



# NATURALIZATION

## *The Oath of Allegiance Waiver for Persons with Severe Disabilities*

By Peggy Gleason

### I. Introduction

Recently, USCIS has conflated guidance for naturalization disability waivers of English and civics with waivers of the oath requirement for persons with disabilities. The confusion stems from USCIS's recent addition of a question on *oath* waivers on the N-648 *disability* waiver form. These are separate waivers with distinct purposes, legislative histories, and administrative guidance. This practice advisory will describe the enactment of the oath waiver and current USCIS guidance as well as describe the ways that it is distinct from a waiver of the English/civics requirement.<sup>1</sup> This advisory will not cover current guidance on the disability waiver of English/civics requirement in detail but will describe the inclusion of the problematic oath waiver question on the current revision of the N-648 form. For more information on the disability waiver, see ILRC, Practice Alert, *October 2022 Changes to Form N-648 and to the USCIS Policy Manual*.<sup>2</sup>

### II. Background

Congress has enacted legislative changes in three major areas that impact naturalization applicants with disabilities. First, with Section 504 of the Rehabilitation Act of 1973, Congress increased access to all government services, including naturalization, by prohibiting discrimination against persons with disabilities in any program run by any Executive agency.<sup>3</sup> Accommodations can modify the process or procedures for naturalization, but do not provide an exception to any of the legal requirements.<sup>4</sup>

Specific accommodations in the naturalization process can include allowing very simplified language or nonverbal communication, allowing a relative to be present to attend the interview

<sup>1</sup> For a review of the disability waiver of the English/civics requirement and changes to Form N-648 and USCIS Policy Manual published in 2022 see ILRC, Practice Alert, *October 2022 Changes to Form N-648 and to the USCIS Policy Manual*, <https://www.ilrc.org/sites/default/files/2023-02/Alert-October%202022%20Changes%20to%20USCIS%20FORM%20N-648%20and%20to%20the%20USCIS%20Policy%20Manual.pdf>.

<sup>2</sup> *Id.*

<sup>3</sup> Section 504 of the Rehabilitation Act of 1973, Pub.L. 93-112, 87 Stat. 355, provides: "No otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination ... under any program or activity conducted by any Executive agency." 29 U.S.C. § 794(a).

<sup>4</sup> More information on accommodations in naturalization can be found at 12 USCIS-Policy Manual (PM) C.3.

and assist in signing, or extending the examination time and breaks. Accommodations can apply at any stage of the naturalization process including the initial interview, the examination of English and civics, and during the oath of allegiance. Accommodations are not discretionary, because the law requires that the agencies shall provide their services to disabled individuals who are otherwise qualified for a benefit.<sup>5</sup>

Besides the modifications of the Rehabilitation Act of 1973 for naturalization, there are also separate statutory exceptions that can impact applicants with disabilities. One is the specific exception that Congress passed in 1994 to the English and civics naturalization requirement for persons with a physical or developmental disability or mental impairment that causes them to be unable to learn or demonstrate knowledge of English and civics.<sup>6</sup>

In addition, Congress in 2000 enacted an exception to the separate requirement of the oath of allegiance because some severely disabled persons were still unable to naturalize. The waiver of the oath of allegiance applies when a profoundly disabled applicant is unable to understand or assent to the oath, even with reasonable accommodations.<sup>7</sup>

### A. The disability waiver of the English and civics requirement

Naturalization applicants are required to demonstrate “understanding of the English language, including an ability to read, write, and speak words in ordinary usage.”<sup>8</sup> They also must show an understanding of “the fundamentals of the history, and of the principles and form of government, of the United States.”<sup>9</sup> This is known as the English/civics requirement for naturalization.<sup>10</sup>

In 1994, Congress inserted an exception in INA § 312(b) that the English/civics requirement “shall not apply to any person who is unable because of a physical or developmental disability or mental impairment” to comply. Regulations were published three years later by the precursor agency to USCIS, the Immigration and Naturalization Service (INS).<sup>11</sup> A series of Policy Memos followed from both INS and USCIS, and implementing guidance is currently published in the USCIS Policy Manual.<sup>12</sup> The policy guidance and the N-648 form (required by regulations to apply for a disability waiver of English/civics) were substantially revised in

<sup>5</sup> 29 U.S.C. § 794(a), 6 CFR § 15.30(a).

