



Questions and Answers

USCIS International Operations – American Immigration Lawyers Association (AILA) Meeting April 5, 2017

Overview

On April 5, 2017, the USCIS International Operations Division hosted an engagement with AILA representatives. USCIS discussed issues related to operations and various services, including Form I-131As, Form I-130s, Form N-400s and Humanitarian or Significant Public Benefit Parole. The information below provides a review of the questions solicited by AILA and the responses provided by USCIS.

Form I-131A and Travel Letters

1. Starting October 1, 2016, the adjudication of an I-131A by USCIS or the Department of State was to replace other agencies' issuance of travel letters. AILA applauds this more centralized and standardized process. As of our November 9, 2016 meeting, Kingston, Jamaica was the only post where Immigration and Customs Enforcement (ICE) was still handling travel letters.¹ Have there been any changes since that time?

Response: The Department of State assumed responsibility for I-131A processing from ICE in Kingston, Jamaica, in January 2017. There have been no other changes to this process.

2. Will USCIS International Operations be supervising I-131A applications at both USCIS Field Offices overseas and/or Department of State Consular Posts?

Response: USCIS will process Form I-131A applications filed in locations where USCIS has an international office. Where USCIS does not have an international office, the Department of State Consular Post will process the application. Pursuant to USCIS guidance and 9 FAM 202.2-5, Consular Posts will refer applications to the USCIS international field office that maintains jurisdiction over the consular post when there are

¹ *USCIS International Operations Liaison Meeting Q&As (11/9/16)*, AILA Doc. No. 17010901, available at http://aila.org/infonet/uscis-intl-ops-liaison-meeting-q-and-a-11-09-16?utm_source=aila.org&utm_medium=InfoNet%20Search

any questions on a particular case or if the Consular Post determines that it cannot approve a case. Only USCIS has the authority to deny Form I-131A.

3. How is USCIS working with the Department of State to distribute information to stakeholders regarding scheduling of I-131A appointments with the Department of State at embassies and consulates overseas? We have seen great improvements since the form was rolled out, but there are still some inconsistencies about how to apply.²

Response: We held two stakeholders calls in October 2016 shortly after the Form I-131A was implemented to explain the process for filing Form I-131A and have updated our information on uscis.gov, including our [international field office websites](#), the [Form I-131A landing page](#), the [Travel Documents](#) page, and the [International Travel as a Permanent Resident](#) page. The USCIS interactive tool, Ask Emma, also provides helpful information to those wishing to file Form I-131A.

Thank you for flagging at our meeting the information on the U.S. Embassy Thailand website. We've followed-up with our colleagues at CBP and State to correct that information. USCIS is now processing requests for transportation letters at that location. Please continue to let us know if you encounter conflicting information at other locations so that we can work to have it corrected.

Generally, scheduling of Form I-131A appointments with Department of State at embassies and consulates overseas is governed by post policy and varies by post. The directions for scheduling an appointment to file Form I-131A are available on each post's website.

4. How many I-131A applications have been submitted worldwide since October 1, 2016?

Response: Between October 1, 2016 and April 30, 2017, USCIS received 1,927 Form I-131A. We do not have the number of applications received by the Department of State.

5. To schedule a transportation letter appointment at a U.S. Embassy or Consulate, the applicant must create a user account with USCIS in order to pay the I-131A application fee.³ Members have experienced the following issues with that interface:
 - a) *Issues with Account Access:* The account only allows a single sign-on, meaning that applicants are not able to regain access to their account if they are not able to pay for the application fee at the time they create their account. If they are timed-out or log out before they make payment, they are unable to access their account. Additionally, there are several security layers, including codes generated by the website that the applicant receives by text, which have not worked consistently. This is a reoccurring

² Thailand seems to still have CBP as providing transportation letters - <https://th.usembassy.gov/embassy-consulate/bangkok/us-agencies/u-s-customs-border-protection/transportation-letters/> But compare USCIS Bangkok - <https://www.uscis.gov/about-us/find-uscis-office/international-offices/thailand-uscis-bangkok-field-office>. This does not give much information on who you are supposed to go to.

³ <https://myaccount.uscis.dhs.gov>

issue for both applicant and representative accounts on myaccount.uscis.dhs.gov. Can USCIS explain the steps for re-gaining account access?

