



Assisting Naturalization Applicants Who Have Disabilities by Using Form N-648 Completing and Submitting Form N-648

Practice Advisory

By Melissa Rodgers

Introduction¹

This is the second of two practice advisories addressing how to help naturalization applicants with disabilities, using Form N-648. This advisory addresses how to complete Form N-648, as well as the procedure for submitting the form. A separate practice advisory describes the criteria for the disability exception.

The eligibility requirements for naturalization include demonstrating an understanding of the English language (the “English” requirement) and a knowledge and understanding of the fundamentals of the history, and of the principles and form of government, of the United States (the “civics” requirement).² Some naturalization applicants are exempt from the English requirement on the basis of their age and how long they have had their green card.³ This practice advisory focuses on exceptions to the English and civics requirements on the basis of disability, and describes the process for obtaining an exception using Form N-648, Medical Certification for Disability Exceptions.

Advocates sometimes refer to the Disability Exception as a “Medical Exception,” “Disability Exemption,” or “Disability Waiver.” This practice advisory uses the term “**Disability Exception.**”

Filing a successful N-648 is no simple task. As one advocate noted, “Prepare the N-648 with the mindset that USCIS will look for any reason—no matter how insignificant—to deny it.”

As of the date of this practice advisory, Legal Services NYC-Bronx Legal Services filed a lawsuit in the Southern District of New York, alleging numerous violations by USCIS of rules and policy related to the adjudication of N-648 applications.⁴ The complaint describes USCIS officers routinely substituting their own judgment for the judgment of medical professionals, denying applications for arbitrary reasons, and failing to provide meaningful notice describing the defects of a denied N-648. The ILRC will monitor the outcome of the litigation and encourages advocates to do so as well. Advocates exploring litigation may want to contact the attorneys in the case for further information.

Process for Applying for the Disability Exception: Completing the N-648 Form

The application for the disability exception must be made using Form N-648, **Medical Certification for Disability**

¹ The ILRC thanks Asian Americans Advancing Justice-Los Angeles, Asian Counseling and Referral Service, Asian Law Alliance, CASA, Catholic Charities-Diocese of Arlington-Hogar Immigrant Services, the Michigan Immigrant Rights Project, and the Northwest Immigrant Rights Project, for providing many examples of good practices in completing N-648 forms. The ILRC also thanks Legal Services NYC-Bronx for sharing the *De Dandrade* complaint.

² 8 CFR §§ 312.1 and 312.2.

³ INA § 312. These exempt applicants are not required to speak English or read or write in English. Applicants exempt from demonstrating a basic understanding of English take the civics exam in their native

language or a language of their choice. See USCIS Policy Manual, Volume 12: Citizenship & Naturalization, Part E: English and Civics Testing and Exceptions, Chapter 2: English and Civics Testing, available at www.uscis.gov/policymanual/HTML/PolicyManual-Volume12-PartE-Chapter2.html (last visited May 2018). Cited hereinafter as 12 USCIS-PM E.2. See Chapter 7 of the ILRC’s manual entitled *Naturalization and U.S. Citizenship, The Essential Legal Guide*, for more information about these exemptions.

⁴ The lawsuit, *De Dandrade et al v. United States Department of Homeland Security et al*, was filed December 7, 2017 (case number 1:17-cv-09604).

Exceptions.⁵ Advocates should use the latest version of Form N-648, available at <https://www.uscis.gov/n-648>. As of the date of this practice advisory, USCIS accepts the current version dated 03/21/2017 as well as previous editions. There is no filing fee for the N-648. A medical professional who has evaluated the applicant must complete the N-648. The applicant's medical provider therefore plays an essential role in establishing the grounds for the N-648. Working closely with the provider to ensure they understand how to complete the form effectively is crucial to success.

