Intercountry Adoption Program Quarterly Statistical Report AD 202B

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	b. New intercountry adoption cases as a supervised provider						
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2.	Intercountry Adoption Applications 2. Intercountry adoption applications pending at the beginning of the quarter						
	a. Item 6 (Cell 11) from last quarter's report , as re		6				
	b. Adjustment (Item 2 minus Item 2a, positive or neg		7				
3.	New intercountry adoption applications received during	•					
4.	Intercountry adoption applications denied, dismissed		9				
5.	Intercountry adoption applications referred for home	10					
6.	Total intercountry adoption applications pending at th						
	(Item 2 plus Item 3 minus Item 4 minus Item 5)	•			11		
Inte							
7.	Intercountry home study assessments pending at the	beginning of the c	uarter		.12		
	a. Item 11 (Cell 18) from last quarter's report, as reported to CDSS						
	b. Adjustment (Item 7 minus Item 7a, positive or neg	. 14					
8.	New intercountry home study assessments requested	15					
9.	Intercountry home study assessments denied, dismis	r	16				
10.	Intercountry home study assessments approved during		. 17				
11.							
	. 18						
Par	Total						
Tve	(Immigration) le of Visa to be Issued to Foreign-Born Child being	Adopted by Calif	iornio Esmily				
12.	Visas to be applied for in California for U.S. citizensh of children during the quarter (Item 12a plus Item 12k	19					
	a. New IH-3 visas to be applied for with a Conventiob. New IR-3 visas to be applied for with a Non-conve	21					
12	Visas to be applied for in California for re-adoption of						
13.	citizenship during the quarter (Item 13a plus Item 13k	22					
		23					
	a. New IH-4 visas to be applied for with a Convention country b. New IR-4 visas to be applied for with a Non-convention country						
Col							
_	Countries of Origin for Children for Whom Visa is Requested 14. List the country of origin for children for whom visa is requested during the quarter and the number of						
"	children immigrating from each country (Countries su						
	a. Children's country of origin (country name)	25	26	27	28		
	b. Number of children immigrating from country above	29	30	31	32		

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Part C. Foreign-Born Child Visas, Placements, Finaliza	Total						
(Immigration) (Continued)							
Intercountry Adoptions Disrupted following Placement							
15. Disrupted adoption placements of foreign-born children	22						
(Item 15a plus Item 15b)				33			
Children with disrupted placements who entered for							
b. Children with disrupted placements receiving altern	ative placements.			35			
Intercountry Adoption Finalizations in California	00						
16. Finalized intercountry adoptions in California during the	36 37						
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b. California families finalizing an adoption in Californi		39					
17. California families provided re-adopt services during th	39						
Intercountry Adoptions Dissolved following Finalization	40						
18. California families dissolving an intercountry adoption of	•	41					
a. Dissolved finalizations with children entering foster				42			
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Part D. California Children being Adopted Abroad (Emi	igration)			Total			
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20. California children with newly approved emigration ass	essments during t	he quarter					
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a. Children relinquished by birth parent(s)	45						
b. Children becoming dependents of the court		46					
Dependent children that will receive Adoption As		47					
21. California children adopted abroad during the quarter (48					
a. Children with adoption finalized in California		49					
b. Children with adoption finalized only in destination of	country			50			
Countries of Destination for California Children being A							
22. List the country of destination for California children to be adopted abroad and the							
number of children emigrating to each country (Countri	ummed in Cell 58):						
a. Children's country of destination (country name) ⁵	1	52	53	54			
b. Number of children emigrating to country above	5	66	57	58			
Item 2b (Cell 7) Explanation (If Cell 7 is not zero). Note: Ti	ihia hay ramaina h	only if there is	an adjuntment (Call 7 i	o zorol			
Item 7b (Cell 14) Explanation (If Cell 14 is not zero). This b				ero).			
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INTERCOUNTRY ADOPTION PROGRAM QUARTERLY STATISTICAL REPORT AD 202B (1/13)

INSTRUCTIONS

CONTENT

The quarterly AD 202B report contains aggregate statistical information on the Intercountry Adoption Program (IAP). Part A of the report provides information about adoption agency operations. Part B of the report includes information about adoptive parent(s) applications and assessments activities. Part C of the report includes information about the children who are subjects of intercountry adoptions. Part D provides information about California children emigrating to another country as part of an intercountry adoption.