Response: There is no requirement that an applicant create a user account before making a Form I-131A payment. To make a payment, anyone can go to the Form I-131A [payment website](#). The payer must know the first name, last name, DOB, and A-Number of the person he or she is paying for. The system validates applicant identity information and will allow the payer to progress only once the validated match is confirmed. The payer can then proceed to payment. The applicant need not be the payer and the payer may provide the filing fee for multiple applicants, so long as the required identity information is provided for each applicant. Unfortunately if a user times out while trying to complete payment(s), he or she will have to start the process from the beginning.

b) *Payment with Non-U.S. Billing Address:* Members have experienced problems paying in ELIS when they do not have a U.S. billing address. Athens Field Office Director James (Jim) Fletcher confirmed at the AILA meeting with USCIS Athens in January that USCIS HQ is examining this. Will USCIS consider additional payment options including payment with a foreign billing address, or direct payment at USCIS Field Offices overseas or Department of State consular posts to eliminate this issue?

Response: The Form I-131A fee must be paid using a credit card, debit card, or U.S. bank account using the Automated Clearing House (ACH) payment system. Currently, the only payment method is to submit the filing fee online using the USCIS interface to the Department of Treasury pay.gov online payment system. The online system has data fields to accept international billing addresses for all major branded credit and debit cards where the funds will be charged in US dollars. However, ACH payments require a U.S. billing address because payments can only be remitted by a U.S. based bank or institution. We are unable to accept direct payment at any USCIS International Field Office and the Department of State informed USCIS of insufficient resources to assume responsibility for this additional pay-processing workload at this time.

6. Under 8 CFR 211.1(b)(1), certain children born to permanent residents overseas may enter the U.S. without filing a Form I-130 application and obtaining an immigrant visa. USCIS has indicated that children who fall under this provision do not need an approved I-131A and do not have to pay a fee for a Transportation Letter or Boarding Foil.⁴ Please clarify the process for return of such children if there is an overseas Field Office handling the request.

Response: Pursuant to 8 CFR 211.1(b)(2), a carrier may board a child in these scenarios. If carrier personnel insist on requiring carrier documentation, USCIS or the Department of State may issue carrier documentation. There is no requirement that the Form I-131A or fee be submitted to request such carrier documentation. In locations where a USCIS international field office is handling carrier documentation, parents should contact the USCIS international field office for information on how to request a transportation letter for such a child. In locations where a Department of State Consular

⁴ <https://www.uscis.gov/about-us/find-uscis-office/international-offices/thailand-uscis-bangkok-field-office>

Post handles such requests, parents should contact post for information on how to request carrier documentation for such a child.

Form I-601 Waivers

7. The November 30, 2012 [Policy Memorandum 602-0062.1](#),⁵ states that certain applicants living in countries that have a USCIS international field office may directly file Form I-601 or Form I-212 with that office when the FOD finds the existence of exceptional and compelling circumstances. The committee applauds these efforts to allow for quicker adjudication given the current six-month processing time at the Nebraska Service Center for overseas waivers. Would IO provide AILA with the latest statistical information for FY2017 Q1 and Q2?

Response:

	FY2017 (Q1&Q2)
I-601	24
I-212	2

8. AILA understands that applicants need to meet appropriate requirements set out by the USCIS Memo on filing I-601s and I-212s abroad.⁶ Assuming an individual meets those requirements and the waiver can be filed locally:
- a. Can you please explain the difference between meeting not only the "exceptional circumstances" that are described in the USCIS memo, but more specifically, the ability to prove that filing in the US using Expedite Criteria will not be sufficient in adjudicating the case fast enough? (For clarification, AILA believes its members do not understand these requirements fully in order to ensure the appropriate documentation is being sent to the offices abroad to make a clear decision on whether the case can be filed abroad).

Response: The difference between expedited adjudication of Form I-601 by a USCIS Service Center and the exceptional circumstances that may warrant filing with the international field office is the degree to which the situation is imminent, urgent, and time sensitive. The more imminent, urgent and time sensitive a situation the more likely that expedited processing will not sufficiently address the need to immediately act to resolve the problem at issue. Applicants must present evidence regarding the imminence, urgency, and time sensitive factors of the exceptional circumstances claim to warrant filing with the international field office and any other evidence that domestic expedited processing would not be sufficient to meet the exceptional circumstance.