USCIS prefers that medical professionals complete the fillable electronic Form N-648 located in the "FORMS" section at www.uscis.gov. The USCIS policy manual, Volume 12: Citizenship & Naturalization, Part E: English and Civics Testing and Exceptions, Chapter 3: Medical Disability Exception, and the Instructions for Form N-648, Medical Certification for Disability Exceptions, provide helpful guidance on completing the form. A hyperlink to the Policy Manual is available in footnote 7 of this practice advisory and a hyperlink to the form and the instructions can be found in the Resources section at the end of this practice advisory)

Which Medical Professionals Can Complete the N-648

The N-648 medical certification may be completed only by a medical doctor (including a psychiatrist), a clinical psychologist, or a doctor of osteopathy, who is authorized to practice in the United States including the U.S. territories of Guam, Puerto Rico, the Commonwealth of the Northern Mariana Islands, or the Virgin Islands.⁶ Other practitioners, such as speech therapists, are not approved to complete the form. In practice medical office staff may help complete the N-648, but the medical professional signing the form is solely responsible for ensuring the accuracy of the form's content. There is no requirement that a specialist complete the N-648. The applicant's primary care physician may complete the form, so long as they have sufficient expertise to make the diagnosis.

Practice Tip: Advocates should work with the provider who is most likely to complete a thorough and successful N-648 for the applicant. The most helpful medical provider may be a specialist who can provide a clear explanation of the diagnostic tests, the diagnosis, the impairment, and the reason the impairment prevents the applicant from meeting the English and civics requirements. Or the most helpful medical provider may be a primary care provider who knows the applicant well, wants to advocate for the applicant, and will take the time to complete the form thoroughly. A specialist who has only met the applicant

once may be unlikely to write as strong an N-648 as the applicant's primary care provider. For example, for an applicant with dementia, a primary care provider could complete the N-648 rather than requiring a time-consuming and costly neurological evaluation by a specialist. In some situations, a primary care provider can consult with a specialist and then complete the form. This is especially helpful if the applicant receives treatment from a medical professional who cannot complete the N-648.

Example: Nou Vang suffers from bipolar disorder. She is treated by a psychiatric nurse practitioner, who is not a medical professional approved to complete the N-648. The practice is all nurse practitioners and does not include a psychiatrist. Ms. Vang's advocate asks her Primary Care Provider to complete the form. The Primary Care Provider speaks with the psychiatric nurse practitioner to gather the psychiatric history and specific information about how Ms. Vang's condition prevents her from demonstrating a knowledge of English and civics. The Primary Care Provider then completes the form, referencing the specific information from the psychiatric nurse practitioner to describe how her bipolar disorder prevents Ms. Vang from learning English or civics.

Practice Tip: If the primary care provider is unable or unwilling to complete the N-648, it helps to provide a clear and compelling statement explaining why another provider completed the form. Advocates report success in a situation where the medical professional who completed the N-648 explained that the reason they were completing the form rather than the primary care provider was that the primary care provider would not complete the form as a matter of policy. The medical professional completing the N-648 must have examined the applicant sufficiently to be able to provide accurate information based on medical evidence, even if they are not the regular treating provider,

Example: Ramon Bautista has Down syndrome. His primary care provider refuses to complete the N-648 because she does not want any involvement with immigration authorities. Fortunately, Ramon also receives services from a Regional Center for persons with developmental disabilities in the State of California. The psychologist at the Regional Center evaluated Ramon and completed a thorough and successful N-648.

Practice Tip: Social workers or caseworkers cannot complete the N-648 but can be instrumental in helping the medical professional do a thorough job. Over the years,

⁵ 8 CFR § 312.2(b)(2).

⁶ 8 CFR § 312.2(b)(2).

social workers who work with immigrants may develop a fair amount of expertise in the process for completing the N-648. Similarly, in many community health centers, the nurse practitioners and physician assistants who provide primary care cannot complete the N-648. They can, however, work with a medical doctor in the same health center to complete and sign the form. Finally, advocates can benefit from working with an applicant's social worker. Similarly, family members may help bridge the relationship with the medical professional and lay the groundwork for the establishing the disability exception before the applicant begins the N-400.

