

TIPS FOR MEDICAL PROFESSIONALS

Form N-648, Medical Certification for Disability Exceptions



Thank you for helping your patient with naturalization. Form N-648, Medical Certification for Disability Exceptions asks about your patient's ability to demonstrate English proficiency and knowledge of U.S. history + civics. In our experience as attorneys practicing immigration law, completing this form is more complicated than it may appear at first glance. This short guide has tips to make the process easier for you and much more likely for your patient to become a citizen.

Ordinarily, naturalization applicants must learn the answers to 100 questions in American civics and history and demonstrate proficiency in reading, writing, and speaking English. However, due to any (combination of) physical/developmental disability or mental impairment, an applicant may be unable to demonstrate as much. In those situations, the applicant is allowed to request exceptions or accommodations to modify those requirements.

There are very strict guidelines for how a *medical doctor, doctor of osteopathy, or clinical psychologist* (not physician's assistant, at this time) should complete Form N-648. Unfortunately, many N-648s are denied because they do not meet these guidelines. Failure to answer a question or to provide a full response will almost inevitably result in a denial. The officer reviewing this Form is not a medical professional, so they must be informed in detail and in everyday language why the applicant is making this request. In following these guidelines, you can help the applicant maximize their chance of becoming a U.S. citizen. Otherwise, your patient will likely need to return to you to re-complete this form and/or their application for citizenship will be denied.

General guidance:

- Please download (or check that the patient has brought in) the most recent version of Form N-648 from <https://www.uscis.gov/n-648>
- Please ensure that your handwriting is legible and that you use black ink (or alternatively, type into the PDF on-screen and print the form).
- Print and complete Form N-648 single-sided
- Please answer **every** question in as much detail as possible, unless the instructions clearly indicate that you can skip that question.

Specific guidance for Part 3 of Form N-648

- Q1: Please be sure to include the clinical diagnosis and DSM or ICD code (if applicable) for the *specific* disability/impairment(s) that *absolutely require(s)* exemptions:
 - Some of these conditions include but are not limited to dementia (including vascular dementia, Alzheimer's disease, and Parkinson's disease), mental retardation (also intellectual disability or Down syndrome), schizophrenia, post-traumatic stress disorder, depression, bipolar disorders, stroke, thyroid eye disease, and more.
 - Other general conditions, like old age, forgetfulness, unspecified learning disability, illiteracy, no formal education, general hearing/sight impairments if correctable, are not physical or development disabilities or impairments that form the basis for the N-648 to be approved.
- Q2: Describe the disabilities and/or impairments in detail, using simple language (no abbreviations or acronyms).
- Q5: Answer this question, even if the cause of the disability or impairment is unknown. If unknown, state as much.

- Q6: Specify which clinical methods were used to diagnose the disability/impairment. An interview or self-report is usually not enough; other tests or methods are often required. If there was a laboratory test, state the name of the test or the finding. If no diagnostic tests were given, explain why that was appropriate and how the diagnosis was reached.
- Q8: You must describe how each disability or impairment affect the applicant's daily life activities (e.g. ability to work, go to school, care for themselves, etc.) **and clearly connect** the disability or impairment to the applicant's inability to learn, read, write, or understanding English and/or learn and a civics and history test. Immigration officers are often suspicious of applicants with completed Form N-648s who are working full time, and this may clear up any perceived inconsistencies about their ability to work but *inability* to learn English, read, write, or prepare for a civics exam. Even if it seems obvious, state it.
- Q10: State why a disability or impairment is expected to last more than 12 months. Even if it seems obvious, state as much. (e.g. though some symptoms of schizophrenia may be controlled or minimized by medication, this condition does not have a cure and it will continue indefinitely).
- Q13: Provide as much detail as possible about why the applicant **cannot** do what is required. In other words, **why is the applicant unable to learn, read, write, and/or speak English or demonstrate an understanding of U.S. civics + history?** If the applicant can do some but not all of these activities, state what they cannot do and why. (Make sure to check the appropriate boxes in Q14, too.) Do not use equivocating or hedging words like "unlikely" or "probably." Be clear about what the applicant can and cannot do.
 - Example: *Posttraumatic stress disorder affects attention, concentration, and proper memory functions. PATIENT becomes dizzy when she concentrates on difficult tasks, experiences frequent headaches, ____, _____ and _____. Further, she is often in a state of heightened anxiety as a result of the posttraumatic stress from _____ which limits her ability to make new long-term and short-term memories and recall this information, if needed. Further, her performance on __ exam demonstrated an inability to _____ and she demonstrates a generalized confusion about orientation to space, time, and place. It is my professional opinion that due to ... PATIENT is unable to recall recently-learned information, including her ability to understand, read, and speak English. Moreover, she is unable to learn and demonstrate a knowledge of the U.S. history and civics required to naturalize.*
- Q14: Select all exceptions that apply to your patient.
- Q22: If you are not the regularly treating medical professional, indicate why you completed Form N-648. Some common situations include a nurse practitioner regularly treating a patient and you work in the same practice group, the applicant requires a specialist for diagnosis or new treatment, and/or the regularly treating medical professional has a policy against completing this Form.

Specific guidance for Parts 4, 5, and 6

- Part 4, Q7: If you used a telephonic interpreter, please write down the interpreter's ID/badge number and "TELEPHONIC" in the signature line.
- Make sure that both you and the applicant sign, in Parts 6 and 5, respectively.

Additional resource guides for preparing Form N-648 as a medical professional:

- Immigrant Legal Resource Center (ILRC) has two comprehensive practice advisories here: <https://www.ilrc.org/using-form-n-648-assist-naturalization-applicants-disabilities>
- Project Citizen also has a comprehensive packet, with annotations and examples, available here: <https://projectcitizenship.org/n-648-disability-waiver-packet/>