PURPOSE

This report provides county, state, and federal entities with information needed for budgeting, staffing, program planning, and reporting requirements for the Hague Convention on Protection of Children and Co-operation of Intercountry Adoption (Hague Convention).

COMPLETION AND SUBMISSION

All private adoption agencies licensed to provide intercountry adoption services shall complete and submit this report. Private adoption agencies that are also licensed to provide domestic agency adoption services shall also complete and submit the Agency Adoption Program Quarterly Statistical Report (AD 56A). If portions of the report are completed by more than one entity within and/or outside the agency, the contact person responsible for submitting the report to the state shall review the report for completeness and accuracy prior to submittal. The four (4) report quarters for the state fiscal year are July through September, October through December, January through March, and April through June. Reports are to be received on or before the 30th calendar day of the month following the report quarter.

Download an Excel version of the report form from http://www.cdss.ca.gov/dssdb to your computer, complete the downloaded report form and e-mail the report to admad202b@dss.ca.gov.

If you have questions regarding the completion or submission of this report, contact Data Systems and Survey Design Bureau (DSSDB) at (916) 651-8269. The report's released quarterly statewide data will be available on the Research and Data Reports (RADR) website at http://www.cdss.ca.gov/research.

GENERAL INSTRUCTIONS

Enter in the boxes provided near the top of the form the adoption agency name, agency code, version (Initial or Revised) and the report quarter and year.

Enter the data required for each item. If there is nothing to report for an item, enter "0". Do not leave any items blank. If your agency does not provide a particular service/activity, or the service/activity is provided but the agency is unable to collect or track the data, enter "0" and explain in the Comments section.

Enter in the boxes at the end of the form the name, job title or classification, telephone number, fax number and e-mail address of the person to contact if there are questions about the report. This person may or may not be the person who completed the report. Enter the date the report was submitted. This is the date when the report is e-mailed to DSSDB.

DEFINITIONS

<u>Accredited agency</u>: An agency that has been accredited by an accrediting entity to provide adoption services in the United States in cases subject to the Hague Convention. It does not include a temporarily accredited agency.

Adopt-abroad: Adoption of a foreign-born child by a United States citizen or a lawful permanent resident alien of the United States completed in foreign courts under the laws of the foreign country.

Adopt in California: For the purpose of an intercountry adoption, an adoption where an adoption agency arranges for the foreign-born child to travel to California without an adoption having been completed in a foreign country, places the child for adoption after arrival in California, and completes the adoption of the child under the laws of California's Intercountry Adoption Program.

<u>Alternative placements</u>: A child placement made by the adoptive parent(s), child welfare agency, or licensed adoption agency with a different family or into an institutional setting.

<u>Application</u>: A written and signed application submitted by prospective adoptive parent(s) to a licensed adoption agency for the purposes of seeking an intercountry adoption.

<u>Assessments</u>: A written document which contains information relevant to the case situation and an appraisal of case services needs.

<u>Child</u>: For the purpose of an intercountry adoption, "child" means a foreign-born, unemancipated unmarried, person under the age of sixteen years.

<u>Convention country</u>: A country that is a party to the Hague Convention and with which the Convention is in force for the United States.

<u>Dependent</u>: As it pertains to public child welfare, a dependent of the court is a child who has met the criteria for dependency as defined in Welfare and Institutions Code, Section 300, for child abuse and/or neglect and is under the care and supervision of the court.

<u>Disrupted placement</u>: A child who came to the United States for the purpose of adoption but whose placement was terminated or who entered foster care prior to the finalization of the adoption regardless of the reason.

<u>Dissolved finalization</u>: A foreign-born child who was previously adopted (whether the full and final adoption occurred in the foreign country or domestically) but whose adoption was terminated or who entered foster care as a result of a court terminating the parent(s)' rights or the parent(s)' relinquishing their rights to the child.

<u>Emigration</u>: A child born in the United States and placed for adoption with a family in another country is referred to as an outgoing case or emigration. The Hague Convention governs adoptions from the United States to other Convention countries – not just adoptions coming into the United States.

<u>Exempt provider</u>: A social work professional or organization that performs a home study on prospective adoptive parent(s) or a child background study (or both) in the United States in connection with a Convention adoption (including any reports or updates), but that is not currently providing and has not previously provided any other adoption service in the case.