⁵ *Policy Memorandum 602-0062.1: Exceptions for Permitting the Filing of Form I-601, Application for Waiver of Grounds of Inadmissibility, and any associated Form I-212, Application for Permission to Reapply for Admission into the United States After Deportation or Removal, at International USCIS Offices (11/30/12)*, AILA Doc. No. 12120568, available at <http://www.aila.org/infonet/uscis-exceptions-permitting-form-i-601-i-212>.

⁶ Id.

The following four examples, but not an exhaustive list, are taken from the November 30, 2012, Policy Memorandum on Exceptions for Permitting the Filing of Form I-601, Application for Waiver of Grounds of Inadmissibility, and any associated Form I-212, Application for Permission to Reapply for Admission into the United States After Deportation or Removal, at International USCIS Offices, and are illustrative of situations where the FOD may accept the filing of Forms I-601 and associated Form I-212:

- Medical emergencies where the applicant or qualifying family member is facing an urgent medical situation requiring immediate travel, as where the petitioner or beneficiary is pregnant and delaying travel for the time it would take for expedited NSC adjudication may create a medical a risk or extreme hardship for the mother or child. The applicant should present documentation from a verified specialist as to the existence of this situation.
- Threats to the personal safety of the waiver applicant or qualifying family member place him or her in imminent danger to personal safety. The documentation for this would be case specific.
- A beneficiary is within a few weeks of aging out of visa eligibility.
- A petitioner has adopted a child locally and has an imminent need to depart the country. The petition must document the adoption and the need to depart.

Each situation will be considered individually except for Cuba where the exceptional circumstances memo still allows the filing of any Form I-601 directly with the USCIS Field Office in Havana, Cuba.

b. Please advise if there is a preferred format for submitting a locally filed I-601.

Response: Please check the USCIS office's website for the location at which the form is filed for any local filing preferences. Applicants should file all evidence and arguments that they would like to be considered in adjudicating Form I-601.

c. In adjudicating I-601s abroad, do local adjudicators receive the same training in processing cases as adjudicators in the US?

Response: Overseas Adjudications Officers receive the same basic training as domestic adjudicators, and also receive guidance on international filing procedures.

9. Please provide an update on the number of I-130 petitions filed with USCIS offices overseas since October 1, 2016, including per country or per office totals.

Response: This information is posted on [USCIS' Citizenship and Immigration Data website](https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-i-130-petition-alien-relative): <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-i-130-petition-alien-relative>.

10. The I-130 Performance Data posted to the [USCIS website](#) appears to show that the denial rate in London has increased substantially. Is that accurate?⁷ If so, are there any specific trends that may have caused the uptick?

Response: We define approval rate as the percentage of approved cases out of those cases decided on the merits (approved or denied). For Q1, London had a 99.7% approval rate for Forms I-130. This is an increase of .5% from the previous quarter. As we noted in the Q&As from our November 2016 meeting, the data posted on the USCIS website shows as “denied” those petitions that were closed or withdrawn, in addition to those that were denied, which explains why there appears to have been an increase in the denial rate.

11. The [USCIS I-130 Performance Data](#) shows a number of offices with no denials or simply “information withheld to protect identity.”⁸ Could you please elaborate on when each of these entries would be used?

Response: Offices with no denials have had no denials, withdrawals or closures of the case type during the time specified. USCIS' Office of Performance and Quality uses the marker noting “information withheld for privacy” when there are fewer than 10 cases that fall into a category.

12. We thank the International Operations Directorate for posting processing times on the USCIS website, as this assists AILA members immensely in managing client expectations. We note that many posts are processing cases in less than two months.

- a. Are there any planned operational changes that may affect this timing over the next 6 months?

Response: No, there are no planned changes.

- b. Is USCIS's processing time goal for all I-130 petitions filed abroad still 90 days?

Response: Yes. Our goal is to process at least 90% of completed cases within 90 days adjusted processing time. Adjusted processing time is the actual processing time, less any delays due to third party action (such as the time taken to respond to a request for evidence).

