid to orphanages through our programs. AAi is a member of Joint Council on International Children's Services, the American Adoption Congress, Families for Russian and Ukrainian Adoptions and the International Adoption Consortium.

In 2003, we will complete approximately 50 international adoptions.

AAi Response to the Hague Convention

Adoptions & Aid International firmly believes that children throughout the world deserve permanency in a family environment. AAi believes children should remain with their birth family or in adoptive placements in their native country wherever possible. When this is not possible, AAi advocates for the placement of children through international adoption.

AAi considers the Hague Convention on Intercountry Adoption and the Intercountry Adoption Act of 2000 a vital aspect to protecting children from exploitation, child trafficking, and other violations of basic human rights.

AAi looks forward to continuing our work in improving the lives of children through international adoption and we appreciate the opportunity to submit our views and comments on the proposed regulations.

Summary of AAi Concerns

Adoptions & Aid International would like to express concerns with the following areas:

- Insurance and budget requirements (96.33)
- Credentials required of staff (96.37)
- Training requirements (96.38)
- State licensing requirements regarding placements out of state (96.30)
- Blanket waivers (96.39)
- Fee requirements (96.40)
- Entities that are exempt from accreditation (96.13)
- Preparation/ Training requirements of parents (96.48)

Each of these areas is discussed in detail in the next section.

Comments and Recommendations on the Regulations

Section 96.13 Activities that do not require accreditation, approval or supervision.

- **96.13 (a)** Home studies and Child Background studies. A social work professional or organizations that is performing a home study on the prospective adoptive parents or a child background study (including any reports or updates) in connection with a Convention adoption but is not providing any other adoption service in the case is an "exempted provider". Exempted providers do not have to be accredited, temporarily accredited, approved, or operates as a supervised provider. The home study or child background study prepared by an exempted provider must be submitted to an accredited agency or temporarily accredited agency, not an approved person, for review and approval. An accredited agency must approve an exempted provider's home study in accordance with 96.47 (c) and an exempted providers child background study in accordance with 96.35 (b).

There are several problems with this "exemption" for homestudy providers. First, as the regulations are written a home study provider does not need to be accredited, temporarily accredited, or a supervised provider. As a result, the home study provider will not be mandated to follow the credentialing requirements for home study preparers (education and experience) yet the regulation dictate that an accredited agency approves the home study. This puts the accredited agency at risk of their own accreditation by not having homestudies that are prepared by qualified preparers. Secondly, as the regulations are written in respect to insurance and risk of providing service through providers, this creates an additional level of risk since the accredited agency often cannot control whom a client chooses to use as a home study preparer and whether that provider offers a low

level of risk by being qualified to prepare home studies through the regulations. Lastly, many foreign countries require that the home study agency make a written commitment to complete the post-placement. There is potential for problems, including denial of adoption, if the foreign country requires the post-placements to be done by the home study agency.

> **Recommendation:** This section should be stricken from the regulations. Homestudy and Child background study providers should be required to be at minimum a supervised provider.

96.30 State Licensing

- **96.30 (c)** If it provides adoption services in a State in which it is not itself licensed or authorized to provide such services, the agency or person does so only through agencies, persons or other entities that are licensed or authorized by the State to provide adoption services in that State.

This requirement addresses an agency, person or other entity that will be providing adoption services in the placing State. However, it does not address the need for the licensed agency within the State to be an approved supervised provider or accredited agency.

Further, since the licensed agency in the placing State may not be the primary provider, the requirement should read that the placing agency works "in cooperation with" instead of "only through" the licensed agency in the placing State.

> **Recommendation:** If it provides adoption services in a State in which it is not itself licensed or authorized to provide such services, the agency or person does so **in cooperation with** agencies, persons or other entities that are licensed or authorized by the State **and are accredited or an approved supervised provider to provide adoption services in that State.**

96.33 Budget, Audit, Insurance and Risk Assessment Requirements

- **96.33 (b)** The agency's or person's finances are subject to independent annual audits.

An independent audit may be cost prohibitive, substantially raising the cost of service to clients. This audit may be completed competently by the accrediting entity when they review the agency's financial statements, balance sheets, etc during the initial application and at each review.