<sup>6</sup> INA § 312(b).

<sup>7</sup> INA § 337(a), Pub.L. 106-448 (July 12, 2000).

<sup>8</sup> INA § 312(a)(1).

<sup>9</sup> INA § 312(a)(2).

<sup>10</sup> There are also modifications to the English and civics requirement, not discussed in detail here, for certain individuals based on a combination of length of time (15-20 years) as a permanent resident and advanced age, and a reduced number of questions for applicants over 65 years of age; however, there is no full exception to the English and civics requirement for adult applicants unless they have a qualifying disability. INA § 312(b). The regulations also require that when evaluating test responses, due consideration must be given to education, background, age, length of U.S. residence, educational opportunities available to applicant, and other relevant factors. 8 CFR § 312.2(c)(2).

<sup>11</sup> 8 CFR § 312 was published in the Federal Register, 62 Fed. Reg. 12,915 (Mar. 19, 1997).

<sup>12</sup> 12 USCIS-PM E.3; USCIS, N-648, *Medical Certification for Disability Exception* (8/19/22 Edition), <https://www.uscis.gov/sites/default/files/document/forms/n-648.pdf>.

October 2022 and for the first time, a question was added to the N-648 form asking the medical professional to assess whether the applicant can understand the oath of allegiance.<sup>13</sup>

### 1. Form N-648—addition of oath question

ILRC and other advocacy groups applauded the 2022 changes to the N-648 which resulted in a shorter, clearer form that was less burdensome for medical professionals and applicants.<sup>14</sup> The major exception to this removal of barriers in the current N-648 is the addition of a new question in Part 4 of the form which asks the medical professional to evaluate whether the applicant can understand the oath of allegiance. The N-648 is designated by regulation as the form needed to apply for a disability waiver of the English/civics requirement, not as the form to apply for a waiver of the oath requirement.<sup>15</sup> The ability to understand the oath represents an entirely different substantive question, including a separate statutory waiver, than that which the N-648 is designed to address: whether the applicant has a disability which renders them unable to learn or demonstrate an understanding of English/civics.<sup>16</sup>

The legislative histories and purposes of the oath waiver and the disability waiver of English/civics are distinct, as described below. The oath waiver was created by a law enacted in 2000 to remedy the need for a naturalization oath from profoundly disabled applicants. In contrast, the 1994 disability waiver of the English/civics requirement is just that—an exception to the English/civics requirement if an individual’s impairment renders them unable to learn or demonstrate knowledge and understanding of English/civics. After the waiver was enacted in 1994, INS continued to require an oath from applicants even when they qualified for a waiver of the English/civics requirement due to a disability. It became necessary for Congress to pass a *different* waiver, specifically for the oath requirement, in 2000 for the discrete group of applicants who were so severely disabled that they could not indicate even a non-verbal or very simplified assent to the oath.

It is confusing and creates a new barrier for applicants to now conflate the waivers on the revised N-648 form and in the USCIS Policy Manual guidance. This confusion may harm potential applicants because the oath waiver, if requested by someone seeking a waiver of English/civics, has many additional requirements imposed by USCIS administrative guidance and thus may prevent applicants from naturalizing, as explained more below.

<sup>13</sup> USCIS, *Revision of Medical Certification for Disability Exceptions (Form N-648)* (Oct. 19, 2022).

<sup>14</sup> ILRC, *Letter to USCIS on Recent Improvements to the Naturalization Disability Waiver (N-648)* (Oct. 26, 2022), <https://www.ilrc.org/resources/ilrc-letter-uscis-recent-improvements-naturalization-disability-waiver-n-648>.

<sup>15</sup> 8 CFR § 312.2(b)(2) describes the requirement of the N-648 to seek a disability waiver of the English/civics requirement.

<sup>16</sup> Part 4 of the N-648 now includes the question: “Is the applicant able to understand and communicate that they understand the meaning of the Oath of Allegiance to the United States?” The medical professional is supposed to indicate Yes or No, even though they have no knowledge of the content of the oath, how an accommodation under Section 504 of the Rehabilitation Act might alter it, and what the impact of a negative answer might be on the applicant’s ability to naturalize. USCIS, N-648, *Medical Certification for Disability Exception* (8/19/22 Edition), <https://www.uscis.gov/sites/default/files/document/forms/n-648.pdf>.

