Policies and Procedures

Adoption Policy

INTRODUCTION

Bethany Christian Services places children into adoptive homes through Domestic Infant, Foster Care, and Intercountry/International Adoption programs.

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to place children into families or with individuals who have a current and approved Bethany Home Study and when placement with that prospective adoptive family/individual is determined to be in the best interest of the child.

Prospective Adoptive Parent Training Policy

INTRODUCTION

Adoption research consistently finds that a significant factor in how well families adjust after adoption is how well prepared they were before adoption. In an effort to assure that adoptive families are as prepared as possible for the unique nature of adoptive parenting, Bethany Christian Services requires all prospective adoptive families in the Domestic Infant and Intercountry Adoption programs to engage in comprehensive training activities that meet Hague Convention (for Intercountry Adoption), Intercountry Adoption Accreditation and Maintenance Entity (IAAME), Council On Accreditation (COA), and state training topic guidelines and are individualized to meet the needs of each particular family and the child(ren) to be adopted.

POLICY

It is the policy of Bethany Christian Services and its subsidiaries (Bethany) that all prospective adoptive families (“applicants”) in the Domestic Infant and Intercountry Adoption Programs will participate in comprehensive training and education in preparation for each adoptive placement they pursue.

PROCEDURE

Bethany requires that all applicants receive comprehensive training which shall include core topics for each applicant’s training plan. Bethany recognizes that the training needs of prospective adoptive families vary as do individual optimal learning styles. Therefore, the training requirement can be fulfilled through methods such as face to face training, webinars, online training videos, podcasts, group meetings, articles, and books.

Training Requirement

Each applicant must complete a minimum of 30 hours of training, for each adoption, prior to placement of the child with the applicant(s) in Domestic Infant Adoption or prior to travel to the child's country of origin to adopt the child in Intercountry Adoption. Applicants will receive and sign the Prospective Adoptive Parent Training Acknowledgement.

Training must cover the following topics at a minimum to meet the standards for training for applicants as established by the Council on Accreditation (COA):

1. Attachment and Bonding (COA AS7.06a)
2. Impacts of adoption on the family, adoptee and birthparent (AS7.06b)
3. Maintaining connections with the child's community or tribe (AS7.06d)
4. Child development and parenting (AS7.06e)
5. Raising a child of a different race, ethnicity, culture or religion (AS7.06f) (specifically required for all families to comply with MEPA)
6. Caring for a child with special needs (AS7.06g)
7. Coping with grief and loss within the adoption triad (AS7.06h)
8. Helping a child cope with a history of maltreatment (AS7.06h) (focus in infant adoption can be on the effects of stress in pregnancy, alcohol/drug use in pregnancy, abuse and/or neglect)
9. Identity development in adopted children (AS7.06h)
10. Open Adoption (AS7.07)

If the applicant(s) are completing an Intercountry Adoption, the following topics must also be covered in the training received by each applicant:

1. The Intercountry Adoption process, the general characteristics and needs of children awaiting adoption (Hague 96.48b(1))
2. The in-country conditions that affect children in the foreign country from which the prospective adoptive parent(s) plan to adopt (Hague 96.48b(1))
3. The effects on children of malnutrition, relevant environmental toxins, maternal substance abuse, and of any other known genetic, health, emotional, and developmental risk factors associated with children from the expected country of origin (Hague 96.48b(2))
4. Information about the impact on a child of leaving familiar ties and surroundings, as appropriate to the expected age of the child (Hague 96.48b(3))
5. Data on institutionalized children and the impact of institutionalization on children, including the effect on children of the length of time spent in an institution and of the type of care provided in the expected country of origin (Hague 96.48b(4))
6. Information on attachment disorders and other emotional problems that institutionalized or traumatized children and children with a history of multiple caregivers may experience, before and after their adoption (Hague 96.48b(5))
7. Information on the laws and adoption processes of the expected country of origin, including foreseeable delays and impediments to finalization of an adoption (Hague 96.48b(6))
8. Information on the long-term implications for a family that has become multicultural through Intercountry Adoption (Hague 96.48b(7))
9. An explanation of any reporting requirements associated with Intercountry Adoptions, including any post-placement or post-adoption reports required by the expected country of origin (Hague 96.48b(8))
10. The child's history and cultural, racial, religious, ethnic, and linguistic background (Hague 96.48c(1))
11. The known health risks in the specific region or country where the child resides (Hague 96.48c(2))

12. Any other medical, social, background, birth history, educational data, developmental history, or any other data known about the particular child (Hague 96.48c(3))

Training Schedule

Each applicant must complete training according to the following intervals:
A minimum of 15 hours of training is required prior to the home study completion and approval.

1. Each applicant is required to read The Connected Child: Bring Hope and Healing to your Adoptive Family by Karyn B. Purvis and David R. Cross.
2. Each applicant is required to complete training regarding depression after adoption, in compliance with the Depression after Adoption – Education and Screening Policy and Procedure
3. Each applicant is required to complete training on sexual abuse prior to home study completion, unless being approved only to adopt a newborn where custody is received directly from the hospital.
4. Each applicant being approved to adopt a child living with HIV is required to complete the Bethany HIV Toolkit and meet with an infectious disease medical specialist prior to home study completion.
5. For Intercountry Adoption, this training requirement is partially met through completion of the 10-hour online Hague Package offered by Adoption Learning Partners (ALP). It consists of five courses: “The Journey of Attachment”, “Conspicuous Families”, “Finding the Missing Pieces”, “Medical Issues in International Adoption”, and “Adopting the Older Child”. Each applicant must register in order to receive a Certificate of Completion.
    a. For families who have previously completed an Intercountry Adoption AND completed the Hague Package from ALP, there are two options for completing the required 15 training hours prior to home study approval and completion:
        i. Completing the Hague Package again for 10 hours of training prior to home study approval and completion, in addition to 5 other training hours; OR
        ii. Working with their Adoption Specialist to determine if there is a more appropriate training to meet the initial training requirement.
6. For Domestic Infant Adoption, this training requirement is met through completion of required branch training and recommended external training opportunities (i.e. books, on-line/in-person classes).
7. Training credit (up to 2 hours) can be awarded for participating in the Discover Bethany Adoption information and training meeting.

