



December 12, 2018

PA-2018-12

## Policy Alert

**SUBJECT:** Sufficiency of Medical Certification for Disability Exceptions (Form N-648)

### Purpose

U.S. Citizenship and Immigration Services (USCIS) is issuing policy guidance in the [USCIS Policy Manual](#) to update and clarify filing procedures and adjudications on the Medical Certification for Disability Exceptions ([Form N-648](#)).

### Background

In 1994, Congress enacted legislation providing an exception to the English and civics requirements for naturalization applicants who cannot meet the requirements because of a physical or developmental disability, or mental impairment.<sup>1</sup> The Form N-648 must be completed and certified by a medical professional and attest that the applicant's condition prevents the applicant from meeting the requirements.<sup>2</sup>

This update to Volume 12 of the Policy Manual provides updated guidance on these requirements. The guidance contained in the Policy Manual is controlling and supersedes any prior guidance on the topic. This policy is effective on February 12, 2019.

### Policy Highlights

- Clarifies filing requirements for Form N-648, including that the form must be submitted with the naturalization application.
- Clarifies that USCIS may consider a late filing if there is a credible explanation.
- Clarifies that an officer may find an N-648 insufficient if there is a finding of credible doubt, discrepancies, misrepresentation or fraud as to the applicant's eligibility for the exception.
- Clarifies that applicants may decline the English and civics test or discontinue the interview when an officer determines the Form N-648 is insufficient, but this will count as a failed attempt to pass the English and civics requirements.

**Citation:** Volume 12: Citizenship & Naturalization, Part E, English and Civics Testing and Exceptions, Chapter 3, Medical Disability Exception (Form N-648) [[12 USCIS-PM E.3](#)].

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

<sup>2</sup> Only medical doctors, doctors of osteopathy, or clinical psychologists licensed to practice in the United States (including the U.S. territories) are authorized to certify the form. See [8 CFR 312.2\(b\)\(2\)](#).