ILRC has advocated for the elimination of the oath waiver question as irrelevant to a N-648 disability waiver of English/civics, confusing to an uninformed medical professional, and posing a major new barrier to applicants who would do not need an oath waiver.

In comments to the revised N-648 form, ILRC and the Naturalization Working Group expressed concern about this change, noting that the inclusion of this question in the N-648 will lead to many unnecessary oath waiver requests.<sup>17</sup> The certifying medical professional will likely have no actual knowledge of what the oath contains or what an oath waiver entails, nor how an oath may legally be modified or simplified for an appropriate applicant.

Under current USCIS Policy Manual guidance, if an oath waiver is requested, the applicant will need to have a court-ordered legal guardian, surrogate or designated representative, or a qualifying U.S. citizen relative who is also a primary caregiver who can act on their behalf.<sup>18</sup> Many applicants do not have one of the limited U.S. citizen relatives currently allowed by USCIS to act for them in this process, nor do they have the time or funds available to go through a lengthy court-ordered guardian or representative process. Most significantly, many of these applicants need a waiver of the English/civics exam, but do NOT need a waiver of the oath, which they could take in a simplified format. See more below. ILRC will continue to advocate for removal of this question from the N-648 because it poses a significant barrier to naturalization for many persons should a medical professional mistakenly indicate “no” to the applicant’s understanding of the oath of allegiance.

## **B. The waiver of the oath of allegiance requirement for naturalization—distinctions from the disability waiver of English/civics**

Completely separate from the English/civics requirement in naturalization law is the requirement that all successful applicants for naturalization must demonstrate that they are “attached to the principles of the Constitution of the United States, and well-disposed to the good order and happiness of the United States.”<sup>19</sup> This is the oath of allegiance, which usually takes place when the applicant is sworn in as a U.S. citizen.<sup>20</sup>

<sup>17</sup> ILRC, *Letter to USCIS on Recent Improvements to the Naturalization Disability Waiver (N-648)* (Oct. 26, 2022), <https://www.ilrc.org/resources/ilrc-letter-uscis-recent-improvements-naturalization-disability-waiver-n-648>.

<sup>18</sup> This limited list of persons who can act in place of a disabled applicant for an oath waiver are listed in 12 USCIS-PM J.3.

<sup>19</sup> INA § 316(a)(3).

<sup>20</sup> The oath of allegiance is recited to naturalizing applicants in a ceremony and these words are repeated: “I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty, of whom or which I have heretofore been a subject or citizen; that I will support and defend the Constitution and laws of the United States of America against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I will bear arms on behalf of the United States when required by the law; that I will perform noncombatant service in the Armed Forces of the United States when required by the law; that I will perform work of national importance under civilian direction when required by the law; and that I take this obligation freely, without any mental reservation or purpose of evasion; so help me God.” 8 CFR § 337.1(a). The oath language and process can be very

There are different ways that the oath can be modified by the need for accommodations or because an applicant has beliefs which conflict with the oath.<sup>21</sup> The regulations also specify that an oath can be expedited for applicants who present sufficient cause including a developmental disability or advanced age, a serious illness of the applicant or a member of the applicant's family, a permanent disability preventing personal appearance, or urgent or compelling circumstances relating to travel or employment.<sup>22</sup>

For persons with disabilities, the language content of the oath and the process can be modified with accommodations under Section 504 of the Rehabilitation Act of 1973.<sup>23</sup> The USCIS Policy Manual provides a non-exhaustive list of possible accommodations for the oath that include simplifying the language for assent to the oath, off-site administration, expedited scheduling of an oath, or providing a sign-language interpreter.<sup>24</sup> Nonverbal communication is also a possible accommodation. Many persons who submit qualifying N-648s to waive the English/civics requirement are able to complete the naturalization process with a modified oath, often one that allows a very simplified version of language and assent.