> **Recommendation:** The agency's or person's finances are subject to audit **by the accrediting entity at time of initial application and reviews, unless the accrediting entity requests an independent audit.**

- **96.33 (e)** The agency's or person's balance sheets show that it operates on a sound financial basis and generally maintains sufficient cash reserves or other financial resources to meet its operating expenses for three months, taking into account its projected volume of cases.

This requirement will be difficult for many agencies to accomplish as the adoption industry is based on the cooperation of foreign countries at all times. Given that fees are related to services, this regulation assumes that adoptions will take place at all times thereby enabling agencies to collect fees. It does not account for the closure/suspension of adoptions in foreign countries or other acts that might deter families from adopting at any given time (acts of terrorism, war, etc).

> **Recommendation:** The agency's or person's balance sheets show that it operates on a sound financial basis and generally maintains sufficient cash reserves or other financial resources to meet its operating expenses for **two** months, taking into account its projected volume of cases, **closures and suspensions of adoption programs in foreign countries and other acts that might deter adoptions from taking place.**

- **96.33 (h)** The agency or person maintains insurance in amounts reasonably related to its exposure to risk, including the risks of providing services through supervised providers, but in no case in an mount less than $1,000,000 per occurrence.

Given the nature of adoption, it is extremely expensive for the agency itself to be insured, let alone be responsible for insurance coverage for the risk of using supervised providers. AAi has received an estimate from our insurance carrier with a quote to be at minimum $20,000.00 per year (see appendix A). This estimate does not take into account coverage for the risk of other providers associated with the adoption. For a small agency, the cost of insurance in excess of $20,000 per year as well as the cost of accreditation will render many agencies inoperable.

In Texas, State law requires child-placing agencies to carry $300,000.00 worth of liability insurance (see appendix B).

> **Recommendation:** The agency or person maintains insurance in amounts reasonably related to its exposure to risk, but in no case in an mount less than **$300,000** per occurrence.

96.37 Education and Experience Requirements for Social Service Personnel

- **96.37 (f)** Home studies. The agency's or person's employees who conduct home studies: (1) have a minimum of a master's degree from an accredited program of social work education or a master's degree in a related human service field, including, but not limited to, psychology, psychiatry, psychiatric nursing, counseling, rehabilitation counseling, or pastoral counseling; (2) are authorized to complete a home study under the laws of the State of the child's proposed residence…

This requirement unduly restricts agencies from hiring competent, experienced professionals with a lesser degree. In many states, there are shortages of social workers. Since the field of social work is so vast, there is even a shortage of social workers that want to work or specialize in the field of adoption. This requirement does not mention any required experience in the field of adoption. A Master's degree alone does not make one capable of conducting a quality home study for prospective adoptive parents.

In Texas, child placing agency regulations provide a variety of different levels of education in combination with experience in providing home studies. Please see Appendix C for details of requirements for the State of Texas.

Further, this requirement severely limits prospective adoptive parents in making choices regarding home study providers.

In addition, this requirement is not stipulated for non-supervisory employees that are expected to make clinical judgments. Also, this requirement does not seem to apply to home study agencies that are exempt.

Home study providers, also, should be authorized to complete a study under the laws of the State in which the agency is licensed, not the State of the child's proposed residence. This is an important distinction for prospective adoptive families that may live abroad whereby a traveling social worker completes the study but the study is then approved (per BCIS requirements) by a licensed agency and supervisor of the agency that is qualified to review home studies.

> **Recommendation:** Home studies. The agency's or person's employees who conduct home studies: (1) have a master's degree from an accredited program of social work education or a master's degree in a related human service field **and experience in family and children's services, adoption, international adoption or a bachelor's degree from an accredited program of social work education or a bachelor's in a related human service field and significant experience in family and children's services, adoption, international adoption.** (2) Are authorized to complete a home study under the laws of the **State in which the agency is licensed.**
>
> If this recommendation is not adopted, then we request that the same "grandfather" clause as seen in 96.37 (d) (3) be added to the requirements for Home study providers.