A minimum of 15 hours of training prior to placement of the child with the applicant(s) or prior to travel to the child’s country of origin to adopt the child (for Intercountry Adoption) is required. This training will cover any required topics not previously addressed in the applicant(s)’ initial training, and any additional topics identified in their Service Plan, which will be developed jointly with the applicant(s) and the Adoption Specialist.

1. Training credit is awarded according to the following guidelines and at the discretion of the Adoption Specialist:
    a. Book/Articles: 50 pages = 1 hour of training credit (excluding appendices/ references)
    b. Webinar/Podcast/Video/Live Training = time spent
    c. Meeting with Adoptive Parent Mentors/Support Group = time spent, no more than 3 hours can count toward training

    d. Training credit cannot be awarded for participating in the home study process or for training that occurred prior to the beginning of the applicant(s)' current adoption inquiry.
2. Adoption Specialists are involved in recommending and approving independent training at their discretion to assure family training is from a reputable source and valuable in preparation for adoptive parenting.
3. Training hours prior to home study are reported in the applicant(s)' home study and are documented in AMS/Family Portal for each applicant. Continued documentation in AMS/Family Portal allows families to track their own progress with their adoption specialist to ensure the minimum 30 hours of total training are documented as required.
4. Additional in-person, individualized training and preparation can be completed as needed to meet the needs of the applicant(s) in light of the particular child to be adopted and his or her special needs, and any other training needed in light of the child background study or the home study.
5. Through the Family Portal, Bethany Christian Services will provide applicant(s) with information about resources for continued learning about common behavioral, medical, and other issues; connecting with parent support groups, adoption clinics and experts; and seeking appropriate help when needed.

POST-ADOPTION TRAINING AND RESOURCES

Bethany believes that adoptive parents, as with all parents, benefit greatly from life-long learning toward effectively meeting the needs of their children and family. To that end, Bethany staff will recommend post-adoption training opportunities and goals, through tools such as the Post-Adoption Service Plan, Lifelines Magazine and website, and through post-adoption follow up visits.

Parental Discipline Policy

Children who join families through foster care or adoption have experienced loss and separation from their biological families. This loss and the probability of having experienced other traumatic events such as in-utero stressors, institutional care, multiple placements, abuse and/or neglect will influence a child's specific needs and behaviors. Given that children express their needs through behavior, appropriate discipline must take into account the child's developmental capacity and temperament. Bethany encourages foster and adoptive parents to use discipline and behavioral guidance practices that nurture, teach skills, ensure safety and provide structure to children.

POLICY
Bethany Christian Services (Bethany) and its subsidiaries does not permit the use of corporal punishment toward a child placed through foster care or adoption. In voluntary compliance with state laws, Bethany prohibits use of any behavior toward a child that could constitute or be construed as physical, verbal or emotional abuse.

PROCEDURE
All families applying to adopt through Bethany Christian Services must review and sign the Parental Discipline policy statement.

Client Grievance/Formal Complaint Policy and Procedure

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to provide a process for clients to express and receive a response to grievances or formal complaints they have regarding services provided.

PROCEDURE

Client Right and Access to Submit a Grievance/Formal Complaint

1. Clients have the right to submit a grievance/formal complaint without interference or retaliation.
2. Clients will be informed of the Client Grievance/Formal Compliant policy at the beginning of service delivery or at the time a contract for services is signed, whichever applies.
3. A copy of the Client Grievance/Formal Complaint Policy and Procedure will be made available to all clients through the branch offices and/or through the appropriate service portal.
4. Youth placed in out-of-home care through the Unaccompanied Children (UC) program may obtain assistance in drafting a written grievance from another youth, Bethany staff member, family member, or legal representative.
5. The grievance procedure may also be used by youth in out-of-home care in the Unaccompanied Children (UC) program to report sexual abuse or harassment, and inappropriate sexual behavior. Grievances involving an immediate risk of harm to youth shall be responded to immediately by the program supervisor/director or branch director, who will determine the appropriate course of action.
6. All other youth in out-of-home care through Bethany are provided with client rights and complaint procedures consistent with state and local licensing requirements.

Submitting a Grievance/Formal Complaint

7. When a client submits a written or verbal grievance/formal complaint, staff will provide the client with a copy of the grievance form or will assist the client in filling out the form if needed.
8. A written grievance/formal complaint will be submitted to the branch director or the designated staff member, who will ensure that at least one of level review occurs without the involvement of staff involved in the complaint.
9. All efforts are made to resolve client grievances/formal complaints at the branch level.

Receipt of Grievance/Formal Complaint and Initial Meeting

10. The branch director or designated staff member will acknowledge the grievance/formal complaint within five (5) business days. A meeting, interview, or conference call will be scheduled with the client to hear identified grievances/formal complaints.
11. At the meeting, the client, any witnesses, and/or staff may present and establish facts and evidence relevant to the grievance/formal complaint and/or discuss, question or refute information presented.
12. A report of the meeting will be submitted to the Regional Director, which includes the decision and reasoning, within five (5) business days of formal decision.
13. The client will be provided with a copy of the formal decision and reasoning in writing within 30 days of receipt by branch,

Appeal of Decision to Agency

14. If the client is dissatisfied with the decision, they may submit a written request within ten (10) business days for a review by the Regional Director which will be scheduled in person or via conference call.

15. The Regional Director will arrive at a final decision within fifteen (15) business days of the appeal meeting, and provide a formal copy of the decision to the client. The CEO/President or other relevant staff may be consulted as needed.