<u>Finalization of adoption</u>: A court order granting completion of the adoption.

DEFINITIONS (Continued)

<u>Foster care placement</u>: The placement of a child in a licensed or certified home that provides 24-hour care and supervision for children who need temporary or long-term substitute care because their own parent(s)/guardian(s) are unable or unwilling to care for them. Foster placement is made by a child welfare social worker following a court order or voluntary placement agreement.

<u>Hague Convention</u>: The Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption, May 29, 1993.

<u>Immigration</u>: Before a foreign adoption can take place, permission must first be obtained from the United States Citizenship and Immigration Services (USCIS) for the foreign child to be able to lawfully enter the United States for the purpose of being adopted. The Hague Convention governs adoptions from other Convention countries to the United States.

<u>Intercountry adoption</u>: The adoption of a foreign-born child for whom federal law makes a special immigration visa available. Intercountry adoption includes completion of the adoption in the child's native country or completion of the adoption in this state.

Non-convention country: A country that is not a party to the Hague Convention.

<u>Parent(s)</u>: Natural or adoptive father and/or mother, whether married or unmarried, or other adult(s) fulfilling the parental role.

<u>Placement for adoption</u>: The arrangement for the care of a child who has been freed for adoptive placement with a family that has been studied and approved for adoption by a licensed adoption agency with the intent of adoption of the child by the family.

Post-adopt services: Services provided following the finalization of an adoption.

<u>Primary provider</u>: The accredited agency, temporarily accredited agency, or approved person that is identified as responsible for ensuring that all six adoption services are provided and for supervising and being responsible for supervised providers where used.

<u>Re-adopt</u>: For the purpose of intercountry adoption, an adoption where a child previously adopted abroad is subsequently adopted in California.

<u>Relinquishment</u>: An action by a parent(s) who signs a relinquishment form in which he or she surrenders custody, control, and any responsibility for the care and support of the child to any licensed public or private adoption agency.

<u>Supervised provider</u>: Any agency, person, or other non-governmental entity, including any foreign entity, regardless of whether it is called a facilitator, agent, attorney, or by any other name, that is providing one or more adoption services in a Convention case under the supervision and responsibility of an accredited agency, temporarily accredited agency, or approved person that is acting as the primary provider in the case.

DEFINITIONS (Continued)

Visas: Children adopted in Convention countries receive IH-3 or IH-4 immigrant visas.

IH-3 visas are for children who are adopted in a Hague Convention country. Children who are under 18 automatically acquire U.S. citizenship upon entry to the United States on an IH-3 visa. In such cases, USCIS automatically sends Certificates of Citizenship without requiring additional forms or fees.

IH-4 visas are for children coming from a Convention country who will be adopted in the United States. IH-4 recipients do not automatically acquire U.S. citizenship, but are lawful permanent residents until the adoption is full and final.

Children adopted in non-Convention countries receive IR-3 or IR-4 immigrant visas.

IR-3 visas are issued after a full and final adoption is completed abroad by both adopting parents; both parents physically see the child prior to or during local adoption proceedings; and the country in which the child resides does not require re-adoption in the United States. Children who are under 18 automatically acquire U.S. citizenship upon entry to the United States on IR-3 visas. In such cases, USCIS automatically sends Certificates of Citizenship without requiring additional forms or fees.

IR-4 visas are issued to children for whom a full and final adoption will be completed in the United States. This classification is used when a foreign country only permits prospective adoptive parents to obtain guardianship of a child, rather than allowing a full and final adoption; and/or the prospective adoptive parent(s) have not seen and observed the child prior to the adoption process. Orphans admitted to the United States on IR-4 visas become lawful permanent residents and are automatically processed to receive an Alien Registration Card ("green card").

ITEM INSTRUCTIONS

Part A. Intercountry Adoption Agency Operations

This part of the report provides information about intercountry adoption agency operations.

Item 1 – Intercountry Adoption Agency Activities this quarter, by Type

This item provides data on intercountry adoption agency activities during the report quarter by type of activity.

