



## Frequently Asked Questions Fee Schedule

### 1. **Background on Intercountry Adoption Accreditation and Maintenance Entity, Inc. (IAAME)**

#### A. **When was IAAME designated as an accrediting entity (AE)?**

The Department of State (the Department) designated IAAME as an AE on July 28, 2017. The Department posted an [FAQ about IAAME](#) and its qualifications to its intercountry adoption website on August 25, 2017. An additional [FAQ about the transition](#) of ASPs to IAAME was posted to the Department's website on January 12, 2018.

#### B. **How and when can ASPs communicate directly with IAAME about questions they may have?**

The Department hosted conference calls to introduce key IAAME staff members to adoption service providers (ASPs) on January 9, 2018. All ASPs were given an opportunity to join a call and to ask questions of IAAME personnel. With this release of IAAME's Schedule of Fees, as approved by the Department, there will be another round of calls with ASPs to address questions specific to the Schedule of Fees.

Responsibility for monitoring and oversight of all ASPs will be transferred to IAAME in the spring 2018. At that time, questions and comments can be sent to IAAME via the contact us form on [www.iaame.net](http://www.iaame.net). Until then, questions about accreditation and approval should be directed to the Council on Accreditation (COA), which is currently the AE for all accredited/approved ASPs. Questions about the transition of ASPs from COA to IAAME should be directed to the Office of Children's Issues at [Adoption@state.gov](mailto:Adoption@state.gov).

### 2. **Schedule of Fees**

#### A. **When did IAAME release its Schedule of Fees?**

On February 1, 2018 IAAME published its Schedule of Fees which can be found on the IAAME website at [www.IAAME.net](http://www.IAAME.net).

#### B. **What did IAAME use as a guide when setting its fees?**

Under 22 CFR 96.8(b), an accrediting entity's schedule of fees must include "the costs of all activities associated with the accreditation or approval cycle, including but not limited to, costs for completing the accreditation or approval process, complaint review and investigation, routine oversight and enforcement, and other data collection and reporting



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activities.” IAAME conducted a thorough analysis of the costs associated with carrying out these activities, including costs for personnel (including a calculation for each element of accrediting work, i.e. initial accreditation/approval, monitoring and oversight, accreditation/approval renewal, and complaints), facilities, insurance, etc. IAAME, as a non-profit agency, utilized the information in the cost analysis to determine fees taking into account the cost of conducting business while at the same time taking into consideration the impact fees and costs have on agencies and persons providing the intercountry adoption services. Please also see the response to questions 3 B and D below.

### 3. **Accreditation and Approval Fees**

#### A. **How is IAAME going to structure fees for accreditation and approval?**

There is a tiered fee schedule for accreditation/approval. The accreditation/approval fee for ASPs seeking renewal of their accreditation or approval is tiered according to the average number of adoptions for which the agency served as the primary provider during the previous 2 years. ASPs seeking accreditation/approval for the first time will be charged the accreditation/approval fee for the 0-5 adoptions tier. ASPs that did not serve as a primary provider during the 2 years prior to their application for renewal (home study only agencies) will be charged the accreditation/approval fee for the 0-5 adoptions tier.

#### B. **Why is IAAME changing from the current accreditation/approval fee structure based on revenue received to one based on the number of adoptions an ASP does?**

IAAME developed its fee schedule after numerous discussions with the Department and review of current and potential fee structures. Data indicates that the majority of ASPs process less than 15 adoptions a year. Understandably, costs of the activities performed by the AE vary significantly between the smallest and largest agencies. The Department requested that IAAME consider a model that reflects variances in AE workload and results in a proportionate distribution of fees across ASPs. IAAME believes the fee schedule reflects an equitable distribution of fees proportionate to the actual costs of the work performed by AE as a result of the number of adoptions processed.

#### C. **How will IAAME determine the average number of cases an agency has processed in order to determine and collect their accreditation/approval fees?**

For the first re-accreditation/approval cycle that ASPs undertake with IAAME, IAAME will rely on the ASP to report the number of adoptions in which the ASP served as the primary provider in the two years preceding the date of their application to renew accreditation/approval. The figures provided will then be checked against the



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Department's Adoption Tracking System and other database resources. The resulting number will be averaged over two years. By early 2020, IAAME will have independent data on the number of adoption applications accepted through ASP mandatory reporting. (These figures can still be cross-checked against Department data, as needed.)

