

VOLUME 7A, APPENDIX A: “REIMBURSEMENT OF ADOPTION EXPENSES”**SUMMARY OF MAJOR CHANGES**

All changes are denoted by **blue font**.

Substantive revisions are denoted by an asterisk (*) symbol preceding the section, paragraph, table, or figure that includes the revision.

Unless otherwise noted, chapters referenced are contained in this volume.

Hyperlinks are denoted by **bold, italic, blue, and underlined font**.

The previous version dated **April 2018** is archived.

PARAGRAPH	EXPLANATION OF CHANGE/REVISION	PURPOSE
A00102	Updated the “Authoritative Guidance” paragraph to comply with current administrative instructions.	Revision
References	Renamed “Bibliography” to “References” and updated statutes and supporting references.	Revision

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APPENDIX A

REIMBURSEMENT OF ADOPTION EXPENSES

A001 GENERAL

A00101. Purpose

The purpose of this appendix is to prescribe the DoD policy for the reimbursement of adoption expenses to qualified members, as authorized by law.

*A00102. Authoritative Guidance

The pay policies and requirements established by DoD in this chapter are derived primarily from, and prepared in accordance with [Title 10, United States Code \(U.S.C.\), section 1052](#). Due to the subject matter in this chapter, the list of authoritative sources is extensive. The specific statutes, regulations, and other applicable guidance that govern each individual section are listed in a reference section at the end of the chapter.

A002 APPLICABILITY AND SCOPE

This appendix applies to the Defense Finance and Accounting Service (DFAS) Cleveland (CL) site, each Military Service personnel activity, and Service members serving on continuous active duty for at least 180 days. This appendix also applies to full-time Active Guard/Reserve members on active duty orders for at least 180 days.

A003 POLICY

The members specified in section A004, whose adoption of a child under 18 years of age has been finalized, may be reimbursed a maximum of \$2,000 per child for qualified expenses related to the adoption. In the event of multiple adoptions, the maximum reimbursable amount is \$5,000 per calendar year. A benefit may not be paid for any expense paid to or for a member of the Armed Forces under any other adoption benefits program administered by the Federal Government or under any such program administered by a state or local government. The DFAS-CL site is responsible for paying all approved adoption reimbursement claims. DFAS-CL is also responsible for providing primary guidance concerning adoption expense reimbursement procedures. The date the claim is received by DFAS-CL determines the creditable calendar year for determining the maximum reimbursable amount for multiple adoptions.

A004 ELIGIBILITY REQUIREMENTS

A00401. Active Duty Requirements

Service members must serve on continuous active duty for at least 180 days. In addition, members are not entitled to reimbursement expenses if they separate from active duty before the adoption is final. Members are eligible for reimbursement expenses if the adoption is finalized

before separation from active duty, the claim form has been signed and certified by the member's commanding officer, and the claim is submitted to the DFAS-CL site prior to discharge. Members may request a voluntary extension of assignment beyond their normal expiration of term of service to complete the adoption process.

A00402. Period of Eligibility

A. A member described in paragraph A00401, who incurs expenses when adopting a child under 18 years of age, must have the adoption finalized while on active duty to be eligible for reimbursement. Prior to separation from active duty, members must submit an application for reimbursement no later than:

1. 2 years after finalization of the adoption; or
2. 2 years after date that documentation of U.S. citizenship is issued (in the case of a foreign adoption).

B. If deployment responsibilities impact the member's ability to comply with the 2-year deadline, DFAS can make exceptions. In these cases, the verifying official who signs the DoD (DD) Form 2675, Reimbursement Request for Adoption Expenses, will submit a letter stating that the member's deployment impacted the member's ability to comply with the 2-year deadline.

A00403. Eligible Members

Adoption expense reimbursements may be paid to married or single members. If both parents are military members (including members of the Coast Guard when operating as a Military Service in the Navy), then only one member may be reimbursed for expenses related to the adoption of the same child.

A00404. Qualifying Adoptions

- A. Adoption expenses that may be reimbursed include:
1. Adoption of a child under the age of 18;
 2. Adoption by a single person;
 3. Infant adoption;
 4. Inter-country adoption;
 5. Adoption of a child with special needs; and
 6. Adoption of stepchildren.