## 2. Purpose of the oath waiver

After Congress created the disability waiver of English/civics in 1994, some eligible applicants who could waive English/civics due to an impairment were still facing obstacles to naturalization because INS took the position that even with a disability that could waive English/civics, an applicant still needed to comprehend and assent to the oath of allegiance. INS argued in several lawsuits that a separate statutory waiver would be needed if applicants were to be allowed to waive the oath requirement as well.<sup>25</sup>

Advocates argued that the government should interpret the Rehabilitation Act and the disability waiver of English/civics to imply authorization to waive the oath requirement, but the government insisted that the oath requirement was substantive, not a technicality, and that it had to be met separately. There was no existing statutory oath waiver for disabled applicants at the time. INS “consistently denie{d} citizenship to those applicants who, in the agency’s view, lack the capacity to understand the nature of the oath to support and defend the constitution.”<sup>26</sup>

This particularly impacted profoundly disabled persons who could not communicate at all due to their impairment, such as persons who were in a coma or vegetative state. Eventually these

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substantially simplified as an accommodation if needed for a disability and an applicant can even communicate non-verbally to indicate assent as an accommodation.

<sup>21</sup> The modifications for certain moral or religious beliefs include changing the language of “on oath” to “affirmation” and refraining from saying “so help me God.” There is also a language modification available for persons whose moral or religious beliefs prevent them from engaging in any type of armed services. These are described in the USCIS Policy Manual, 12 USCIS-PM J.3.

<sup>22</sup> 8 CFR §§ 337.3(a)(1)-(4).

<sup>23</sup> 12 USCIS-PM C.3.

<sup>24</sup> 12 USCIS-PM C.1-3.

<sup>25</sup> See, e.g., *Chow v. Meissner*, 1997 WL 285066 (N.D.Cal. May 22, 1997); *Galvez-Letona v. Kirkpatrick*, 54 F. Supp. 2d 1218 (D. Utah 1999) (aff’d on other grounds), 3 F. App’x. 829 (10th Cir. 2001). By the time the case was decided in the Tenth Circuit, Congress had changed the law and added an oath waiver.

<sup>26</sup> Joren Lyons, *Mentally Disabled Citizenship Applicants and the Meaningful Oath Requirement for Naturalization*, 87 Calif. L. Rev. 1017 (1999).

cases were presented by constituents to legislators who proposed bills to create a separate waiver of the oath requirement for severely disabled persons who could not understand the oath at all nor communicate an assent to it. Many heart-wrenching cases of such applicants were presented in the discussion of the bills. This advocacy culminated in an oath waiver enacted in 2000, when Congress decided to remedy the situation.

One such case that led to the passage of a separate oath waiver in 2000 was that of Andrew Lau:

“The experience of citizenship applicants such as Andrew Lau, who recently found himself in the midst of this exact dilemma illustrates the problem. Although he meets the requirements for length of residency and good moral character and qualifies for a waiver of the English and U.S. history/civics test, Mr. Lau was rejected because he has the mental age of three to four. The specific reason for barring him for citizenship, the INS told him, is that he failed to respond appropriately to questions such as, Do you believe in the Constitution? and Do you want to give up your Chinese citizenship? INS informed him that he was unable to demonstrate [he] understood [he was] becoming a U.S. citizen, that [he was] forswearing allegiance to[his] country of nationality, and that [he was] personally and voluntarily agreeing to a change in [his] status to that of a United States Citizen. There is no waiver of this requirement.”<sup>27</sup>

Another denied applicant whose case was described in the advocacy for an oath waiver was Vijai Rajan, who had cerebral palsy, muscular dystrophy, seizures, and Crohn’s disease. She had very limited mental capacity. INS rejected her application because she could not understand, recite, or raise her hand to take the oath of allegiance. Her U.S. citizen family filed a discrimination suit against INS.

