



Licensed Child Caring Agency Site Visit Report Adoption Agency

Licensee: America World Adoption Association (AWAA) - Oregon

Date of Site Visit: November 7, 2020

Board Chairperson: Michael Shafran, Jr

Executive Director: Leslie Knight

Licensing Coordinator: Tom Heidt

Other regulatory or accrediting agencies:

AWAA's Corporate Office is in McLean, Virginia and the agency is licensed in over twenty states.

AWAA is also a Hague accredited agency through September 13, 2021.

Program Compliance:

The program was found to be compliant or will be compliant with:

[OAR 413-215-0001 to 0131](#) Licensing Umbrella rules

[OAR 413-215-0401 to 0481](#) Licensing Adoption Agencies

Personnel records were reviewed and compliance with required background checks was documented for the employees in the program.

Type of Adoptions provided:

Domestic (Indy/Private) ____

SNAC (DHS Foster Adopt) ____

International (Hague) X**Program Description:**

AWAA-Oregon is an independent affiliate office of America World Adoption Association of McLean, Virginia. AWAA-Oregon is a private, non-profit 501(c)3 adoption agency which provides home studies and post placement supervision to Oregon families who have contracted with AWAA or other agencies to facilitate their international adoption. The agency also provides education, general counseling and consultation regarding international adoptions. AWAA currently completes adoptions through China, Haiti, Honduras and India. AWAA-Oregon has averaged four new home studies per year over the last biennium.

Disruptions/dissolutions in the last review period:

None.

Average daily population served – number of families currently serving:

AWAA-Oregon interacts with 1-2 families on an average day.

Number of placements in each of the last two years:

AWAA-Oregon performed eight new home studies and four updates in the last biennium.

Program Strengths:

- AWAA-Oregon is a very small agency that provides personal service and responsive communication to the families they serve.
- Home studies provided by AWAA-Oregon are detailed and well written.
- The agency does a good job with providing families with the orientation and training they need to prepare for an adoption.

Program Challenges:

The agency had to adapt to serving families during the COVID-19 pandemic by replacing some face to face visits with various forms of technology.

Changes that have occurred in the last 2 years:

AWAA-Oregon was able to successfully onboard a second staff member.

Lawsuits:

None.

Grievances and complaints filed in the last two years:

AWAA-Oregon has not received any complaints or grievances. Their corporate office has been involved in several issues.

- In December of 2018, AWAA was placed on suspension by the Ministry in Kyrgyzstan for allegedly not providing post adoption reports on time. AWAA responded with proof that the reports had been submitted. In March of 2019, AWAA's license was reinstated. AWAA has since decided to voluntarily close the program.
- In February of 2019, AWAA was notified that the U.S. Department of State had received a complaint alleging wrongful practices by their representative in India. On September 27, 2019, the investigation was unsubstantiated, but it did result in two corrective actions regarding the agency's Foreign Supervised Provider Agreement. On March 10, 2020, the adverse action was terminated.
- In April of 2019, AWAA was notified that the U.S. Department of State had filed a complaint alleging wrongful practices by their representative in Kyrgyzstan. On November 1, 2019, the investigation was unsubstantiated, but it did result in a corrective action regarding the agency's Foreign Supervised Provider Agreement. On March 10, 2020, the adverse action was terminated.

Corrective Actions and Timeframes: Please submit the following to verify compliance.

413-215-0056 Licensing Umbrella Rules: Policies and Procedures

(2) In addition to other policies and procedures required by these rules, the policies and procedures in section (1) of this rule must include:

(a) A written policy on mandatory child abuse reporting, consistent with ORS 418.257, 418.258, 419B.005, 419B.010, and 419B.015 that includes requirements that child-caring agency employees, staff, contractors, agents, and proctor foster parents do all of the following:

(B) Receive child-caring agency-provided training on mandatory abuse reporting requirements as part of employee orientation and at least annually thereafter as described in OAR 413-215-0061.

CORRECTIVE ACTION 1: AWAA-Oregon must provide training at orientation and at least annually thereafter regarding Oregon's mandatory abuse reporting requirements.

413-215-0081 Licensing Umbrella Rules: Application for License, Renewal, or to Add a Program

(4) Documents to be submitted to renew a license. A licensee must submit to the Department at the time of application for renewal all of the following documents 30 days prior to expiration of the license:

(i) A tax compliance certificate issued by the Oregon Department of Revenue.

CORRECTIVE ACTION 2: AWAA-Oregon must submit a tax compliance certificate. It is understood that the document has been requested, but not yet received.

