



U.S. Citizenship  
and Immigration  
Services

# Form N-648, Medical Certification for Disability Exceptions

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## USCIS Overview

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June 24, 2024

# Today's Topics



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1. Naturalization Eligibility Requirements
2. English and Civics (Educational) Requirements
3. Role of Medical Professionals (MP)
4. Accommodations or Modifications
5. The Oath of Allegiance
6. Avoiding Fraud and Scams
7. Examples: Applicant's Disability and Inability to Learn

# Law, Policy, and Operational Guidance



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- Immigration and Nationality Act (INA) §§ 312, 337
- Title 8 Code of Federal Regulations (CFR) §§ 312.1, 312.2, 312.5, 337.1
- USCIS Policy Manual, Volume 12,
  - Part E, Chapter 3
  - Part J, Chapter 3
- Form N-648 & Instructions





# Overview of the Naturalization Requirements

# General Naturalization Requirements



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- 18 years of age at filing
- Lawful Permanent Resident
- Continuous Residence and Physical Presence
- Good Moral Character
- Attachment to U.S. Constitution
- **Educational requirements (English and Civics)**
  - **Form N-648** is used to request an exception to some or all educational requirements.
- Oath of Allegiance



# English and Civics Requirements

# Educational Requirements

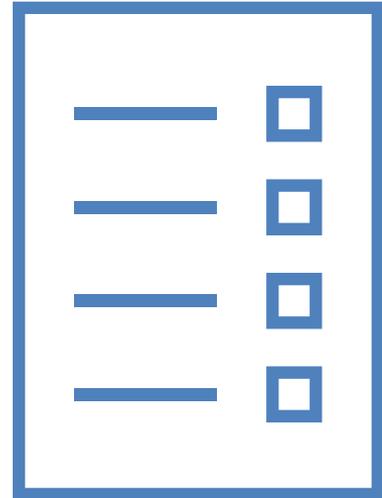


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The law requires naturalization applicants to demonstrate:

- **English**: An ability to, read, write, speak and understand basic English
- **Civics**: A knowledge of U.S. civics (U.S. history and principles of government)

There are certain exceptions for these requirements, including medical disability exceptions.



# Medical Exception and Eligibility



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In 1994, Congress passed a law providing an exception to the educational requirements for naturalization for applicants who cannot meet them.



*Medically determinable* physical or developmental disability or mental impairment;



Condition prevents the applicant from learning or demonstrating knowledge of English, civics or both;



Condition has lasted, or is expected to last, 12 months or more;



Not the direct result of illegal use of drugs.

# Medical Professionals and Form N-648



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- Under 8 C.F.R. 312.2, only the following medical professionals can complete and certify a Form N-648 on behalf of an applicant:
  - 1) **Medical doctors (MD);**
  - 2) **Doctors of osteopathy (DO);** and
  - 3) **Licensed clinical psychologists (PhD or PsyD).**
- The certifying medical professional does not need to hold certification as a civil surgeon.
- Must be licensed to practice in any state of the United States, Washington D.C., Guam, Puerto Rico, the U.S. Virgin Islands, or CNMI.





# **Form N-648, Medical Certification for Disability Exceptions**

# Form N-648, Medical Certification for Disability Exceptions



U.S. Citizenship and Immigration Services

## Current Version

- Has edition date: 08/19/22
- Has only 5 pages
- USCIS reviews and revises all forms on a periodic basis before their expiration date.
- Form revisions also happen after related policy changes.



### Medical Certification for Disability Exceptions

Department of Homeland Security  
U.S. Citizenship and Immigration Services

USCIS  
Form N-648  
OMB No. 1615-0060  
Expires 08/31/2024

▶ **START HERE - Type or print in black ink.**

**Please read the instructions before examining the applicant and filling out this form.**

In general, applicants for naturalization must demonstrate that they understand the English language, including the ability to read, write, and speak words in ordinary usage. They must also demonstrate knowledge and understanding of the fundamentals of the history, principles, and form of government of the United States. These are called the "English and civics requirements." This form is used for applicants to seek an exception to the English and civics requirements due to a physical or developmental disability or mental impairment that has lasted, or is expected to last, 12 months or more. Applicants seeking such an exception should submit this form as an attachment to the Form N-400, Application for Naturalization.

