

SBA Electronic Fingerprinting Policy

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On March 25, 2020, the U.S. Small Business Administration (the SBA) announced a policy change in how it conducts background checks as part of the Small Business Investment Company (SBIC) license application. Under the new policy, the SBA has discontinued using paper-and-ink fingerprint cards, and now requires individuals to submit electronic fingerprints. The enforcement of this new policy had been delayed due to complications related to the COVID-19 outbreak, but the SBA has recently announced that it will now begin enforcement.

An individual who is required to submit fingerprints to the SBA as part of an SBIC license application can register by accessing the SBA fingerprinting [website](#). Once on this page, the individual should select “SBA SBIC” and follow the registration steps.

This website will use the individual’s address to provide nearby locations where the individual can schedule an appointment to have electronic fingerprints taken. Once fingerprints are scanned, they will automatically be submitted to the SBA, without any further action by the individual.

For individuals who do not live near an electronic fingerprinting provider, the SBA will continue to permit paper-and-ink fingerprints. If, following registration, the website determines that local electronic fingerprinting is not available to an individual, it will provide additional information and forms to help that individual submit paper-and-ink fingerprints.

Importantly, the new policy applies to both applicants for an SBIC license and currently licensed SBICs that were licensed while the SBA fingerprinting policies were suspended. Those SBICs that have been licensed, but have not submitted fingerprints to the SBA, should complete this process as soon as possible.

If you have any questions regarding the changes to the fingerprinting policies, or whether the changes apply to you, please contact the authors or your Winston & Strawn relationship attorney.

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