



May 22, 2008

By Certified Mail

Jennifer Flowers
Director of Commission
Council on Accreditation
120 Wall Street, 11th Floor
New York, NY 10005

Petition for Reconsideration of Denial of Initial Application for Temporary Accreditation

Dear Ms. Flowers:

This is to request reconsideration of the Council on Accreditation's decision to deny AdoptInternational's application for accreditation due to its failure to demonstrate substantial compliance with applicable Hague Standards as reflected in the Post Commission Report dated May 14, 2008.

The Post-Commission Review Report dated May, 14, 2008 enumerated the following as reasons for non-compliance:

Standard Values: Eligibility Criteria in 96.96 must be fully met in order for an adoption service provider to achieve temporary accreditation.

Evaluator Team Non-Compliance Reason(s):

"Website states: 'We are Hague-accredited and so our home studies are acceptable for all countries!' The adoption serviced provider is not Hague-accredited and stating otherwise is unethical and improper conduct."

"Agency website lists Guatemala as a program source yet adoption service providers should not be accepting applications for this country. Therefore, the information posted is misleading and a misrepresentation of the facts."

"Agency website lists Azerbaijan as a program source with brief process timelines. New cases from Azerbaijan have not been processed since 2006. Therefore, the information is posted is misleading and a misrepresentation of the facts."

AdoptInternational sets forth the following responses to the deficiencies and provides the following evidence of compliance:

**Website states: "We are Hague-accredited and so our home studies are acceptable for all countries!"
The adoption serviced provider is not Hague-accredited and stating otherwise is unethical and improper conduct."**

420 Lincoln Road, Suite 601 • Miami Beach, Florida 33139
Tel: (305) 604.9676 • Fax: (305) 695.9190 • Email: info@adoptintl.com • www.adoptintl.com

Response:

I am mortified that this statement appears on the website, as well as embarrassed and sorry. This was truly an honest oversight and mistake for which I take full responsibility. I respectfully request the opportunity to explain what happened. I had been in discussions with Board members, as well as other agency directors about the agency engaging in more home study work; therefore, I set out to redesign the section of the website, "our services" and add a separate services category for home studies and then include a description of our services. I wrote this copy end of March after discussions with Board members. At this time, we were anticipating that AdoptInternational would soon be accredited; however, it was NEVER my intention that the copy which stated that AdoptInternational was "Hague-accredited" should have appeared on the site at that time. I made changes to the design of this section of the site as described above during approximately the 3rd week of March and I mistakenly gave the web site consultants text that included the paragraph indicating that AdoptInternational was Hague Accredited and then failed to review it once it appeared on the site. This was truly an innocent oversight and this agency never intended to misrepresent our status as Hague accredited.

There is no other indication on the web site of our being Hague-accredited and in our informational materials don't indicate that we are Hague-accredited.

Supporting Evidence: The statement regarding Hague-accreditation has been removed from our website and replaced with the following statement:

"AdoptInternational is not Hague-accredited; therefore, we are not able to provide home study services for adoptions in Hague countries. For a list of Hague countries, visit: http://hcch.e-vision.nl/index_en.php?act=conventions.status&cid=69"

"Agency website lists Guatemala as a program source yet adoption service providers should not be accepting applications for this country. Therefore, the information posted is misleading and a misrepresentation of the facts."

Response: This agency has not accepted applications for this program since before its closure in December of 2007. If we receive any inquiries, we indicate that this program is closed. While our responses to all inquiries regarding adoption from Guatemala clearly indicate that the program is closed, unfortunately, our website did not clearly reflect this position. We have now corrected this and the following statement appears on the Guatemala program pages on the website:

"This program is suspended indefinitely. AdoptInternational is no longer able to accept applications for adoption for our Guatemala program."

"Agency website lists Azerbaijan as a program source with brief process timelines. New cases from Azerbaijan have not been processed since 2006. Therefore, the information is posted is misleading and a misrepresentation of the facts."

Response: AdoptInternational has not accepted any applications for this program since 2005. Our foreign program coordinators in Azerbaijan actually warned us against accepting applications in 2005 due to

internal problems in Azerbaijan and we did not accept any applications since that time and we clearly state to anyone inquiring that the program is closed due to issues in Azerbaijan. There are agencies that have been accepting applications which AdoptInternational strongly advises against and questions the wisdom of such decisions. While our position and responses to all inquiries regarding adoption from Azerbaijan clearly reflect the US Department of State position, unfortunately, our website did not clearly reflect this position; however, we have now corrected this. AdoptInternational has placed "closure notices" for AdoptInternational's Azerbaijan program stating the following:

"Azerbaijan is temporarily closed to new applicants due to a change in adoption law which will ultimately implement the Hague Convention on Intercountry Adoption. Due to the uncertainty as to the time when adoptions will resume in Azerbaijan, we do not recommend initiating an adoption from that country at this time. For further information, visit the US Department of State site:
http://www.travel.state.gov/family/adoption/intercountry/intercountry_3209.html "

Further Evidence:

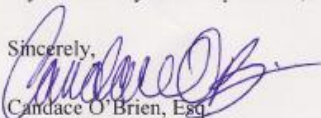
I have included AdoptInternational's responses to inquiries we have received about Guatemala, Azerbaijan and also Liberia over the past five months. Though you did not mention the situation with Liberia, there are internal problems in Liberia which preclude the completion of adoptions at this time and AdoptInternational was the first agency to clearly state to those inquiring that the program was closed. In fact, I had just made a referral to a family when I discovered through unofficial channels that the government might decide to suspend adoptions. The family was about to remit payment to AdoptInternational to begin the process when I heard rumors, though not substantiated at that time, and I immediately informed the family of the rumors and did not accept any payment of fees. I later confirmed the closure with the Deputy Minister of Social Welfare, as stated earlier, before any other agency, and closed the program.

Dr. Laura Nemeyer, Executive Director of Adoption Resource Associates which is a temporarily accredited agency, is a member of our Board. We have worked together for many years and she can certainly attest to AdoptInternational's policy with respect to Azerbaijan, Guatemala and Liberia. I had also discussed with her the issue of doing more home study work and she can attest that it was never the intention of AdoptInternational or myself as the Executive Director to misrepresent AdoptInternational's status as Hague accredited at the time the changes were posted on the website.

In summary, AdoptInternational truly strives to be completely forthright and painstakingly honest and direct about programs, risks, timelines, potential and real problems and issues. AdoptInternational has made changes to the website to reflect the current situation with the programs and which reflect our response to those inquiring about these programs.

I look forward to a positive resolution of this matter. In my discussions with other Executive Directors who had similar issues with their web sites, I know that COA was able to extend the option of correcting the web site so that they could go on to receive accreditation. I trust that COA will provide AdoptInternational the same opportunity.

If you have any further questions, I can be reached at 305.984.2154.

Sincerely,

Candace O'Brien, Esq.
Executive Director
AdoptInternational

CC: Richard Klarberg, President CEO
Julie Fulmer, Director of Quality Services Management