



December 12, 2025

PA-2025-29

Policy Alert

SUBJECT: Photograph Reuse for Identity Documents

Purpose

U.S. Citizenship and Immigration Services (USCIS) is issuing policy guidance in the [USCIS Policy Manual](#) to address a change in the agency's photograph reuse policy.

Background

As part of the current process of issuing secure documents, USCIS may take a photograph of a benefit requestor at an Application Support Center (ASC) or through another approved submission process authorized by agency policy (collectively referred to as a biometric services appointment (BSA) for the purposes of this update).¹

During the COVID-19 pandemic, in order to reduce the need for benefit requestors to physically appear at an ASC for photograph collection, USCIS reused previously collected photographs for certain requestors, where the reuse period was based on the age of the requestors. However, this policy resulted in the issuance of secure documents where the photograph could be up to 22 years old by the expiration of the secure document's validity period.

Following the end of COVID-19 flexibilities, in September 2024, USCIS limited photograph reuse to a maximum of 10 years on any agency-issued secure document. USCIS considered the age of the photograph at the time of initial reuse and ensured it did not exceed 10 years during the validity period of the secure document for requestors 26 years of age and older. For requestors 25 years of age and younger, the age of the photograph could not exceed 30 months during the validity period of the secure document.

USCIS is now changing its photograph reuse policy. USCIS may only reuse a previously collected photograph if, at the time of filing, no more than 36 months (3 years) have passed since the date the photograph was collected at a BSA. This policy applies to all immigration benefit requests, with the exception of the Application for Naturalization ([Form N-400](#)), the Application for Certificate of Citizenship ([Form N-600](#)), the Application to Replace Permanent Resident Card ([Form I-90](#)), and the Application to Register Permanent Residence or Adjust Status ([Form I-485](#)). These forms require the collection of new biometrics, including a new photograph.

¹ See [8 CFR 103.2\(b\)\(9\)](#).

This guidance, contained in Volume 1 of the Policy Manual, is effective immediately and applies to benefit requests filed on or after the publication date. The guidance contained in the Policy Manual is controlling and supersedes any related prior guidance on the topic.

Policy Highlights

- Provides that USCIS may only reuse a previously collected BSA photograph if, at the time of filing, no more than 36 months (3 years) have passed since the date the photograph was collected at a BSA.
- Clarifies that USCIS has the discretion to require a new photograph from requestors in lieu of reusing an existing photograph.
- Removes the requirement to calculate both the age of the photograph and the secure document validity time frame.
- Provides that USCIS will not use or reuse self-submitted photographs.

Summary of Changes

Affected Section: Volume 1 > Part C > Chapter 2 > Section D, Biometrics Collected

- Revises content in Subsection 2 (Photographs) throughout.

USCIS may also make other minor technical, stylistic, and conforming changes consistent with this update.

Citation

Volume 1: General Policies and Procedures, Part C, Biometrics Collection and Security Checks, Chapter 2, Biometrics Collection [[1 USCIS-PM C.2](#)].