



**U.S. Department of Justice**  
Immigration and Naturalization Service

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Office of the Executive Associate Commissioner

*425 I Street NW*  
*Washington, DC 20536*

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MEMORANDUM FOR REGIONAL DIRECTORS  
DEPUTY EXECUTIVE ASSOCIATE COMMISSIONER,  
IMMIGRATION SERVICES  
ACTING DIRECTOR,  
OFFICE OF INTERNATIONAL AFFAIRS

FROM: Johnny N. Williams /s/  
Executive Associate Commissioner  
Office of Field Operations

SUBJECT: Fingerprint Check Integrity When Adjudicating Orphan Petitions

Policy regarding the expiration of FBI fingerprint checks when adjudicating Forms I-600A and Forms I-600

In recent months, several questions regarding the expiration of Federal Bureau of Investigation (FBI) fingerprint checks and the adjudication of Forms I-600A, Application for Advance Processing of Orphan Petition, and Forms I-600, Petition to Classify Orphan as an Immediate Relative, have been raised. This memorandum reiterates Immigration and Naturalization Service (Service) policy on this issue and should be read in conjunction with the Fingerprint Waiver Policy memorandum dated July 20, 2001, and Part III, Fingerprint Check Integrity, of the Naturalization Quality Procedures.

The regulations at 8 CFR 204.3(c)(3) require the fingerprinting of the prospective adoptive parent(s) (applicants) and any adult members of the applicant's household. FBI fingerprint responses are valid for a period of 15 months. Prior to the approval of any Form I-600A or Form I-600, Service personnel must ensure that the 15-month validity period of the FBI fingerprint responses has not expired. If the fingerprint response has expired, then the applicants and any adult members of the applicant's household must be re-fingerprinted prior to approval of any Form I-600A or Form I-600.