

Transition – A Presidential Change Update

April 2025

DHS Implements Foreign National Registration Requirement

Key Notes:

- All foreign nationals in the U.S. over 18 must carry evidence of registration with them at all times
- Children need to be registered
- Non-compliance is a criminal offense

The U.S. Department of Homeland Security (DHS) has announced a new registry for foreign nationals, effective April 11, 2025. Although the registry was challenged in federal court, the court allowed its implementation to proceed.

Summary

Non-U.S. citizens residing in the United States must register with DHS by providing personal information, including fingerprints and home addresses.

Most foreign nationals in the U.S. on employer- or family-sponsored visas will generally be considered already registered. If a foreign national obtained a visa at a U.S. consulate and completed the biometrics/fingerprinting process as part of that application process, the foreign national is already registered.

However, children who entered the U.S. on a visa before turning 14 will not be considered registered, as fingerprinting is not required under age 14. Once they turn 14, they must register.

Regardless of whether a foreign national is already registered, individuals aged 18 and older must always carry proof of registration.

Who Must Register

The following individuals are required to register:

- All non-citizens aged 14 or older who were not fingerprinted or registered during the visa application process and who will remain in the United States for 30 days or more
- Any foreign national child under age 14 must be registered by a parent or legal guardian; they must re-register within 30 days after turning 14 when biometrics will be collected
- Any foreign national child who entered the U.S. before turning 14 and has since turned 14 must register within 30 days of their birthday
- Canadian visitors who will spend more than 30 days in the U.S. must register

Who is Already Considered Registered

The following foreign nationals are not required to register because they are considered already registered:

- Individuals who were fingerprinted, obtained a visa at a U.S. consulate or embassy and entered the U.S. with an I-94 record—even if it has since expired
- Lawful Permanent Residents
- Parolees
- Foreign nationals who have been issued an Employment Authorization Document (EAD)
- Foreign nationals with a pending Form I-485 (Application to Adjust Status)

Note: Children who entered the U.S. on a visa before age 14 and have since turned 14 must still register within 30 days of their birthday.

Registration Procedure

- Registration must be completed online through myaccount.uscis.gov.
- Parents registering minor children must create a separate account for each child and complete the form on their behalf.
- After submission, U.S. Citizenship and Immigration Services (USCIS) will review the information. If the foreign national is already registered, USCIS will confirm this. If not, USCIS will issue a biometrics notice for fingerprinting.
- USCIS will mail proof of the G-325R registration and make a digital copy available in the foreign national's myUSCIS account.

Carrying Proof of Registration (Mandatory)

Foreign nationals aged 18 and older must carry proof of registration on their person at all times. Acceptable forms of documentation include:

- Form I-94, Arrival-Departure Record (noncitizens admitted as nonimmigrants; noncitizens paroled into the U.S. under 212(d)(5) of the INA)
- Form I-551, Permanent Resident Card
- Form I-766, Employment Authorization Document (EAD)
- A valid, unexpired nonimmigrant DHS admission or parole stamp in a foreign passport
- Proof of registration (Form G-325R and confirmation of biometrics completion)

Penalties for Non-Compliance

- Willful failure or refusal to register or undergo fingerprinting is a criminal misdemeanor. Parents or legal guardians who fail or refuse to register a minor child may also be charged. The use of fraud or knowingly providing false information during registration is likewise a misdemeanor.

Penalties may include:

- A fine of up to \$5000
- Imprisonment for up to six months
- Or both

Additionally, failure to notify USCIS of a change of address within 10 days is a separate misdemeanor, punishable by a fine of up to \$5000, up to 30 days in jail, or both.

FOR MORE INFORMATION

For more information, please contact:

Sarah C. Flannery

Partner, Immigration

216.566.5718

Sarah.Flannery@ThompsonHine.com

Kelli L. Hayes

Partner, Immigration

614.469.3344

Kelli.Hayes@ThompsonHine.com

or any other member of our [Immigration](#) group.

This advisory bulletin may be reproduced, in whole or in part, with the prior permission of Thompson Hine LLP and acknowledgment of its source and copyright. This publication is intended to inform clients about legal matters of current interest. It is not intended as legal advice. Readers should not act upon the information contained in it without professional counsel.

This document may be considered attorney advertising in some jurisdictions.

© 2025 THOMPSON HINE LLP. ALL RIGHTS RESERVED.