- 1. New intercountry adoption activities during the quarter by type (Item 1a plus Item 1b plus Item 1c):

 This item is automatically calculated when using the electronic form. This is the sum of Item 1a, Item 1b and Item 1c. [Cell 1]
 - a. New intercountry adoption cases as the primary provider: Enter the number of new intercountry adoption cases where this agency was the primary provider. [Cell 2]
 - b. New intercountry adoption cases as a supervised provider: Enter the number of new intercountry adoption cases where this agency was a supervised provider. [Cell 3]
 - c. New intercountry adoption cases as an exempt provider: Enter the number of new intercountry adoption cases where this agency acted as an exempt provider. [Cell 4]

Part B. Intercountry Adoption Applications and Assessments

This part provides data on intercountry adoption activities by prospective adoptive parents.

Items 2 through 6 - Intercountry Adoption Applications

These items provide data on families submitting intercountry adoption applications.

- 2. <u>Intercountry adoption applications pending at the beginning of the quarter</u>: Enter the intercountry adoption applications that are pending at the beginning of the quarter. *[Cell 5]*
 - a. <u>Item 6 from last quarter's report, as reported to CDSS</u>: Enter Item 6, Total intercountry adoption applications pending at the end of the quarter, from last quarter's report. [Cell 6]
 - b. Adjustment (Item 2 minus Item 2a, positive or negative number, explain in Comments if not 0): This item is automatically calculated when using the electronic form. This is any change, plus (+) or minus (-), in applications resulting from actions reported (including those authorized by mistake or in error) in prior quarters that were not previously reported. Whenever an adjustment is reported (i.e., Item 2b is not zero), explain in the "Item 2b Explanation" box in the Comments section why an adjustment was made. If there is no change, this item will be "0". [Cell 7]
- 3. New intercountry adoption applications received during the quarter: Enter the number of new intercountry adoption applications received during the quarter. [Cell 8]
- 4. <u>Intercountry adoption applications denied, dismissed or removed during the quarter</u>: Enter the number of intercountry adoption applications that were denied, dismissed, or removed for any reason this quarter. *[Cell 9]*
- 5. <u>Intercountry adoption applications referred for home study during the quarter</u>: Enter the number of intercountry adoption applications referred for home study during the quarter. *[Cell 10]*
- 6. Total intercountry adoption applications pending at the end of the quarter (Item 2 plus Item 3 minus Item 4 minus Item 5: This item is automatically calculated when using the electronic form. This is the sum of Items 2 and 3 minus Items 4 and 5. It should equal the case count at the end of the quarter of families with pending intercountry applications. This item is used to complete Item 2a in next quarter's report. [Cell 11]

Items 7 through 11 - Intercountry Home Study Assessments

These items provide data on families receiving home study assessments.

- 7. Intercountry home study assessments pending at the beginning of the quarter: Enter the intercountry home study assessments pending at the beginning of the quarter. [Cell 12]
 - a. <u>Item 11 from last quarter's report, as reported to CDSS</u>: Enter Item 11, Total intercountry home study assessments pending at the end of the quarter, from last quarter's report. [Cell 13]

- b. Adjustment (Item 7 minus Item 7a, positive or negative number, explain in Comments if not 0): This item is automatically calculated when using the electronic form. This is any change, plus (+) or minus (-), in caseload resulting from actions reported (including those authorized by mistake or in error) in prior quarters that were not previously reported. Whenever an adjustment is reported (i.e., Item 7b is not zero), explain in the "Item 7b Explanation" box in the Comments section why an adjustment was made. If there is no change, this item will be "0". [Cell 14]
- 8. New intercountry home study assessments requested or referred during the quarter: Enter the number of new intercountry home study assessments requested or referred during the quarter. [Cell 15]
- 9. <u>Intercountry home study assessments denied, dismissed or removed during the quarter</u>: Enter the number of intercountry home study assessments denied, dismissed, or removed the quarter. *[Cell 16]*
- 10. <u>Intercountry home study assessments approved during the quarter</u>: Enter the number of intercountry home study assessments approved during the quarter. *[Cell 17]*
- 11. Total intercountry home study assessments pending at the end of the quarter (Item 7 plus Item 8 minus Item 9 minus Item 10): This item is automatically calculated when using the electronic form. This is the sum of Items 7 and 8 minus Items 9 and 10. It should equal the case count of home study assessments requested or referred pending at the end of the quarter. This Item is used to complete Item 7a in next quarter's report. [Cell 18]

Part C. Foreign-Born Child Visas, Placements, Finalizations and Post-Adopt Services (Immigration)

This part provides data on foreign-born children being adopted by a California family.

