



NATURALIZATION UPDATE:

Policy Manual Revisions to Disability Waivers

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Appendix: 2023 Version 12 USCIS-PM E.3 – Medical Disability Exception (Form N-648). This guidance applies to applications filed before June 13, 2025.

I. Introduction

This practice advisory will provide background on the disability waiver of the English and civics requirement for naturalization and describe the June 2025 revisions to the USCIS Policy Manual (PM) on the submission and review of disability waivers.

The revised guidance in the PM applies to applications filed on or after the publication date of June 13, 2025.¹ Naturalization applications and disability waivers filed before June 13, 2025 are still governed by the prior guidance, which was first published in October 2022.² Because the USCIS website no longer contains the prior 2023 version of the PM, we attach it here as an Appendix. The 2025 revised version of the PM is available on the USCIS website.³ All applications that were in the pipeline and filed before June 13, 2025 should be adjudicated under the prior standards. Advocates should bring a copy of the prior guidance to interviews for cases filed before June 13, 2025 should adjudicators need to be reminded which standards apply. Note that the N-648, the form needed to apply for the disability waiver, has not been revised as of the date of this advisory. The current version is dated 9/25/2024 and does not expire until 9/30/2027.

Overall, the PM revisions signal a change in tone that assumes fraud in the disability waiver process is frequent and encourages increased scrutiny by USCIS adjudicators.

II. 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.”⁴ They also must show an understanding of “the fundamentals of the history, and of the principles and form of government, of the United States.”⁵ This is known as the English/civics requirement for naturalization.⁶

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).⁷ A series of

¹ USCIS, Policy Alert, *Revised Guidance for Form N-648 Submission and Review Process* (June 13, 2025), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20250613-N-648MedicalCertification.pdf>.

² A copy of the prior guidance that applies to applications filed before June 13, 2025, is attached as Appendix 1 to this advisory. USCIS does not have it available on their website.

³ 12 USCIS-PM E.3., <https://www.uscis.gov/policy-manual/volume-12-part-e>.

⁴ INA § 312(a)(1).

⁵ INA § 312(a)(2).

⁶ 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).

⁷ 8 CFR § 312 was published in the Federal Register, 62 Fed. Reg. 12,915 (Mar. 19, 1997).

Policy Memos followed from both INS and USCIS, and implementing guidance is currently published in the USCIS Policy Manual.⁸

A. Regulations for the Disability Waiver of English/Civics

The 1997 regulations provided clarifications about the eligibility criteria and created the mandatory use of Form N-648, Medical Certification for Disability Exceptions to apply for the waiver of the English/civics requirement due to a disability.⁹

The regulations state that the physical or mental impairment or combination of impairments must be “medically determinable” and expected to last or have lasted for at least 12 months and not be due to the direct effects of illegal use of drugs. “Medically determinable” means the impairment results from an anatomical, physiological, or psychological abnormality which can be shown by “medically acceptable clinical or laboratory diagnostic techniques” to impair function so that the applicant is unable to understand the English language requirements for naturalization, even if reasonable accommodations are made.¹⁰

The impairment must be one that can be shown by diagnostic techniques. The N-648 must be signed by a qualified medical professional who is a medical or osteopathic doctor, or a clinical psychologist licensed to practice in the United States or a U.S. territory.¹¹

The medical professional must attest to the origin, nature, and extent of the medical condition.¹²

B. Policy Guidance on the Disability Waiver of English/Civics

In addition to the regulations, the government issued many policy documents implementing the disability waiver for the English/civics requirement for naturalization. INS and later USCIS shifted often in its interpretations. Currently USCIS policy resides in the USCIS Policy Manual (PM), a centralized resource which the agency has been building since at least 2010. The PM chapter on disability waivers has been revised frequently, most recently in June 2025. The 2025 revisions added several sections to the pre-existing guidance and removed some of the prior language. This practice advisory will review the current guidance in the PM and point out some of the major differences with the prior guidance.

III. Policy Manual Revisions

The revised guidance adds a new introduction which stresses that the disability or impairment supporting an exception to the English and civics requirement for naturalization must be “legitimate and demonstrated,” language that was not present in the prior guidance. The alert announcing the change in the PM states: “Across the country and over the decades, there have been numerous instances where the medical certification process has been exploited.”¹³

⁸ 12 USCIS-PM E.3.

⁹ 8 CFR § 312.1(b)(3); 8 CFR § 312.2(b)(1)(2).

¹⁰ 8 CFR § 312.1(b)(3).

¹¹ 8 CFR § 312.2(b)(2).

¹² *Id.*

¹³ USCIS, Policy Alert, *Revised Guidance for Form N-648 Submission and Review Process* (June 13, 2025).

To support this claim, USCIS cites to three court judgements against medical professionals who committed fraud in this process, two cases from 2016 and one from 2023. Despite USCIS's conclusions, one could reason that three cases over a seven-year period are not frequent, and since the court judgements resulted in severe penalties, the current process has been sufficient to punish fraudulent actors.

The revisions to the PM add layers of scrutiny and suspicion to the applicants who file disability waivers. The vast majority of bona fide, legitimate applicants are ignored in favor of this unsupported perception of fraud. As the CIS Ombudsman has reported, USCIS has a robust process for investigating immigration benefit fraud through the Fraud Detection and Analysis Directorate (FDNS), and in FY 2020, only 0.5 % of N-648 filings (302 of 65,091) were referred to FDNS of which only 66 (0.1 percent) were found to be fraudulent. USCIS's own record does not support the allegation of widespread fraud in disability waivers.¹⁴

The revised guidance focuses on a few areas to add text and additional detail. It also, fortunately, leaves much of the prior guidance in place. As described in more detail below, the new sections involve filing N-648 after filing an N-400, deemed a "late" filing, the treatment of filing multiple N-648s, and changes to the bases on which adjudicators can find credible doubt about the legitimacy of the N-648. The revised guidance also returns to prior policies that encourage officers to request additional N-648s and to request medical records. Overall, the new guidance allows much more opportunity for adjudicators to deny disability waivers based on discrepancies or inconsistencies with an applicant's testimony or other documentation in the record.