Within 45 days of receipt of this report, the agency must submit a letter of verification indicating they are in compliance with the specific rules cited above and describing how compliance will be maintained going forward. Along with the letter of verification, the agency must submit any and all specific documentation requested in the body of this report. The letter of verification and any additional requested documents can be emailed directly to or sent by regular mail to the following address:

Tom Heidt, Licensing Coordinator
Department of Human Services
Children's Care Licensing Program
201 High Street SE, Suite 500

Salem, Oregon 97301
Phone: 503-373-2062
E-Mail: Tom.Heidt@State.OR.US

Recommendations:

In the “Prepared by” section on home studies, Licensing is referred to as the “Office of Licensing and Regulatory Oversight.” Our name has changed several times. It is currently the Children’s Care Licensing Program, but I recommend leaving that out and keeping your references to the State of Oregon and the Department of Human Services.

413-215-0456 (1) Requires agencies to relate information, education, and training to adoptive parents regarding:

- (e) What research indicates about the potential effect on a child's development of physical abuse, sexual abuse, neglect, institutionalization, and multiple caregivers.
- (h) Emotional adjustment of adopted children and their families, including attachment and psychological issues of adopted children who have experienced abuse, neglect, or trauma.

AWAA’s principles regarding training and discipline which allows for “reasonable corporal punishment” are not compatible with evidenced based trauma informed care. “America World’s Statement of Mission, Vision, Principles on Adoption and Statement of Faith” form goes on to quote the law code in Maryland regarding the definition of abuse, which is different than the definition in Oregon.

Although adoption agencies are currently excluded from the umbrella licensing rules which prohibit spanking, hitting, or striking and any technique designed to or likely to cause a child physical pain, adoption agencies still need to educate prospective adoptive parents regarding appropriate discipline and behavior management techniques for children who have likely suffered abuse, neglect, and trauma. On AWAA’s website and documentation, they promote and condone corporal punishment, but they also endorse Trust-Based Relational Intervention (TRBI). Corporal punishment is extremely contradictory to TRBI. TBRI is based on connection, which builds trust and helps a child process trauma. Any use of corporal punishment creates fear vs. trust and safety for a child. There are correcting principles within TRBI, but nothing involves physical punishment of any kind.

Exceptions:

None.

Changes in License:

None.

Summary of Review					
Program and Services 413-215-0011(2)	Yes	No	N/A	Comments	Corrective Action Completed
Program and services are in scope of license	X				
Governance of the Agency 413-215-0021	Yes	No	N/A	Comments	Corrective Action Completed
(1)(a) Minimum of 5 board members	X				
(2)(f) Formally evaluate the exec. Director's performance annually	X				
(2)(g) Approves annual budget	X				
(2)(h) Obtain and review an annual independent financial review or audit of financial records.	X				
(2)(k) Written quality improvement program	X				
(2)(l) Meeting minutes	X				
Executive Director or Program Director 413-215-0021	Yes	No	N/A	Comments	Corrective Action Completed
(3)(a) knowledge of requirements for providing care and treatment appropriate to programs	X				
(3)(g) Approval from BCU	X				
Physical Plant	Yes	No	N/A	Comments	Corrective Action Completed
413-215-0051(1) Sufficient safe space, equipment, and office equipment	X				
413-215-0091(12) License is posted in common area at each facility	X				

Supplemental Information Provided by CCA	Yes	No	N/A	Comments	Corrective Action Completed
Documents as indicated on the form titled "Renewal Licensing Required Documents"	X				
Documents as indicated on form titled "Required Financial Documents and Information"		X		AWAA-Oregon must submit a tax compliance certificate. It is understood that the document has been requested, but not yet received.	
All required policies and procedures as identified in the "Umbrella Rules"	X				
All required policies and procedures as identified in "Agency Type Specific Rules"	X				

Personnel Files 413-215-0061	Yes	No	N/A	Comments	Corrective Action Completed
Staff Name	X				
Position	X				
(3)(g) Date of Hire	X				
(3)(a) record of education, training and previous employment	X				
(1)(b) & (3)(b) reference checks completed and documented	X				
(1)(a) & (3)(c) Background check completed and documented	X				
(3)(d) Annual performance evaluations	X				
(3)(f) Record of personnel actions	X				
(3)(g) Termination date, reason for termination	X				
(3)(h) Current job description (1)(c) Employee meets minimum qualifications stated in current job description	X				
Meets the qualifications in 413-215-0416	X				