Items 12 through 13 – Type of Visa to be Issued to Foreign-Born Child being Adopted by California Family

These items provide data on types of visas to be applied for in California on behalf of foreign-born children involved in an intercountry adoption with a California family.

- 12. Visas to be applied for in California for U.S. citizenship to be granted by foreign adoption of children during the quarter (Item 12a plus Item 12b): This item is automatically calculated when using the electronic form. This is the sum of Items 12a and 12b. It should equal the case count of IH-3 and IR-3 visas to be applied for during the quarter. [Cell 19]
 - a. New IH-3 visas to be applied for with a Convention country: Enter the number of IH-3 visas to be applied for. [Cell 20]
 - b. New IR-3 visas to be applied for with a Non-convention country: Enter the number of IR-3 visas to be applied for. [Cell 21]
- 13. Visas to be applied for in California for re-adoption of children as required for U.S. citizenship during the quarter (Item 13a plus Item 13b): This item is automatically calculated when using the electronic form. This is the sum of Items 13a and 13b. It should equal the case count of IH-4 and IR-4 visas to be applied for during the quarter. [Cell 22]
 - a. New IH-4 visas to be applied for with a Convention country: Enter the number of IH-4 visas to be applied for. [Cell 23]

b. New IR-4 visas to be applied for with a Non-convention country: Enter the number of IR-4 visas to be applied for. [Cell 24]

Item 14 - Countries of Origin for Children for Whom Visa is Requested

This item provides data on countries of origin of foreign-born children for whom a visa is to be requested.

- 14. <u>List the country of origin for children for whom visa is requested and the number of children</u> immigrating from each country (Countries are summed in Cell 28, children are summed in Cell 32):
 - a. <u>Children's country of origin (country name)</u>: In Cells 25, 26 and 27 enter the <u>name</u> of each country of origin of children for which visas are to be requested. *Cell 28 is automatically calculated when using the electronic form.* It is the <u>number</u> of countries listed in Cells 25, 26 and 27. [Cells 25, 26, 27 and 28]

Examples:

If no countries, Cell 25, Cell 26 and Cell 27 should be left blank.

Cell 28 will be calculated as 0.

If one country, in Cell 25 enter the country name and Cell 26 and Cell 27 should be left blank. Cell 28 will be calculated as 1.

If two countries, in Cell 25 and Cell 26 enter the country names and Cell 27 should be left blank. Cell 28 will be calculated as 2.

If three countries, in Cell 25, Cell 26 and Cell 27 enter the country names.

Cell 28 will be calculated as 3.

If there are four or more countries of origin of children for whom visas are requested, list the countries and the number of children immigrating from each country in the **Comments section**. Identify the comments as Item 14a and 14b.

b. Number of children immigrating from country above: In Cells 29, 30 and 31 enter the number of children for which visas are to be requested for each country listed in Item 14a. *Cell 32 is automatically calculated when using the electronic form.* It is the sum of Cells 29, 30 and 31. [Cells 29, 30, 31 and 32]

Items 15 through 19 - Placements, Finalizations and Post-Adopt Services

These items provide data on disrupted adoptive placements, finalizations, dissolved finalizations and intercountry post-adoption services.

Item 15 - Intercountry Adoptions Disrupted following Placement in California

- 15. <u>Disrupted adoption placements of foreign-born children in California during the quarter (Item 15a plus Item 15b)</u>: **This item is automatically calculated when using the electronic form.** This is the sum of Items 15a and 15b. [Cell 33]
 - a. <u>Children with disrupted placements who entered foster care in California</u>: Enter the number of children who entered foster care in California after disrupted placement occurred. *[Cell 34]*
 - b. Children with disrupted placements receiving alternative placements: Enter the number of children receiving alternative placements after disrupted placement occurred. [Cell 35]

Items 16 through 17 - Intercountry Adoption Finalizations in California

- Finalized intercountry adoptions in California during the quarter (Items 16a plus Item 16b): This item is automatically calculated when using the electronic form. This is the sum of Items 16a and 16b. [Cell 36]
 - a. <u>California families adopting in country of origin</u>: Enter the number of families that will be finalizing their adoption in the child's country of origin. *[Cell 37]*
 - b. <u>California families finalizing an adoption in California</u>: Enter the number of families that will finalize their adoption in California. *[Cell 38]*
- 17. <u>California families provided re-adopt services during the quarter</u>: Enter the number of families that received any type of re-adopt services this quarter. [Cell 39]