What Information Must Be Included on Form N-648

The N-648 is structured to address all the requirements described above. A properly completed form N-648 contains:

- The clinical diagnosis that is the grounds for the disability exception, and its relevant medical code as accepted by the Department of Health and Human Services (HHS), which includes Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD).
- A description of the disability or impairment.
- The date the medical professional examined the applicant.
- A description of the doctor-patient relationship indicating whether the medical professional completing the form regularly treats the applicant for the conditions listed on the Form N-648 and, if not, an explanation of why that provider, not the regularly treating medical professional, is completing the form.
- A statement that the medical condition has lasted, or is expected to last, at least 12 months.
- A statement indicating whether the medical condition is the result of the illegal use of drugs.
- An explanation of what caused the medical condition, if known.
- A description of the clinical methods used to diagnose the applicant's medical condition.
- The nexus between the impairment and the applicant's inability to successfully complete the English and/or civics requirements for naturalization.
- An indication whether an interpreter was used or a statement that the medical professional is fluent in the language spoken by the applicant.

Practice Tip: Recommendations from advocates are a reminder of how challenging it is to secure an N-648

approval. Advocates suggest leaving nothing to chance, noting tips such as:

- Type responses, or at least print very clearly and neatly.
- Review all responses for accuracy and completeness.
- Make sure responses are internally consistent.
- Do not leave any boxes or spaces blank. Use "N/A" or "none" as needed.
- Proofread responses. Correct errors.
- Provide a full signature, not just initials over the medical office's stamp.

When Is the Interpreter Certification Required

The medical professional may examine the applicant in their native language.⁷ However, if an interpreter translated communications between the applicant and the medical professional during the examination that formed the basis of the information on the N-648, then the interpreter must sign and complete the "Interpreter's Certification" on the N-648 form.

Practice Tip: If the applicant speaks several languages other than English, and the interpreter signing the N-648 used a different language than the language used at the naturalization interview, this may generate questions from the USCIS officer. Advocates can prepare applicants to explain the choice of languages if questions arise.

How Much Detail Should the Medical Professional Provide

The questions in Part 3 of the N-648 ask the medical provider to provide *detailed* answers. It is especially important for the medical professional to articulate clearly the causal relationship between the disability and the applicant's inability to meet the English and civics requirements. USCIS officers are not expected or qualified to make the connection between a diagnosed medical condition and that condition's effect on an applicant's ability to learn English or civics. Detailed answers from the medical provider will reduce the risk that the USCIS officer will try substituting their opinion. The strongest N-648 responses provide sufficient detail that clearly answers each question, in simple, everyday language where appropriate.

Practice Tip: Medical professionals are frequently working under time pressures and may write short and unhelpful answers. It is unrealistic to think that most providers will

⁷ See USCIS Policy Manual, Volume 12: Citizenship & Naturalization, Part E: English and Civics Testing and Exceptions, Chapter 3: Medical Disability Exception, available at

www.uscis.gov/policymanual/HTML/PolicyManual-Volume12-PartE-Chapter3.html (last visited May 2018). Cited hereinafter as 12 USCIS-PM E.3.

take the time to read the N-648 instructions. Advocates can attach a letter to the N-648 with some key information about the disability exception and tips on how to complete the form. Some advocates place post-it notes with tips in the most important sections of the blank N-648. Some attach sample successful N-648 forms (for a similar disability). Even better, advocates should take the time to develop a relationship with the medical provider and help the provider understand what specific information is required. This time investment before the provider completes the form can help ensure they complete it properly the first time. It can also spare the applicant significant costs, as some medical professionals charge (sometimes hundreds of dollars) to complete forms. If the medical professional completes the form improperly, the advocate should follow up with the medical professional requesting that the professional complete the form again. Otherwise, USCIS will deny the request for the exception.

Practice Tip: Medical professionals who are accustomed to completing Social Security or Workers Compensation disability determinations will not automatically know to establish the linkage between the disability and the applicant's inability to fulfill the English and/or civics requirements. Advocates can explain the typical ways in which immigrants applying for naturalization learn English and civics (through ESL programs, private tutoring, English language television, audio tapes and the like) so the provider can consider the skills necessary for success.