### **D. Were the challenges of small agencies considered in developing the Schedule of Fees?**

As described above, IAAME's goal was a fee structure that reflects the costs of all activities associated with providing accreditation and approval services to ASPs. IAAME then established a series of tiers that takes into account the fact that the majority of ASPs handle less than 15 adoptions per year. Four tiers were established to divide this group as equitably as possible without creating an overly complex set of tiers. While the Schedule of Fees primarily reflects an equitable breakdown based on the actual costs of providing services, IAAME was certainly cognizant of the financial burden on small ASPs and is pleased to create a system that IAAME feels is fair and reasonable for all.

### **E. Why are some of IAAME's accreditation/approval "tier" fees higher than COA's?**

As discussed in the question above regarding the use of a case-based fee structure, a primary goal was to ensure fairness and equity in setting the accreditation/approval fees. ASPs with multiple country programs and a high number of adoption cases require more analysis and document review during the accreditation/approval process (as well as in monitoring and oversight) than agencies that have only one country program and process only a few adoptions cases each year. The tier structure reflects the different work demands associated with the diverse group of ASPs providing intercountry adoption services (as well as home study-only agencies) to equitably distribute the costs associated with accreditation and approval.

### **F. How does this affect home study-only agencies that end up serving as the primary provider in one or more adoption cases?**

ASPs that did not serve as a primary provider during the 2 years before the date of their re-accreditation/approval application (home study-only agencies) will be charged the accreditation/approval fee for the 0-5 adoptions tier. Home study-only agencies that begin to act as a primary provider, for any reason, are responsible for reporting the number of adoption applications accepted during the next accreditation/approval cycle.



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### 4. Monitoring and Oversight (M & O) Fee

#### A. How is IAAME going to structure fees for M & O?

M & O fees will be charged to each primary provider based on the number of new adoption applications the ASP accepts. For each new case in which the ASP agrees to serve as a primary provider, a per case fee of \$500 will accrue.

#### B. How will IAAME collect M & O fees?

An ASP serving as a primary provider will report to IAAME monthly data on the number of newly accepted applications from prospective adoptive parents. Initially, the data will be provided by all accredited/approved ASPs on an excel spreadsheet created by IAAME. The accredited/approved ASPs will complete and submit the excel spreadsheet to IAAME via email. In the coming months, this process will transfer to an online reporting tool where ASPs will input their data in real time. IAAME will then use the report to formulate the monthly invoice for payment of the M & O fee. IAAME may utilize data from other sources to validate the information ASPs provide and will submit an invoice to the ASP for any difference between the reported applications accepted and the verification data. M & O fees must be transmitted to IAAME within 30 days of invoice and can be paid by check, Paypal, money order, or credit card.

#### C. Will home-study only agencies pay M & O fees?

As described below, the fee structure was created so M & O fees are only paid once during each adoption. Accordingly, providers that are “home study-only” will be exempt from collecting and transmitting the M & O fee, unless no other primary provider is named by the prospective adoption parents and the agency/person becomes the primary provider by default (see 22 CFR 96.14 (a)), or the agency/person decides to begin acting as a primary provider in one or more cases by providing adoption services. In these instances, the accredited agency or approved person will need to inform IAAME that they are no longer a home study-only agency, which may in turn affect future accreditation fees. Home study-only agencies that begin to act as a primary provider, for any reason, are responsible for collecting and transmitting the M & O fee per accepted application in a timely manner. Failure to inform IAAME about adoptions in which an agency/person is acting as a primary provider may result in adverse action.

#### D. Why is the M & O fee based on the number of adoption cases handled?

Similar to the basis for establishing the tiered accreditation/approval fees, M & O fees are intended to reflect the costs involved in providing monitoring and oversight for ASPs of



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varied sizes. The more programs and adoption cases an ASP handles, the more likely they are to make certain self-reports, require more in depth analysis of their financial documents and foreign supervised provider agreements, etc. By collecting the M & O fee based on the number of adoption applications, the actual costs associated with providing M & O services are accurately and equitably reflected.

IAAME anticipates that most ASPs will pass the M & O fee along to adoptive families on a per case basis, which the Department has calculated would increase the average cost of an adoption by 1.4 percent. Such a pass through results in equitable treatment, without regard to a prospective adoptive parent's decision to work with a small or large agency.

As the fees will most likely be passed through to families, a fee structure was created that allowed such fees to only be paid once during each adoption (i.e. no M & O fee collected by the home study only agency). Collected M & O Fees will be used by IAAME to cover the costs of all M & O work for all adoption service providers, and will not be limited to services provided by one particular agency.