Please note:

- Only medical doctors, doctors of osteopathy, or clinical psychologists can certify the form.
- Additionally, they must be licensed to practice in the United States (including the U.S. territories of the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the Virgin Islands) to certify the form.
- While staff of the medical practice associated with the certifying medical professional certifying the form may assist in its completion, the certifying medical professional is responsible for the accuracy of the form's content and therefore must sign it.
- Answer all the questions regarding medical information, using common terminology that a person without medical training can understand, with no abbreviations. Failure to fully and accurately complete this form, including all applicable signatures, may result in the form being found insufficient.

Part 1. Applicant Information	USCIS USE ONLY
1. Applicant's Legal Name Family Name (Last Name) _____ Given Name (First Name) _____ _____ _____	This N-648 is: <input type="checkbox"/> Sufficient <input type="checkbox"/> Insufficient <input type="checkbox"/> Continued/RFE

Form N-648 Edition 08/19/22

Page 1 of 5

# Diagnosing Disability or Impairment



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## The certifying medical professional must, at a minimum:



- Examine the applicant;
- Identify each disability or impairment on the Form N-648, with clinical diagnosis;
- Explain clearly how each disability or impairment prevents the applicant from learning English, civics, or both; and
- Use common terminology that a person without medical training can understand.



### Part 3. Information About Disabilities and/or Impairments

1. Provide the **clinical diagnosis and medical code** for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, **clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics.** Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."

# Common Issues in Part 3, Question 1



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## The certifying medical professional must avoid:

- Failing to connect the disability or impairment to the inability to learn;
- Using “difficult to” instead of “unable to” language;
- Using medical terminology that a person without medical training cannot understand;



## Part 3. Information About Disabilities and/or Impairments

1. Provide the **clinical diagnosis and medical code** for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, **clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics.** Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, “DSM-V 318.1 Intellectual Disability (Severe)” or “2022 ICD-10-CM F72 Severe intellectual disabilities.”

# Identifying Disability or Impairment



- Describe clinical or lab techniques you used to diagnose disabilities or impairments;
- Attest that the disability or impairment has lasted or is expected to last at least 12 months and is not related to the use of illegal drugs; and answer all items fully and accurately.



2. What clinical or laboratory diagnostic techniques did you use to diagnose each of the applicant's disabilities and/or impairment(s) listed in **Part 3., Item Number 1.**?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

3. Have any of the applicant's disabilities and/or impairments listed in **Part 3., Item Number 1.** lasted, or do you expect any of them to last, 12 months or more? If your answer is "No," do not complete this form because the applicant is not eligible for this exception.  Yes  No

4. Are any of the disabilities and/or impairment(s) listed in **Part 3., Item Number 1.** the result of the applicant's illegal use of drugs? If your answer is "Yes" for all of the disabilities or impairments, do not complete this Form because the applicant is not eligible for this exception.  Yes  No

# Ability to Demonstrate English and Civics



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**The certifying medical professional (MP) must answer this question fully:**

- Once the MP determines the respective requirement the applicant cannot meet, the MP must select it in question 7;
- The MP may select all or some of the requirements in this question;
- The requirement(s) selected will be the portions of the test that the applicant cannot answer due to medical conditions.



7. Do any of the disabilities or impairments listed in **Part 3., Item Number 1.** prevent the applicant from demonstrating the following? Select **all that** apply. If none applies, do not complete this Form because the applicant is not eligible for this exception.

The ability to:  Read English     Speak English     Write English  
 Answer questions regarding United States history and civics, even in a language the applicant understands.

# Resubmitting Same Form N-648



## Accepting Same Form N-648

- If Form N-648 has missing information, or deficiencies, USCIS accepts the same Form N-648, re-signed and dated by the same MP.

**Part 7. Medical Professional's Certification** ▶ A-

I certify that:

1. I have examined the applicant/patient listed in Part 1. above.
2. I will furnish relevant medical records to USCIS, if requested to do so by USCIS, based on the applicant's consent in Part 6.
3. This applicant's identity has been verified through the following United States or State government-issued photographic identity document:  
 Permanent Resident Card     State ID Number:   
 Other Identification (Indicate type and ID Number):

Additionally, I certify, under penalty of perjury under the laws of the United States of America, that the information on this form and any evidence submitted with it are all true and correct. I am aware that the knowing placement of false information on Form N-648 and related documents may also subject me to criminal penalties including under 18 U.S.C. section 1546, civil penalties under 8 U.S.C. section 1324c and Immigration and Nationality Act (INA) section 274C, and civil license suspension or revocation by the appropriate authorities.