Medical professionals treating an applicant should make written notes in the medical record, including observations, tests, diagnosis, treatment plan, and treatment results. If these notes are over a significant period of time, this lends credibility to the N-648. If the applicant has a condition that may improve with treatment, such as depression, the applicant, in consultation with their medical provider, may decide to try starting treatment. This could either lead to improvement, or strengthen the case for the N-648 if the condition does not respond to treatment. Depending on all the factors in the applicant's case, it may make sense to briefly delay submitting the N-400 application, to allow enough time to start appropriate treatment. At that point, the medical professional will have stronger grounds to state whether or not the disability is expected to last at least 12 months and whether it will continue to prevent the applicant from meeting the English and civics requirements.

Practice Tip: Succeeding in having USCIS approve an N-648 is very challenging, even when advocates and applicants follow and meet all the requirements. Advocates who have been successful report the importance of investing sufficient time in working closely with the medical professional, including having the applicant visit the provider several times if necessary, to get a correct and comprehensive N-648. These advocates

emphasize to applicants upfront the importance of gathering and attaching supporting evidence and putting in the necessary effort. Advocates note that it is better and easier to ask the medical professional to make changes upfront rather than risk an N-648 denial.

Practice Tip: In the past, USCIS Headquarters encouraged USCIS District Offices to schedule meetings with local doctors, medical associations, and medical centers that help immigrants and to carry out informational trainings on how to complete the N-648 correctly. Advocates working with people with disabilities should encourage their local medical associations and the local USCIS office to conduct such trainings. This is especially true given the fact that a poorly prepared N-648 creates a suspicion of fraud.

Who Must Sign the N-648 Form

The medical professional must sign the N-648, as must the interpreter, if used.

Practice Tip: Confirm that the N-648 has all the necessary signatures and that all required parties have dated it properly. If possible, advocates recommend that the medical professional, interpreter (if any), and applicant sign and date the form on the same date. This reduces the risk of questions.

If the applicant cannot sign the N-648 form because of a disability, advocates may request an accommodation to the signature requirement (on both the N-400 and the N-648), such as signing with a mark. Chapter 7 of the ILRC's manual entitled *Naturalization and U.S. Citizenship, The Essential Legal Guide*, discusses the issue of waivers to signature requirement, as well as waivers of the oath requirement on the basis of a disability.

Process for Applying for the Disability Exception: Submitting the N-648 Form

Timing for Submitting the N-648

An applicant seeking a disability exception should file Form N-648 with the naturalization application, Form N-400. While it is best to submit the N-648 and the N-400 together, the initial N-648 may be submitted at any time during the naturalization process, including after the application is filed but before the first examination, during the first examination, at the re-examination if the applicant's first examination was rescheduled, and even during the rehearing on a denied naturalization

application.⁸ Additional documentation to support an existing N-648 may also be provided at any time.

Practice Tip: Advocates submitting new information on an existing N-648, or submitting multiple N-648 forms for an applicant, should ensure there are no discrepancies within the medical information provided that might reduce the credibility of the application.

Practice Tip: If the N-648 is submitted at the time of the interview, advocates should either request that the USCIS officer postpone the English and civics exam to allow time for the N-648 adjudication, or adjudicate the N-648 on the spot before proceeding with the interview. Under no circumstances should the applicant be asked to try passing the English and civics exam before the N-648 adjudication.

USCIS states in its policy manual that the N-648 must be filed within six months of when it is completed and signed.⁹ It does not expire after it is submitted.¹⁰ Even though current naturalization application processing times have increased to over 12 months at many Field Offices (see <https://egov.uscis.gov/processing-times/>), the N-648 remains valid.

Practice Tip: For conditions that are not expected to improve (such as Alzheimer's), an N-648 completed and signed within six month of when it is submitted should be approved even if the underlying documentation and diagnosis are older. To avoid having USCIS improperly request new testing, the medical professional can explain on the N-648 why, for the particular impairment, the existing documentation is still valid.

USCIS N-648 Review Process

At the time of the first naturalization interview, the USCIS officer will review the N-648 form to determine whether the naturalization applicant is eligible for a medical exception to the English and/or civics requirements. Advocates have noted, some with frustration, that USCIS officers do not review the N-648 in advance.