A. Concurrent Filing of N-648 with N-400

The revised PM states that an applicant "must submit" their initial N-648 as a concurrent attachment with their naturalization application. While the prior PM specified that an applicant "should" submit their N-648 concurrently, it also specified that USCIS "should accept" an N-648 filed after the N-400. Now the PM states that USCIS "may" accept a later filed N-648, but only in limited situations that USCIS defines as permissible "extenuating circumstances." The revisions now deem an N-648 that is not filed concurrently to be a "late" filing, language that was not used in the prior guidance.¹⁵

The extenuating circumstances described in the revisions that can justify a later-file N-648 must be explained by applicants in writing or verbally at the time of interview. Examples that USCIS provides of such circumstances are the development of a disability or impairment after filing of the N-400 or the worsening of a medical condition that existed before filing but that later rendered the applicant unable to meet the educational requirements.

The revised PM states that other reasons might be able to support "extenuating circumstances" for filing of an N-648 after the filing of the N-400, but only on an individual basis are adjudicators to decide whether to accept the "late" submission. Furthermore, only after

¹⁴ See DHS, *CIS Ombudsman Annual Report 2021*, p. 47.

https://www.dhs.gov/sites/default/files/publications/dhs_2021_ombudsman_report_med_508_compliant.pdf.

¹⁵ 12 USCIS-PM E.3.C.2.

consultation with a supervisor will an officer be able to accept such a later-filed N-648.¹⁶ Thus the bias exists to deny later-filed N-648s.

There are many legitimate reasons that an N-648 might be filed after the initial filing of the N-400 that are not specified in the current PM and its requirement of narrowly defined “extenuating circumstances.” Unrepresented applicants might file a naturalization application on their own but later find counsel and learn that they may be eligible for such a waiver due to a qualifying disability if a medical professional makes that determination. Given the current PM, advocates should advise clients to seek medical evaluation early in the process if they think a qualifying disability may be present. The filing of the N-400 should be delayed until there has been ample time (often 3-4 months given the back-and-forth communication needed with the medical professional’s office) for the medical professional to prepare a thorough N-648.

This new section in the revisions to the PM also states that if the explanation to support the later-filing of the N-648 is “vague, incomplete, or if there is evidence suggesting that disability or impairment existed before filing Form N-400, officers may question the validity of the medical certification.”¹⁷ The revised PM states that if USCIS requests an additional or updated N-648 that it will not be considered a “late” submission.¹⁸ Also, if an applicant has already submitted one N-648 with the N-400 but files a new or updated one at interview, USCIS will consider that a multiple submission rather than a “late” filing.¹⁹ The effect of this is unclear as both are disfavored by the current guidance.

B. Multiple N-648 Filings

The revised PM also regards multiple filings of an N-648 with suspicion. There are many valid reasons that an applicant may submit an additional N-648 that does not warrant the negative presumptions made in the current guidance. Unrepresented applicants with little knowledge of the correct process may initially obtain and file a cursory evaluation from a medical professional that does not meet USCIS’s requirements. Later, with better information about what is needed, the applicant may seek a more competent, more specialized or more available medical professional to complete and submit an additional N-648. These will be regarded with suspicion despite the legitimate reasons for multiple filings of the N-648.

If there is more than one N-648 filed, officers are advised to question the validity of the N-648. Officers are instructed to examine multiple filings for “significant discrepancies” and to find the N-648 insufficient if the applicant is unable to explain them.²⁰

Another part of the guidance states that re-submission of a second N-648 at re-exam by the same medical professional to address insufficiencies that USCIS identified, or re-submission by a different medical professional where USCIS has made that request, will not be considered “multiple submissions.” However, officers are directed to again compare the N-648 to any previously filed N-648 to ensure that it addresses all insufficiencies and is consistent with the

¹⁶ 12 USCIS PM E.3.C.2.fn.8.

¹⁷ 12 USCIS-PM E.3.C.2.

¹⁸ 12 USCIS-PM E.3.C.2.

¹⁹ 12 USCIS-PM E.3.C.2.

²⁰ 12 USCIS-PM E.3.C.3.

prior N-648.²¹ In a footnote, the guidance directs that forms from different medical professionals describing different conditions may not pose a credibility issue.²²

When there is an issue of multiple submissions of N-648s, the PM requires the adjudicator to give the applicant an opportunity to explain discrepancies.²³

C. Requests for Evidence

The current PM states that if an officer identifies inconsistencies or discrepancies and cannot resolve them during the interview, then “the officer **may** issue an RFE...” and should only request the information necessary to determine the sufficiency of the N-648, such as a new form N-648, medical records to verify the diagnosis, and evidence confirming that the medical professional actually examined and diagnosed the applicant.²⁴

However, another section of the PM clarifies that if an applicant’s N-648 is found to be insufficient, “the officer **must** notify the applicant of the Form N-648 deficiencies in writing by issuing an RFE that specifically addresses the issues with the Form N-648.”²⁵ Because of this language, advocates should insist on issuance of an RFE in all cases where validity of the N-648 is challenged.

There is another reference to RFEs in the section describing circumstances where an officer requests a supplemental N-648. The PM states that where an officer wants to request a supplemental N-648, “The officer issues an RFE to the [noncitizen], clearly explaining all specific reasons for the validity or completeness of the original form. The RFE should include such details as any inconsistencies observed during the interview that raised credible doubts, the [noncitizen’s] responses to interview questions that conflicted with the medical certification, and any relevant sworn statements submitted during the interview that contradict the medical certification.”²⁶

Advocates should request that USCIS issue an RFE in all cases where an insufficiency determination is made based on the language in the PM. An RFE will detail the reasons for a finding and allow an opportunity to respond in writing.

D. Scope of the Medical Examination

Some of the guidance in this section of the PM remains the same as the prior version in that it recommends that the medical professional use common language that a person without medical training can understand, clearly identify the disability or impairment and explain how it

²¹ 12 USCIS-PM E.3.C.3.

²² 12 USCIS-PM E.3.C.3.fn.10.

²³ 12 USCIS-PM E.3.G.4 states, “If significant discrepancies or inconsistencies exist, the officer may determine that Form N-648 is insufficient. However, before making this determination, the officer must give the [noncitizen] an opportunity to explain the discrepancies.”

²⁴ 12 USCIS-PM E.3.G.4.

²⁵ 12 USCIS-PM E.3.I.1. states, “Failing the English and Civics Requirements. If an applicant’s Form N-648 is found to be insufficient, and the applicant fails to meet the English and civics requirements: The officer must notify the applicant of the Form N-648 deficiencies in writing by issuing an RFE that specifically addresses the Form N-648.”