- B. Adoptions qualify for reimbursement only if the adoption is arranged by:
1. A qualified adoption agency; or
 2. Other source authorized to place children for adoption under state or local law.
- C. A qualified adoption agency means any of the following:
1. State or local government agency which has responsibility under state or local law for child placement through adoption;
 2. A nonprofit, voluntary adoption agency that is authorized by state or local law to place children for adoption; or
 3. Any other source authorized by a state to provide adoption placement, if the adoption is supervised by a court under state or local law. (As used in this appendix, “state or local” refers to a state or locality in the United States.)
- D. A qualified adoption agency for inter-country adoptions would be a foreign government or an agency authorized by a foreign government to place children for adoption, in any case which:
1. The adopted child is entitled to automatic citizenship in accordance with [8 U.S.C. § 1431](#), also known as the Immigration and Nationality Act; or
 2. A certificate of citizenship has been issued for such child under [8 U.S.C. § 1433](#).

NOTE: In either case, documentation that describes the mission of the foreign agency and the authority delegated from the foreign government should be provided.

A005 RESPONSIBILITIES

A00501. Member Responsibilities

- A. A member must submit requests for reimbursement of qualified adoption expenses using a separate [DD 2675](#) for each qualifying adoption. Application assistance is available through Military One Source or installation personnel designated by the Military Service. The completed DD 2675 and substantiating documentation must be submitted no later than:
1. 2 years after finalization of the adoption; or
 2. 2 years after date that documentation of U.S. citizenship is issued (in the case of a foreign adoption).

B. A member must manually or digitally sign a thoroughly completed application for reimbursement and have it verified by the member's commander or designated verifying official.

1. When the DD 2675 is manually signed, the member's command must submit the application via postal mail, or DoD Enterprise (encrypted) email to:

Defense Finance and Accounting Service - Cleveland
Special Actions Team/JFLADA
ATTN: Adoption Reimbursement
1240 East Ninth Street
Cleveland, OH 44199

Email: dfas.cleveland-oh.jfl.mbx.adoption-reimbursement-cle@mail.mil

2. When the completed DD 2675 is digitally signed, either the member's command or the member must submit a copy of the application via postal mail or DoD Enterprise (encrypted) email (see subparagraph A00501.B.1).

NOTE: The member must retain the original application, including all supporting documents and proof (e.g., postal tracking receipt or email message) that the application was submitted by the 2-year deadline.

C. If neither the member nor the spouse is able to appear personally at the servicing personnel activity, then the completed claim forms may be mailed to the personnel activity. The spouse of a Service member, who is unable to complete a claim package due to military duty, can sign a claim form under a power of attorney. All claims signed by a spouse must include the power of attorney as a part of the claims package.

D. Service members must substantiate all expenses with documentation. Documentation must include receipts marked "PAID" or canceled checks.

1. If the receipts are from a foreign entity, then they should list the U.S. currency equivalency.

2. Reconstruction of expense records is permissible when the original records are unavailable, and the member submits a notarized affidavit stating the costs.

3. The member must submit a full English translation of any foreign language document, to include the translator's certification that he or she is competent to translate the foreign language into English, and that his or her translation is complete and correct.

4. The member is responsible for providing the appropriate documentation that establishes the adoption is final and that it was arranged by a qualified adoption agency, as defined in paragraph A00404.

5. With respect to documents originating from a state or other authorized adoption agency, copies of those documents must be certified as true copies of the original by the state or adoption agency. If the original document is filed with the court, then the member must submit a copy of the adoption order certified by the clerk of courts.

NOTE: These documents will not be returned to the member.

E. In determining whether an adoption of a child in a foreign country is final, the member must submit a copy of the final court documents, as well as proof of U.S. citizenship for the child. The following documents are acceptable forms of proof of U.S. citizenship:

1. A copy of a U.S. court order that recognizes foreign adoption or documents the “re-adopting” of the child in the United States, granting the child U.S. citizenship;
2. A letter from the U.S. Citizenship and Immigration Services which states the status of the child’s adoption, granting the child U.S. citizenship;
3. A copy of a U.S. passport (page with personal information only); or
4. A copy of a U.S. Certificate of Citizenship.

F. The member is responsible for maintaining a file for the reimbursement claim. This file should contain copies of all paperwork related to the claim, including the receipts, agency documentation, and court papers associated with the adoption proceedings or court-certified copies until the claim is paid or denied.

G. The member will submit only one reimbursement claim per adoption.

A00502. Secretaries of the Military Departments Responsibilities

Each Service Secretary will designate personnel as reviewing officials to evaluate and approve submission of payment claims for reimbursement by Service members under the jurisdiction of the Military Department concerned; accept and maintain a copy of claims for reimbursement; and forward the authorization for payment of the adoption reimbursement claim to DFAS for final approval and payment. See subparagraphs A00501.B.1 and 2 for instructions on how the application should be submitted.