⁷ <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-i-130-petition-alien-relative>

⁸ <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-i-130-petition-alien-relative>.

- c. In our meeting on November 9, 2016, USCIS said that ‘publishing processing times by averages can be somewhat misleading’ and that you ‘continue to explore ways to publish processing times in a manner that more accurately manages public expectations and welcome your input.’⁹ Has there been any shift in the way in which you report processing times?

Response: No, there has been no shift, although we continue to look at how best to report our processing times. We recognize the shortcomings of reporting average processing times, and welcome any ideas you have of how to report our data in a manner that best provides the information you wish to have, as we study this issue.

13. As a result of the limitation on direct filing of immigrant visas at posts where no USCIS office is located, USCIS permits DOS to request an exception for filing directly with post. Please provide statistics on the number of these requests received and granted by USCIS overseas offices in FY2017 Q1 and Q2.

Response:

Receipts	210
Grants	178

* This does not include filings for which State does not need to seek USCIS permission in advance.

14. We understand based on a request from the Department of State, USCIS has authorized State to use its discretion in deciding whether to accept and approve Form I-130 filings at Post for petitioners from Yemen without seeking individual approval from USCIS until April 1, 2017. Has any further extension been granted? Have there been additional nationalities included in this policy?

Response: The filing exception for Forms I-130 filed on behalf of Yemeni nationals expired on April 1, 2017. The filing exceptions for Forms I-130 filed on behalf of Syrians and Libyans expired on July 31, 2017. The Department of State has not requested filing exceptions for any other nationalities. The filing exception remaining active is:

- o Iraqis: Authorized October 1, 2016 through September 30, 2017.

15. AILA has received reports of Form I-130 filings with requests for exceptional circumstances that are not being forwarded from the State Department to USCIS IO in a timely fashion. When this arises, petitioners often must file the I-130 at the Lockbox in the US where lengthy processing times result in families living separately for a minimum of 9 months. What is the best way to follow up on long-delayed requests?

⁹ See *USCIS International Operations Liaison Meeting Q&As (11/9/16)*, AILA Doc. No. 17010901, available at <http://www.aila.org/infonet/uscis-intl-ops-liaison-meeting-q-and-a-11-09-16>.

Response: We have raised this issue with the Department of State. If this occurs, please contact the USCIS field office with jurisdiction over the post location where you are seeking to file an I-130 under exceptional circumstances so that the office may reach out the consular post to ask about any delay. While we may raise issues of delay and advise the Department of State on whether we believe exceptional circumstances have been established, the Department of State has discretion to determine whether or not it will seek USCIS permission to accept a filing under exceptional circumstances._

16. In the [November meeting](#), USCIS mentioned that ‘State and USCIS will work together to update the USCIS Policy Memo on exceptional circumstances to ensure the public has full understanding of the process and procedures.’ Have there been any changes that we should disseminate to our membership?¹⁰

Response: We are still in the process of updating the policy guidance and will post it publically when it has been issued._

17. In the [November meeting](#), USCIS IO also said it expected to begin accepting I-130s that are filed online in ELIS in the coming year, and that IO would provide further guidance about online filing and any revised expedite process.¹¹

- a) Is this update still planned for FY2017 Q3?

Response: Incorporation of Forms I-130 in USCIS ELIS will not take place in FY2017. USCIS will inform the public as new Forms are incorporated into the online processing system in the future.

- b) Will all I-130s be filed via ELIS, even those currently adjudicated through the exceptional circumstance process? If so, will there be a mechanism for routing such cases directly back to DOS?

Response: We will provide information on the impact of incorporating Forms I-130 into USCIS ELIS as it becomes available.

- c) Will those I-130s that were previously filed directly with USCIS international field offices be routed to the international offices for adjudication?

Response: See our response to 17b.

¹⁰ *USCIS International Operations Liaison Meeting Q&As (11/9/16)*, Q16, AILA Doc. No. 17010901, available at http://aila.org/infonet/uscis-intl-ops-liaison-meeting-q-and-a-11-09-16?utm_source=aila.org&utm_medium=InfoNet%20Search.

¹¹ *USCIS International Operations Liaison Meeting Q&As (11/9/16)*, Q18, AILA Doc. No. 17010901, available at http://aila.org/infonet/uscis-intl-ops-liaison-meeting-q-and-a-11-09-16?utm_source=aila.org&utm_medium=InfoNet%20Search.