²⁶ 12 USCIS-PM E.3.G.5.

prevents the applicant from learning or demonstrating knowledge of English, civics or both. Also, the doctor should attest that the disability has lasted or is expected to last at least 12 months, and that the impairment is not due to the illegal use of drugs. As with the prior PM, adjudicators are advised to examine any extra documents provided by the medical professional if information is missing from the N-648 to determine whether they complete the needed information on the N-648. However, the revised guidance also has a new instruction, that, “If the missing information is not present in the additional documentation, the officer must reject the N-648 as insufficient.”²⁷ There is no mention of an RFE in this section of the PM, but guidance elsewhere in the PM states that an RFE must be issued if an N-648 is found to be insufficient.²⁸

One of the major changes made in the prior version of the PM was that telehealth medical exams were explicitly permitted for the first time in 2022. Importantly, in the 2025 revisions, the telehealth provisions remain intact. Telehealth exams are permissible as long as the medical professional is properly licensed and is operating according to their state’s telehealth laws. After a telehealth exam, an applicant must make sure that all needed signatures are on the form before it is submitted to USCIS.

As with prior guidance, the burden of proof on the applicant is preponderance of the evidence. The revised guidance states that the N-648 will be reviewed based on “the totality of the evidence in the record” to assess eligibility.²⁹

Also added to this section is the advisal: “If legitimate concerns about the validity of the medical certification still exist, USCIS may find the Form N-648 insufficient and require the [noncitizen] to submit a Form N-648 from a different medical professional.”³⁰ This language is much broader than what the prior PM allowed, where USCIS suggested that an additional N-648 or medical record might be requested only if there was a question as to whether the medical professional actually examined the applicant or there were credible reasons to doubt the N-648 because it was clearly contradicted by other evidence.

The current guidance has a list of steps that an adjudicator should and should not take when reviewing the N-648, and these remain largely the same as they were in the prior PM. Officers should examine the N-648 to see if it is complete, certified, and signed; ensure that the N-648 relates to the applicant and there are no significant discrepancies between the form and “other available information, including biographic data, testimony during the interview,” and information in the A-file or record.³¹ And the officer should examine the N-648 to determine if it contains sufficient detail in the medical explanation that is specific to the applicant to establish eligibility by the preponderance of the evidence.

²⁷ 12 USCIS-PM E.3.F.

²⁸ 12 USCIS-PM E.3.I.1. states, “Failing the English and Civics Requirements. If an applicant’s Form N-648 is found to be insufficient, and the applicant fails to meet the English and civics requirements: The officer must notify the applicant of the Form N-648 deficiencies in writing by issuing an RFE that specifically addresses the Form N-648.”

²⁹ 12 USCIS-PM E.3.G.1.

³⁰ 12 USCIS-PM E.3.C.3.

³¹ 12 USCIS-PM E.3.G.1.

The PM revisions, like the prior version, prohibit adjudicators from second guessing why the diagnosis precludes the applicant from complying with the educational requirement and states that officers should not ask to see medical or prescription records solely to question whether there was a proper basis for a diagnosis unless evidence exists that creates significant discrepancies that those records can help resolve. Officers may ask follow-up questions to resolve outstanding issues. Furthermore, officers should not require that an applicant undergo specific medical, clinical or laboratory diagnostics.

The PM also still states, consistent with the prior version,³² that officers should not conclude that the burden of proof has not been met solely because the applicant did not previously disclose the condition on other immigration-related medical documents, although this can be a factor in determining sufficiency and should be addressed with follow-up questions. Lastly, the adjudicator should not refer the applicant to another medical professional solely because the applicant shares the same language, culture, ethnicity or nationality as the medical professional.

E. Connection/Nexus Between Disability and Educational Requirements

Both regulations and the PM require that the medical professional explain the disability or impairment in sufficient detail and describe how it prevents the applicant from being able to meet the English requirement, the civics requirement, or both. The current PM also points out that the regulations require that the medical professional be experienced in diagnosing those with physical or medically determinable impairments. The medical professional should attest to the origin, nature and extent of the condition as it relates to the exception.³³ The current PM sometimes uses the language “nexus” to describe the needed connection between diagnosis and the inability to comply with the educational requirement. “Nexus” had been dropped from the prior PM in favor of the plain language word “connection,” which has an equivalent meaning – the disability must render the applicant unable to understand or learn English and civics.

F. Interpreter Guidance

This section of the PM discusses interpreters in the medical examination and in the naturalization interview. Consistent with the prior version, the revised PM still states that the person who interprets at a telehealth exam need not sign the N-648; instead, the medical professional should sign the interpreter certification on the form.³⁴

The revised PM states that if it’s not clear that an interpreter was present during the medical exam, the officer can question the applicant and the interpreter. While officers are instructed not to ask the interpreter about the medical condition, they are also advised in a new section of the current PM that an interpreter who was used for the medical exam but is not present at the time of the naturalization interview may be summoned by a G-56 Call-in letter or by a visit from

³² 12 USCIS-PM E.3.G.1.

³³ 12 USCIS-PM E.3.G.2.fn.21, 8 CFR § 312.2(b)(2).

³⁴ 12 USCIS-PM E.3.G.3.

the fraud detection officers at USCIS (officers who work at the Fraud Detection and National Security (FDNS) office). The PM also states that officers can also, as a last resort, seek a subpoena to question an interpreter if they first consult with the Office of Chief Counsel.³⁵ The use of G-56 Call-in notices or visits by FDNS officers were not specified as ways to call in interpreters as witnesses in the prior PM.

At the interview, officers must question the applicant under oath in their preferred language through an interpreter, which can be provided by the applicant or, if the applicant agrees and it is available, by a government language service. Adjudicators have discretion to disqualify an interpreter for cause and reschedule an interview. Additional guidance on interpreters in the revised PM states: “If the officer disqualifies the [noncitizen’s] interpreter and no additional questioning about the Form N-648 is needed to determine the sufficiency, the officer should reject the N-648.”³⁶ This change raises the stakes should an applicant provide a poorly qualified interpreter. Prior guidance explicitly allowed officers to reschedule an interview if needed but provided that the applicant should have an opportunity to provide a new interpreter.

G. Credible Reasons to Doubt the Validity of the N-648

While prior guidance created a presumption of invalidity of the N-648 in certain circumstances, these scenarios have been expanded and given additional emphasis in the current PM. Prior guidance pointed to “significant” discrepancies sometimes giving rise to such a negative presumption.³⁷

While the PM still states that there is a general presumption that the medical professional’s diagnosis is correct, there is no such presumption if “credible evidence suggests otherwise.”³⁸ Also, there is new language that undermines the medical professional’s diagnosis by stating that “[t]he presumption that the medical professional has correctly diagnosed the [noncitizen’s] medical condition is not a presumption that the [noncitizen] has met his or her burden of establishing eligibility for a waiver.”³⁹ This language was not present in the prior PM and encourages more denials.