96.38 – Training requirements for social service personnel

- **96.38 (c)** The agency or person ensures that employees who provide adoptions related social services that involve the application of clinical skills and judgment also receive, in addition to the orientation described in paragraphs (a) and (b) of this section, no less than 20 hours of training each year, or more if required by State law, on current and emerging adoption practice issues through participation in seminars, conferences and other similar programs.

The number of yearly training hours required for agency personnel, above and beyond the initial training, should not be specified. Further, it should not be a requirement that the training only consist of emerging adoption practice issues. Instead, agency personnel should be required to fulfill whatever training hours are required by the social work licensing board in their state or the state entity responsible for licensing agencies. Furthermore, many states require the training hours to be delivered by approved providers. This sometimes severely limits the types of training offered. Trainings in the adoption field are not as common as general social work trainings, about child development, family dynamics, etc. All of which are not related to emerging adoption issues but are needed in dealing with adoptive families. Requiring an additional 20 hours of training in emerging adoption related topics only would cause many social workers to be required to complete essentially two sets of training requirements in addition to the orientation.

The Texas State Board of Social Worker Examiners requires 15 hours of training by approved providers in any topic related to social work. The State licensing entity for child placing agencies requires 20-30 hours of training in areas related to the employees job description.

> **Recommendation:** The agency or person ensures that employees who provide adoptions related social services, that involve the application of clinical skills and judgment, also receive, in addition to the orientation described in paragraphs (a) and (b) of this section, **training each year as required by State law, by the social work licensing board in their state or the state entity responsible for licensing agencies, on current and emerging adoption practice issues; relevant child, adolescent, family issues; or other relevant social work training, through participation in seminars, conferences and other similar programs.**

In section C, we suggest that you clarify whether or not there is going to be a requirement for training seminars and conferences to be approved and/or accredited. If so, then please clarify which governing body will be approving or accrediting the trainings.

96.39 Information Disclosure and Quality Control Practices

- **96.39 (d)** The agency or person does not require a client or prospective client to sign a blanket waiver of liability in connection with the provision of adoption services in Convention cases.

It is standard business practice to outline risks associated with any venture, especially those involving foreign countries, and require a client to sign an acknowledgement that the business is not responsible for actions beyond their scope. It is unrealistic to expect an agency not to explain the risks associated with international adoption and impart some risk onto the prospective parents. Further, if the clients are not required to sign a waiver of liability then this will make obtaining insurance almost impossible. Insurance companies expect that the client bear responsibility as to whether they choose to adopt a particular child given the risks associated with adoption.

It is impossible for an agency in the US to monitor doctors, government officials and orphanage directors from foreign countries in order to ensure that those parties are not imposing risk on the Convention adoption. For instance, when an agency receives a medical report about a child from Russia, we must accept in good faith that the lab findings are correct, that the blood sample was not accidentally mislabeled in the lab, that the immunizations were given using the correct amount of serum that was not expired. If any of those situations were to happen, the agency is not the appropriate target for responsibility. The responsibility lies with the doctors, orphanage staff, and government officials, or the party directly responsible for the mistake. It is naïve to believe that by imposing this regulation that the agency has the power, resources or influence to ensure other entities on the periphery of the adoption are never making mistakes. Since this regulation does not allow the agency to have any protection against wrong doings from other entities, it will significantly drive up the cost of adoption.

> **Recommendation:** The agency or person **may** require a client or prospective client to sign a blanket waiver of liability in connection with the provision of adoption services in Convention cases **after thoroughly explaining the various risks involved with international adoption**

96.40 Fee Policies and Procedures

- **96.40 (f) (3)** It provides written receipts to the prospective adoptive parents for fees and expenses paid in the Convention country and retains copies of such receipts.

Due to cultural differences in various countries, it is not always possible to obtain receipts for services rendered in the foreign country. Agencies should only be expected to provide receipts for fees the agency directly collects.

> **Recommendation:** It provides written receipts to the adoptive parents for fees and expenses **collected directly by the agency or person** in the Convention country and retains copies of such receipts.