Her attorneys argued that an oath was a formality, and that an oath waiver was implicit in the 1994 disability waiver for English/civics, but the INS disagreed. The government maintained its position that the oath could not be waived. The lawyer expressed frustration with the government’s position, and as he stated, “If you are mildly disabled you can become a citizen. If you are severely disabled you cannot become a citizen. What kind of distinction is that? It serves no purpose.”<sup>28</sup>

Congressional representatives also supported the creation of an oath waiver, again because constituents had raised tragic individual cases of severely disabled naturalization applicants who were able to obtain a waiver of the English/civics requirement but were denied because the government would not imply a waiver of the oath. As Representative Morella described, “Constituent with down syndrome—INS waived English and civics test requirement but refused to waive the oath. The family litigated and the federal district court granted petition for naturalization stating that because of his severe mental disability, he is no different than a child who is unable to understand the oath and attachment requirements (for whom there is a

<sup>27</sup> *Id.*

<sup>28</sup> Raju Chebium, CNN, *Disabled Woman’s Family Says INS denial of Citizenship is Discriminatory* (July 18, 2000) <https://www.cnn.com/2000/LAW/07/18/citizenship.ins.suit/index.html>.

waiver,) but the DOJ has appealed the court’s decision.”<sup>29</sup> Because of this protracted resistance by the government, it was necessary to enact a separate oath waiver in the INA.

The oath waiver was signed into law by President Clinton in 2000.<sup>30</sup> The law allowed the government to “waive the taking of the oath by a person if in the opinion of the Attorney General the person is unable to understand, or to communicate an understanding of, its meaning because of a physical or developmental disability or mental impairment.”<sup>31</sup> The oath waiver was intended for very severely disabled individuals who could not indicate any understanding of or assent to the oath of allegiance, even if it were vastly simplified as an accommodation. At the time of the oath waiver’s passage, it was estimated that it would apply to a small subset of persons with disabilities, estimated at 1100 naturalization cases per year.<sup>32</sup>

As noted, this waiver is not the same as the 1994 waiver of the English/civics for persons with disabilities. There are times when a severely disabled individual may need to apply for both waivers, but many times an applicant with a disability will only need to waive the English/civics requirement. This has again become an issue because USCIS, in contrast to prior government positions that emphasized the distinctions between the waivers, has now de facto conflated the two waivers by including a question on the N-648 (the form used to assess whether a disability prevents an applicant from learning English/civics) asking the medical professional to assess whether the applicant can understand the oath of allegiance.

There are no regulations interpreting the oath waiver. However, the government published several Policy Memoranda implementing it prior to publishing its current administrative guidance in the USCIS Policy Manual. No form was introduced for an oath waiver because it was meant to apply only to a “very small class of individuals.”<sup>33</sup> The oath waiver was clearly described as separate from the disability waiver of English/civics, and eligibility for one would not be equated with qualification for the other. As described by the government: “The requirements for the oath waiver are distinct from the requirements of the English and civics waiver under section 312 of the Act.” In the same memo the government emphasized that “the assessment of the applicant’s ability to meet the oath requirement is different from the assessment of the applicant’s ability to learn English/civics.”<sup>34</sup> The separate requirements of these waivers are specified in a footnote in the current USCIS Policy Manual: “The oath requirements are distinct from the requirements for the medical disability exception to the English and civics requirements for naturalization under INA § 312(b),<sup>35</sup> yet the inclusion of the oath waiver question on the N-648 muddles the requirements of the two waivers.

<sup>29</sup> Rep. Morella, 146 Cong. Rec. H9545-01, H9547.

<sup>30</sup> INA § 337(a), Pub.L. 106-448 enacted Nov. 6, 2000.

<sup>31</sup> *Id.*

<sup>32</sup> 146 Cong. Rec. S6121, S6122; Bureau of Citizenship and Immigration Services (BCIS), William R. Yates, *Procedures for Implementing the Waiving of the Oath of Renunciation and Allegiance for the Naturalization of Aliens Having Certain Disabilities* (June 30, 2003). After INS was reorganized into the Department of Homeland Security in 2003, it was initially called BCIS, but by 2004 it was re-named United States Citizenship and Immigration Services.

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> 12 USCIS—PM J.3 n. 13.

### 3. The USCIS Policy Manual on the oath waiver

The agency did not pass any regulations governing the oath waiver. Because the waiver was only intended for a small number of applicants who had very severe impairments, INS decided not to create a form and instead to have applicants submit a letter from a medical professional with the request.<sup>36</sup> USCIS subsequently published guidance in Policy Memos and eventually in the USCIS Policy Manual.<sup>37</sup> Current guidance allows applicants to make the request either on the N-648 Medical Certification for Disability Exceptions (which is used to seek a waiver of the English/civics requirement, as described above) or by a separate written request with written evaluation by an authorized medical professional.