A00503. DFAS-CL Responsibilities

The DFAS-CL site is the central site location for review, certification, and payment of adoption expense reimbursement payments. DFAS-CL is the primary source for guidance concerning the adoption expense reimbursement program. DFAS-CL will also maintain data on expenditures on a fiscal year basis. The contact information for DFAS-CL adoption expense reimbursement program is:

DFAS-CL
(Code JFLADA)
Commercial phone: 216-522-5576/6701
DSN: 580-5576/6701

Email: dfas.cleveland-oh.jfl.mbx.adoption-reimbursement-cle@mail.mil

A00504. Military Services' Adoption Expense Reimbursement Funding Responsibilities

The Military Services provide funding authorization to DFAS-CL by memorandum each fiscal year. The DFAS-CL site charges the applicable Military Service provided appropriations according to standard cross-disbursing operating procedures.

A006 ADOPTION REIMBURSEMENT PROCEDURES

A00601. Authorized Reimbursable Expenses

The DFAS-CL site will pay documented, reasonable, and necessary adoption expenses, up to \$2,000 per adoptive child. Not more than \$5,000 will be paid per calendar year to any member. In the case of two married members (including the Coast Guard when operating as a Military Service in the Navy), only one member may claim expenses for each adopted child and the couple is limited to the \$5,000 per calendar year maximum. The calendar year is determined by the date the claim is received by DFAS-CL for payment. Reasonable and necessary expenses include the following:

- A. Public and private agency fees, including adoptive fees charged by an agency in a foreign country;
- B. Placement fees, including fees charged adoptive parents for counseling;
- C. Legal fees, including court costs, for services that are unavailable to a member for the Military Services;
- D. Medical expenses, including hospital expenses, of the biological mother of the child to be adopted and of a newborn infant to be adopted; and
- E. Temporary foster care charges when payment of such charges is required to be made before the adoptive child's placement.

A00602. Unqualified Expenses

The term "reasonable and necessary expenses" does not include:

- A. Travel expenses;

- B. Items such as clothing, bedding, toys, and books; or
- C. Any costs associated with an adoption arranged in violation of federal, state, or local law.

A00603. Payment Processing Requirements

- A. A separate DD 2675 must support each claim.
- B. Eligibility for reimbursement is supported by the documentation submitted. If the eligibility for reimbursement cannot be determined from the documents provided or claimed expenses are not properly supported by receipts, then the DFAS-CL site will retain the claim and request the necessary information or documentation.
- C. The DFAS-CL site will issue the reimbursement by Electronic Funds Transfer (EFT) to the member's EFT account as designated on the DD 2675 within 30 days of receipt of a properly prepared and supported claim package. A member without access to an EFT method of payment must submit a request for EFT waiver to receive a check.
- D. If the claim is denied, then DFAS-CL will send a letter to the member stating this fact. DFAS-CL will not return documents to the members.

A00604. Appeals

If a member receives a claim denial, they can request reconsideration in writing and add additional explanation or documentation. If, upon reconsideration, the member receives a notice of final action regarding the denial of the claim, the member may appeal to the Defense Office of Hearings and Appeals, in accordance with DoD Instruction (DoDI) 1340.21, Enclosure 7. The request for appeal should include copies of all relevant court documents and statements of the member or other persons in support of the claim and be sent to DFAS at the address listed in subparagraph A00501.B.1.

REFERENCES*APPENDIX A – REIMBURSEMENT OF ADOPTION EXPENSES**

A003 – POLICY

DoDI 1341.09, July 5, 2016

A004 – ELGIBILITY REQUIREMENTS

DoDI 1341.09, July 5, 2016

A00404.A	10 U.S.C. § 1052(g)(3)(D)(i)
A00404.B	10 U.S.C. § 1052(g)(3)(D)(ii)
A00404.D.1	8 U.S.C. § 1431
A00404.D.2	8 U.S.C. § 1433

A005 – RESPONSIBILITIES

A00501	DoDI 1341.09, July 5, 2016
A00502	DoDI 1341.09, July 5, 2016

A006 – ADOPTION REIMBURSEMENT PROCEDURES

A00601	DoDI 1341.09, July 5, 2016
A00602	DoDI 1341.09, July 5, 2016
A00604	DoDI 1340.21, May 12, 2004