

VIP



November 4, 2015

León Rodríguez, Director
US Citizenship and Immigration Services
20 Massachusetts Ave NW
Washington, DC 20529-2000

Re: Request to Allow Nurse Practitioners to Complete Form N-648 in states that allow nurse practitioners "full practice" rights.

Dear Mr. Rodríguez:

I am writing to convey the urgency in changing USCIS regulations to allow licensed nurse practitioners to complete Form N-648 (Medical Certification for Disability Exceptions) in states that allow nurse practitioners "full practice" rights.

Specifically, I am requesting that you amend the current regulation governing Form N-648 to include licensed nurse practitioners for those states (including Washington State) which already allow nurse practitioners to work independently. Expanding the scope of this rule is necessary to acknowledge the changes occurring in the medical field, and because the current regulation disproportionately impacts the most vulnerable Lawful Permanent Residents (LPRs) who are eligible to naturalize – those who are low-income and disabled.

Many low-income immigrants in Seattle and Washington State receive primary care from nurse practitioners because they are often more accessible than medical doctors. Due to the expansion of access to medical services under the Affordable Care Act, and a shortage of primary care physicians, nurse practitioners play a critical role in helping meet the demand for medical care. States are now recognizing and embracing the important role that nurse practitioners play in providing essential services.

Twenty one states, including all of the Western states except California, have laws giving nurse practitioners "full practice" rights. In Washington State, nurse practitioners who receive "full practice" rights must complete either a master's degree that includes a minimum of 500 hours of clinical training or a doctorate with 1,000 hours of practice. While doctors make up more than two-thirds of Washington's 8,100 primary care providers, more than 1,700 nurse practitioners

Group⁴ and correspondence sent to you and Ms. Cecilia Muñoz on February 9, 2015 by the Naturalization Working Group.⁵ In those letters, stakeholders similarly asked that the regulation include licensed nurse practitioners on the list of medical professionals authorized to complete Form N-648.

I look forward to hearing from you regarding this issue. Our Office of Immigrant and Refugee Affairs has been active in partnering with USCIS to promote naturalization efforts, and to ensure that those who are eligible to naturalize do not encounter barriers in their efforts to do so. I look forward to a speedy resolution to this matter.

Sincerely,



Edward B. Murray
Mayor, City of Seattle

⁴ The members of the Disability Working Group are Catholic Legal Immigration Network, Inc.(CLINIC), World Relief, Hebrew Immigrant Aid Society, and Northwest Immigrant Rights Project. This group was formed by INS in 1999 as part of a class action settlement on behalf of citizenship applications for people with disabilities.

⁵ The members of the Naturalization Working Group are the National Immigration Forum, National Association of Latino Elected and Appointed Officials (NALEAO), AFL-CIO, Asian Americans Advancing Justice (national and Los Angeles chapters), Catholic Charities, Filipino American Service Group, Hebrew Immigrant Aid Society (national, Pennsylvania and Chicago chapters), Illinois Coalition for Immigrant and Refugee Rights, Immigrant Legal Resource Center, International Rescue Committee, Korean Resource Center, National Council of La Raza, New York Immigration Coalition, One America and TODEC Legal Center.



**U.S. Citizenship
and Immigration
Services**

December 15, 2015

The Honorable Edward B. Murray
Mayor of Seattle
P.O. Box 94749
Seattle, WA 98124

Dear Mayor Murray:

Thank you for your November 4, 2015 letter regarding Form N-648, Medical Certification for Disability Exceptions. Form N-648 is a critical piece of the naturalization process for people with physical or developmental disabilities and mental impairments.

U.S. Citizenship and Immigration Services (USCIS) continuously review its policies to ensure we meet our customers' needs while maintaining the integrity of the immigration system.

As per 8 CFR 312.2(b)(2), at this time only medical or osteopathic doctors and clinical psychologists licensed to practice in the United States are authorized to certify Form N-648. USCIS understands that numerous States allow nurse practitioners "full practice" rights, and that they play an important role in providing medical services to many in our communities, including underserved populations.

We particularly appreciate your interest in reducing barriers to naturalization. Recently, USCIS has taken numerous steps to reduce language, financial, and other barriers, including developing a standardized fee waiver form, accepting credit card payments for the naturalization application, and developing citizenship education tools in a variety of languages. USCIS will continue to engage with various stakeholders, including our municipal partners, to discuss more ways to facilitate the naturalization process.

We appreciate the time you took to share your recommendation regarding Form N-648 and nurse practitioners. Your feedback will help ensure that we continue to meet the needs of all our customers.

Thank you again for your letter and your interest in this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mariela Melero". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mariela Melero
Associate Director