

**Table of Changes-Instructions**  
**Form N-648**  
**April 16, 2010**

<b>LOCATION</b>	<b>CURRENT VERSION</b>	<b>PROPOSED VERSION</b>
<p><b>Page 1, What is the Purpose of This Form?</b></p>	<p><b>What is the Purpose of This Form?</b></p> <p>This form is intended for applicants for U.S. citizenship who seek an exception to the English and civics testing requirements for naturalization "because of physical or developmental disability or mental impairment."</p>	<p><b>What is the Purpose of This Form?</b></p> <p>In general, applicants for naturalization must demonstrate an understanding of the English language, including an ability to read, write, and speak words in ordinary usage. They must also demonstrate a knowledge and understanding of the fundamentals of the history and principles and form of government of the United States. Together, these are known as the English and civics requirements for naturalization. This form is intended for applicants who 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.</p>
<p><b>Page 1, What are the Naturalization Testing Requirements?</b></p>	<p>An applicant for naturalization is generally required to demonstrate:</p> <p>Knowledge of the English language including an ability to read, write, and speak words in ordinary usage; and knowledge and understanding of the fundamentals of the history, principles, and form of government of the United States.</p> <p>To implement these requirements, U.S. Citizenship and Immigration Services (USCIS) administers tests of each applicant's ability to read, write, and speak English words in ordinary usage and to answer</p>	<p><b>DELETE ENTIRE SECTION</b></p>

	<p>basic questions about the government and history of the United States (civics). However, the law allows an exception to the English and civics testing required for naturalization in the case of an applicant who is unable to comply "because of physical or developmental disability or mental impairment."</p>	
<p><b>Page 1, Who Should Use This Form?</b></p>	<p><b>Who Should Use This Form?</b></p> <p>Applicants for naturalization must submit Form N-648, Medical Certification for Disability Exceptions, along with a completed Form N-400, Application for Naturalization, if they are seeking an exception from the English and civics requirements. Form N-648 is intended for applicants with medical condition(s) that are long-term (lasting 12 months or longer) and so severely debilitating that they are incapable of meeting the English or civics requirements for naturalization. USCIS will evaluate the completed Form N-648 to determine whether the applicant qualifies for an exception from those requirements.</p>	<p><b>Who Should Submit This Form and When?</b></p> <p>An applicant for naturalization seeking an exception to the English and civics requirements because of a physical or developmental disability or mental impairment(s) should submit this form at the time he or she files an N-400, Application for Naturalization, with USCIS. Per Immigration and Nationality Act (INA) §312 (b)(1), applicants are not required to fulfill the English <b>and</b> civics requirements if the person is unable to do so because of physical or developmental disability or mental impairment(s).</p> <p><b>Note: Failure to submit Form N-648 with Form N-400 may delay the time for the adjudication of Form N-400.</b></p>
<p><b>Page 1, Who is Not Eligible?</b></p>	<p><b>Who is Not Eligible?</b></p> <p>An applicant for naturalization who <b>is capable</b> of learning or demonstrating the required knowledge and understanding of basic English and civics, as explained above, is <b>not eligible</b> for an exception from the English and civics requirements and <b>should not submit</b> this</p>	<p><b>Who Should Not Submit This Form?</b></p> <p>An applicant who can satisfy the English and civics requirements with reasonable accommodations provided under the Rehabilitation Act of 1973 does not need to submit this form. Reasonable accommodations include, but are not limited to, sign language interpreters, extended time for testing and off-site testing. An applicant</p>

	<p>form.</p> <p>An applicant's difficulty in fulfilling these requirements, such as illiteracy in his or her native language, is not sufficient <b>by itself</b> to support a finding of eligibility for the exception.</p> <p>Additionally, an applicant who <b>can</b> meet the English and civics requirements with accommodations should <b>not</b> submit this form. Under the Rehabilitation Act of 1973, USCIS makes reasonable modifications or accommodations to enable applicants with disabilities or impairments to participate in the English and civics testing requirements for naturalization.</p> <p>Reasonable modifications or accommodations may include but are not limited to: sign language interpreters, extended time for testing, or off-site testing. Applicants who believe that they will need a reasonable modification or accommodation to take the tests should refer to Part 3.I of the Step-by-Step Instructions in the General Instructions of Form N-400.</p>	<p>requesting an accommodation should so indicate on Part 3 of his or her completed Form N-400. Illiteracy alone is not a valid reason to seek an exception to the English and civics requirement by submitting this form.</p>
<p><b>Page 1, Who is Authorized to Complete This Form?</b></p>	<p><b>Who is Authorized to Complete This Form?</b></p> <p>All parts of this form (except for the "Applicant Attestation" in Part I) must be completed by a currently licensed medical doctor, doctor of osteopathy, or clinical psychologist (a "medical professional"). The medical professional must have</p>	<p><b>Who is Authorized to Certify This Form?</b></p> <p>Only medical doctors, doctors of osteopathy, or clinical psychologists licensed to practice in the United States (including the U.S. territories of Guam, Puerto Rico, and the Virgin Islands) are authorized to certify the form. While staff of the medical practice associated with the medical professional certifying</p>