The revised guidance states that when an officer identifies inconsistencies or discrepancies in the N-648 during the interview, they must give the applicant an opportunity to explain. If the discrepancies are not resolved during the interview the officer “may” issue a Request for Evidence (RFE) and require a new N-648, medical records that verify the diagnosis, or evidence that the medical professional actually examined the applicant.⁴⁰ As noted, advocates

³⁵ 12 USCIS-PM E.3.G.3.fn.22.

³⁶ 12 USCIS-PM E.3.G.4.

³⁷ Note that the “significant” modifier for discrepancies has been preserved in other sections of the current PM, such as 12 USCIS-PM E.3.C.3 discussing multiple submissions of N-648s and 12 USCIS-PM E.3.G.1 discussing steps to take when reviewing the N-648. Discrepancies or inconsistencies must also be “material” to justify a finding of insufficiency of an N-648. 12 USCIS-PM E.3.H.2.

³⁸ 12 USCIS-PM E.3.G.4.

³⁹ 12 USCIS-PM E.3.G.4.

⁴⁰ 12 USCIS-PM E.3.G.4.

should remind officers that elsewhere in the PM it states that the officer must notify an applicant with an RFE of the reasons for a finding of insufficiency.⁴¹

The credible doubt examples that are listed are not exhaustive.⁴² The specific examples of credible doubt that were carried over from the previous version include: lack of proper certification where the applicant was not examined by the medical professional or paid for an N-648 without undergoing a medical exam; fraud by a medical professional who is under investigation for immigration or health care fraud or has been disciplined for such practices; fraudulent involvement of interpreters; multiple inconsistent N-648s with conflicting diagnoses; or other articulable grounds. These familiar “credible doubt” situations now have additional detail and reach.

There are a few new “credible doubt” examples, such as inconsistencies in the applicant’s interview, where statements during the interview directly contradict the medical condition described in the N-648. Another new ground for credible doubt is contradictory information in the applicant’s existing records, including prior N-648s or existing medical records in the A-file, including Form I-693, the medical examination form presented at the time of applying for permanent residence. If the I-693 shows no history of the condition described in the N-648, that is a basis for credible doubt. Other “official documentation” that directly contradicts the information in the N-648 will also justify the negative presumption of a “credible doubt.”⁴³

In addition, the revised PM states that if any of these “credible doubt” situations are present, the officer will find the N-648 insufficient and will refer the case to FDNS for further investigation. This advisal was present in prior guidance but previously supervisor review was required before a decision to refer to FDNS, and the officer was required to explain the deficiencies in a Notice of Intent to Deny or a denial notice. Those safeguards are eliminated by the current guidance, but an RFE is mandated where there is a finding of insufficiency.

If an officer has doubts about the N-648 they can request a supplemental N-648 in a RFE from a different medical professional. Previously, a supervisor’s approval was required to do this, but that is no longer needed. The RFE must detail the inconsistencies observed during the interview, the applicant’s responses that conflict with the medical certification, and any relevant sworn statements from the interview that contradict the certification.

IV. Conclusion

The 2025 revisions create new challenges for naturalization applicants seeking medical disability waivers of the English and civics requirement. For applications filed before June 13, 2025, the prior version of the PM applies. Advocates should be prepared to show the prior version of the PM to USCIS adjudicators since the USCIS website does not make the earlier version retrievable.

⁴¹ 12 USCIS-PM E.3.I.1. states, “Failing the English and Civics Requirements. If an applicant’s Form N-648 is found to be insufficient, and the applicant fails to meet the English and civics requirements: The officer must notify the applicant of the Form N-648 deficiencies in writing by issuing an RFE that specifically addresses the Form N-648.”

⁴² 12 USCIS-PM E.3.G.4.fn.26.

⁴³ 12 USCIS-PM E.3.G.4.

It's useful with the current version of the PM to read it in its entirety and point out to officers where guidance emphasizes preponderance of the evidence, the requirement of RFEs, and the need to allow applicants an opportunity to explain any discrepancies. The N-648 should be judged based on the totality of the evidence to assess its sufficiency.

Despite the new caveats in the current PM, the guidance clearly states that the reviewing officer should not attempt to determine the validity of the medical diagnosis or second guess why this diagnosis precludes the applicant from complying with the English and civics requirement. Also remember that the current PM states that officers shall not request an applicant's medical or prescription records solely to question whether there was a proper basis for the medical professional's diagnosis unless evidence exists that creates significant discrepancies that those records can help resolve. Officers should ask follow-up questions rather than request medical records. These prohibitions existed in the prior PM guidance and continue to apply in the revised version.


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APPENDIX

2023 version

Chapter 3 - Medical Disability Exception (Form N-648)

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A. Medical Disability Exception Background

In 1994, Congress enacted legislation providing an exception to the English and civics requirements for naturalization applicants who cannot meet the requirements^[1] because of a physical or developmental disability or mental impairment.^[2]

The English and civics requirements do not apply to naturalization applicants who are unable to comply due to a “medically determinable” physical or developmental disability or mental impairment that has lasted, or is expected to last, at least 12 months. The regulations define medically determinable as an impairment that results from abnormalities which can be shown by medically acceptable clinical or laboratory diagnostic techniques.^[3]

The applicant must demonstrate that the applicant has a disability or impairment that affects functioning such that the applicant is unable to meet the English and civics requirements for naturalization, even with reasonable accommodations.^[4]

A licensed medical professional^[5] must complete a Medical Certification for Disability Exceptions ([Form N-648](#)) and certify, under penalty of perjury, that the applicant’s physical or developmental disability or mental impairment prevents the applicant from meeting the English requirement, the civics requirement, or both requirements.

B. Filing

1. Form N-648 Submission

An applicant seeking an exception to the English or civics requirements or both should submit a [Form N-648](#) as an attachment to the Application for Naturalization ([Form N-400](#)).^[6] However, USCIS should accept a Form N-648 submitted after the applicant files the naturalization application. Applicants should use the form edition of the Form N-648 listed on the form [webpage](#).

2. Multiple Submissions

If the applicant submits more than one [Form N-648](#) during the initial interview, during the re-examination, or anytime during the pendency of the same naturalization application, an officer may examine any significant discrepancies between the documents. However, the officer must provide the applicant with an opportunity to explain discrepancies.

C. Distinction Between Medical Disability Exception and Accommodation

Requesting an exception to the English or civics requirements or both is different from requesting an accommodation for the naturalization test or interview.^[7] An accommodation simply modifies the manner in which an applicant meets the educational requirements; it does not exempt the applicant from the English or civics requirements. [Form N-648](#) is not used to request an accommodation.