Record Keeping

16. Original records of all meetings will be kept on file at the branch office in the client's file, with a copy submitted to the National Director of Quality Services for quarterly review by the Performance and Quality Improvement (PQI) team.
    a. The PQI team reviews all grievances/formal complaints on a quarterly basis in effort to improve services.
    b. The Director of Quality Services must report formal complaints related to international adoptions on a semi-annual basis to the Council on Accreditation and the U.S. State Department.

Appeal of Decision Outside of the Agency

17. When government funding supports the service/program or if the client believes the decision is against state regulations or requirements, the client will be informed of his/her right to appeal to the relevant state office (typically, the Department of Human Services or the state Attorney General).
18. If the grievance/formal complaint is related to an Intercountry Adoption, clients have the right to file a complaint with The Hague Registry at the U.S. State Department, Bureau of Consular Affairs - http://adoption.state.gov/hague_convention/agency_accreditation/complaints.php

**Please note: Both grievances and formal complaints are used in this policy as the Council on Accreditation uses the term grievances for all programs and services, and The Hague Convention and U.S. State Department utilize the term complaint for intercountry adoptions. With either use of these words, this policy is meant to address grievances and formal complaints.*

Health Insurance for Adoptive Families Policy and Procedure

INTRODUCTION:

Children without health insurance often have reduced access to health care and poorer outcomes if they do become ill. To adequately provide for all of a child's needs, Bethany Christian Services requires that adoptive families have health insurance to cover the medical needs of their children. Both the Omnibus Budget Reconciliation Act of 1993 and the Health Insurance Portability and Accountability Act of 1996 prohibit discrimination in coverage of a child placed for the purpose of adoption through group health insurance plans.

POLICY

It is the policy of Bethany Christian Services that all prospective adoptive parents will have health insurance or other organized coverage in place at the time of approval for adoption and placement to cover the healthcare needs of an adopted child.

PROCEDURE

1. Families applying to adopt a child through Bethany Christian Services will have their insurance provider or an employer representative complete Bethany's Affidavit of Health Insurance Coverage.
2. In the event that both parents have individual health insurance, an affidavit will be required from both parents verifying insurance.

3. In the event that families, for religious reasons, participate in a communal organization to cover health care needs, an elder or pastor could complete the affidavit describing how the community meets medical and health care needs.
4. Families adopting through Bethany Christian Services also sign a Statement of Understanding – Changes in Family Status which would require the family to notify their adoption specialist of any change in status including in their health insurance status.
5. Workers will verify with families prior to placement that healthcare coverage remains intact.
6. Workers should confirm any possible changes with families throughout the adoption process. Should there be a reported change in coverage, forms should be updated.
7. It is the responsibility of families and it is expected that they will add a child to their health care policy when placed for the purpose of adoption.
8. Families will not have to submit a new Affidavit of Health Insurance coverage at the time of placement unless there is a new employer.

Immunizations Policy Statement

Bethany Christian Services (Bethany) and its subsidiaries require that adoptive parents abide by the recommended childhood and adolescent immunization schedule as approved by the Center for Disease Control and the American Academy of Pediatrics for all children in Bethany's legal care. For more information or to obtain a copy of the most recent immunization schedule, please visit http://www.cdc.gov/vaccines/schedules/hcp/child-adolescent.html

While Bethany cannot require that biological children or legally adopted children living in the adoptive parents' home be fully immunized, it is strongly recommended. If adoptive parents have chosen not to immunize children in their legal custody, and are planning to adopt a child through Bethany, this information must be addressed during the home study process and may impact final home study approval.

If adopting through Bethany's Domestic Infant Adoption program, expectant parents will be informed prior to the process of identifying/matching with a family of the presence of any non-immunized individuals in the home and of any stated plans not to immunize a child in their legal custody following the finalization of an adoption.

On-Hold Policy and Procedure

INTRODUCTION

On-hold is the term referring to the status that a prospective adoptive family may fall under due to specific circumstances, entered into either by choice or by unanticipated situations, which temporarily prevents that family from receiving an adoption referral or placement of a child in their home.

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to permit prospective adoptive parents to place their adoption process temporarily on-hold under certain circumstances. On-hold status is time-limited based on family circumstances and assessment of readiness to reenter the adoption process. All prospective adoptive parents wishing to have their adoption process placed on-hold must sign the Bethany Agreement to Place an Adoption Process On-Hold.

PROCEDURE

A prospective adoptive family may be placed on-hold in order to allow adequate time for adjustment to new life circumstances and/or resolution of the circumstances that led to being placed on-hold. Reassessment of the pre-adoptive family's readiness to continue with the adoption process must take place in order for the family to again be eligible/able to receive a referral or placement of a child.

When prospective adoptive parents request the adoption process be placed on-hold, significant changes have occurred in the family circumstances that must be newly assessed in order to grant re-approval of the home study. Bethany Adoption staff must utilize the Adoption On-Hold Status: Guidelines for Eligibility and Reassessment to navigate this process.

Potential reasons a prospective adoptive family may be placed on-hold include but are not limited to the following:

1. Pregnancy or miscarriage;
2. Another child entering their home for any reason (birth of biological child, foster care, foster to adopt, concurrent adoption, temporary custody, etc.);
3. Loss of a job or other factors temporarily impacting financial stability. Level of income falls below country and/or USCIS eligibility requirements (International adoption),
4. Job change;
5. Relocation to new state or community;
6. Natural disaster (tornado, hurricane, flood) which results in displacement of the family;
7. Serious, treatable illness or accident involving a prospective adoptive parent;
8. Death or terminal illness in immediate family;
9. Need for counseling services to address an issue preventing a family's preparedness to receive the referral/placement of a child;
10. Legal issues preventing a family's eligibility to receive the referral/placement of a child;
11. Unexpected changes in adoption-process (i.e. expectant parent decides to parent, significant changes in a country program or eligibility, loss of a referral); and
12. Other significant changes that temporarily affect the family's current functioning and ability to accept the placement of an adopted child.