New Employee Orientation – Umbrella Requirements (30 days) 413-215-0061(4)	Yes	No	N/A	Comments	Corrective Action Completed
(a) Agency policies and procedures	X				
(b) Ethical and professional guidelines	X				
(c) Organizational lines of authority	X				
(d) Attributes of population served	X				
(e) & (5)(a) to (c) Mandatory reporting that includes: (a) legal definition of child abuse ORS 419B.005, Oregon Laws 2016, chapter 106, section 36 (b) legal responsibility to immediately report (c) legal responsibility to report is personal to the employee		X		AWAA-Oregon must provide training at orientation and at least annually thereafter regarding Oregon's mandatory abuse reporting requirements.	
(f) Privacy laws	X				
(g) Emergency procedures	X				
Ongoing Training 413-215-0421	Yes	No	N/A	Comments	Corrective Action Completed
(2) Social services staff and contracted providers complete 10 hours minimum training on issues related to adoption	X				
(3) Social services staff and those who provide adoption services complete training in all of the following areas:	X				
(3)(a) Potential short and long term effects of prenatal exposure to alcohol, drugs, and poor nutrition	X				
(3)(b) Potential effects of separation and loss	X				
(3)(c) Process of developing emotional ties to an adoptive family	X				
(3)(d) Normal child and adolescent development	X				
(3)(e) Potential effects of physical abuse, sexual abuse, neglect, and institutionalization on the development of the child	X				
(3)(f) Potential issues of race, culture, and identity; issues of acculturation and assimilation; and if applicable, the effects of having been adopted internationally	X				

(3)(g) Emotional adjustment of adopted children and their families	X				
(3)(h) Open adoption	X				
413-215-0061(5) Mandatory reporting that includes: (a) legal definition of child abuse ORS 419B.005, Oregon Laws 2016, chapter 106, section 36 (b) legal responsibility to immediately report (c) legal responsibility to report is personal to the employee		X		AWAA-Oregon must provide training at orientation and at least annually thereafter regarding Oregon's mandatory abuse reporting requirements.	
<i>Intercountry Adoptions</i> 413-215-0476(1)(d) Employees and volunteers are trained about the adoption laws and procedures of sending country.	X				
Contractors (if applicable) 413-215-0061(6)	Yes	No	N/A	Comments	Corrective Action Completed
(a) Agency ensures the contractor meets the requirements of this rule and Chapter 413 division 215			X		
(b)(B) Contract includes the following: (i) Services provided (ii) Contractor fees (iii) Disclosure of information from contractor to agency (iv) Lines of authority (v) Adherence to rules, including background check (vi) Any liability of the agency for acts of the contractor, rights of indemnity and limitations on liability			X		
Comments:					

Adoption Files Compliance	Yes	No	N/A	Comments	Corrective Action Completed
413-215-0431(3) Adoption records are permanently retained and stored in a fire-retardant, locked location.	X				
Name of Family	X				
Orientation (before approving of home study) 413-215-0446(2)	Yes	No	N/A	Comments	Corrective Action Completed
(a) Adoption program, policies and procedures	X				
(b) Needs and characteristics of children available	X				
(c) Attachment, separation, and loss issues	X				
(d) Importance of cultural and ethnic identity to the child	X				
(e) Effects of adoption on child and family	X				
(f) Adoption process	X				
(g) Rights and responsibilities of adoptive family and agency	X				
(h) Information on potential risks and challenges	X				
(i) Pre-placement, placement, and post-legal adoption services and resources	X				
Training	Yes	No	N/A	Comments	Corrective Action Completed
413-215-0451(3)(a) 6 hour minimum pre-adoptive training and education before home study	X				
413-215-0456(1) 10 hours documented orientation and training independent of home study and covers the following:	X				
(a) Possible short and long term effects of prenatal exposure to alcohol, drugs and poor nutrition	X				
(b) Effects of separation and loss	X				
(c) Process of developing emotional ties to an adoptive family	X				
(d) Normal child and adolescent development	X				
(e) Research on potential effect on child's development from physical abuse,	X			AWAA endorses corporal punishment – please review recommendations.	

sexual abuse, neglect, institutionalization, and multiple caregivers					
(f) Issues related to race, culture, and identity	X				
(g) Acculturation, assimilation, and if applicable, effects of international adoption	X				
(h) Emotional adjustment of adopted children and their families	X				
(i) Intercountry adoption (if applicable)	X				
(2) Documented reasonable efforts to prepare prospective parents for each child under consideration <i>before</i> the earliest of the following; (a) child is placed (b) travel to child's country for purpose of adoption	X				
(3) Appropriate methods of training used	X				
(4)(a) Agency provided detailed written information on the following subjects:					
(A) Resources for financial support	X				
(B) Medical assistance availability	X				
(C) Support services	X				
(D) Identification of organization or individual who will be involved in proposed placement	X				
(E) Potential ramifications of a failure of birth	X				
Home Study 413-215-0451	Yes	No	N/A	Comments	Corrective Action Completed
(1)(a) Individual interviews completed with each household member	X				
(1)(b) Joint interview with couple (if applicable)	X				
(1)(c) On-site evaluation of home and compliance with CF979	X				
(2)Written Home Study includes all of the following:					
(a) Dates and places of interviews	X				
(b) Identity of each child to be considered for placement (if known)	X				
(c) Motivation for adoption	X				
(d) Family's plan for honoring ethnic and cultural heritage	X				
(e) Education or training needs	X				
(f) Need for support services and description of current support system	X				