In addition to checking that the form is complete and that the medical professional dated and signed the form, USCIS will focus on the requirements described above, including both whether the applicant has a medically determinable impairment, and whether a causal

connection exists between the impairment and the applicant's inability to meet the English and civics requirements. The USCIS officer's role is to determine whether the form contains sufficient information to establish that the applicant is eligible for the disability exception by a *preponderance of the evidence* ("more likely than not").¹¹ The officer will also be checking for discrepancies between the N-648 and other information about the applicant. Any discrepancies could affect the adjudication of the application.

Practice Tip: Advocates should ensure the information on the N-648 is consistent with information in the applicant's A-file, information on the N-400, and testimony the applicant provides during the interview.

The USCIS officer adjudicating the N-400 and the N-648 should not draw their own conclusions about the validity of the medical professional's diagnosis or its nexus to the educational requirements. The USCIS Policy Manual provides clear information about actions the USCIS officer is *not* permitted to take, such as requiring that an applicant complete specific tests, questioning the applicant about medical care or activities when there is no conflicting information in the applicant's file that would justify this line of questioning, or asking to see medical records in order to question the medical professional's diagnosis.¹²

Practice Tip: USCIS officers may use applicants' work history against them, assume that applicants with disabilities cannot work at all, and engage in improper questioning. If the issue is likely to arise at the interview, advocates can proactively address this risk by having the medical professional explain on the N-648 that although an applicant can do certain enumerated tasks, they cannot learn the required English and civics.

If the USCIS officer doubts the truthfulness of the information provided on the N-648, they may request additional information. Specifically, the officer may refer an applicant to another authorized medical source for a supplemental disability determination if the officer "has credible doubts about the veracity of a medical certification that has been presented by the applicant."¹³ In this instance, the officer must receive approval from a supervisor before requesting a supplemental disability

⁸ See 12 USCIS-PM E.3.

⁹ The requirement that "the medical professional must have certified the form within 6 months of its submission" does not exist in the statute or regulations and is therefore vulnerable to a legal challenge. See 12 USCIS-PM Part E.3. For circumstances in which advocates want to submit a new or amended N-648 that was completed and signed by a medical professional more than six months before filing it, but after the first N-648 denial, and that is being submitted within the timeframe

specified in the Request for Evidence (Form N-14), please see Chapter 7 of the ILRC's manual entitled *Naturalization and U.S. Citizenship, The Essential Legal Guide*, for legal guidance.

¹⁰ See 12 USCIS-PM E.3.

¹¹ See 12 USCIS-PM E.3.

¹² For a complete list of Guidelines for Officer's Review of Form N-648, please see 12 USCIS-PM E.3.

¹³ 8 CFR § 312.2(b)(2).

determination and explain the reasons for doubting the truthfulness of the N-648.¹⁴

Before requesting that a second N-648 be completed, the officer has to receive approval from a supervisor.¹⁵ The officer will then explain the reasoning for doubting the veracity of the form and provide the applicant with the relevant state board medical contact information to facilitate the completion of another N-648.¹⁶

***Practice Tip:** Although the phrasing of the USCIS Policy Manual suggests the applicant will identify a medical professional for the supplemental disability determination from the state medical board list, the ILRC's position is that this list is provided to facilitate the process for applicants, not to limit their choice of medical professional, and that applicants may choose any medical professional authorized to complete the N-648. For example, a clinical psychologist is qualified to complete the N-648 but would not be on a state medical board list.*

What Happens if USCIS Approves the N-648

If the disability exception is granted, USCIS will proceed to ask questions regarding the N-400, without the English and civics exams. If the N-648 pertains to the applicant's inability to learn English, USCIS will use an interpreter. If the N-648 addresses *only* the inability to learn English, the USCIS officer will administer the civics exam using an interpreter. If the N-648 addresses *only* the inability to learn civics, USCIS will administer the English exam and conduct the interview in English.