If a family's circumstances do not fall generally into one of the above categories, the family's adoption process is not eligible to be placed on-hold. If a prospective adoptive family is unwilling or are unable to maintain an updated home study or accept a referral for placement of a child, they may withdraw from the adoption process and may be eligible for a refund per the signed Adoption Services Contract. Each branch has the discretion to adjust fees if a family that has closed their adoption case prior to completion later wishes to re-enter the adoption process.

<u>Subsequent Adoption Procedure</u>

When a family applies for a subsequent adoption, a new file will be opened with a new application for services.

- Families may submit a new formal application for adoption after completion and closure of their previous adoption, unless involved in a concurrent adoption placement process.

- As knowledge continues to grow about attachment and bonding between parents and the children they adopt, we recognize the importance of time and shared experiences between the parents and child. As such, we recommend that families allow for a minimum of 9-12 months between the placement of a child and a subsequent adoptive placement.

- A new Adoption Services Contract is required in order to initiate a subsequent adoption. Adjustments in fees are at branch discretion.

- Prior to placement of their updated profile on the Web or in selection books, the family will have their home study updated and approved. The home study update includes assessment of all areas of family functioning impacted by the previous adoption(s).

- All documents requiring periodic updating, such as police and protective service clearances and medical reports, will be current with the updated assessment.

- Documents necessary to adoptive approval but not requiring updating such as birth and marriage certificates will be copied from the original file and added to the current file.

Prohibition on Child Buying Policy and Procedure

POLICY

It is the policy of Bethany Christian Services (Bethany) Global to provide adoption services ethically and in accordance with The Hague Convention's principles of ensuring that intercountry adoptions take place in the best interest of children and to prevent the abduction, exploitation, or trafficking of children.

PROCEDURE

Bethany Christian Services Global prohibits its employees, foreign and domestic supervised providers, prospective adoptive families, and other partners and agents from giving money or other consideration, directly or indirectly, to a child's parent(s), guardian(s), caregiver(s), or any other individual(s) or entity as payment for the child or as an inducement to release the child. Such prohibition is stated in writing in the Adoption Services Contract, Supervised Provider Agreement, Memorandum of Understanding, and other legally binding contractual documents. Should a family or service provider be found to be acting in a way inconsistent with this policy, Bethany Global takes immediate action to terminate that relationship.

When permitted or required by the child's country of origin, reasonable payments may be made for activities related to the adoption proceedings, care of the child, or the provision of general child welfare and child protection services. Payments for purposes such as those described above are made to Central Authorities and child care entities such as orphanages and foreign supervised providers, and are never made directly to a birth parent or other individual relinquishing rights to the child. Permitted or required contributions shall not be remitted as payment for the child or as an inducement to release the child. Payments and contributions made by Bethany Global are made for the care and support of all children served by the entity, independent of their adoption status.

All fees and payments made by adoptive families are clearly explained to the family with the specification that payments are made for services rendered, not the placement of a child. Child care fees are paid only as permitted/approved by the foreign government and are a flat-rate fee, not child-specific. In the event that special child care fees are incurred as a direct result of a family's request (such as additional medical testing or specialized care), the family may reimburse the child's care facility for such expenses. However, all payments for a child's care are made after a child's availability for adoption has already been determined in order to avoid influencing the release of the child.

When culturally appropriate and not in direct conflict with Hague principles against child buying, Bethany Global does permit families to give small, non-monetary gifts to in-country adoption guides and the child's caregivers. Such gifts are given as a culturally-appropriate gesture of appreciation and only after the adoption is finalized or legal guardianship is granted. Gifts, money, and other considerations are not to be given to legal entities or adoption officials such as judges, legal administrators, or immigration officers.

Within 30 days of employment, all new workers who have intercountry adoption-related responsibilities involving the application of clinical skills and judgment receive training and orientation on Bethany Christian Services' ethical guidelines, including Bethany Global's policy and procedures prohibiting child buying.

Provision of Medical and Social Information

POLICY

It is the policy of Bethany Christian Services (Bethany) Global that when medical or social information is received directly from supervised providers, public officials, authorized representatives of the Central Authority, or through the means of in-country partners , Bethany Global will provide the information to the prospective adoptive family, allowing the family a minimum of two weeks (unless extenuating circumstances require a more expedited decision) to consider the needs of the child and the family's ability to meet those needs, and to obtain physician review of medical information and other information, including videotapes of the child if available.

PROCEDURE

1. Bethany Global will provide a copy of the child's medical records (including, to the fullest extent practicable, a correct and complete English-language translation of such records) to the prospective adoptive parent(s) as early as possible, but no later than two weeks before either the adoption or placement for adoption, or the date on which the prospective adoptive parent(s) travel to the foreign country to complete all procedures in such country relating to the adoption or placement for adoption, whichever is earlier.
2. Where any medical record provided is a summary or compilation of other medical records, Bethany Global includes those medical records in the summary of records given to the prospective adoptive parents when this information is available.
3. If Bethany Global provides the prospective adoptive parent(s) with any un-translated information such as medical reports, video footage, or other reports, an opportunity is given for them to arrange for their own translation, including a translation into a language other than English, if needed.