Reasonable accommodations may include, but are not limited to, sign language interpreters, extended time for completing the English and civics requirements, and completing the English and civics requirements and naturalization interview at an off-site location. A disability exception, which can only be requested by submitting [Form N-648](#), requires an applicant to show that the applicant's physical or developmental disability or mental impairment prevents the applicant from complying with the English or civics requirements or both, even with reasonable accommodations. The impact of a particular physical or developmental disability or mental impairment may vary between applicants.

It may be possible for USCIS to accommodate one applicant who is affected by a particular physical or developmental disability or mental impairment, while another applicant affected by the same disability or impairment may be eligible for a disability exception.^[8] For example, an applicant who has a traumatic brain injury may require the accommodation of more time to complete the writing portion of the English test, while an applicant with the same diagnosis may not be able to write a simple sentence in English even with an accommodation, and needs to submit a [Form N-648](#).

An applicant may request both a medical disability exception and a reasonable accommodation where both are needed. For example, if an applicant is deaf and uses a sign language interpreter and is also unable to meet the English and civics requirements due to a physical or developmental disability or mental impairment, the applicant may submit a [Form N-648](#) and also request that USCIS provide a sign language interpreter for the naturalization interview.^[9]

D. Authorized Medical Professionals

USCIS only authorizes the following licensed medical professionals to certify the disability exception form:

- Medical doctors;
- Doctors of osteopathy; and
- Clinical psychologists.^[10]

These medical professionals must be licensed to practice in any state of the United States, the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, or the Commonwealth of the Northern Mariana Islands.

E. Scope of Medical Examination

In order for USCIS to consider deeming a [Form N-648](#) sufficient, the medical professional must, at a minimum:

- Conduct an examination of the applicant;
- Identify and describe each physical or developmental disability or mental impairment on [Form N-648](#);
- Explain how each physical or developmental disability or mental impairment prevents the applicant from learning or demonstrating knowledge of English, civics or both;
- Attest that the physical or developmental disability or mental impairment has lasted or is expected to last at least 12 months; and
- Attest that the cause of the physical or developmental disability or mental impairment is not related to the illegal use of drugs.

The medical professional should complete the [Form N-648](#) using common terminology that a person without medical training can understand. While staff associated with the medical professional may assist in completing the form, the medical professional alone is responsible for providing the necessary information, answering the questions, and verifying and attesting to the accuracy of the form's content. If information is missing from the Form N-648, the officer

should review any extra documents provided by the medical professional to determine if the information completes the Form N-648.

Telehealth Examination

USCIS may accept a [Form N-648](#) certified by an authorized medical professional who completed the applicant’s medical examination through a telehealth examination.^(u1) The medical professional must be licensed. In conducting telehealth examinations, medical professionals must adhere to the respective state telehealth laws and requirements, otherwise USCIS may request a new Form N-648. After a telehealth examination, the applicant should ensure all signatures are present and then submit the Form N-648 to USCIS.

F. Review of Medical Certification

1. General Guidelines for Review

The officer must review the form for sufficiency^(u2) to determine whether the applicant is eligible for the exception. The tables below provide general guidelines on what steps the officer should and should not take when reviewing the [Form N-648](#).

When reviewing the form, the officer should:
<ul style="list-style-type: none">• Determine whether the form has been completed, certified, and signed by all appropriate parties.^(u3)
<ul style="list-style-type: none">• Ensure that the Form N-648 relates to the applicant and that there are no significant discrepancies between the form and information contained in the applicant’s A-file or record.
<ul style="list-style-type: none">• Determine whether the Form N-648 contains enough information to establish that the applicant is eligible for the exception by a preponderance of the evidence. This determination includes ensuring that the medical professional’s explanation is both sufficiently detailed as well as specific to the applicant and to the applicant’s stated physical or developmental disability or mental impairment.

When reviewing the form, the officer should not:
<ul style="list-style-type: none">• Attempt to determine the validity of the medical diagnosis or second guess why this diagnosis precludes the applicant from complying with the English requirement, civics requirement, or both requirements.
<ul style="list-style-type: none">• Request to see an applicant’s medical or prescription records solely to question whether there was a proper basis for the medical professional’s diagnosis unless evidence exists that creates significant discrepancies that those records can help resolve. The officer may ask follow-up questions to resolve any outstanding issues.
<ul style="list-style-type: none">• Require that an applicant undergo specific medical, clinical, or laboratory diagnostic techniques, tests, or methods.
<ul style="list-style-type: none">• Conclude that the applicant has failed to meet the burden of proof simply because the applicant did not previously disclose the alleged medical condition in other immigration-related medical examinations or documents. It is appropriate, however, to consider this as a factor when determining the sufficiency of the Form N-648. The officer should always examine the evidence of record and ask follow-up questions to resolve any outstanding issues.
<ul style="list-style-type: none">• Refer an applicant to another medical professional solely because the applicant sought care from a professional who shares the same language, culture, ethnicity, or nationality.

2. Connection Between Medical Disability and Educational Requirements

When reviewing the request for the medical disability exception, the officer must determine whether the medical professional explained that the applicant has a physical or developmental disability or mental impairment that prevents the applicant from being able to demonstrate that they meet the English requirement, civics requirement, or both. Illiteracy alone is not a valid reason to seek an exception to the English and civics requirements. In addition, advanced age, in and of itself, is not a medically determinable physical or developmental disability or mental impairment.

After review of the record, the officer may only grant an exception from the English or civics requirements if the applicant has demonstrated by a preponderance of the evidence that the physical or developmental disability or mental impairment results in functioning so impaired as to render the applicant unable to:

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- Demonstrate an understanding of the English language, including reading, writing, and speaking words in ordinary usage in the English language;
- Demonstrate a knowledge and understanding of the fundamentals of history and of the principles and form of government of the United States; or
- Both.

3. Use of Interpreters

Certification on Form N-648 and Presence of Interpreter at Medical Examination

If it is unclear whether an interpreter was used during the medical examination, the officer will ask the applicant if the medical examination that formed the basis of the [Form N-648](#) was performed with the assistance of an interpreter. For example, the officer may question the applicant during the interview about the manner of communication used to conduct the medical examination. Interpreters providing interpretation services for telehealth medical examinations do not have to complete the interpreter certification on Form N-648. Instead, the medical professional must complete the interpreter certification on the form.