4. Certifying Medical Professional Signature  
  
New Signature

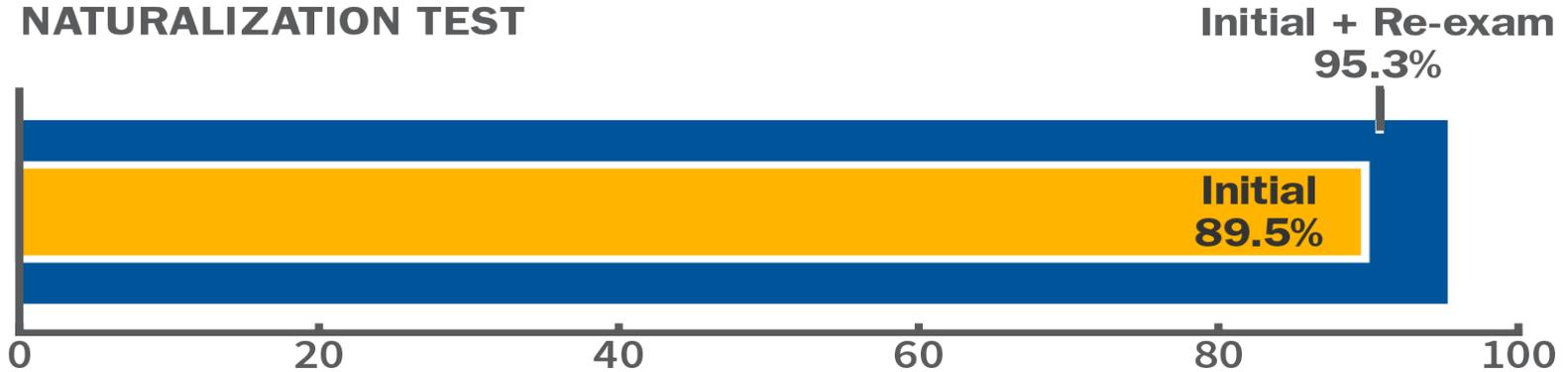
Date of Signature (mm/dd/yyyy)  
  
05/01/2024

# N-400 Test Statistics (FY 22-24)



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## PERCENT WHO PASSED THE NATURALIZATION TEST



[uscis.gov/citizenship-resource-center/naturalization-statistics](https://uscis.gov/citizenship-resource-center/naturalization-statistics)

- **89.5%** denotes the test pass rate of applicants who took the *initial* exam only;
- **95.3%** denotes the test pass rate of applicants who took the *initial* and *re-exam*;
- Includes applicants who were exempt from one or more portions of the naturalization test or had an approved Form N-648.

# Telehealth Examinations



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- USCIS accepts a Form N-648 certified by an authorized MP who completed it through a **telehealth examination**.
- Telehealth examinations should be **synchronous, real-time** interactions between the MP and the applicant.
- MPs conducting telehealth examinations must adhere to the state's telehealth laws and requirements.
- MPs are not responsible for submitting Form N-648 to USCIS.

# Interpreters



- If an interpreter was present at an in-person medical examination, the *interpreter* must fill out Part 5 of the form.
- If a telephonic or video-facilitated interpreter was used (such as telehealth examinations), the *certifying MP* must complete Part 5.
- Missing signatures from applicant or interpreter can be completed at the interview if the individual is present.
- If MP is also the interpreter, they fill out Part 5.

**Part 5. Interpreter Information and Certification** ▶ A

If in-person interpretation services were used during the medical examination, the interpreter must fill out the certification. If telephonic interpretation services were used during the medical examination, the interpreter must complete all items in this section, except **Item Number 6**.

1. Was a telephonic or video facilitated interpreter used during the examination of the applicant?
2. Interpreter's Name  
Family Name (Last Name)  Given Name (First Name)  Mid

**Interpreter's Contact Information**

3. Interpreter's Daytime Telephone Number
4. Interpreter's Mobile Telephone Number
5. Interpreter's Email Address (if any)

**Interpreter's Certification**

I certify that I am fluent in English and the following language,



# Accommodations/Modifications

# Accommodations



- Requesting an accommodation to the English or civics requirements is different from requesting an exception.
- An accommodation simply changes the way an applicant meets the educational requirements; it does not exempt the applicant from the English or civics testing requirements.
- There are applicants whose disabilities do not make them **unable** to learn or demonstrate knowledge. They can meet the English and civics testing requirement with a reasonable accommodation.
- It may be possible for USCIS to provide a reasonable accommodation to one applicant who is affected by a disability or impairment, while another applicant affected by the same disability or impairment may be eligible for an exception because they are unable to learn or demonstrate knowledge.