4. Bethany Global will not withhold from or misrepresent to the prospective adoptive parent(s) any available medical, social, or other pertinent information concerning the child.
5. Bethany Global uses reasonable efforts, or makes requests of public officials, supervised providers, or others in the child's country of origin who are responsible for obtaining medical information about the child, to obtain available information, including in particular:
    a. The date that the foreign country or other child welfare authority assumed custody of the child and the child's condition at that time;
    b. History of any significant illnesses, hospitalizations, special needs, and changes in the child's condition since the foreign country or other child welfare authority assumed custody of the child;
    c. Growth data, including prenatal and birth history when available, and developmental status over time and current developmental data at the time of the child's referral for adoption; and
    d. Specific information on the known health risks in the specific region or country where the child resides.
6. If Bethany Global provides medical information, other than the information provided by public foreign authorities, to the prospective adoptive parent(s) from an examination by a physician or from an observation of the child by someone who is not a physician, Bethany Global uses reasonable efforts to include the following:
    a. The name and credentials of the physician who performed the examination or the individual who observed the child;
    b. The date of the examination or observation, how the report's information was retained and verified, and if anyone directly responsible for the child's care has reviewed the report;
    c. If the medical information includes references, descriptions, or observations made by any individual other than the physician who performed the examination or the individual who performed the observation, the identity of that individual, the individual's training, and information on what data and perceptions the individual used to draw his or her conclusions;
    d. A review of hospitalizations, significant illnesses, and other significant medical events and the reasons for them;
    e. Information about the full range of any tests performed on the child, including tests addressing known risk factors in the child's country of origin; and
    f. Current health information.
7. Bethany Global uses reasonable efforts, or makes requests of public officials, supervised providers, or others in the child's country of origin who are responsible for obtaining social information about the child, to obtain available social information, including in particular:
    a. Information about the child's birth family and prenatal history and cultural racial, religious, ethnic, and linguistic background;
    b. Information about all of the child's past and current placements prior to adoption, including, but not limited to, any social work or court reports on the child and any information on who assumed custody and provided care for the child; and
    c. Information about any birth siblings whose existence is known to the agency, or its supervised provider, including information about such siblings' whereabouts. Information regarding siblings is disclosed according to the confidentiality laws of the child's country of origin and proposed state of residence.

8. Where available, Bethany Global provides information for contacting the examining physician or the individual who made the observations to any physician engaged by the prospective adoptive parent(s), upon request.
9. Bethany Global ensures that videotapes and photographs of the child are identified by the date on which the videotape or photograph was recorded or taken and that they were made in compliance with the laws in the country where recorded or taken.
10. Bethany Global will not withdraw a referral until the prospective adoptive parent(s) have had two weeks, unless extenuating circumstances involving the child's best interests require a more expedited decision, to consider the needs of the child and their ability to meet those needs, and to obtain physician review of medical information and other descriptive information, including videotapes of the child if available. "Extenuating circumstances" may include, but are not limited to: a sudden change in the health status of the child; need for immediate medical treatment of the child; or a decision by the country of origin does not permit the adoption.
11. Where any of the information listed above cannot be obtained, Bethany Global documents in the adoption record, the efforts made to obtain the information and why it was not obtainable. Bethany Global continues to use reasonable efforts to secure those medical or social records that could not be obtained up until the adoption is finalized.

Concurrent Adoption Planning Policy and Procedure

Introduction:
Bethany Christian Services offers multiple adoption programs giving prospective adoptive families both a network of offices and the advantages of flexibility and choice. Our primary client is always the child, and adoption planning is child-centered. Additionally, Bethany believes that children coming into a family through adoption need time to bond and attach to their new family.

Concurrent adoption planning is the prospective adoptive family's simultaneous participation in two adoption programs with the intent to complete both adoptions. Concurrent adoption planning is not appropriate for families intending to complete only the first adoption that takes place.

Concurrent adoptions may occur within Bethany programs or, in the case of intercountry adoption, with a Bethany program and another placement agency.

Policy:
It is the policy of Bethany Christian Services that families may pursue concurrent adoptions through Bethany Christian Services after assessment, approval, and payment of applicable fees. Concurrent adoption planning will comply with specific country requirements in intercountry adoptions and with all applicable state laws. In intercountry adoptions, concurrent adoption planning is also dependent on USCIS approval for both adoption plans.

When a family is pursuing concurrent intercountry adoptions and another agency is involved, Bethany Christian Services will partner with the other agency for case management services. When a prospective adoptive family has a home study completed by another agency, Bethany Christian Services will conduct the home study or update for the concurrent adoption plan.

Families pursuing concurrent adoptions will allow for a minimum of six months between adoptive placements and will place a concurrent adoption plan on hold to allow at least six months between adoptive placements.

Eligibility:
A prospective adoptive family's eligibility to concurrently plan adoption through two programs is determined after:

- Assessment by the branch worker with supervisory approval in domestic, including embryo, adoptions;
- Assessment by the branch worker with approval of the country program coordinator in intercountry adoptions.

Procedure: Families approved to pursue concurrent adoption will:

- Complete the application process for each program.
- Pay applicable fees.
- Complete necessary Releases of Information according to established policy to allow interagency communication.
- Meet educational requirements of each program.
- Cooperate with completion of home studies for each program.
- Sign a Statement of Understanding of Risk involved in the concurrent adoption planning.
- Allow for an adjustment period between placements as required by the specific program or in consultation with their worker.
- Cooperate with agency staff to update the home study, complete addendums, and complete post-placement/post-adoption reports after the placement of a child for adoption.
- Maintain valid USCIS approval for any intercountry adoption programs.

Fee Structure:

- For the first adoption plan, families will pay the Formal Application and Home Study fee according to the branch fee schedule.
- For the concurrent adoption application and home study, fees will be reduced to reflect the reduced agency cost.
- Fees for home study updates, addendums and post-placement visits are charged according to branch schedule, and fees for updates or addendums may be reduced to reflect reduced agency cost.
- Fees for required education will be paid to each program.

Refund Policy:

- Standard refund policies apply for the applicable program should a family choose to withdraw after commencement of concurrent adoption planning.

Escorting and Transferring of Children Policy and Procedure

INTRODUCTION

Bethany Christian Services Global believes that it is in the best interest of children to have both adoptive parents travel to escort the child from their country of origin as it promotes attachment and bonding and allows the adoptive parents to experience the culture of their child.

POLICY

It is the policy of Bethany Christian Services Global that escorting of children by individuals other than the adoptive parents is prohibited except in extreme situations, such as medical or political emergencies, where escorting is found to be in the best interest of the child. Whenever

possible, both adoptive parents must travel to meet the child and bring them from their country of origin to the United States. One parent may be allowed to travel on a case-by-case basis with the prior approval of Bethany Global and its partners in the sending country.