96.48 Preparation and training of prospective adoptive parent(s) in incoming cases

AAi supports the requirement for mandatory training in adoption related topics for all prospective adoptive parents.

Recommendation: A segment on parenting skills training should be added to the adoptive parent curriculum requirements

Closing Remarks

Adoptions & Aid International supports the tenets behind the Hague Convention on Intercountry Adoptions and the Intercountry Adoption Act of 2000. It is important to protect the rights of children throughout the world however in doing so, we must be careful not to impede the adoption process to the point of a significant reduction of adoptions. While the majority of the proposed regulations are on target in protecting children from exploitation and trafficking, many other regulations will render adoption agencies unable to continue providing important adoption services. This will result in fewer agencies and fewer choices for prospective parents. Most importantly, it will result in far fewer adoptions.

AAi respectfully requests a thorough review of our recommendations by the United States Department of State. We would also respectfully request another review period for public comment before these regulations are submitted as final and entered into force.

Adoptions & Aid International

Appendix A
Professional Liability Insurance Estimate

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South Towers
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December 10, 2003

Adoptions and Aid International
Ms. Amanda Way, Director
23995 Bat Cave Road, Suite 130
San Antonio, Texas 78266

via overnight courier

Dear Ms. Way,

In response to your inquiry regarding the availability and approximate cost of Professional Liability coverage for your adoption agency, we have spoken with several companies and have compiled the following information:

1. Specific adoption agency underwriting factors will comprise a portion of the risk assessment. These include, but are not limited to:
   a. The number of adoptions attempted and completed during a typical year, and the yearly trend of these numbers;
   b. Whether children are kept in residence within the agency;
   c. The professional depth of the agencies (in number of personnel and qualification);
   d. The existence of and adherence to standard operating procedures;
   e. The financial strength of the agency, both current and the five-year trend;
   f. State experience regarding complaints with the agency or their professional personnel; and
   g. Claims filed by parties over the previous years against the agency.
2. For smaller-sized agencies in Texas, the cost of a $1 million per occurrence, $1 million aggregate policy could be in the $20,000 range, plus or minus a few thousand dollars, depending on the company evaluation of the underwriting factors considered.

It is important to emphasize that each application is carefully evaluated prior to the provision of a proposal for professional liability coverage, and that specific agency information will be the basis of such proposals.

Should you have additional questions about this matter, please do not hesitate to contact us.

Very truly yours,

John R. Lloyd

Appendix B
Texas Regulation regarding Liability Insurance
from the Human Resources Code as Amended, 75th Texas Legislature

(b) The notice required by Subsection (a)(2) must be published at least 10 days before the date of the public hearing required by Subsection (a)(1) and must include:

(1) the name and address of the applicant;

(2) the address at which the child-care services are proposed to be provided;

(3) the date, time, and location of the public hearing;

(4) the name, address, and telephone number of the department as the licensing authority; and

(5) a statement informing the public that a person may submit written comments to the department concerning the application instead of or in addition to appearing at the public hearing.

(c) The department shall require a representative of the department to attend the public hearing in an official capacity for the purpose of receiving public comments on the application.

(d) Before issuing a license or certificate described by Subsection (a), the department shall consider:

(1) the amount of local resources available to support children proposed to be served by the applicant;

(2) the impact of the proposed child-care services on the ratio in the local school district of students enrolled in a special education program to students enrolled in a regular education program and the effect, if any, on the children proposed to be served by the applicant; and

(3) the impact of the proposed child-care services on the community and the effect on opportunities for social interaction for the children proposed to be served by the applicant.

(e) The department may deny the application if the department determines that:

(1) the community has insufficient resources to support children proposed to be served by the applicant;

(2) granting the application would significantly increase the ratio in the local school district of students enrolled in a special education program to students enrolled in a regular education program and the increase would adversely affect the children proposed to be served by the applicant; or

(3) granting the application would have a significant adverse impact on the community and would limit opportunities for social interaction for the children proposed to be served by the applicant.

(f) A child-placing agency that proposes to verify an agency home or agency group home that is located in a county with a population of less than 300,000 that provides child care for 24 hours a day at a location other than the actual residence of a child's primary caretaker shall:

(1) comply with the notice and hearing requirements imposed by Subsections (a) and (b); and

(2) after conducting the required public hearing, provide the department with information relating to the considerations specified in Subsection (d).