For naturalization applicants who are unable to understand or communicate an understanding of the oath of allegiance because of a physical or developmental disability or mental impairment, USCIS's Policy Manual requires that the applicant have a court-ordered legal guardian, surrogate, or designated representative to stand in for them in the process.<sup>38</sup> USCIS further limits the oath waiver availability by requiring that if an applicant does not have a court-ordered guardian (who must provide documents proving legal guardianship), then only a U.S. citizen spouse, parent, adult son, or adult daughter who can document that they are the primary custodial caregiver can appear for the applicant.<sup>39</sup> The U.S. citizen caregiver must provide proof of relationship, citizenship, and financial documentation to prove that they have authority to act as primary custodial caretaker. Documents from Social Security, income tax returns, or affidavits from other relatives can help verify this.<sup>40</sup> Practitioners report that USCIS officers often disfavor affidavits and require additional documentation of financial responsibility to allow the representative to stand in for the applicant. Even if an applicant for an oath waiver makes that request by the medical professional indicating "no" to understanding the oath on an N-648, practitioners report that USCIS requires a separate medical evaluation letter describing the condition that renders the applicant unable to understand the oath.

Applicants for an English/civics waiver who may have a disability may reasonably want to avoid an oath waiver if they can understand a simplified oath as an accommodation because they do not have a court-ordered legal guardian or a limited list of U.S. citizen relatives that are essential for an oath waiver. Guardianship orders in court require time and money, both of which can be in short supply for applicants with severe health conditions who may also be low-income. In addition, the alternative list of U.S. citizen relatives may provide no options to many

<sup>36</sup> BCIS, William R. Yates, *Procedures for Implementing the Waiving of the Oath of Renunciation and Allegiance for the Naturalization of Aliens Having Certain Disabilities* (June 30, 2003).

<sup>37</sup> 12 USCIS-PM J.3.

<sup>38</sup> *Id.* Note that the requirement of a substitute representative or U.S. citizen relative for the oath waiver does not exist in the statute. This requirement is an administrative interpretation of USCIS that is found in the USCIS Policy Manual.

<sup>39</sup> The person acting on behalf of the applicant must provide proof of legal guardianship such as a court order designating that person as someone authorized to act for the applicant. This is the preferred person to stand in for an applicant on an oath waiver. If no legal guardian is available then an applicant must have one of the following U.S. citizen relatives, in descending order of preference: U.S. citizen spouse, U.S. citizen parent, U.S. citizen adult son or daughter, U.S. citizen adult sibling. 12 USCIS-PM J.3.

<sup>40</sup> 12 USCIS-PM J.3.



applicants who may simply not have any of those specific relatives. This barrier to the oath waiver is an onerous one and imposing it unnecessarily on applicants seeking a waiver of English/civics due to a disability poses an impossible barrier for many applicants.

ILRC has advocated that USCIS remove the requirement that a person seeking an oath waiver have a court-ordered guardian or a certain U.S. citizen relative because this unnecessarily restricts the waiver and is not supported by statute or regulation.<sup>41</sup> If a person is needed to stand in for an applicant with a severe disability, USCIS could require a family member, a social worker, or other trusted individual instead of creating artificial barriers to the waiver. Furthermore, any requirements that USCIS has imposed on oath waiver applicants should not be extended to apply to a person seeking a waiver of the English/civics requirement, as these are completely separate waivers with different purposes.

### III. Conclusion

Over the last five decades, Congress has issued various laws to try to provide full access to naturalization for persons with disabilities.

Practitioners should be aware of the differences between English/civics waivers and oath waivers and help educate medical professionals, as well as USCIS officers, so that the current confusion on the N-648 does not create additional unnecessary barriers for naturalization applicants.



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<sup>41</sup> ILRC, *Advocacy Letter on Oath Waiver and Accommodations for Naturalization* (June 21, 2022), <https://www.ilrc.org/resources/ilrc-advocacy-letter-oath-waiver-and-accommodations-naturalization-applicants>.