Compensation for Intercountry Adoption Services Policy and Procedure

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to not make any payments, promise payments, or give other considerations to any individual directly or indirectly involved in provision of adoption services in a particular case, except salaries or fees for services actually rendered and reimbursement for costs incurred.

PROCEDURE

All individuals directly or indirectly involved in the provision of intercountry adoption services are paid only salaries, fees for services rendered, or are reimbursed for costs incurred.

Bethany Christian Services does not provide any in-kind gifts or donations intended to influence or affect a particular adoption. Bethany may, on occasion, provide a nominal gift to a person serving as a host when traveling, according to cultural customs. Bethany may also provide in-kind gifts or donations to various in-country partners that are intended to support their in-country social services. These gifts or donations are not provided with the goal of influencing or affecting a particular adoption.

Bethany Christian Services does not compensate any individual who provides intercountry adoption services with an incentive fee or contingent fee for each child located or placed for adoption.

Bethany Christian Services compensates its directors, officers, employees, and supervised providers who provide intercountry adoption services only for services actually rendered and only on a fee-for-service, hourly wage, or salary basis rather than a contingent fee basis.

Adoption Fee Payments and Acknowledgement Policy and Procedure

INTRODUCTION

Bethany Christian Services offers adoption services on a fee for service basis. Fees are based on the actual cost of delivering the services and recipients only pay for the services actually provided.

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries that all adoption fees are paid in accordance with the applicable Adoption Fee Contract and are charged when the service is commenced with a clear refund protocol for fees associated with services not provided. In addition, for Foster Care Adoption, inquiring families will be made aware of any possible fees prior to commencing the home study.

PROCEDURE

Intercountry and Domestic Infant Adoption
A schedule of fees (estimated or actual expenses) will be given to applicants for review prior to signing the Adoption Fee Contract. The Adoption Fee Contract includes: the amount they will be charged for services, the conditions under which fees are charged, changed, refunded, waived or reduced, the manner and timing of payment and the consequences of non-payment.
Each prospective adoptive family enters into an Adoption Fee Contract for services provided toward an adoption plan. Requests to begin a new adoption process will require a new Adoption Fee Contract and a new case in AMS.

Foster Care Adoption
A Fee Acknowledgement will be given to applicants for review prior to commencement of the home study process. The FCA Fee Acknowledgement is not a contract but includes the following: the amount they may be charged for services, the conditions under which fees are charged, changed, refunded, waived or reduced, the manner and timing of payment and the consequences of non-payment. All fees (including the home study fee) are non-refundable unless the child's state reimburses Bethany for these specific fees. If a family desires to inquire about a child out of state, the Home Study Fee will be due prior to branch follow-up on the inquiry.

Soliciting Contributions from Adoptive Families Policy and Procedure

INTRODUCTION

Bethany strives to create a service environment that avoids any appearance that donations could interfere with or influence service provision. While donations are maintained separately and not connected to program decisions, Bethany further prohibits and declines charitable contributions from prospective adoptive families to ensure that adoptive families do not misinterpret that their contribution could or will influence the adoptive placement of a child.

POLICY
It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to neither solicit nor accept contributions from prospective adoptive families from the time of submission of an application for services including a formal preliminary application or application for adoption, until conclusion of services, finalization of an adoption, or for one year post placement in the case of international adoption.

PROCEDURE
To ensure that contributions do not influence or are not perceived as influencing child placement decisions in any way, the following safeguards are instituted:

1. Contribution history and placement decisions are maintained in separate databases accessible only to staff with designated access for their job position. Bethany notifies donors and contributors regarding these separate processes and systems
2. Donors/contributors are notified that Bethany Christian Services does not give preferential treatment with respect to the placement of children for adoption or other provision of services to children and families.
3. Family and friends of adoptive parents who choose to make charitable contributions are encouraged to make such donations subsequent to the finalization of any adoption.
4. Donations are returned to families in the process of adoption (as identified above) with a thank you letter for their donation, a return of funds, and explanation of this policy.

5. If a family in the process of adoption has a donation history with Bethany prior to applying for adoption, arrangements may be made to plan for how they may continue donations after the adoption has been finalized, if desired.
6. Contributions for child sponsorship are permissible during the adoption process and directly following an adoptive placement. Prospective adoptive parents may not sponsor a child they are hoping to adopt.

No Preferential Treatment Regarding Adoption Services Policy and Procedure

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries to prohibit preferential treatment in the provision of adoption services to Bethany employees, board members, donors, and volunteers.

PROCEDURE

Bethany Employees, Volunteers and Board Members

1. All prospective adoptive parents applying for adoption services through Bethany, including those who have a current or previous relationship with the agency, will:
    a. Follow the standardized Bethany adoption process;
    b. Adhere to Bethany policies and procedures including, but not limited to, family assessment and home study, approval, referral and placement decisions; and
    c. Use the same fee scale as would other prospective adoptive parents.
2. Placing Agency: Bethany employees, current board members, and active volunteers must use another agency or a Bethany branch other than their own as the placing agency for domestic, international, and older child adoption. Employees or current board member are not permitted to utilize their own branch for adoption work.
3. Home Study Agency: Another accredited, licensed adoption agency should be contacted to serve as the home study agency, as well as the provider of post-placement reporting (as required). When possible, the SAFE home study model should be utilized.

Bethany Donors

1. Current donors may choose to work with Bethany for adoption home study or placement services.
2. Bethany does not accept donations from individuals or families in the process of adopting through the agency.

Preparation, Review, and Approval of Intercountry Adoption Home Studies Policy and Procedure

INTRODUCTION

The home study is an essential component of the adoption process to assess the family's ability and suitability to meet the needs of an adopted child. It is a collaborative process which identifies the interests and qualities of prospective adoptive parents as well as any educational needs while ensuring that state and licensing requirements are met. Required by every state prior to adoption, home studies are the purview of licensed child placing agencies and social workers. The goal of the agency is to ensure consistency in practice and assessment of a family's strengths and challenges that would impact their ability to parent. The ultimate purpose

of the home study is to identify the characteristics of child (ren) the family is best able to parent as well as to approve the family for adoption.