If necessary, the officer may also choose to question the interpreter who was present at the medical examination about the interpretation provided during a medical examination in connection with the applicant's [Form N-648](#).^{[141](#)} If the officer wishes to question an interpreter, the officer must place the interpreter under oath. If the person who interpreted at the medical examination is to be questioned as a witness, and is also present during the naturalization interview to provide interpretation services, the interpreter must be disqualified from interpreting for that applicant at the naturalization interview unless a good cause exception exists.^{[145](#)} Officers may not ask interpreters about the medical condition of the applicant.

If a good cause exception is not found, the officer should reschedule the interview, as needed, to permit the applicant an opportunity to find a new interpreter.

Interpreter at Interview

If the officer needs to ask the applicant questions about [Form N-648](#) or explain why it is insufficient, the officer must do so in the applicant's preferred language, with the use of an interpreter,^{[146](#)} and while the applicant is under oath. If the office has a language service available and the applicant agrees, the officer may use the language service when the interpreter provided by the applicant is disqualified. In the agency's discretion, as in all cases, the officer may disqualify an interpreter provided by the applicant or a telephonic language service interpreter for cause and reschedule the interview.^{[147](#)}

4. Credible Reasons to Doubt the Validity of Form N-648

There are different reasons that USCIS may find a [Form N-648](#) insufficient, including if USCIS determines there are credible reasons to doubt the validity of the Form N-648 due to significant discrepancies, misrepresentation, or fraud. However, in general, USCIS accepts the medical professional's diagnosis.

The officer must provide the applicant an opportunity to address any specific discrepancies or inconsistencies during the interview. When issuing a Request for Evidence (RFE), the officer should only request the information necessary to make a determination on the sufficiency of the [Form N-648](#). In some cases, USCIS may require the submission of an additional Form N-648 or request the applicant's medical reports or other supplementary medical background information if there is a question as to whether the medical professional actually examined the applicant or there are credible reasons to doubt the validity of the Form N-648 because it is clearly contradicted by other evidence.

Below are some examples of credible reasons to doubt the validity of the form certification to assist officers in determining the sufficiency of [Form N-648](#):^[18]

- During the interview, the officer determines that the applicant was not examined by the certifying medical professional, someone other than the authorized medical professional certified the form, or the applicant paid for the Form N-648 without having an examination and diagnosis by an authorized medical professional;
- The medical professional who completed the Form N-648 is under investigation for immigration fraud, Medicaid fraud, or other fraud schemes identified by USCIS Fraud Detection and National Security (FDNS) Directorate, Immigration and Customs Enforcement, or another federal, state, or local agency, or a state medical board;
- The interpreter used during the medical examination, the naturalization interview, or both, is known or suspected, by FDNS or another state or federal agency, to be involved in any immigration fraud, including and especially Form N-648 related fraud;
- The evidence in the record or other credible information available to the officer indicates fraud or misrepresentation;
- The applicant provides multiple Forms N-648 with different diagnoses and information; or
- Any other articulable grounds that are supported by the record.

If any one or more of these indicators are present, the officer should consult with a supervisor for next steps, which may include requesting additional documentation or finding the [Form N-648](#) insufficient.

In addition, there may be cases where USCIS suspects or determines that an applicant, interpreter, or medical professional has committed fraud in the process of seeking a medical disability exception. The officer should consult with a supervisor to determine whether to refer such a case to FDNS. If an officer or the local FDNS office determines that an applicant, interpreter, or medical professional has made material misrepresentations or committed fraud, the officer must explain those findings in a Notice of Intent to Deny or denial notice, as appropriate. Additionally, if an officer determines that an in-person or a telehealth examination did not appear to comply with state law or licensing regulations, the officer may refer the case to FDNS.

Requesting a Supplemental Form N-648 from a Different Medical Professional

In general, USCIS does not request a supplemental [Form N-648](#) from a different medical professional after evaluating the originally submitted Form N-648. However, if there is a question as to whether the medical professional actually examined the applicant or there are credible reasons to doubt the validity of the medical certification because it is clearly contradicted by other evidence, the officer may request a new Form N-648 from a different medical professional.⁽¹⁹⁾ The officer should exercise caution when requesting an applicant obtain a supplemental Form N-648 from another authorized medical professional. The officer should:

- Consult with a supervisor and receive supervisory approval before requesting that the applicant submit a supplemental [Form N-648](#);
- Explain to the applicant, through an RFE, the reasons for doubting the veracity of the information on the original Form N-648, including any sworn statements, observations or applicant responses to questions during the interview that raised issues of credible doubt; and
- Provide the applicant with the relevant state medical board contact information to facilitate the applicant's ability to find another medical professional.

G. Sufficiency of Form N-648

As previously stated, in general, USCIS should accept the medical professional's diagnosis. The [Form N-648](#) should be completed by the certifying medical professional no more than 180 days before the applicant files the naturalization application. Once this requirement is satisfied, the Form N-648 remains valid for the entire naturalization process connected to that particular [Form N-400](#).

An officer reviews the [Form N-648](#) in its totality and may determine that the Form N-648 is sufficient, even if some of the questions have incomplete responses. The officer should determine that a request for a medical disability exception is sufficient if the file and testimony establish that the applicant is eligible for the medical disability exception. The file may include medical documentation and information in addition to the Form N-648.

An officer may find the [Form N-648](#) insufficient if the form does not include the required information as detailed below.

1. Sufficient Form N-648

A request for a medical disability exception is sufficient if it contains the following information:

- Clinical diagnosis of the applicant’s physical or developmental disability or mental impairment;^[20]
- Indication as to whether the physical or developmental disability or mental impairment has lasted, or is expected to last, at least 12 months;
- Statement that the physical or developmental disability or mental impairment is not the result of the illegal use of drugs;
- Description of the clinical methods used to diagnose the physical or developmental disability or mental impairment;
- Date that the medical professional last examined the applicant for the physical or developmental disability or mental impairment;^[21] and
- A sufficient explanation of how the applicant’s physical or developmental disability or mental impairment prevents the applicant from meeting the English requirement, the civics requirement, or both requirements.

In addition the [Form N-648](#) is completed, certified, and signed by all appropriate parties^[22] and no significant discrepancies, or fraud indicators exist, based on the totality of evidence in the record, that call into question a finding of eligibility under a preponderance of the evidence standard.

The table below provides the general procedures for cases where an applicant qualifies for a medical disability exception. The procedures apply to any phase of the naturalization examination, including the initial examination, re-examination, or hearing on a denial.

