

## ORR Guidance on Fingerprint Background Checks for Family Reunification Applications Frequently Asked Questions February 2025

### Who are unaccompanied children?

According to the Homeland Security Act of 2002, “unaccompanied alien children” (UAC), are defined as children under the age of 18 who have no lawful immigration status in the U.S. and do not have a parent or legal guardian in the U.S., or whose parent or legal guardian in the U.S. is not available to provide care and physical custody. For more information read Global Refuge’s [FAQ about Unaccompanied Children](#) and the [ORR UAC Bureau Fact Sheet](#).

### What is the process for an unaccompanied child to be released to a vetted family member or loved one?

Reuniting an unaccompanied child into a safe and secure home begins with identifying potential sponsors while the child remains in the Office of Refugee Resettlement (ORR) care. Prior to release to a vetted sponsor, children are provided age-appropriate care and services in ORR-funded facilities and programs. Once a sponsor is identified, they must complete an application and undergo a thorough screening to assess suitability, which involves verifying the sponsor’s identity and their relationship to the child.

### What is the new ORR guidance on fingerprint background checks and supporting documentation for family reunification?

On February 14, 2025, ORR issued [Field Guidance #26 – Fingerprint Background Checks and Acceptable Supporting Documentation for a Family Reunification Application](#).<sup>1</sup> This field guidance replaces previous ORR UAC background check requirements. Under the new guidance, “to enhance the safety of releases to sponsors, prevent fraud, and combat trafficking,” effective immediately, ORR will:

(1) 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.

(2) 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.

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<sup>1</sup> This guidance does not apply to reunifications pursuant to UAC Policy Guide Section 2.10 Separations under the Ms. L Settlement.

(3) 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.

**Were there background checks in the UAC program previously?**

Yes. There has always been a vetting system for all potential sponsors. Sex offender registry checks and public records checks have been required for all adults identified as a potential sponsor, adult household members, or potential caregivers. The release of all UAC is contingent on review of these background checks and approval for release by ORR.

**Were fingerprint checks previously required in the UAC program?**

In specific instances, fingerprint checks were previously required. Prior to the new ORR *Field Guidance #26*, FBI fingerprint checks were required for a potential sponsor who was the child's parent, legal guardian, sibling, or immediate relative (who previously served as the child's caregiver) when a public records or sex offender check revealed possible disqualifying factors. Following the results, the Federal Field Specialist would make a release decision. Additionally, all potential non-related sponsors, and proposed non-immediate family member sponsors who had not previously served as the UAC's primary caregiver, were required to be fingerprinted as a safety check.<sup>2</sup> In any situation in which there was an identified risk to the safety of the child, or the child was considered especially vulnerable, enhanced background checks were immediately initiated for all involved adults, including FBI fingerprint checks, home studies, and child abuse and neglect (CA/N) checks.

Under the new [field guidance](#), all potential sponsors, adult household members, and adults specified in sponsor care plans are now required to complete fingerprint checks.

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<sup>2</sup> HHS, Unaccompanied Alien Children (UAC) Program Fact Sheet (2019) *available at* <https://www.hhs.gov/sites/default/files/unaccompanied-alien-children-program-fact-sheet-10-2019.pdf>