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries that every adoptive family will have a completed and approved home study which meets applicable legal and regulatory standards including state, United States Citizenship and Immigration Services (USCIS), Hague Convention, Council on Accreditation and relevant Convention country requirements, as applicable.

All home studies for Intercountry Adoption completed by Bethany staff are completed in the Structured Analysis Family Evaluation (SAFE) Home Study format according to the SAFE Home Study protocol as developed by the Consortium for Children. Updates and addendums to home studies are completed in the SAFE Home Study Update and SAFE Home Study Addendum formats. The home study is a collaborative process that is limited to information and assessment pertinent to adoptive parenting.

PROCEDURE – Intercountry Adoption

1. The first step is receipt of the preliminary application.
2. Once a preliminary application is dispositioned by Bethany Global staff and the applicant family is found to be eligible for at least one program, the applicant family is provided with country-specific information, fee information, a program statement, information on Bethany's policies, grievance procedure, U.S. federal regulations and country laws as they relate to intercountry adoption, needs and characteristics of children available for adoption, and an orientation acknowledgement to review and sign.
3. Once the signed orientation acknowledgement is returned, the family is presented with the formal application and invited to submit a formal application via the Family Portal. The Formal Application is returned to the appropriate branch for review and approval before review by Bethany Global.
4. Once the Formal Application has been received and approved by Bethany Global, the Formal Application Documents are sent to the applicant family. Documents included with the Formal Application are:
    a. International Adoption Services Contract
    b. Notice of Privacy Practices and Acknowledgement of Receipt
    c. Country Fees Summary Chart
5. Upon completion of the Formal Application and return of all required documents including the billed fees, a pre-study document packet is sent to the applicant family by the local Bethany branch office.
    a. Documents included in the pre-study packet include:
        i. Affidavit of Health Insurance Coverage
        ii. Duty of Disclosure: I-600
        iii. Duty of Disclosure: I-800
        iv. Physician's Report for Adoption – Adult
        v. Physician's Report for Adoption – Children in Household
        vi. Parental Discipline Policy
        vii. Permission and Consent Forms for sharing contact information, as appropriate
        viii. Prospective Adoptive Parent Training Requirement
        ix. SAFE Questionnaire #1

x. State /Local required documentation

b. References, criminal background checks, and child abuse registries in every state and country where the applicants have lived since age 18 are completed during the home study process.

6. The local branch office of Bethany will assign an Adoption Specialist who has been trained according to Hague Standard 96.37 to prepare a home study for the applicant family. The assigned Adoption Specialist contacts the applicant family to schedule the first face-to-face contact.
7. SAFE Home Study procedures are followed for the Questionnaires, supervisory review and mitigation procedure.
8. As many interviews as possible are held in the family home, with a minimum of three (or four if counting each individual interview separately) contacts and including one focused on assessment of the appropriateness of the family home. Additional visits are at the worker's/supervisor's discretion as determined by the needs of the individual family.
9. All required documents must be received before the final approval of the home study.
10. Using the SAFE Home Study template and the Bethany Global home study tools, the local Adoption Specialist will ensure that a home study on the prospective adoptive parent(s) is performed in accordance with 8 CFR 204.3(e) and any applicable State law, while also including:
    a. Information about the prospective adoptive parent(s), including identity, background, family and medical history, social environment, reasons for adoption, ability to undertake an intercountry adoption, and the characteristics of the children for whom the prospective adoptive parent(s) would be qualified to care (specifying in particular whether they are willing and able to care for a child with special needs);
    b. A determination as to whether the prospective adoptive parent(s) are eligible and suitable to adopt;
    c. A statement describing the counseling and training provided to the prospective adoptive parent(s);
    d. The results of a criminal background check on the prospective adoptive parent(s) and any other individual for whom a check is required by 8 CFR 204.3(e);
    e. A full and complete statement of all facts relevant to the eligibility and suitability of the prospective adoptive parent(s) to adopt a child under any specific requirements identified to the Secretary by the Central Authority of the child's country of origin; and
    f. A statement in each copy of the home study that it is a true and accurate copy of the home study that is being provided to the prospective adoptive parent(s), USCIS, the State's Department of Human Services or other approving authority (when required), and the Central Authority of the child's country of origin.
11. All Bethany home studies are read and approved by the Adoption Specialist's supervisor and Bethany Global.
12. All home studies are reviewed by the applicant family.
13. If Bethany Christian Services is not able to provide home study services directly to a family, a home study may be completed by a Hague-accredited agency upon Bethany entering into a supervised or exempt provider agreement with that agency. Bethany Christian Services will review and approve the study in writing. The written approval includes determination that the home study:
    a. Includes all of the information required by COA standards 96.47(a) and is performed in accordance with CFR 204.3 (e) and applicable State law; and
    b. Was performed by an individual who meets the requirements in COA standards Section 96.37 (f) or, if the individual is an exempted provider, ensures that the individual meets the requirements for home study providers established by 8 CFR 204.3 (b).

14. Bethany Christian Services takes all appropriate measures to ensure the timely transmission of the home study to the Central Authority of the child's country of origin. Additionally, an identical copy of the home study is submitted to USCIS, the State's Department of Human Services or other approving authority (when required), and the prospective adoptive parent(s).
15. When a significant change occurs in the household of the prospective adoptive parents, such as a change in residence, criminal history, financial resources, and/or the addition of one or more children or other dependents to the family prior to the child's immigration into the United States, a home study addendum or update is completed by the local Adoption Specialist, reviewed and approved by Bethany Global, and submitted to USCIS by the adoptive family.

Home Study Procedure

PROCEDURE

The following tasks are completed as part of preparing for and conducting the home study assessment of individuals with an approved formal application.

Home Study Tasks:

1. Gather local, state and federal child protective service and criminal history clearances from appropriate agencies. Child protective service clearance requests are required in both the current state of residence and in prior states, or countries, of residence since the age of 18.