Item 18 – Intercountry Adoptions Dissolved following Finalization of Adoption

- 18. California families dissolving an intercountry adoption during the quarter (*Item 18a plus Item 18b*): This item is automatically calculated when using the electronic form. This is the sum of Items 18a and 18b. [Cell 40]
 - a. <u>Dissolved finalizations with children entering foster care in California</u>: Enter the number of children who entered foster care in California after dissolution of an intercountry adoption. [Cell 41]
 - b. <u>Dissolved finalizations with children receiving alternative placements</u>: Enter the number of children with alternative placements after dissolution of an intercountry adoption. [Cell 42]

Item 19 - Intercountry Post-Adoption Services

This item provides data on intercountry post-adoption services.

19. <u>California families receiving post-adoption services during the quarter</u>: Enter the number of families receiving any intercountry post-adoption services, during the quarter. [Cell 43]

Part D. California Children being Adopted Abroad (Emigration)

Items 20 through 21 - Emigration Assessments and Finalizations for California Children

These items provide data on California children emigrating to another country to be adopted.

- 20. <u>California children with newly approved emigration assessments during the quarter (Item 20a plus Item 20b)</u>: **This item is automatically calculated when using the electronic form.** This is the sum of Items 20a and 20b. [Cell 44]
 - a. <u>Children relinquished by birth parent(s)</u>: Enter the number of emigrating children who were relinquished by their birth parent(s). *[Cell 45]*
 - b. <u>Children becoming dependents of the court</u>: Enter the number of emigrating children who became dependents of the court. *[Cell 46]*
 - 1) <u>Dependent children that will receive Adoption Assistance Payments (AAP)</u>: Enter the number of emigrating dependent California children that will receive AAP. [Cell 47]

- 21. California children adopted abroad during the quarter (Item 21a plus Item 21b): This item is automatically calculated when using the electronic form. This is the sum of Items 21a and 21b. [Cell 48]
 - a. <u>Children with adoption finalized in California</u>: Enter the number of emigrating children having their adoption finalized in California. *[Cell 49]*
 - b. Children with adoption finalized only in destination country: Enter the number of emigrating California children having their adoption finalized only in destination country. [Cell 50]

Item 22 - Countries of Destination for California Children being Adopted Abroad

This item provides data on countries of destination for California children being adopted abroad.

- 22. <u>List the country of destination for California children to be adopted abroad and the number of children emigrating to each country (Countries are summed in Cell 54, children are summed in Cell 58):</u>
 - a. <u>Children's country of destination (country name)</u>: In Cells 51, 52 and 53 enter the <u>name</u> of each country to which California children are emigrating. *Cell 54 is automatically calculated when using the electronic form.* It is the <u>number</u> of countries listed in Cells 51, 52 and 53. [Cells 51, 52, 53 and 54]

Examples:

If no countries, Cell 51, Cell 52 and Cell 53 should be left blank.

Cell 54 will be calculated as 0.

If one country, in Cell 51 enter the country name and Cell 52 and Cell 53 should be left blank. Cell 54 will be calculated as 1.

If two countries, in Cell 51 and Cell 52 enter the two country names and Cell 53 should be left blank.

Cell 54 will be calculated as 2.

If three countries, in Cell 51, Cell 52 and Cell 53 enter the three country names.

Cell 54 will be calculated as 3.

If there are four or more countries of destination for California children to be adopted abroad, list the countries names and the number of children from each country in the **Comments section**. Identify the comments as Item 22a and 22b.

b. Number of children emmigrating to country above: In Cells 55, 56 and 57 enter the number of children emigrating to each country listed in Item 22a. Cell 58 is automatically calculated when using the electronic form: it is the sum of Cells 55, 56 and 57. [Cells 55, 56, 57 and 58]

COMMENTS

Use the Comments section to:

Explain any adjustment entries. See Item 2b (Cell 7) and Item 7b (Cell 14).

Explain any major fluctuations in data.

Provide information as directed in the report instructions. See Items 14a, 14b, 22a and 22b.

Provide any other comments the agency determines necessary.