General Procedures Upon Determination the Form N-648 is Sufficient	
If the officer determines an applicant's Form N-648 is sufficient at the naturalization examination or hearing and	USCIS action
<ul style="list-style-type: none"> The medical professional indicated on the form that the applicant is unable to comply with the English speaking requirement. 	<ul style="list-style-type: none"> USCIS proceeds with the interview and civics test in the applicant's preferred language with the use of an interpreter, if applicable.
<ul style="list-style-type: none"> The medical professional indicated on the form that the applicant is unable to comply with any or part of the English and civics requirements. 	<ul style="list-style-type: none"> USCIS waives the indicated requirement(s).
<ul style="list-style-type: none"> The medical professional indicated on the form that the applicant is unable to understand or communicate an understanding of the Oath of Allegiance. 	<ul style="list-style-type: none"> USCIS follows the process established for legal guardians, surrogates, or designated representatives.^[23]
USCIS then determines whether the applicant meets all other naturalization eligibility requirements.	

2. Insufficient Form N-648

A request for a medical disability exception is insufficient if the [Form N-648](#) does not contain all of the required information.^[24]

The table below provides the general procedures USCIS follows when the [Form N-648](#) is found to be insufficient. The procedures apply to any phase of the naturalization examination, including the initial examination, re-examination, or hearing on a denial.^[25]

General Procedures Upon Determination the Form N-648 is Insufficient	
If the Form N-648 is insufficient at the naturalization examination or hearing:	
	<ul style="list-style-type: none">• The officer must explain why they found the form insufficient in the applicant's preferred language, using an interpreter if needed.
	<ul style="list-style-type: none">• USCIS proceeds with the initial examination, re-examination, or hearing on a denial as if the applicant had not submitted a Form N-648.
	<ul style="list-style-type: none">• USCIS must provide the applicant with an opportunity to complete all portions of the English and civics requirements.
	<ul style="list-style-type: none">• An applicant has a total of two opportunities to pass the English and civics requirements before the application for naturalization is adjudicated: once during the initial examination and then again during a re-examination, which is scheduled if the requirements are not passed at the initial examination.
	<ul style="list-style-type: none">• An applicant may decline to attempt to complete the English and civics requirements. However, declining to continue the interview or attempt to complete the requirements counts as a failed attempt to pass the English and civics requirements.^{1261}
	<ul style="list-style-type: none">• An applicant's failure to appear at the re-examination or hearing on a denial, or to complete the English or civics requirements for any reason, results in a denial, unless excused by USCIS for good cause.

If USCIS identifies deficiencies in a [Form N-648](#), which the applicant is unable to sufficiently explain at the interview, an applicant does not have to submit a new Form N-648. USCIS will accept a previously submitted Form N-648 which contains updated or additional information. However, the resubmitted form must be re-signed and dated by the same medical professional who signed the original Form N-648. USCIS will accept a resubmitted Form N-648 under these circumstances even if a new edition of Form N-648 has been published since the Form N-648 was initially submitted, and the resubmitted form now has an expired edition date. USCIS will also accept a letter or other medical documentation addressing the Form N-648 deficiencies, if it is signed and dated by the same medical professional who signed the Form N-648.

H. Interview, Re-Examination, and Hearing after an Insufficient Form N-648

1. Initial Interview

Passing the English and Civics Requirements^[27]

If an applicant's [Form N-648](#) is found to be insufficient, but the applicant subsequently meets the English and civics requirements in the same examination:

- The officer must provide the applicant the opportunity to proceed with the rest of the naturalization interview to determine if the applicant meets the other applicable eligibility requirements.
- The officer should not determine that the applicant engaged in fraud or lacks good moral character for the sole reason that the applicant met the educational requirements after submitting an insufficient Form N-648.
- The officer may question the applicant further, however, on the reasons for submitting the form, and any other relevant factors, if necessary.^[28]

Failing the English and Civics Requirements

If an applicant's [Form N-648](#) is found to be insufficient, and the applicant fails to meet the English or civics requirements:

- The officer must notify the applicant of the Form N-648 deficiencies in writing by issuing an RFE that specifically addresses the issues with the Form N-648.
- The officer should schedule the applicant to appear for a re-examination for a second opportunity to meet the English or civics requirements or both, between 60 and 90 days after the initial examination. If the applicant requests that the re-examination be rescheduled to a date that is more than 90 days after the initial examination, the applicant must agree in writing to waive the requirement under [INA 336](#) that USCIS must adjudicate the application within 120 days from the initial interview before the applicant may apply to U.S. district court for review of a pending application for naturalization, and instead permit USCIS to adjudicate the application within 120 days from the re-examination before seeking review.^[29]

2. Re-Examination

If new information is received in support of a [Form N-648](#) that USCIS found insufficient at the initial interview, the officer must review the new evidence at the re-examination. In addition, the officer conducting the re-examination should review the original Form N-648 and accompanying evidence for consistency with the new information.

If an applicant submits a [Form N-648](#) for the first time at the re-examination interview, the officer should review the form to determine if it is sufficient.^[30] If the applicant has established eligibility for the disability exception, the officer should continue the naturalization interview and examination, exempting the applicant from the English or civics requirements, or both, as indicated on the Form N-648. If the medical professional indicated on the form that the applicant is unable to comply with the English speaking requirement, the applicant may use an interpreter during the interview and examination.

If an RFE related to an insufficient [Form N-648](#) was issued at the initial interview and the interviewing officer determines that the evidence submitted in response to the RFE is insufficient:

- The officer must explain the reasons for the insufficiency in the applicant's preferred language verbally during the interview, using an interpreter, if needed. The RFE also needs to have an explanation of the insufficiency;
- The officer must proceed with the re-examination as if the applicant had not submitted a Form N-648;
- The officer must administer any portion of the English and civics tests that the applicant previously failed;
- The officer must not issue another RFE related to any insufficient Form N-648 to provide the applicant another opportunity to submit a Form N-648 or to take the English and civics tests for a third time;
- If the applicant fails any portion of the test or declines to take the test, the officer must deny the naturalization application based on the applicant's failure to meet the English or civics requirements or both; and
- In the notice to deny the application for naturalization, the officer must provide an explanation for finding the Form N-648 insufficient.

3. Hearing on Denial

An applicant whose naturalization application was denied may file a Request for a Hearing on a Decision in Naturalization Proceedings Under Section 336 ([Form N-336](#)) within 30 calendar days of receiving the adverse decision.^[31]

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USCIS may conduct a full de novo hearing on a denied naturalization application, including a full review of any previously submitted [Form N-648](#) as well as other information contained in the record.^{[\[32\]](#)} An applicant may submit additional documentation at the hearing, including a new or initial Form N-648 and relevant medical diagnostic reports, records, or statements. At the hearing, an applicant will only be allowed to submit one Form N-648 and only allowed to attempt to satisfy the educational requirements once.