# Exception vs. Accommodation



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## Exception

- Exempts the applicant, due to a disability or impairment, from the English requirement or civics requirement or both, even with reasonable accommodations, based on the medical professional's certification.



## Accommodation

- Modifies the way an applicant meets the educational requirements; it does not *exempt* them.
- Examples include American Sign Language interpreters, extended examination time, oral writing test, or a large print version of the reading test for someone with low vision.

# Requesting Accommodations



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- The applicant can make their request online at [uscis.gov/accommodations](https://uscis.gov/accommodations).
- Alternatively, an applicant can make their request by contacting the USCIS Contact Center, or in-person, if requesting the use of a wheelchair or assistive listening device at the time of the appointment.
- A Form N-648 is not required for accommodation requests. If your patient falls within these parameters, you should not complete Form N-648.

# Offsite Visit (Home Visit)



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When an applicant's illness or disability makes it medically unsuitable for them to leave their residence or appear in person at a scheduled appointment, USCIS may conduct an offsite visit in the:

- Applicant's home; or
- Other residence such as a nursing home, hospice, or hospital.



# Oath of Allegiance

# Oath of Allegiance Key Principles



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- Completely give up all loyalty to leaders and governments of other countries where they were a subject or citizen before.
- Protect the Constitution and all laws from all enemies, from other countries or from within the United States.
- Be loyal only to the United States.
- Use a weapon if the U.S. government asks them to.
- Serve in the military performing duties other than combat if the U.S. government asks them to.
- Do other non-military work that is important to the country if the U.S. government asks them to.
- Promise these without influence from anyone or hesitation.

# Waiver of the Oath



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USCIS may waive the Oath of Allegiance for an applicant who, due to a physical or developmental disability or mental impairment, is unable to:

- Understand the meaning of the Oath of Allegiance; or
- Communicate an understanding of the Oath of Allegiance

# Requesting an Oath Waiver



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An applicant may request an oath waiver with the assistance of a legal guardian, surrogate, or designated representative on Form N-648, Part 4, Ability to Understand Oath of Allegiance.

## Part 4. Ability to Understand Oath of Allegiance

The applicant will not be able to naturalize without a legal guardian, surrogate, or an eligible designated representative unless they are able to understand and communicate that they understand the meaning of the Oath of Allegiance. The Oath may be administered in the applicant's language of choice and they may communicate their understanding in any manner (for example, by nodding).

1. Is the applicant able to understand and communicate that they understand the meaning of the Oath of Allegiance to the United States?

Yes  No

# Written Request for an Oath Waiver



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- If an applicant does not request an oath waiver on the Form N-648, then with the assistance of a legal guardian, surrogate, or designated representative, they must submit a:
  - Written request with written evaluation by an authorized medical professional, requesting a waiver of the Oath of Allegiance.

# Effect of an Oath Waiver



- An applicant who is granted an oath waiver is considered to have met the requirement of attachment to the principles of the Constitution of the United States and be well disposed to the good order and happiness of the United States.
- When an oath waiver is granted, a legal guardian, surrogate, or designated representative signs on behalf of the applicant, who cannot understand or communicate an understanding of the Oath of Allegiance.

# Legal Guardian, Surrogate, or Designated Representative



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If an applicant cannot undergo any part of the naturalization process, including requesting a medical exception or accommodation, due to a physical or developmental disability or mental impairment, a legal guardian, surrogate, or an eligible designated representative may complete the naturalization process for them.

# Legal Guardian, Surrogate, or Designated Representative (cont.)



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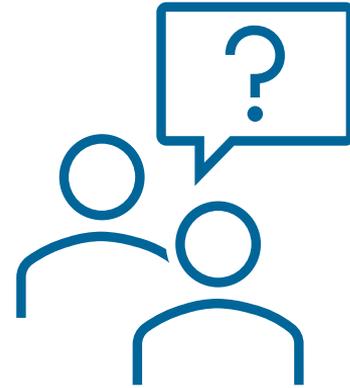
Persons eligible to act on behalf of the applicant include:

- A person whom a proper court has designated as the applicant's legal guardian or surrogate and who is authorized to exercise legal authority over the applicant's affairs; or
- In the absence of a legal guardian or surrogate, a designated representative (a U.S. citizen spouse, parent, adult son or daughter, or adult brother or sister), who is the primary custodial caregiver and who takes responsibility for the applicant.

