



ADMINISTRATION FOR CHILDREN & FAMILIES

Office of Refugee Resettlement | 330 C Street, S.W., Washington, DC 20201
www.acf.hhs.gov/programs/orr

FIELD GUIDANCE – February 14, 2025

RE: Field Guidance #26 – Fingerprint Background Checks and Acceptable Supporting Documentation for a *Family Reunification Application*

GUIDANCE

Until further notice, this field guidance replaces ORR background check requirements described at **UAC Policy Guide Section 2.5.1 Background Check Requirements**. Further, **UAC MAP section 2.5.1 – Quick Glance: Release of UAC Prior to Receiving Fingerprint Results** is suspended and will be replaced with procedures consistent with this Field Guidance.¹

ORR's Unaccompanied Alien Children (UAC) Bureau requires potential sponsors of UAC to undergo a suitability assessment process, which includes verification of identity and background checks of the potential sponsor and adults living in the sponsor's home. See 8 U.S.C 1232(c)(3)(A); see also 45 C.F.R. 410.1202(b), (c).

To enhance the safety of releases to sponsors, prevent fraud, and combat trafficking, **effective immediately**, ORR will:

- Require fingerprinting of **all** adult sponsors and their adult household members aged 18 and over, and adult caregivers identified in a Sponsor Care Plan. All potential sponsor, household member, and adult caregiver fingerprint results must be received, adjudicated, and recorded in the UAC Portal prior to approval for release.
- Only accept *unexpired* and *legible* photocopies of identification documents for purposes of establishing identity under **UAC Policy Guide Section 2.2.4 Required Documents for Submission with the Application for Release**. A photocopy, high-resolution color digital scan, or high-resolution digital color photo depicting both front and back of the unexpired identification documents must be received, reviewed, and saved in the UAC Portal prior to approval for release.²
- Require potential sponsors, adult household members, and adult caregivers identified in a sponsor care plan, to present *original* unexpired versions (not photocopies) of the identification documents along with their *Authorization for Release of Information (ARI)* at the ORR Digital Site, FieldPrint, or other designated fingerprint processing site when presenting themselves for fingerprinting. Sponsors must also present the same original and unexpired identification documents upon the physical release of the child to the potential sponsor.

¹ Field Guidances # 10, 14, and 15 were previously rescinded and remain rescinded.

² Pursuant to 45 C.F.R. § 410.1202(b) and applicable ORR policy and procedures, ORR must verify the validity of government-issued identity documents presented by the potential sponsor.

This Field Guidance and applicable policies and procedures may be further updated to account for operational considerations. Any deviation from the requirements of this Guidance requires the express waiver of the ORR Director.³

INSTRUCTIONS

Overview of Key Players and General Responsibilities

Key Players	General Responsibilities
Case Managers and Unification Specialists	Case Managers refer sponsors to the Unification Specialist (where applicable). Case Managers or Unification Specialists assist sponsors with completing the <i>Family Reunification Application (FRA)</i> , collect and review identity documents, and refer sponsors for fingerprinting.
Case Coordinators	Conduct third-party review of cases to ensure that the release recommendation complies with all policies and procedures. Case coordinators also make an independent recommendation on the release.
Federal Field Specialists	Make final release decisions on all cases after reviewing recommendations obtained from Unification Specialists, Case Manager, and third-party review. Federal Field Specialists are also responsible for adjudicating fingerprint results for all Sponsors, Household Members, and Adult Care givers, and communicating the viability as outlined by policy.
HHS Program Support Center, Division of Children’s Services (PSC/ DCS)	Conducts Non-Public Records Checks – FBI National Criminal History Check (Fingerprint Check), FBI Biometric Services Unit (FBI/BSU) Civil Name Check, and Child Abuse and Neglect (CA/N) Check – on behalf of ORR.
Central Fingerprint Review Team	Evaluates Fingerprint Check results in conjunction with other criminal history records or self-disclosed criminal history to determine how criminal history may impact the sponsor’s ability to care for the child and determine the applicability of UAC Policy Guide Sec. 2.7.4 – Release Denial criteria for each case.
FieldPrint	ORR contracted FBI-Approved channeler; provides digital fingerprinting services through their remote services network using LiveScan technology located in business and professional services retail locations nationwide.

Verification of Identity

Following guidance outlined in **UAC Policy Guide Section 2.2.1 Identification of Qualified Sponsors and UAC MAP Sec. 2.2.1**, the Case Manager or Unification Specialist interviews the child as well as parents,

³ This guidance does not apply to reunifications pursuant to **UAC Policy Guide Section 2.10 Separations under the Ms. L Settlement**.

legal guardians and other relatives or family friends in both the country of origin and the United States to identify potential qualified sponsors. Once identified, the Case Manager or Unification Specialist contacts potential sponsors to confirm their interest to proceed with the sponsor vetting process. When interest is confirmed, the Case Manager or Unification Specialist reviews the Family Reunification Package contents, the sponsor vetting process, and the roles of all parties involved. The Case Manager or Unification Specialist takes the following actions:

1. Assists the potential sponsor with completing the *Family Reunification Application* and *Authorization for Release of Information* (ARI) following guidance in the **UAC Policy Guide** and **UAC MAP Sec. 2.2.3 – The Family Reunification Application**. All adult household members (HHMs) and adult care givers (ACGs) must also complete an ARI.
2. Informs the potential sponsor that they and all adult HHMs, and all ACGs identified in the sponsor care plan must provide valid and unexpired government-issued photo identification documents to establish their identity. Legible copies of these unexpired documents may be submitted electronically with the FRA. The original identification documents must be presented for physical inspection at the Fingerprint Check appointment and upon the physical release of the child to the potential sponsor and must match the documents provided with the FRA. The ID must be unexpired at the time of release.
 - a. The FRA will remain in process and active while the potential sponsor works to obtain acceptable identification documents, as applicable. The Case Manager or Unification Specialist will document the potential sponsor’s progress to obtain acceptable documents in the UAC Portal – Sponsor Profile – Additional Information field.

Background Check Requirements

Case managers or Unification Specialists must complete the following criminal history background checks for all potential sponsors, HHMs, and ACGs identified in the sponsor care plan regardless of sponsor category:

- Public Records Check
- Name and Address-based (1-mile radius) Sex Offender Public Registry Check through the U.S. Department of Justice (DOJ) National Sex Offender Public Website (www.nsopw.gov) with all repositories reporting.
 - If a state, territory, or tribal repository is listed as offline, the Case Manager or Unification Specialist should periodically re-run the check until the issue is resolved, and all repositories are included in the result.
 - If complete results with all repositories reporting are unobtainable through the U.S. DOJ NSOPW for a period of 48 hours or more, the Case Manager or Unification Specialist may supplement the incomplete NSOPW result by pulling a supplemental report directly from the state, territory, or tribal repositories missing from the US DOJ NSPOW result. The Case Manager or Unification Specialist ensures all supplemental results are attached to the NSOPW result, uploaded to the UC Documents section in UC Portal. Additionally, the Case Manager or Unification Specialist should note if supplemental state-level reports were pulled to obtain a complete NSOPW result in the UAC Portal Sponsor Assessment – Criminal History and Background Check “Additional Information” field.
- Local/State Sex Offender Registry Checks for all states in which the potential sponsor, HHM, or ACG resided from age 18 to present.

- FBI National Criminal History fingerprint-based check using digital fingerprints
 - The use of digitized paper prints or rolled ink prints is allowed for cases when the individual’s digital prints are returned twice as unreadable/unclassifiable.
- FBI/BSU Civil Name Check Results, as applicable.
- Child Abuse and Neglect (CA/N) checks, as applicable.
- State Criminal History Repository and/or Local Police Records Checks are required for all potential sponsors, HHMs, and ACG subjects to evaluate unresolved criminal arrests or charges, as applicable.

Background Check and Identification Document Procedures for Sponsors, HHMs, and ACG

The Case Manager or Unification Specialist must perform the following actions:

1. Notify the potential sponsor and all HHMs and ACGs that the above-listed background checks will be required.
2. Complete all required public records searches as discussed in this Field Guidance.
3. Obtain signed copies of the *ARI* from the potential sponsor, all adult HHMs, and all ACGs and upload the ARIs to the UAC Portal.
4. Obtain legible scans or copies of valid and unexpired government-issued photo ID for the potential sponsor, all HHMs and ACGs, and upload these documents to the UAC Portal.

NOTE: Both the front and back of the government-issued photo ID must be copied or scanned and uploaded to the UAC Portal. Both images must be legible.

5. Assist Sponsor, HHM, and ACG to schedule Fingerprinting Appointment at FieldPrint site or ORR Digital Site to occur within 3 (three) business days of receipt of ARI. Case Manager/Unification Specialist instructs Sponsor, HHMs, and ACGs to bring valid *original* government-issued photo ID that was provided as part of the *FRA* (See **UAC Policy Guide Sec. 2.2.4 List A and List B**) in addition to FieldPrint required secondary ID (see **FieldPrint Acceptable forms of ID**) to their fingerprinting appointment whether the appointment is at a FieldPrint site or ORR Digital Site.
 - The Case Manager/Unification Specialist documents the first available date and the accepted date for a fingerprinting appointment in UAC Portal – Sponsor Assessment Criminal History Background Checks Tab. When the results are received, PSC/DCS documents them in the UAC Portal – Sponsor Assessment Criminal History Background Checks Tab.
6. PSC/DCS provides initial review of fingerprint results and notifies FFS/Program POC of Clear/Not Clear status. A “Pass/ Clear” status means no disqualifying criminal history record information is included in the background check result; “Review/ Referred to FFS” determination means the results include criminal history record information that may present a safety risk or concern for the child and requires additional review in the context all other available sponsor data. A “Fail/ Not Clear” result indicates that the results contain mandatory denial criteria discussed in **UAC Policy Guide Sec. 2.7.4 Deny Release Request**.
7. FFS adjudicates the fingerprint results according to **UAC MAP 2.5.1**.