	<p>professional expertise in diagnosing and evaluating an applicant for a physical or developmental disability or impairment that makes the applicant incapable of meeting the English or civics requirements for naturalization.</p> <p>An employee under the direct supervision of the certifying medical professional may, if necessary, fill in the form with information directly provided or verified by the certifying medical professional. However, the certifying medical professional who signs the form under penalty of perjury remains responsible for the accuracy of its contents.</p>	<p>the form may assist in its completion, the medical professional is responsible for the accuracy of the form's content.</p>
<p><b>Page 1, What Qualifications Must a Certifying Medical Professional Have?</b></p>	<p><b>What Qualifications Must a Certifying Medical Professional Have?</b></p> <p>The licensed medical professional certifying this form must have training and experience in the field of the applicant's claimed disability or impairment. A medical professional who is <b>not</b> a specialist in the field of the claimed disability or impairment may complete this form only if his or her training, experience, or other qualifications enable him or her to make the disability or impairment assessment.</p> <p>Because only severe and lasting disabilities are eligible for the exception to the naturalization testing requirements, the medical professional who makes the certification should normally</p>	<p><b>DELETE THIS SECTION</b></p>

	<p>be the "treating physician"; that is, the medical professional who has been regularly treating the applicant for the claimed disability or impairment. If the certifying medical professional is <b>not</b> the applicant's regular treating physician, the reason for the substitution should be explained in item 4 of Part II, as well as information regarding the future plan of treatment for the applicant.</p>	
<p><b>Page 2, What is Required for a Complete Medical Certification?</b></p>	<p><b>What is Required for a Complete Medical Certification?</b></p> <p>The medical professional completing this form must provide an accurate assessment of the applicant's disability or impairment so that USCIS can determine whether the applicant qualifies for an exception from the English and civics requirements for naturalization. The medical professional must provide <b>all</b> of the following:</p> <ol style="list-style-type: none"> <li><b>1.</b> A certification of the duration of the claimed disability or impairment and whether it is the direct result of the applicant's illegal use of drugs (<b>Items 7 and 8</b>);</li> <li><b>2.</b> A clinical diagnosis and description of the applicant's claimed disability or impairment, a list of medically accepted techniques used to reach the diagnosis, and any applicable DSM-IV-TR code for each mental impairment (<b>Item 9</b>);</li> </ol>	<p><b>How to Complete This Form?</b></p> <p>All parts of Form N-648, except the "Applicant Attestation" and "INTERPRETER'S CERTIFICATION", must be certified by a licensed medical professional. Before certifying Form N-648, the medical professional must have conducted an in-person examination of the applicant.</p> <p>All questions or items must be answered fully and accurately. USCIS will not accept an incomplete Form N-648. Responses should use common terminology, without abbreviations, that a person without medical training can understand. If completed in writing, all responses must be legible and appear in blue or black ink. USCIS recommends that the certifying medical professional use the electronic Form N-648 located in the "FORMS" section at <a href="http://www.uscis.gov">www.uscis.gov</a>.</p> <p>Failure to provide all information requested on the form may result in USCIS determination that the form is insufficient. In addition to providing a detailed assessment of the applicant's physical or developmental disability or mental impairment as requested on the</p>