(g) The department may prohibit the child-placing agency from verifying the proposed agency home or agency group home on the same grounds that the department may deny an application under Subsection (e).

§ 42.047. CONSULTATIONS

(a) The department shall offer consultation to potential applicants, applicants, and license, listing, registration, and certification holders about meeting and maintaining standards for licensing, listing, registration, and certification and achieving programs of excellence in child care.

(b) The department shall offer consultation to prospective and actual users of facilities or homes.

§ 42.048. LICENSING

(a) The department shall issue a license after determining that an applicant has satisfied all requirements.

(b) When issuing a license, the department may impose restrictions on a facility, including but not limited to the number of children to be served and the type of children to be served.

(c) The department may grant a variance of an individual standard set forth in the applicable standards for good and just cause.

(d) A license holder must display a license issued under this chapter in a prominent place at the facility.

(e) A license issued under this chapter is not transferable and applies only to the operator and facility location stated in the license application. A change in location or ownership automatically revokes a license.

(f) A license must be issued if the department determines that a facility meets all requirements. The evaluation shall be based on one or more visits to the facility and a review of required forms and records. A license is valid until revoked or surrendered.

§ 42.049. LIABILITY INSURANCE REQUIRED

(a) A license holder shall maintain liability insurance coverage in the amount of $300,000 for each occurrence of negligence. An insurance policy or contract required under this section must cover injury to a child that occurs while the child is on the premises of the license holder or in the care of the license holder.

(b) A license holder shall file with the department a certificate or other evidence from an insurance company showing that the license holder has an unexpired and uncancelled insurance policy or contract that meets the requirements of this section.

(c) Should the license holder for financial reasons or for lack of availability of an underwriter willing to issue a policy be unable to secure the insurance required under Subsection (a) or should the policy limits be exhausted, the license holder shall notify the parent or a person standing in parental relationship to each child for whom the license holder provides care a written notice that the liability coverage is not provided and there will not be a ground for suspension or revocation of the license holder's license under this chapter. The license holder shall also notify the department that the coverage is not provided and provide the reason for same. In no case shall the inability to secure coverage serve to indemnify the license holder for damages due to negligence.

(d) The insurance policy or contract shall be maintained at all times in an amount as required by this section. Failure by a license holder to renew the policy or contract or to maintain the policy or contract in the required amount is a ground for suspension or revocation of the license holder's license under this chapter.

(e) This section does not apply to a group day-care home or a listed or registered family home.

§ 42.050. LICENSE RENEWAL

REPEAL

<Without reference to the amendment of this section by Acts 1997, 75th Leg., ch. 1063, § 7, Acts 1997, 75th Leg., ch. 1022, § 104(b) repealed this section effective September 1, 1997.>

(a) A license holder may apply for a new license in compliance with the requirements of this chapter and the rules promulgated by the department.

(b) The application for a new license must be completed and decided on by the department before the expiration of the license under which a facility is operating.

(c) The department shall evaluate the application for a new license to determine if all licensing requirements are met. The eval-

Appendix C
Minimum Standards for Homestudy Preparers in the State of Texas
from the Texas Department of Protective and Regulatory Services

APPENDIX P: PRE-ADOPTIVE HOME SCREENING

§745.11. What words must I know to understand this chapter?

The following words have the following meanings when used in this chapter:

(1) I, my, you, and your - An applicant or permit holder, unless otherwise stated.

(2) We, us, our, and Licensing - The Licensing Division of the Texas Department of Protective and Regulatory Services (PRS).

§745.4023. What is a pre-adoptive home screening?

A pre-adoptive home screening is a written evaluation, prior to the placement of a child in an adoptive home, of:

(1) The prospective adoptive parent(s);

(2) Their family; and

(3) Their environment in relation to its ability to meet the needs of a child and, if a child has been identified for adoption, the needs of that particular child.

§745.4027. What qualifications must I meet to review and approve a foster home screening, a pre-adoptive home screening, or a post-placement adoptive report?