# Avoiding Fraud and Scams



- USCIS reviews Form N-648 for discrepancies, misrepresentation, or fraud, such as:
  - MP did not examine applicant
  - MP was paid only to certify the Form
  - MP is not authorized or licensed
- USCIS may refer a case for investigation.





# **Review Examples for Sufficiency Connection Between Medical Disability and Inability to Learn**

# Example #1 – Is It Sufficient?



## Part 3. Information About Disabilities and/or Impairments

1. Provide the clinical diagnosis and medical code for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."

Depressive Disorder. The patient's condition is global, lifelong impairment that affects cognition, language and motor skills.

It is difficult for the applicant to learn new skills like English or civics.

# Example #1 Answer



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Depressive Disorder. The patient's condition is global, lifelong impairment that affects cognition, language and motor skills.

It is **difficult** for the applicant to learn new skills like English or civics.

**Insufficient**

# Example #2 – Is It Sufficient?



## Part 3. Information About Disabilities and/or Impairments

1. Provide the clinical diagnosis and medical code for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."

The patient has PTSD. Patient claims he cannot learn English or civics, and so he will not be able to pass the tests. Please waive the tests.



The patient has PTSD. Patient claims he cannot learn English or civics, and so he will not be able to pass the tests. Please waive the tests.

## Example #2 Answer



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The patient has PTSD. Patient claims he cannot learn English or civics, and so he will not be able to pass the tests. Please waive the tests.

Insufficient

# Example #3– Is It Sufficient?



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## Part 3. Information About Disabilities and/or Impairments

1. Provide the clinical diagnosis and medical code for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."

The patient has dementia and cannot learn English.



The patient has dementia and cannot learn English.

## Example #3 Answer



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The patient has dementia and cannot learn English.

Insufficient

# Example #4– Is It Sufficient?



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## Part 3. Information About Disabilities and/or Impairments

1. Provide the clinical diagnosis and medical code for **all** physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."

**The patient is diagnosed with disability X (DSM V code # given). The patient's condition is global, lifelong impairment that affects cognition, language and motor skills. Because of this impairment, the patient's memory is deficient, the patient cannot learn new skills, and the patient is not capable of reasoning. The patient's severe intellectual disability makes the patient incapable of learning a new language (even basic words) and demonstrating the required knowledge of U.S. history and government.**

# Example #4 Answer



The patient is diagnosed with disability X (DSM V code #). The patient's condition is global, lifelong impairment that affects cognition, language and motor skills. Because of this impairment, the patient's memory is deficient, the patient cannot learn new skills, and the patient is not capable of reasoning. The patient's severe intellectual disability makes the patient incapable of learning a new language (even basic words) and demonstrating the required knowledge of U.S. history and government.

**Sufficient**

# Resources



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- **General Information for Completing Form N-648:**
  - [uscis.gov/forms/all-forms/information-for-medical-professionals-completing-form-n-648](https://uscis.gov/forms/all-forms/information-for-medical-professionals-completing-form-n-648)
- **Form N-648 and Instructions:**
  - [uscis.gov/n-648](https://uscis.gov/n-648)
- **Policy Manual:**
  - [uscis.gov/policy-manual/volume-12-part-e-chapter-3](https://uscis.gov/policy-manual/volume-12-part-e-chapter-3)
- **Report Fraud and Scams**
  - [uscis.gov/report-fraud/uscis-tip-form](https://uscis.gov/report-fraud/uscis-tip-form)

# Thank you for joining today's session



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Please email your feedback to [policyfeedback@uscis.dhs.gov](mailto:policyfeedback@uscis.dhs.gov).

Include the following:

- In the subject line, include the sections of the [USCIS Policy Manual](#) that your feedback relates to;
- Explain the reason for any recommended change; and
- Include data, information, or authority that supports the recommendation.



**Questions?**

# About This Presentation



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- Author: USCIS Office of Policy and Strategy (OP&S).
- Date of last revision: 06/24/2024.
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