What Happens if USCIS Denies the N-648

At the first interview, if USCIS denies the N-648, advocates may contest the denial with a supervisor and ask for clarification, in order to address the specific deficiencies. Nonetheless, if the USCIS officers deems the N-648 insufficient at the time of the first interview, the officer must proceed with the full examination, in English, as if the applicant had not submitted a disability exception form.

***Practice Tip:** Applicants have the opportunity to try to meet the English and civics requirements if the USCIS officer rejects their N-648. In practice, some advocates report that USCIS officers regularly require naturalization applicants to take the English and civics exams after denying the N-648 rather than giving them the opportunity to either take the exams, or decline to take the exams (and therefore fail the first interview).*

If the naturalization applicant takes the exams and meets the English and civics requirements during the examination, the USCIS officer should proceed with the rest of the naturalization exam to determine whether the applicant meets the remaining naturalization eligibility requirements. Passing the exams after submitting the N-648 does not constitute fraud or lack of good moral character. It is possible, however, that the USCIS officer will ask questions about why the applicant submitted Form N-648 and on the applicant's relationship to the medical professional.¹⁷

If USCIS denies the N-648 at the first interview and the applicant fails the English and civics exams, the applicant will have the opportunity to meet the requirements again at a second interview or re-examination.¹⁸ This provides advocates with a second opportunity to either submit new information to support an existing N-648, or to submit a new N-648. USCIS must issue a Request for Evidence (Form N-14) addressing the deficiencies with the N-648. Deficiencies could be related to completeness, lack of sufficient evidence to establish an impairment, or lack of nexus between the impairment and the English and civics exams.

***Practice Tip:** The De Dandrade complaint (see footnote 4) includes repeated examples of USCIS providing deficient Requests for Evidence (Form N-14), including forms on which the USCIS officer checked every box—suggesting improperly that the N-648 is deficient on all counts—or forms that provide such a vague description of the deficiency that the applicant and advocate cannot understand it enough to address it. Advocates should ensure Form N-14 provides clear information that allows them to address deficiencies. If the Request for Evidence is completed improperly, advocates should raise the issue immediately to a supervisor, the Section Chief, the Field Office Director, District Director, or the USCIS Ombudsman.*

If the USCIS officer rejects the N-648 because they doubt the veracity of the information provided, the officer must comply with specific requirements for requesting a supplemental disability determination, described above.

***Practice Tip:** Some USCIS offices may require the applicant to mail in the amended N-648 before the appointment, while others may require the applicant to bring the N-648 to the interview. Advocates should verify local practices by asking the officer at the first interview or contacting the local district office.*

¹⁴ The officer must also provide the applicant with state medical board contact information to identify another medical professional who can conduct a supplemental evaluation. See 12 USCIS-PM E.3.

¹⁵ See 12 USCIS-PM E.3.

¹⁶ See 12 USCIS-PM E.3.

¹⁷ See 12 USCIS-PM E.3.

¹⁸ 8 CFR § 312.5.

At the second interview, the USCIS officer will look over the documents submitted in response to the Form N-14 issued during the initial interview. Similar to the first interview, the USCIS officer will either approve the N-648 and proceed without the English and civics exams, or deny the N-648 and continue with the exams and the interview in English. If the applicant either fails the English and civics tests during the second interview, or refuses to answer the test questions, then USCIS will deny the N-400 application. In the N-400 denial notice, the officer must explain in detail reasons for finding the Form N-648 insufficient.¹⁹

How to Appeal an N-648 Denial

The current appeal process is the same as the regular naturalization appeal process. There is no special appeal process for the N-648. If USCIS denies the N-400 due to the applicant's failure to meet the English and civics requirements at a second interview, applicants may:

- Appeal the N-400 denial by submitting an appeal (Form N-336) with the appropriate fee (currently \$700) or fee waiver application within 30 days of the denial. Applicants may submit new evidence on the N-648, or a new N-648, before the hearing.
- Submit a new application for naturalization (N-400), along with an N-648, at any time, even the same day as the naturalization denial. Note, however, that a new application will be subject to current processing times (see <https://egov.uscis.gov/processing-times/>).