You must qualify as a level 1 child-placing staff by meeting one of the following options:

Options to Qualify As a Level 1 Child-Placing Staff:	Must you have a license in social work or a license in another human services field?	At a minimum, you must have the following educational qualifications:	At a minimum, you must have the following professional qualifications, in addition to any field placement practicum:
Option 1	Yes	A. A master's degree from an accredited college or university in social work or other human services field; and B. Nine credit hours in graduate level courses that focus on family and individual function and interaction.	Two years of documented full-time experience in a social services or human services agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.
Option 2	No	A. A master's degree from an accredited college or university; and B. Nine credit hours in graduate level courses that focus on family and individual function and interaction.	Three years of documented full-time experience in a social services or human services agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.

Options to Qualify As a Level 1 Child-Placing Staff:	Must you have a license in social work or a license in another human services field?	At a minimum, you must have the following educational qualifications:	At a minimum, you must have the following professional qualifications, in addition to any field placement practicum:
Option 3	Yes	A. A bachelor's degree from an accredited college or university in social work or other human services field; and B. Nine credit hours in undergraduate level courses that focus on family and individual function and interaction.	Four years of documented full-time experience in a social services or human services agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.
Option 4	No	A. A bachelor's degree from an accredited college or university; and B. Nine credit hours in undergraduate level courses that focus on family and individual function and interaction.	Five years of documented full-time experience in a social services or human services agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.

§745.4029. May someone who does not meet minimum qualifications help level 1 child-placing staff conduct a foster home screening, a pre-adoptive home screening, or a post-placement adoptive report?

If you are conducting a foster home screening, a pre-adoptive home screening, or a post-placement adoptive report, someone may help you if they meet the following qualifications:

Options For Assisting With a Screening or Report:	At a minimum, the person must have the following educational qualifications:	At a minimum, the person must have the following professional qualifications:
Option 1	A. A master's degree from an accredited college or university in social work or other human services field; and B. Nine credit hours in graduate level courses that focus on family and individual function and interaction.	None.
Option 2	A master's degree from an accredited college or university.	Two years of documented full-time experience in a child-placing agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.
Option 3	A bachelor's degree from an accredited college or university in social work or other human services field.	Two years of documented full-time experience in a child-placing agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.

Options For Assisting With a Screening or Report:	At a minimum, the person must have the following educational qualifications:	At a minimum, the person must have the following professional qualifications:
Option 4	A bachelor's degree from an accredited college or university.	Three years of documented full-time experience in a child-placing agency under the direct supervision of a person fully qualified to conduct level 1 child-placing activities.
Option 5	A bachelor's degree from an accredited college or university.	Direct supervision from a level 1 child-placing staff.

§745.4031. What must occur if another person reviews and approves a portion of the foster home screening, pre-adoptive home screening, or post-placement adoptive report?

(a) All people involved in interviewing, studying, reviewing, and approving the case must have all relevant information and specific directions regarding the case.

(b) Each person responsible for reviewing and approving any portion of a foster home screening, pre-adoptive home screening, or post-placement adoptive report must qualify as a level 1 child-placing staff and be accountable for the finalized home screening or adoptive report (See §745.4027 of this title (relating to What qualifications must I meet to review and approve a foster home screening, a pre-adoptive home screening, or a post-placement adoptive report?)).

§745.4033. Whom must I interview when conducting a foster home screening, a pre-adoptive home screening, or a post-placement adoptive report?

(a) Interviews for a foster home screening, a pre-adoptive home screening, or post-placement adoptive report for family applicants may be conducted in one visit and must include:

(1) Individual interviews with each prospective foster or adoptive parent;

(2) Individual interviews with each child three years or older living in the home and any other person living full time with the family;

(3) A joint interview with the prospective foster or adoptive parents; and

(4) A family group interview with family members living in the home.

(b) Interviews for a foster home screening and a pre-adoptive home screening for family applicants must also include any minor child 12 years old or older or adult child of the prospective foster or adoptive parents not living in the home. These interviews may be conducted by telephone, in person, or by letter.