	<p>3. A detailed explanation of the nexus (connection) between the disability or impairment and the applicant's capacity to learn and demonstrate the required knowledge and understanding of English and civics. This explanation must include a description of how the claimed disability or impairment resulted from an anatomical, physiological, or psychological abnormality <b>(Item 10)</b>; and</p> <p>4. A certified opinion as to whether the applicant is unable, even with reasonable accommodations or modifications, to learn and/or demonstrate the required knowledge of English or civics because of the documented medical condition(s) <b>(Items 11 and 12)</b>.</p> <p>If the medical professional does not provide all required information, USCIS may deem Form N-648 insufficient.</p> <p>In order to facilitate the adjudication of Form N-648, the medical professional may also submit copies of relevant medical diagnostic reports or records to further substantiate the claim of medical disability indicated on the form. However, a supplemental report is not acceptable as a substitute for any of the responses required in Part II of this form.</p> <p><b>Examples of Insufficient and Sufficient Responses:</b></p> <p>The following examples</p>	<p>form, a medical professional completing the form may attach supporting medical diagnostic reports or records. However, these attachments may not take the place of written responses to each question or item on Form N-648.</p> <p>The following are examples of sufficient responses to some of the items on <b>Part III</b> of Form N-648:</p> <p><b>1. Provide the clinical diagnosis, and DSM IV code (If applicable) of the applicant's disability and/or impairment(s), that form the basis for seeking an exception to the English and/or civics requirements.</b></p> <p>"DSM-IV 318.0, Down syndrome."</p> <p><b>2. Provide a basic description of the disability and/or impairment(s).</b></p> <p>"Down syndrome is a genetic disorder that causes lifelong intellectual disability (also referred to as mental retardation), developmental delays, and other problems."</p> <p><b>8. What caused the applicant's medical disability and/or impairment(s) listed in number 3?</b></p> <p>"Down syndrome is usually caused by an error in cell division occurring <i>in utero</i>. The cause of such errors in cell division is currently unknown."</p> <p><b>9. What clinical methods did you use to diagnose the applicant's medical disability and/or impairment(s) listed in number 3?</b></p> <p>"The patient was diagnosed <i>in utero</i> through a Chorionic Villus Sampling</p>
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	<p>illustrate acceptable and unacceptable responses regarding diagnosis and nexus (<b>Items 9 and 10</b>). The actual medical certification must address the condition of the individual applicant who has been examined.</p> <p><b>Example 1:</b></p> <p><b>Insufficient Answer:</b></p> <p><b>Item 9 (Diagnosis):</b> "The patient is a 42-year-old female who suffers from Angelman syndrome, which is a complex genetic disorder that affects the nervous system."</p> <p><b>Item 10 (Nexus):</b> "The patient is unable to learn a new language and U.S. history and civics."</p> <p>(<b>Comment:</b> The doctor failed to articulate how the impairment is related to the applicant's ability to learn or demonstrate knowledge of English or civics.)</p> <p><b>Sufficient Answer:</b></p> <p><b>Item 9 (Diagnosis):</b> "The patient is a 42-year-old female who suffers from Angelman syndrome, which is a complex genetic disorder that affects the nervous system, typically with developmental delay or mental retardation, severe speech impairment, seizures, small head size (microcephaly), and problems with movement and balance (ataxia). The resulting delayed mental development</p>	<p>(CVS). CVS is a test done during early pregnancy that can identify certain genetic disorders or chromosomal birth defects, such as Down syndrome."</p> <p><b>10. Clearly describe how the applicant(s) disability and/or impairment(s), affect his or her ability to demonstrate a knowledge and understanding of English and/or civics.</b></p> <p>"The patient's condition is a global, lifelong impairment that severely affects cognition, language, and motor skills. While many individuals with mild to moderate forms of Down syndrome are capable of daily tasks and working in the community, this patient suffers from a particularly severe form. Because of this impairment, his memory is deficient, he cannot learn new skills, and he is not capable of reasoning but only of performing simple daily activities. The patient's severe intellectual disability (mental retardation) makes him incapable of learning a new language (even basic words) and demonstrating the required knowledge of U.S. history and government."</p>
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	<p>was first noticed in this patient at the age of eight months, and she suffered from severe learning disability since childhood."</p> <p><b>Item 10 (Nexus):</b> "The most common cause of Angelman syndrome is a small deletion (missing piece) of the UBE3A gene in the maternally inherited chromosome 15, either through gene mutation or chromosomal change, causing the person to have no active copies of the gene in the brain. Because of the chromosomal change and the loss of gene function in this patient's brain, she is incapable of learning, remembering, or demonstrating knowledge of English or civics."</p> <p><b>(Comment:</b> The doctor adequately described the effect of the Angelman syndrome on the patient's cognitive functions and provided a definitive opinion explaining why as a result of it the patient is unable to learn and demonstrate knowledge of English or civics.)</p> <p><b>Example 2:</b></p> <p><b>Item 9 (Diagnosis):</b> "The patient has Down's Syndrome."</p> <p><b>Item 10 (Nexus):</b> "The patient should be exempted from the English language and U.S. civics requirements for citizenship due to his medical condition."</p>	
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**(Comment:** The doctor failed to explain how the applicant's condition prevents him from learning or demonstrating knowledge of English or civics.)

**Sufficient Response:**

**Item 9 (Diagnosis):** "The patient has Down's Syndrome, which is a genetic condition that causes delays in physical and intellectual development. While many individuals with mild to moderate forms of Down's Syndrome are capable of daily tasks and working in the community, this patient suffers from a particularly severe form. It was diagnosed *in utero* through a Chorionic Villus Sampling (CVS). He has an IQ of 50."

