

**SUPPORTING STATEMENT**  
**Medical Certification for Disability Exceptions**  
**Form N-648**  
**OMB No. 1615-0060**

**A. Justification.**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Section 312(a) of the Immigration and Nationality Act (the Act) requires applicants for naturalization to demonstrate a knowledge and understanding of the form of government and history of the United States. Section 312(b)(1) of the Act allows an exception in the case of persons who, because of a physical or developmental disability or mental impairment, are unable to comply with the requirements of section 312(a) of the Act. In order to determine whether applicants for the above named exception to the section 312 requirements are qualified to receive that benefit, the U.S. Citizenship and Immigration Services (USCIS) regulations at 8 CFR 312.2(b)(2) require them to submit a Medical Certification for Disability Exceptions, Form N-648 from a licensed health care provider (medical or osteopathic doctor or clinical psychologist), affirming the existence of a medical condition warranting the exception, as part of their application for naturalization.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

USCIS uses the Form N-648 to substantiate a claim for an exception to the requirements of section 312(a) of the Act. Only medical doctors, doctors of osteopathy, or clinical psychologists licensed to practice in the United States are authorized to certify Form N-648. By certifying the form, the doctor states that an applicant filing an Application for Naturalization, Form N-400, is unable to complete the English and/or civics requirements because of a physical or developmental disability or mental impairment(s).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The use of this form currently provides the most efficient means for collecting and processing the required data. USCIS provides this application to the public via the

USCIS Internet Web site at [www/uscis.gov/n-648](http://www/uscis.gov/n-648). This form can be downloaded, completed and saved electronically, but cannot be e-filed at this time. Due to the partial GPEA compliance of allowing for accessing, completing and saving the form electronically, USCIS respectfully requests a minimum 2-year approval.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

A search of USCIS automated forms tracking system was accomplished and revealed no duplication. There is no similar data collected.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This collection of information does not impact small businesses or other small entities. This form is completed by individuals seeking an exception and, while they may engage the services of medical doctors, doctors of osteopathy, or clinical psychologists licensed to practice in the United States, those activities are a normal part of the medical professionals' function and no unnecessary burden is placed upon them due to the collection activities associated with this form.

Under 8 CFR 1320.3(c)(4), for the purposes of the definition of ten or more persons, persons do not include contractors engaged by a respondent for the purpose of complying with the collection of information. Medical professional providing medical certifications fall under the category of contractors engaged by the respondents to comply with this information collection, and may not be considered respondents or persons impacted by this information collection for purposes of the Paperwork Reduction Act.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information is not collected, the adjudicating officer will be unable to determine whether the applicant is qualified for the exception.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

requiring the use of a statistical data classification that has not been reviewed and approved by OMB; that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances applicable to this information collection.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 10, 2012, USCIS published a 60-day notice in the Federal Register at 77 FR 27474. USCIS received one comment submission on the 60-day notice. Commenter would like to refuse entry of disabled people to the United States. The commenter further states United States already has a high population of disabled people and cannot afford the cost of paying for disabled immigrants. Therefore, disabled people who are interested in immigrating to the United States should stay in their countries.

Form N-648 pertains to applicants, with the exception of active members of the U.S. Armed Forces, who live in the United States seeking to become naturalized U.S. citizens. This form does not pertain to people who are interested in immigrating to the United States. Therefore, the public commenter's suggestions cannot be implemented.

On August 8, 2012, USCIS published a 30-day notice in the Federal Register at 77 FR 47426. USCIS has not received any comments on the 30-day notice to date.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The USCIS does not provide payments or gifts to respondents for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality. The system of record notice associated with this information collection is Alien File, Index, and National File Tracking System of Records, which was published in the Federal Register on January 16, 2007 at 72 FR 1755. The privacy impact assessment associated with this information collection is the Integrated Digitization Document Management Program (IDDMP).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person's form whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals or households	Medical Certification for Disability Exceptions/ Form N-648	13,801	1	2	27,602	*\$30.44	\$840,205
<b>Total</b>		<b>13,801</b>			<b>27,602</b>		<b>\$840,205</b>

*\* The above Average Hourly Wage Rate is calculated from the Bureau of Labor Statistics May 2011 average wage for "All Occupations" of \$21.74 times the wage rate benefit multiplier of 1.4 equaling \$30.44.*

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no capital or start-up costs associated with this information collection. There is

no fee charge associated with this collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized Cost Analysis:

a.	Printing Cost	\$ 5,104
b.	Collection and Processing Cost	\$138,010
c.	Total Cost to Government	\$143,114

**Government Cost**

**The estimated cost to the Government is \$143,114.** This figure is calculated by multiplying the estimated number of respondents 13,801 x (1) frequency of response x (0.25 hours) 15 minutes per response x \$40 (Suggested average hourly rate for clerical, officer, and supervisory time with benefits), plus the estimated overhead cost for printing, stocking, and distributing the form, which is \$5,104.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

There has been a decrease of 12,398 burden hours previously reported for this information collection. This change can be attributed to the decrease in the number of respondents from 20,000 to 13,801. The decrease in the number of respondents is based on updated FY 2011 statistical data and the resulting adjustment in agency estimates. There is no change in the information being collected.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

DHS will display the expiration date for this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification

for Paperwork Reduction Act Submission," of OMB 83-I.

The USCIS does not request an exception to the certification of this information collection.

- B. Collection of Information Employing Statistical Methods.**  
Not Applicable.