In addition, the officer also should follow the same procedures in the hearing as provided in this chapter when making a determination that a [Form N-648](#) filed for the first time at the hearing is sufficient or insufficient.

Footnotes

[^ 1] The term “English and civics requirements” refers to demonstrating English language proficiency, which is determined by an ability to read, write, speak, and understand English, as well as knowledge of U.S. history and government, which is determined by a civics test. See Chapter 2, English and Civics Testing, Section A, Educational Requirements [12 USCIS-PM E.2(A)].

[^ 2] See [INA 312\(b\)\(1\)](#). See Section 108 of the Immigration and Nationality Technical Corrections Act of 1994, [Pub. L. 103-416 \(PDF\)](#), 108 Stat. 4305, 4309 (October 25, 1994) (adding [INA 312\(b\)](#)).

[^ 3] See [INA 312\(b\)](#). See [8 CFR 312.1\(b\)\(3\)](#) and [8 CFR 312.2\(b\)](#).

[^ 4] The applicant has the burden of proof by the preponderance of the evidence standard.

[^ 5] See Section D, Authorized Medical Professionals [12 USCIS-PM E.3(D)].

[^ 6] See [8 CFR 312.2\(b\)\(2\)](#). Applicants filing a naturalization application online should upload a scanned copy of the Medical Certification for Disability Exceptions ([Form N-648](#)) using their USCIS online account.

[^ 7] See Part C, Accommodations [12 USCIS-PM C].

[^ 8] See the [Disability Accommodations for the Public](#) webpage to request an accommodation.

[^ 9] See Part C, Accommodations, Chapter 3, Types of Accommodations [12 USCIS-PM C.3].

[^ 10] See [8 CFR 312.2\(b\)\(2\)](#).

[^ 11] See the [What is telehealth?](#) webpage from the U.S. Department of Health and Human Services.

[^ 12] See Section G, Sufficiency of Form N-648 [12 USCIS-PM E.3(G)].

[^ 13] An officer may allow an applicant or the interpreter (if the same interpreter was present at the time of the [Form N-648](#) examination) to sign the form at the naturalization interview if their signatures are missing; however, if a missing signature from the certifying medical professional or interpreter present at the time of the Form N-648 examination cannot be provided at the interview, an officer issues an RFE to have the medical professional or the interpreter sign the Form N-648.

[^ 14] If necessary, the officer may issue a subpoena to the interpreter for this purpose. Officers should consult with Office of the Chief Counsel before issuing a subpoena that seeks health information.

[^ 15] In the officer's discretion, a good cause exception may be granted that would allow the witness to interpret. See [The Role and Use of Interpreters in Domestic Field Office Interviews \(PDF, 497.54 KB\)](#), PM-602-0125.1, issued January 17, 2017. See Part B, Naturalization Examination, Chapter 3, Naturalization Interview, Section A, Roles and Responsibilities, Subsection 3, Interpreters [[12 USCIS B.3\(A\)\(3\)](#)].

[^ 16] The interpreter must be under oath. See Part B, Naturalization Examination, Chapter 3, Naturalization Interview, Section A, Roles and Responsibilities, Subsection 3, Interpreters [[12 USCIS B.3\(A\)\(3\)](#)].

[^ 17] See [The Role and Use of Interpreters in Domestic Field Office Interviews \(PDF, 497.54 KB\)](#), PM-602-0125.1, issued January 17, 2017, and Part B, Naturalization Examination, Chapter 3, Naturalization Interview, Section A, Roles and Responsibilities, Subsection 3, Interpreters [[12 USCIS B.3\(A\)\(3\)](#)].

[^ 18] The list provided is not exhaustive and is meant only to provide some examples for officers when reviewing [Form N-648](#) for sufficiency. Officers should consult with a supervisor if there are any questions.

[^ 19] The officer requests this evidence by issuing an RFE, Form N-14.

[^ 20] The officer may not find the [Form N-648](#) insufficient solely because the Diagnostic Statistical Manual or International Classification of Diseases medical codes are missing in the form if the medical professional has provided a sufficient description of the clinical diagnosis for all the physical or developmental disabilities or mental impairments.

[^ 21] If the date of last examination is missing from the [Form N-648](#), the officer may review the date of signature of the medical professional in Part 6 and confirm with the applicant if that was the date of last examination. The officer should not determine that the form is insufficient solely because the date of last examination is missing on the form if the date can be confirmed during the naturalization interview.

[^ 22] An officer may allow an applicant or the interpreter (if the same interpreter was present at the time of the [Form N-648](#) examination) to sign the form at the naturalization interview if their signatures are missing; however, if a missing signature from the certifying medical professional or interpreter present at time of the Form N-648 examination cannot be provided at the interview, an officer issues an RFE to have the medical professional or the interpreter place the signature(s) on the same Form N-648.

[^ 23] See Part J, Oath of Allegiance, Chapter 3, Oath of Allegiance Modifications and Waivers, Section C, Waiver of the Oath [[12 USCIS-PM J.3\(C\)](#)].

[^ 24] Before determining that a [Form N-648](#) is insufficient due to missing information, officers should review all sections to confirm that the information needed does not appear in a different section of the form.

[^ 25] See Part B, Naturalization Examination, Chapter 3, Naturalization Interview, Section D, Subsequent Re-examination [[12 USCIS-PM B.3\(D\)](#)]. See Part B, Naturalization Examination, Chapter 6, USCIS Hearing and Judicial Review [[12 USCIS-PM B.6](#)]. See Request for a Hearing on a Decision in Naturalization Proceedings Under Section 336 ([Form N-336](#)).

[^ 26] An officer should annotate that the applicant declined to take any part of the educational requirements in the record.

[^ 27] See [INA 312](#).

[^ 28] The officer may question the applicant about a [Form N-648](#) with the use of an interpreter.

[^ 29] See [8 CFR 312.5\(b\)](#).

[^ 30] For more information see Section F, Review of Medical Certification, Subsection 4, Credible Reasons to Doubt the Validity of Form N-648 [[12 USCIS-PM E.3\(F\)](#)].

[^ 31] See Part B, Naturalization Examination, Chapter 6, USCIS Hearing and Judicial Review [[12 USCIS-PM B.6](#)].

[^ 32] See [8 CFR 336.2](#).

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