2. Send personal references, utilizing the SAFE Reference (Couple) or SAFE Reference (Single), as listed on the formal application and as follows:
    a. Personal references are requested according to applicable state licensing regulations
    b. Minimum of three personal references; more should be requested if the reference only knows one of the prospective parents, or as required by applicable state law
    c. No more than one reference may be from an extended family member, depending on applicable state licensing regulations
    d. A family may choose to use a pastor or other faith leader as a personal reference (completing the SAFE Reference) but this is not a required part of the adoption process.

3. Gather signed Consent to Release Records or Information for the following forms:
    a. Physician's Report on Adoption – one consent form for each applicant, adult household member and child in the home.
    b. School Reference –one consent form for each child in school (PreK-12).
    c. Employer Reference –one consent form for each current employer.
    d. Mental Health Provider –one consent form for any current mental health providers. Past mental health provider references/treatment summaries are sought at the discretion of the Adoption Supervisor.

4. Gather Physician's Report on Adoption forms for each applicant, each child, and any adult household member.
    a. Applicants should submit Physician's Report on Adoption-Applicant, Physician's Report on Adoption -Child or Physician's Report – Adult Household Member to their medical professional along with the Consent to Release Records form.
    b. Medical professional should complete and return forms directly to the branch office.

c. Verification of health status will comply with the Adoptive Family Health Status Assessment Procedure

5. Send School Reference, with accompanying consent form.
    a. School reference should be completed for each child in PreK-12 schooling.
    b. School reference can be completed by a teacher or administrator, as deemed appropriate by the school. If a child is between school years or beginning a new school year, the school should determine which individual can most accurately complete the requested information.
    c. c. Parents who are home schooling their children may seek a reference through a home school cooperative, church education leader, or other individual as deemed appropriate to provide input.

6. Send Employer Reference, with accompanying consent form. Alternative methods to verify employment and income are acceptable if this is the only method offered by an employer (i.e. The Work Number).

7. If an applicant is currently receiving mental health counseling/treatment, request a summary of treatment from the treating clinician. It is strongly recommended that a letter of reference or treatment summary be received from all mental health providers from an applicant's teen and adult years, whenever possible. References and/or treatment summaries from prior mental health treatment providers are sought on a case by case basis, at the discretion of the adoption supervisor.

8. Request the following forms reviewed and completed by applicants:
    a. Notice of Privacy Practices Acknowledgement of Receipt
    b. Affidavit of Health Insurance, see Health Insurance for Adoptive Families
    c. Financial Statement Worksheet
    d. Guardianship Plan for our Child
    e. SAFE Questionnaire 1 for Couple Applicants or SAFE Questionnaire 1 for Single Applicant
    f. Prospective Adoptive Parent Training Acknowledgement Form g. For Intercountry Adoption only: USCIS Duty of Disclosure Form

9. Request copies of the following forms from applicants:
    · Copies of birth certificates of all family members,
    · Copy of the marriage license,
    · Copy of driver's licenses and/or Social Security, if required;
    · Copy of any divorce decree, if applicable;
    · Copy of income verification records (i.e. IRS 1040 and/or others as needed)

10. Request any additional state-required forms

11. Complete SAFE interviews with applicant(s). A minimum of four separate interviews are required in the Intercountry Adoption program. A minimum of three separate interviews are required in the Domestic Infant Adoption Program. The individual applicant interviews (SAFE Questionnaire 2 interviews) are counted as one home study interview for this purpose.

    It is strongly recommended that all interviews take place in the home of the applicant(s). No more than one interview should take place outside of the home.

a. Married applicants must be interviewed together and individually.
b. Interviews are conducted with all adults and minor children living in the home. Children who are too young for an interview should be observed interacting with the home environment.
c. It is recommended that at least one visit should include all members of the household together.
d. Individual and joint interviews form the basis of the assessment and include assessment of all topic areas covered in the SAFE home study report template located in AMS.

12. Complete a safety assessment of the home environment to ensure it complies with state licensing guidelines during one of the scheduled interviews. The Bethany Adoption Home Study Safety Assessment tool does not supersede state requirements but should be utilized in the absence of state-required licensing guidelines related to safety of the home and surroundings.

13. Review & discuss the following:
· Information regarding required and/or recommended training and educational resources. See Intercountry and Domestic Infant Adoption Prospective Adoptive Parent Training Policy
· Service Planning/Openness Plan. See Service Planning policy.
· Domestic Infant Adoption only: Personal Statement of Faith (see Faith-Based Application Requirement for guidelines on what should be included) and Family profile creation

Intercountry Adoption Home Study Update Policy and Procedure

POLICY

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries that when acting in the role of home study and/or post placement intercountry adoption services provider, a family's home study must be updated annually, or in accordance with state guidelines, to ensure the family assessment remains current and accurate.

PROCEDURE

1. For those home studies that require an annual update, Bethany staff must notify the family at the that an annual home study update must be completed
2. A home study update may be necessary when there is a major change in an approved home study when there is a change in adoption plan, e.g. child characteristics, number of children, change in country preference; relocation of the family to a new residence.
3. A home study addendum may be needed when minor changes occur in the family or adoption plan not requiring a home visit and usually requiring a short explanation and assessment.
4. If the family does not participate in the competition of a required annual home study update within 15 months of completion of their most recent home study or home study update, their case will be placed "on-hold" until the time a home study update is completed.
5. While the family's case is "on-hold", they are not able to receive a referral or placement of a waiting child unless approved by Bethany Christian Services Global and in accordance with applicable state licensing regulations.

Prohibition of Accepting and Giving Payment for Referrals Policy

It is the policy of Bethany Christian Services (Bethany) and its subsidiaries that no board members, staff, volunteers or interns shall give, receive or accept payment, gifts or other considerations from another service provider or individual who provides or receives referrals for/of applicants, clients, or members of the families of applicants or clients.