From: Diane Reynolds [d.m.reynolds@verizon.net]

Sent: Tuesday, September 23, 2003 10:31 AM

To: adoptionregs@state.gov

Subject: Comments: REGULATIONS FOR INTERCOUNTRY ADOPTION

Dear Congressman Delahunt, et al.:

Bravo !, We are a Massachusetts family that has benefited greatly from the Congressman's work on international adoption. Both of our sons were automatically citizens of the USA upon arriving from Russia.

My concern is the current regulalations may inadvertently negatively effect US families that adopt from foreign countries working directly with the foreign government WITHOUT a US Adoption Agency. In Russia in particular, US families are required use a US adoption agency accredited by the Russian government for post-adoption reporting. However, these US adoption agencies charge families tens of thousands of dollars for their children placement services. Many, many more children would be adopted if more families could afford these high costs. In addition, many families prefer not to work with US adoption agencies because the agencies will not open their books to show where the money the families pay is going. The families never seem to get an answer to their question "where does this money labeled 'foreign fee' go?" Thus, some families highly suspect unethical practices are taking place and want no part of this.

There are a small number of families (compared to agency-assisted adoptions) that choose to work directly with the foreign governments to adopt a child, bypassing the high-fee US adoption agencies. These families must have BCIS approval as well as state-level approved homestudy to adopt. However, for Russian adoptions, US adoption agencies already engage in some questionable business practices. My fear is they will continue to monopolize adoptions from foreign countries and continue to price gouge US families wishing to adopt from Russia.

Currently, about 60 US adoption agencies are accredited by the Russian government to do adoptions in Russia. If a family wishes to bypass these US adoption agencies due to financial or ethical concerns, these US adoption agencies refuse to work with independent families. These families need the agencies for the post-adoption reports to be done for Russian government. For this service where the US adoption agency simply agrees to "oversee" the post-placement reports done by the family's homestudy agency, the agencies charge families fees in excess of $5,000. This is not for child-placement services, just for agency to say they will "oversee" the post-adoption follow up reports. The agency does no work here. They simply forward the post-adoption reports written by family's homestudy agency to Russia. I think you would agree, if a family does not need full child-placement services from an adoption agency, just a letter of commitment, the fee of $5000 is very close to price gouging!

In a similar fashion, if a family chooses to bypass the US adoption agency and work directly with the foreign government, however the family needs this commitment letter, the agency will simply refuse to work with these families. Refusing services to independent family amounts to monopolistic practices.

Please, with the new Intercountry Adoption Act, please ensure there are provisions for families who choose to bypass US adoption agencies for child-placement services and choose to work directly with foreign government instead.

Thank you.

Diane Reynolds
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