



HIAS ALERT: *New Requirements for Form N-648*

On May 10, 2006, the United States Citizenship and Immigration Services issued a new policy guidance on adjudication of disability waiver applications. ***A great deal of information that is not specifically asked for on the form N-648 needs to be provided.*** If this information is lacking, the N-648 will be rejected and the CIS may ask for a new N-648, your patient's complete medical records, or both.

New Requirements:

- The Form N-648 must contain **an explanation of the origin, nature, and extent of the medical condition(s)** that qualify your patient for a disability waiver.
- You must provide **a thorough explanation of how the disability or impairment was diagnosed, with a list of what medically acceptable clinical or laboratory diagnostic tests were used.**
- Provide **an explanation of all diagnostic test results.** If, for example, a patient scored 20 points out of the possible 30 points on the Mini-Mental Status Examination, you must explain the significance of such results.
- If no diagnostic tests were taken, explain how the diagnosis was reached and why diagnostic testing was inappropriate.

Other Helpful Hints for Physicians:

- A disability waiver of educational requirements for naturalization is only for those applicants who are ***completely unable to take the test.*** If your patient would have ***difficulty*** taking the naturalization test but, under certain conditions, will be able to pass it, he/she has the option of requesting an ***accommodation*** to the naturalization testing procedures due to a disability. For example, extra testing time or written testing may be granted to some applicants as an accommodation to their disability. In this situation, you just need to write a letter in support of your patient's request for an accommodation, state the diagnosis, and explain why the accommodation is needed.
- General practitioners can certify a disability waiver based on a mental impairment if the practitioner has "appropriate experience and qualifications that will enable him/her to diagnose and assess the claimed disability." You must provide an explanation as to your qualifications on the N-648, for example, in response to question 8.
- You must draw a detailed nexus (connection) between the patient's illness and his/her inability to learn English and history/civics. Explain how the illness



- functions and progresses within the body, and how the illness or disability has so impaired the applicant's functioning that he or she is unable to learn or demonstrate knowledge of English and/or U.S. history and government.
- If your patient suffers from a mental impairment with psychotic features, please indicate if he/she is a danger to him/herself and/or others.
- If you are not a psychiatrist, there is no need to use the multi-axial assessment. Additionally, the DSM-IV codes are only necessary for mental impairment diagnoses. If the waiver is based only on a physical impairment or illness (e.g. stroke), write "N/A" in Question 2(b).
- State whether the patient is capable of understanding and taking the Oath of Allegiance.