The calculation of the M & O fee, based on the number of new adoption applications accepted, does not mean that each of those cases will be monitored directly by the AE. The fee reflects the overall costs involved in M & O activities and the correlation of those costs to the number of cases processed by an ASP. While certain M & O activities will involve individual case review, others are of a more general nature, such as financial solvency and supervision of foreign providers.

### **E. IAAME will likely collect more in M & O fees than COA did, why?**

The regulations that govern the accreditation/approval process require AEs to charge fees necessary to cover the cost of accreditation or approval "including, but not limited to, costs for completing the accreditation or approval process, complaint review and investigation, routine oversight and enforcement, and other data collection and reporting activities." The M & O fees collected were set considering the work involved with monitoring and oversight, informed in part by the Department's priorities and learning from COA's experience.

As IAAME developed the tools to implement its responsibilities as an AE, IAAME incorporated policies and procedures, the [Department of State identified](#) as essential to successfully and effectively overseeing accredited/approved ASPs. This includes a particular focus on accreditation standards that, if not observed, put children and families at risk, such as ASP financial solvency and requirements to return funds to families for services not rendered, increased transparency regarding use of foreign supervised providers and funds provided to them, greater accountability for adoption fees, and



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improved data collection and analysis to identify trends and better track cases at key milestones. This enhances confidence and transparency in the accreditation/approval, renewal, and monitoring processes that will benefit ASPs, children, and families.

To conduct these activities, IAAME requires a larger staff than COA utilized. In addition, IAAME believes the accreditation/approval evaluative process, including site visits, is most efficiently and effectively conducted by staff, rather than by volunteers. Although personnel costs will increase, this approach increases the reliability and consistency of results between evaluators, which will, as a result, be a benefit to all ASPs.

### **F. How will M & O fees be handled in light of the transition?**

COA has typically charged monitoring and oversight fees annually on May 1. To avoid the risk of overlapping responsibilities, the Department intends to transition the M & O responsibility to IAAME before May 1, 2018. IAAME anticipates that ASPs will begin to report the number of new adoption cases accepted on or after February 15, 2018 to IAAME. IAAME will begin to bill ASPs for new cases begun after February 15, 2018 in March 2018.

### **G. Is the M & O fee a per family, or per child, fee?**

The M & O fee will be charged on a per child basis. If a family is adopting more than one child, the primary provider will report information on each child. See 4 B above and 4 I below for additional information.

### **H. How will M&O fees be handled in the event a client withdraws from the adoption process?**

Primary providers will report each accepted adoption application on a monthly basis. In the event a family withdraws their application before IAAME prepares the monthly invoice for M & O fees, the application approval is not required to be reported to IAAME. This is the only situation in which application/case data is not required to be reported.

### **I. How will M & O fees be reported to IAAME if the family is planning to adopt multiple children, but children have not yet been referred?**

Each month, the primary provider will report one case for each accepted adoption application. Later, when the referral for additional children is accepted, the primary provider will reference one child's case to the initial report, and report additional cases for each additional child. See 4 B and G above for additional information.



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### 5. Other Fees

#### A. **Why is the application fee for a new adoption service provider applicant so much higher?**

The increased fee reflects a more extensive process for first time applicants. First time applicants seeking accreditation or approval will be provided a thorough orientation to the procedures and expectations of the accreditation/approval process, as well as an understanding of the requirement for “routine oversight and enforcement.” The application intake process is designed to ensure that applicants fully understand how to obtain and maintain accreditation/approval, as well as to ascertain if there are any obvious obstacles to successful accreditation/approval before an applicant pays the accreditation/approval fee. The costs of providing this orientation and preliminary review are reflected in the application fee.

#### B. **How will site visit fees be charged?**

During the site visit planning conference call, IAAME will provide an estimate of transportation, lodging, and per diem expenses. Upon finalization of the site visit dates, an invoice for all expenses will be provided to the ASP for payment in advance of IAAME staff travel.

#### C. **Under what conditions will the site visit rescheduling fee be charged?**

ASPs will be responsible to cover the costs associated with changes or cancellations within three months of the scheduled site visit dates.

#### D. **If I want a new certificate with IAAME’s logo on it, can I pay the certificate replacement fee to get one?**

ASPs who were accredited or approved by the Council on Accreditation (COA) should continue to use their accreditation or approval certificates issued by COA. When an ASP seeks authorization to provide adoption services in a foreign country, the Department typically provides a letter to the adoption authority verifying the accreditation/approval status of the ASP. This letter will explain the transition of responsibility for M & O and accreditation and approval of previously accredited/approved ASPs from COA to IAAME.