- d) Will moving cases into ELIS substantially change the current processing time and/or who adjudicates the workload?

Response: Please see our response to 17b.

Humanitarian Parole

18. We appreciate the updated guidance for Humanitarian Parole applications at uscis.gov.¹² New Executive orders indicate that significant changes may occur with respect to all forms of parole. Is USCIS IO able to share any updates to Humanitarian Parole policies?

Response: As required by the Executive Order: Border Security and Immigration Enforcement Improvements, USCIS is currently reviewing its use of the parole authority under INA sec. 212(d)(5). We will provide additional guidance as it becomes available.

19. This is a process that is necessarily urgent so in order to avoid unnecessary delays, would you be able to provide us with examples of any common errors that you see in Humanitarian Parole requests.

Response: The common error that we see most often is the lack of evidence documenting the material facts represented in a parole request. The parole application should always include supporting evidence that establishes the urgency of the claim, supporting family relationships, if relevant to the claim, or other factors if material to the request. Generally, if petitioners follow instructions on the Form I-131 and review the USCIS Humanitarian Parole website, they should have good guidance on the evidence that will support a parole application. The link to this USCIS website:

<https://www.uscis.gov/humanitarian/humanitarian-or-significant-public-benefit-parole-individuals-outside-united-states>.

The specific page referring to supporting documentation:

<https://www.uscis.gov/humanitarian/humanitarian-parole/guidance-evidence-certain-types-humanitarian-or-significant-public-benefit-parole-requests#Documents%20to%20Submit%20All%20Requests>.

20. Applicants generally must provide evidence of their inability to obtain a necessary visa: In cases where there was a visa denial, is there a time frame during which it must have occurred? Could this criteria be satisfied by showing *prima facie* evidence that the applicant is likely to be denied, rather than presenting an actual denial letter?

Response: There is no specific time frame during which a visa denial must have occurred, however, the visa denial should be reasonably associated with the travel plans of the parole beneficiary, relating to the associated request for parole. In some instances, *prima facie* evidence may be considered. However, parole is not intended to be used

¹² <https://www.uscis.gov/humanitarian/humanitarian-or-significant-public-benefit-parole-individuals-outside-united-states>

solely to avoid normal visa processing procedures and timelines, to bypass inadmissibility waiver processing, or to replace established refugee processing channels. Therefore, the petitioner must establish an extremely compelling reason why the beneficiary has not applied for a visa or, where relevant, other immigration benefit, prior to applying for parole.

21. Once a case is approved, there is often confusion on whether the applicant should immediately reach out to State or whether the applicant should wait to be contacted. Can USCIS clarify this part of the process?

Response: The individual seeking parole (Form I-131 beneficiary) should wait to be contacted by the Department of State at the designated post, including in locations where USCIS has a presence. Upon approval of the request for a parole document, USCIS will send an approval memo to post that includes contact information provided in the parole application for the beneficiary. USCIS will also send the petitioner an approval notice describing the post requirements for final processing. Post will contact the beneficiary utilizing the contact information provided by USCIS.

22. How do USCIS and Customs and Border Protection (CBP) coordinate, if at all, when an individual has unsuccessfully filed a Humanitarian Parole application with USCIS, and then tries to apply at a land border, or vice versa?

Response: If an individual denied humanitarian parole by USCIS later sought parole at a port of entry from CBP, USCIS is not notified. CBP would make its own determination to grant or deny parole at the port of entry on a case-by-case basis, based on the information presented by the applicant and relevant systems checks which would, among other things, indicate if parole had previously been denied by USCIS.

23. Members have faced issues with being granted transportation letters in situations where Advanced Parole has been lost. It appears from the updated USCIS guidance that Humanitarian Parole is appropriate in these circumstances.¹³

- a. Can you please confirm that this is a proper use of Humanitarian Parole?

Response: Currently, there is no process for USCIS to issue a replacement Advance Parole Document overseas. International Operations is currently working with Field Operations and Service Center Operations to establish a process for these applicants to get a replacement document overseas.

