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Line 4 Question re: six-month exception. I don't see a purpose in it, given the previous stated exclusions. Given how vital time can be in cases of missing children, it seems likely the six-month exception could do a great deal of harm.

Line 24 Section 5. Information to Prospective Adoptive Parent. Under Section 1, subsection B. "Any condition in the child's country of origin" – I suggest you consider specifying conditions common to countries where intercountry adoptions take place such as malnutrition and PTSD. (The impact of malnutrition goes far beyond weight or size and can have long term and even permanent effects on the brain.)

In regard to pre-placement measures, I agree with the recommendation in A (Re)Adoption Story to use "evidence-based home study methods" such as SAFE. (p12) I see that the federal bill meant to address that issue appears to have died. Would it make sense to fold it into this Act?

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Section 6. Training for Prospective Adoptive Parent

Is it possible beyond requiring agencies to provide training, to also require that PAP's consult with an International Adoption doctor before accepting a referral? My thinking is that such a doctor or clinic would be more likely to provide an unbiased review of the child's file and medical information, as well as share knowledge about children they have seen who were also adopted from that country and the resources they recommend. There are a number of International Adoption doctors and clinics across the US as well as in Canada. (<http://www.comeunity.com/adoption/health/clinics.html>) Most agencies likely already recommend this step, but as it is an additional cost, it is likely that many families decline.

The (Re)Adoption Story Law Review's recommendation to "mandate trauma-informed training for parents before the child enters the home *as well as* when the child has been in the home for a specified time" (p 12) is sound advice that could be integrated into this section. Alternately, a separate section on post-adoptive support may be warranted. I would like to see more emphasis and funding from states or even on the federal level for such services. I'm wondering if there is a way to leverage the funding that goes to the adoption tax credit, or other child welfare funding for this. A great model of this type of support is Pennsylvania's Post-Adoption Services (<http://www.adoptpakids.org/PostPermanency.aspx?>)

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Section 7. Custody Transfer of a Child with High Needs

I refer again to the (Re)Adoption Story Law Review and their recommendation to "make one or both of the first two options feasible for parents." As the Review states, currently "a parent cannot voluntarily relinquish to CPS without having a suit filed against them... the fear of a CPS record may be enough to

steer families away from this method”. It is therefore important to consider removing that deterrent and instead casting CPS as an ally and a resource for families in crisis.

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Section 9. Duty to Report Unregulated Custody Transfer

Who is “an individual?” Is that a Mandated Reporter? (If so, can that be specified?). It looks like some states have removed the clergy clause in regard to abuse, I could see an argument for doing the same in this case.

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Line 3 section (d) I would also recommend that it be stipulated that a parent found guilty of an Unregulated Transfer would not be legally allowed to adopt any other children in the future.

Line 4 Comments/Questions

Are there non-governmental entities other than a child welfare agency? Is Wasatch 2nd Chance Adoption Program (<https://wiaa.org/2nd-chance-adoption/>) considered a child welfare agency? If not, I recommend including this agency (as well any others that do similar work) because it is my understanding they are doing good work advocating and finding good permanent homes for children.