



ADMINISTRATION FOR
CHILDREN & FAMILIES

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

FIELD GUIDANCE – March 14, 2025

RE: Field Guidance #27 – DNA Testing Expansion

GUIDANCE

To enhance its sponsor vetting processes, ORR's Unaccompanied Alien Children (UAC) Bureau requires DNA testing to support proof of relationship between a potential sponsor and an unaccompanied alien child where a sponsor purports to be biologically related to the child. ORR requires DNA results that confirm biological parentage, biological grand-parentage, avuncular relationship (when an uncle or aunt is a full sibling to a parent), or siblingship (full or half), to establish biological relationship with the unaccompanied alien child.

In cases where the sponsor does not purport to be biologically related to the unaccompanied alien child, ORR and grantees must refer to the current guidance to establish proof of relationship in the [UAC Policy Guide Section 2.2.4 Required Documents for Submission with the Application for Release](#) and accompanying section of the UAC Manual of Procedures (MAP).

Submission of a DNA sample by the potential sponsor is not mandatory. However, refusal to submit a DNA sample may be grounds for ORR to recategorize the sponsorship as an unrelated Category 3 sponsorship and will require enhanced vetting procedures pursuant to ORR Policy.

Competent UAC aged 14 or over must voluntarily consent to DNA sample submissions. For children aged 14 or older where a clinician has assessed that the child is unable to consent, the FFS must be consulted for a best interest determination on behalf of the child to obtain consent. ORR will presume consent for children under the age of 14 for purposes of DNA sample submissions to establish relationship.

DNA test results must never be the sole reason for denying release to a potential sponsor, unless the sponsor misrepresented his or her relationship with the child. However, results of DNA tests may result in ORR updating the potential sponsor's Sponsor Category under [UAC Policy Guide Section 2.2.1 Identification of Qualified Sponsors](#).

If there is suspicion of a fraud attempt, ORR staff and care providers staff must follow [UAC Policy Guide Section 5.7.2 Responding to Fraud Attempts](#) and ensure proper reporting and compliance with [UAC Policy Guide Section 5.8 Reporting Child-Level Events and Program-Level Events](#).

This Field Guidance and applicable policies and procedures may be further updated to account for operational considerations and consistency with other program requirements. Where this Field Guidance is silent, care providers are instructed to follow existing guidance in UAC Policy Guide and UAC MAP.

Sharing DNA Test Results with Child, Family, and/or Potential Sponsor

Case managers are not authorized to automatically share DNA test results with the potential sponsor. The case manager may verbally share test results with the child after making a determination that sharing the results is in the child's best interest. Care provider should determine on a case-by-case basis who is the best person to disclose the information to the child and extent of the disclosure. Under no circumstances may the case manager share test results with anyone who is not the care provider, ORR staff, or one of the individuals who submitted their biological sample for the test (i.e., the potential sponsor and child); this restriction applies even if the requester for the test result is a parent or other family member of the child and/or potential sponsor.

DNA Records Management Policies

ORR Records Management Policies: Results from DNA testing are only used for purposes of confirming biological relationship to inform the release decision making and are not to be shared with any individual or organization outside of ORR. Use of DNA testing is only used for purposes of establishing biological relationship as part of the sponsor vetting process. DNA results are not submitted to law enforcement personnel or run against law enforcement databases, unless requested for purposes of a criminal investigation through a subpoena or search warrant. See [UAC Policy Guide Section 5.10.7 Information Sharing with Investigative Agencies](#). Results and references to results of DNA tests are maintained in the UAC Portal but are considered Protected Health Information (PHI) and may only be disclosed as required by law. References to results of DNA tests are maintained in the ORR database but are considered confidential information and may only be disclosed as required by law.

Transfer of Children While DNA Test Results are Pending

If a child is transferred to another ORR care provider, DNA Diagnostics Center will keep the DNA referral open. The sending case manager must notify the receiving case manager of the pending DNA results and provide the Point Comfort Underwriters (PCU) reference number. The receiving case manager must contact PCU at 866-956-4959 (PCU will ask for the reference number) and update information on where the test results should be sent. Failure to do so will delay the receipt of the test results.

This Field Guidance and applicable policies and procedures may be further updated to account for operational considerations and consistency with other program requirements. Where this Field Guidance is silent, care providers are instructed to follow existing guidance in UAC Policy Guide and UAC MAP.

INSTRUCTIONS

Proof of Sponsor-Child Relationship and Rapid DNA Testing Procedure

1. Potential sponsors must provide evidence of identity and biological relationship with the child, if there is such relationship, consistent with [UAC Policy Guide Section 2.2.4 Required Documents for Submission with the Application for Release](#).
2. If a potential sponsor identifies as biologically related to the child (i.e., biological parentage or avuncular relationship) the case manager or unification specialist emails the assigned Federal Field Specialist, copying the Case Coordinator, stating the claimed biological relationship between the potential sponsor and UAC and attaching the provided identity documents. The case manager or unification specialist requests a DNA test be conducted to confirm the biological relationship.

critical that once the need for a DNA test is identified, FFS approval is sought immediately, within one (1) business day.

- a. Within one (1) business day, the FFS responds to the case manager or unification specialist and copies the Case Coordinator authorizing DNA testing if appropriate.
 - b. The case manager must provide notice to the child's attorney of record, as applicable, that a DNA test is conducted.
3. The case manager contacts Point Comfort Underwriters (PCU) to identify the nearest testing center(s) and pricing. See the *DNA Testing Instruction Sheet* for detailed instructions.
4. Based on the information received, the case manager works with the facility's Medical Coordinator to complete the Treatment Authorization Request (TAR) and emails the TAR to DNA Diagnostics Center at info@allabouttruthdna.com. This should be done immediately after receiving authorization to proceed with a DNA test. See the *DNA Testing Instruction Sheet* for detailed instructions.
 - a. **NOTE:** Once the TAR is submitted, appointments are generally able to be scheduled within 2 days.
5. The case manager coordinates the testing with the potential sponsor, child, and DNA Diagnostics Center to occur as soon as possible.
6. DNA Diagnostics will mail the results via FedEx to the assigned case manager in the program where the child is placed.
7. The case manager reviews the test results within one (1) business day of receiving them. The case manager uses the test results when assessing the viability of the potential sponsor and the correct sponsorship category under **UAC Policy Guide Section 2.2.1 Identification of Qualified Sponsors**.
8. The case manager must upload the record of the DNA results under the UAC Documents. The uniform title for the document must be, "Results for DNA Testing for Validating Proof of Relationship."
9. In the case review for weekly updates and under release request, make a note of the results. Suggested language: "sponsor-child relationship confirmed per DNA results" or "sponsor-child relationship not confirmed per DNA results."