Chapter 11 of the ILRC's manual entitled *Naturalization and U.S. Citizenship, The Essential Legal Guide*, explains the naturalization appeal process in detail.

Completing the N-648 at Naturalization Group Processing Workshops

Although most legal services providers do not complete N-648 forms in group processing workshops, grouping N-400s that have N-648s can be a successful practice. The Michigan Immigrant Right Center (MIRC) has established a relationship with a well-regarded Senior Center, where MIRC conducts small naturalization application workshops with groups of senior applicants, with the added benefit that the Center can provide interpreter services. Social workers associated with the Senior Center, who know the seniors and have forged relationships with medical providers in the community, work on obtaining the N-648s in advance. MIRC provides training and coaching to support the process. At the workshop, MIRC provides feedback on N-648s that require revisions. After the workshop, MIRC sends the N-400s with N-648s to USCIS in batch, and flags them with a request for advance review and off-site processing. USCIS is able to review the N-648s before scheduling the off-site processing, and pre-approve them or point out any questions that need to be resolved. This benefits USCIS because it avoids sending an officer across the state for off-site processing unnecessarily. For MIRC and the Senior Center, the process both ensures quality N-648s and builds credibility that will help future N-648 applicants.

Practice Tip: Having a solid working relationship with leadership from the local USCIS office is essential to success. Regular liaison meetings between non-profit organizations and the local USCIS office provide a forum in which to increase cooperation and communication between the USCIS and community agencies, share information, and address concerns. For more information about setting up liaison meetings with USCIS, please contact the ILRC.

¹⁹ See 12 USCIS-PM E.3.

Resources

USCIS Resources

- **USCIS Form N-648 and Instructions:** <https://www.uscis.gov/n-648>
- **USCIS Instructional Video:** <https://www.youtube.com/watch?v=KnwreOU4YbQ>.
- **USCIS Training:** Medical Certification for Disability Exceptions Form N-648 [Training for External Stakeholders](#)

Materials

- **Chapter 7 of ILRC's Manual, *Naturalization and U.S. Citizenship: The Essential Legal Guide***
- **New Americans Campaign Blog, *From New Americans*.** May 2015 blog post includes a five-minute video by the Michigan Immigrant Rights Center (MIRC) to help medical professionals who are evaluating naturalization applicants for the disability exception. The blog post also includes links to a USCIS presentation and instructional video. Read more at <https://newamericascampaign.org/disability-waivers-101/>. Follow the link to the [Citizenship and Disability Video for Medical Providers Completing the N-648](#).
- **New Americans Campaign Ning *Materials*** providing tips on the N-648:
 - [N-648 Tips for Success](#) (Asian Americans Advancing Justice-LA)
 - [N-648 Instructions for Medical Professionals](#) (Asian Americans Advancing Justice-LA)
 - [Tips for Physicians Completing Form N-648](#) (MIRC)
- **University of Washington's Harbor Medical Center** has an ethnic medicine website (EthnoMed) that contains information for physicians who work with immigrants and refugees, including information about helping immigrants who are applying for naturalization with the N-648 at https://ethnomed.org/cross-cultural-health/immigration/copy_of_for-providers. (Note, however, that the specific materials on the site may not all be up to date; for example, examples of diagnoses may refer to the DSM-IV rather than the current DSM-5.)
- **New Americans Campaign Best Practices Toolkit** on [Serving a Diversity of Applicants](#)

Trainings

- **Using the N-648 to Help Individuals with Disabilities Naturalize** (recorded webinar): <https://www.ilrc.org/recordings>.
- **Pro Bono Training Institute**, online training module covering the N-648 (California CLE available): <http://pbtraining.org/all-courses/naturalization/>.



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About the Immigrant Legal Resource Center

The Immigrant Legal Resource Center (ILRC) works with immigrants, community organizations, legal professionals, law enforcement, and policy makers to build a democratic society that values diversity and the rights of all people. Through community education programs, legal training and technical assistance, and policy development and advocacy, the ILRC's mission is to protect and defend the fundamental rights of immigrant families and communities.