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Intercountry Adoption Accreditation and Maintenance Entity, Inc.

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March 23, 2020

IAAME Updated Messaging COVID-19 Pandemic Crisis

IAAME is cognizant of the effects the COVID-19 global pandemic is having on Adoption Service Providers (ASPs). For this reason, IAAME is temporarily revising some accreditation/approval and monitoring and oversight activities practices and guideline during this crisis.

Monitoring and Oversight

Semi-Annual Report of Complaints (SARC):

The SARC for October 1, 2019 through March 31, 2020 is now due on July 15, 2020. This due date will be revisited if present conditions persist.

Annual Attestation:

The Annual Attestation covering calendar year 2019 is now due on July 15, 2020. This due date will be revisited if present conditions persist.

Complaints:

Existing requests for evidence are extended to June 30, 2020, except when there is a child safety issue. During the weeks of March 23, 2020 to April 3, 2020, IAAME will follow-up with ASPs whose complaints involve child safety issues to discuss possible adjustments in due dates.

Adverse Action:

ASPs that have open existing adverse actions with a deadline for evidence to be submitted or actions are extended to June 30, 2020. This due date will be revisited if present conditions persist.

Self-Reports:

IAAME may continue to process self-reports already submitted in the portal, and any request for information or submission of additional evidence will not be due until June 30, 2020. This due date will be revisited if present conditions persist.

IAAME will not take adverse action related to timeframes for submission of self-reports until at least until July 30, 2020. IAAME still encourages Adoption Service Providers to submit self-reports during this timeframe if practicable.

Two Months Operating Expenses

To assess Adoption Service Providers' compliance with 22 CFR 96.33 (e), IAAME will determine compliance based on the ASP's finances prior to March 1, 2020. It will be a retrospective assessment of the ASP. For 2020, ASPs will need to show that they were in compliance with the standard prior to March 1. ASPs do not need to demonstrate that they maintained those reserves after March 1 2020 due to the National Emergency. In consultation with the



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Department, IAAME will explore ways it may be flexible in its assessment of two months operating expenses in the event the crisis or its effects extend beyond 2020.

Accreditation and Approval

Extensions of Accreditation/Approval:

Recognizing that there may be delays in the accreditation/approval review process, IAAME, during the weeks of March 23, 2020 to April 3, 2020, will be in individual contact with adoption service providers whose on-site review is scheduled to occur between March 23, 2020 and June 30, 2020, and whom IAAME has determined is eligible, according to the requirements outlined in CFR 96.60 (b), for an extension of accreditation or approval. IAAME will offer these adoption service providers the option of requesting an extension of accreditation or approval. Extension fees for this purpose will be waived. IAAME will consider verbal or email confirmation as the written request for extension, should an adoption service provider choose this option. IAAME will process and approve the request and accordingly submit to the adoption service provider a letter and certificate evidencing the new accreditation/approval expiration date. For ASPs with an on-site review scheduled between March 23, 2020 and June 30, 2020, if an ASP believes it is eligible for an extension and does not hear from IAAME regarding an extension, the ASP may contact their assigned IAAME Analyst to discuss questions they have related to extensions and the ASP's eligibility for an extension.

On-Site Reviews:

IAAME is cancelling staff travel for physical on-site reviews through June 30, 2020. However, we are making every effort to maintain the existing timeframe for the review to be completed as a desk review with the physical on-site review occurring at a later date in compliance with 22 CFR 96.24 (c). IAAME, during the time between March 23, 2020 to April 3, 2020, will be in direct communication with those adoption service providers with on-site reviews scheduled to occur within the next 90 days. IAAME will contact each of these adoption service providers if alternative arrangements are to be made. ASPs who do not hear from IAAME are encouraged to contact their assigned IAAME Analyst to discuss questions they may have.

See information previously posted to the IAAME Newsfeed on March 17, 2020 for information regarding required evidence and on-site review travel expenses.

On-Site Review Travel Expenses Additional Information:

In recognition of current exigent circumstances and the unknown impact on ASPs' and IAAME's budget, IAAME is working to reduce the travel expenses related to on-site reviews. Conducting a majority of the on-site review as a desk review will reduce the amount of evidence to be reviewed on-site and as such IAAME is looking to reduce the number of reviewers and days required to be on-site. Given the unknown effects of the COVID-19 emergency on the budgets of the ASPs and IAAME it is best to work together to limit travel as appropriate.



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Part B Submission:

For ASPs with an Application Part B due between April and June 2020, the submission of the Application Part B will now be due no later than 30 calendar days prior to the date of the ASP's scheduled on-site review date. There may be case by case situations in which this process would need to be altered. If such an event occurs IAAME will be in direct contact with the ASP to craft alternate plans of action.

Accreditation Fees:

Throughout this crisis IAAME will be maintaining flexibility with respect to required accreditation or approval renewal fees. ASPs will have the option to pay accreditation/approval renewal fees in installments. Such installments will be allowed up and until the point of expiration. Once the initial installment is paid, IAAME will provide the ASP with access to their Application Part B for completion. IAAME however will not finalize an accreditation, approval or renewal until the total accreditation or approval fee has been paid. If ASPs would like to exercise this option, they should contact their assigned IAAME Analyst to determine specific payments and due dates.

Adverse Action Related to Accreditation and Approval Renewal Process:

Agencies or persons currently with an open adverse action related to an Application Part B must submit all required evidence by the date required in the Notice of Deficiencies. IAAME may, on a case-by-case basis, be able to grant extensions of due dates. However, Adoption Service Providers must be cognizant that the accreditation and approval renewal process may not extend beyond the ASP's current date of expiration.

Child Safety and Risk to Children

If something is determined to be an immediate child safety-related risk, IAAME is required as the accrediting entity to take action. IAAME will work directly with ASPs on a case-by-case basis to address these issues, if they arise.

Ongoing Monitoring of the Plan of Action

Every 30 days IAAME will reassess the effects of COVID-19 on its daily operations, including the plan laid out above. As needed, IAAME will make adjustments to the plan and will specifically focus on the activities scheduled to occur in the following 90-day period. If plans are to be revised, IAAME will send updated communication to all Adoption Service Providers via a Portal Newsfeed post.