**Item 10 (Nexus):** "The patient's condition is a global, lifelong impairment that severely affects cognition, language, and motor skills. Because of this impairment, his memory is deficient, he cannot learn new skills, and he is not capable of reasoning but only of performing simple daily activities. The patient's severe mental disability makes him incapable of learning a new language (even basic words) and demonstrating the required knowledge of U.S. history and government."

**(Comment:** The doctor adequately addressed the nexus (connection) between the condition and how it affects the

	applicant's functioning and ability to learn to demonstrate knowledge of English or civics.)	
<b>Page 3, General Instructions</b>	<p><b>General Instructions</b></p> <p><b>Step 1. Fill Out Form N-648</b></p> <p>All parts of this form (except for the "Applicant Attestation"), must be completed by a licensed medical doctor, doctor of osteopathy, or clinical psychologist.</p> <p>Part I of this form must be signed by the applicant or the applicant's authorized representative.</p> <p>All questions must be answered fully and accurately. If an item is not applicable, indicate it with "N/A." If the answer is none, write "None."</p> <p><b>USCIS recommends that the certifying medical professional complete and print the fillable electronic Form N-648 provided on our Web site at <a href="http://www.uscis.gov">www.uscis.gov</a>.</b></p> <p><b>NOTE:</b> If you require additional space to complete the answer to any item, the information fields in the fillable electronic form will expand to accommodate the additional information.</p> <p>If the application is prepared manually, print or type legibly in black ink. If additional space is needed to complete the</p>	<p><b>General Instructions</b></p> <p><b>USCIS recommends that the certifying medical professional complete and print the fillable electronic Form N-648 located in the "FORMS" section at <a href="http://www.uscis.gov">www.uscis.gov</a>.</b></p> <p>1. Type or print clearly using blue or black ink. Keep all information within the area provided. If you require additional space to complete the answer to any item, the information fields in the fillable electronic form will expand to accommodate the additional information. If you are not completing an electronic version of the form and you continue to need extra space to complete any item, write the applicant's name and Alien Registration Number (A-Number) at the top of each continuation sheet and indicate the part and number of the item to which the answer refers. You must sign and date each continuation sheet.</p> <p>2. All questions must be answered fully and accurately. If an item is not applicable, indicate it with "N/A." If the answer is none, write "None."</p> <p>3. The medical professional must provide the completed form to the applicant.</p>

	<p>answer to any item, the certifying medical professional may attach an additional sheet of paper indicating the item number to which the attachment refers.</p> <p>Note that each additional page or supplementary attachment to the completed form, including medical report(s), must include the name and Alien Registration Number (A- Number) of the applicant and the complete name and signature of the medical professional.</p> <p>After the medical professional has completed the form electronically or manually, he or she must provide it to the applicant.</p> <p><b>Step 2. The Applicant Submits the Completed Form N-648 to USCIS</b></p>	
<p><b>Page 4, When and Where Should This Form Be Submitted?</b></p>	<p><b>When and Where Should This Form Be Submitted?</b></p> <p>All applicants seeking an exception from the testing requirements for naturalization should submit to USCIS a completed Form N-648 as an attachment to the applicant's Form N-400 at the time of filing Form N-400.</p> <p>USCIS recognizes that there may be exceptional circumstances that do not make it possible for the completed Form N-648 to be attached to Form N-400 when it is filed with USCIS. In such cases, the</p>	<p><b>DELETE THIS SECTION</b></p>

	<p>completed Form N-648 must be submitted to USCIS at the time of the applicant's naturalization interview. <b>NOTE:</b> While USCIS will accept delayed submissions, such claims may delay the adjudication of Form N-400.</p>	
<p><b>Page 4, Privacy Act Notice</b></p>	<p>Authority for the collection of the information requested on this form is contained in 8 U.S.C. 1182(a)(15), 1183A, 1184(a), and 1258. USCIS will use the information principally to support an individual's application for naturalization. Submission of the information is voluntary. However, failure to provide the necessary information may result in the denial of a request for a waiver of the English language and U.S. history and civics requirement in the applicant's naturalization application. USCIS may also, as a matter of routine use, disclose the information contained on this form to other Federal, State, local and foreign law enforcement and regulatory agencies.</p>	<p>Authority for the collection of the information requested on this form is contained in 8 U.S.C. 1103, 1423, and 1427. USCIS will use the information principally to support an individual's application for naturalization. Submission of the information is voluntary. However, failure to provide the necessary information may result in the denial of a request for a waiver of the English language and U.S. history and civics requirements for naturalization. USCIS may also, as a matter of routing use, set forth in USCIS System of Records Notices published in the Federal Register, disclose the information collected on this form, to other Federal, State, local, and foreign law enforcement and regulatory agencies.</p>