In some cases, individuals who have lost their Advance Parole Document have been able to obtain a replacement document by contacting the domestic office that issued the document. If this solution is not possible, an application for an Advance Parole Document for an individual outside of the United States may be appropriate and will be adjudicated on a case-by-case basis.

¹³ <https://www.uscis.gov/humanitarian/humanitarian-parole/guidance-evidence-certain-types-humanitarian-or-significant-public-benefit-parole-requests>

- b. Is there a way to expedite these requests in urgent cases, or, alternatively, to allow transportation letters?

Response: Transportation letters are not issued to non-LPRs when an Advance Parole Document is lost overseas. The International Operations Division considers all requests to expedite requests for parole. Additionally, regardless of whether there is a request to expedite, we review each new application within two business days of receipt at the Humanitarian Affairs Branch (HAB) to determine urgency. It may take two weeks from the date of receipt at the USCIS Lockbox for the cases to arrive at HAB. In particularly urgent cases, the international post may contact HAB to receive permission for an applicant to file the application with post. In any request to expedite, the petitioner should set out the reasons for the request, including any specific time frame relating to the request and the impact of delays.

Form I-407

24. How many Form I-407 applications did each IO field office receive as of October 1, 2016?

Response: This information is posted on [USCIS' Immigration and Citizenship Data page](https://www.uscis.gov/tools/reports-studies/immigration-forms-data/record-abandonment-lawful-permanent-resident-status-form-i-407): <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/record-abandonment-lawful-permanent-resident-status-form-i-407>.

25. What is the process for requesting to withdraw a Form I-407 that was executed when seeking admission with CBP at a U.S. Port of Entry? Can USCIS international field offices assist in these situations?

Response: We would welcome additional information regarding this question, particularly if you are aware of examples where individuals are seeking to withdraw their Form I-407. There is currently no process for withdrawing a Form I-407, and we would need to consult more broadly in the Agency to determine how such situations might be handled. We have not heard reports of customers at our offices wishing to do this.

Military Naturalization, Form N-400

26. Please provide the number of N-400 applications that have been adjudicated abroad since the beginning of FY2017 Q1.

Response: This information is posted on [USCIS' Immigration and Citizenship Data website](https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-n-400-application-naturalization): <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-n-400-application-naturalization>.

General Operations

27. USCIS International Operations (IO) has advised AILA on several occasions that workload and staffing developments are ongoing.

- a. Does USCIS anticipate that any overseas offices will be opening or closing during the next 6 to 12 months?

Response: We will advise you and the public well in advance whenever any decisions are made to open or close an office abroad. Of note, however, is that staffing at USCIS Moscow was reduced by 60% in August 2017 as part of the overall downsizing of US Mission Russia required by the Russian government. USCIS Moscow now has two U.S. citizen staff and one locally engaged employee. USCIS is evaluating the field office's workload in light of its reduced footprint and will keep AILA and the public informed of any changes.

- b. Have there been any significant workload shifts either between offices or from other USCIS, in the previous 6 months?

Response: No, there have not been any significant workload shifts.

28. We understand that USCIS continues to work toward a paperless filing environment. During our meeting in [November 2016](#), IO advised AILA that Form N-400 would be the next form that will be available for online filing in "the coming months" for military members and families.¹⁴

- a. Does IO have any updates as to the timeline of this roll-out?

Response: Currently, USCIS is focusing on refining its initial electronic and online rollout of Form N-400 naturalizations. As such, the timeframe for implementation of military naturalizations overseas has been pushed out. We will provide updates, as appropriate, and keep you posted as we learn more.

- b. Does USCIS anticipate rolling out any additional pilot or transformation-related programs in the next 6 to 12 months that will impact the filing of applications outside the U.S.?

Response: We do not anticipate any other overseas form types going into USCIS ELIS in the next 12 months.

- c. Is the Form N-600K and Form N-600 also forthcoming imminently?

Response: At this time, USCIS is focused on refinement of the N-400 product line. No deployments of additional form types are scheduled at this time.

¹⁴ *USCIS International Operations Liaison Meeting Q&As (11/9/16)*, Q2, AILA Doc. No. 17010901, available at http://aila.org/infonet/uscis-intl-ops-liaison-meeting-q-and-a-11-09-16?utm_source=aila.org&utm_medium=InfoNet%20Search.