(g) Life experiences and challenges	X				
(h) Marriage status or relationship	X				
(i) Names and ages of children in home	X				
(j) Names and ages of children not living in the home	X				
(k) Parenting skills and values	X				
(l) Lifestyle	X				
(m) Home and community	X				
(n) Health	X				
(o) Religion or spiritual beliefs	X				
(p) Employment and finances	X				
(q) Safety information and safety issues	X				
(r) Minimum 4 references - not related	X				
(s) Compliance with background check rules	X				
(t) Release of information	X				
(u) Background check from every state lived in for last 5 years	X				
(v) Background check from every country lived in last 5 years	X				
(w) Assessment of all information gathered and recommendations	X				
(x) Signed approval or denial by social services supervisor to use home for adoption	X				
413-215-0461 Pre-placement evaluation	X				
INTERCOUNTRY ADOPTIONS 413-215-0476	Yes	No	N/A	Comments	Corrective Action Completed
(1) In <u>compliance with foreign law</u> and makes reasonable efforts to learn and understand requirements in sending country			X		
(2) <u>Compliance by foreign representatives</u> (if applicable) Reasonable efforts are made to ensure: (a) Compliance with laws and procedures of sending country (b) Licensed or otherwise authorized (c) Does not engage in practices that are not in best interests of child or exploitation, trafficking of children (d) No pattern of licensing suspensions or sanctions (e)&(f) Full disclosure			X		

(3) <u>Pre-placement determination of compliance</u>. Authorized service or person has certified that: (a) Child is qualified for adoption (b) Necessary consents and determination made that placement in best interests of child (c) Proper emigration and immigration permits (d) Child's social and medical history or reasons why it could not be obtained			X		
(4) <u>Child information requirements</u> (reasonable efforts made) (a) Date the authority in sending country took custody and reasons why child in custody (b) Child's history (c) Information on child's immediate family (d) Information on child's cultural, racial, religious, ethnic, and linguistic background (e) Child's medical information (f) Videotapes and photographs of child (date) (g) Health risks specific to region or country where child resides			X		
(5) Information in section (4) is provided to prospective adoptive parents at least 2 weeks before adoption or placement for adoption, or date which the prospective adoptive parents travel to sending country to complete adoption procedures			X		
(6) The file documents all of the following: (a) Efforts of the agency to obtain the information (b) Reasons why agency was not able to obtain information (c) All communications with prospective adoptive parents (contents, dates, manner information was provided)			X		
(7) <u>Post placement and post-legalization</u> (a) Ensure appropriate measures to transfer child (b) Post placement reports (c) Home visit (1-4 months) documented in the post placement report			X		

(d) Original post-placement report is filed with the court and forwarded to the department (e) Parents are informed of other available post-placement services and resources (f) Adoption not finalized in sending country; (A) agency monitors and supervises placement, (B) informs importance of finalizing in U.S. and (C) advise parents means of obtaining proof of citizenship and SSN					
413-215-0481 Prior to placing a child in another country, reasonable efforts are made to search for prospective adoptive parents in the U.S.			X		
Comments: AWAA has had some issues come up with the US Department of State over the last review period, however AWAA-Oregon is not the placement agency so these rules are not applicable to the Oregon agency.					

Adoption Finalization 413-215-0471	Yes	No	N/A	Comments	Corrective Action Completed
(1) Documents required for filing with court are promptly provided to adoptive family or attorney	X				
(2) Agency promptly files all required documents with the court	X				

Records and Documentation 413-215-0071	Yes	No	N/A	Comments	Corrective Action Completed
(1) Stored safely	X				
(2) Permanent, legible, dated, and signed	X				
(3)&(4) Uniform in organization, readily identifiable and accessible, current, and complete, containing all required info. No eraser tape or white out.	X				
(7) Permanent registry of each child	X				

Licensing Coordinator's Signature: Tom Heidt

Date: 12-2-2020

Manager Review: H. Gibe

Date: 11-30-2020