



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

**Non-Precedent Decision of the
Administrative Appeals Office**

MATTER OF A-A-, INC.

DATE: MAR. 21, 2017

APPEAL OF VERMONT SERVICE CENTER DECISION

PETITION: FORM I-129, PETITION FOR A NONIMMIGRANT WORKER

The Petitioner, an information technology staffing firm, seeks to temporarily employ the Beneficiary as an “agile coach” under the H-1B nonimmigrant classification for specialty occupations. *See* Immigration and Nationality Act (the Act) section 101(a)(15)(H)(i)(b), 8 U.S.C. § 1101(a)(15)(H)(i)(b). The H-1B program allows a U.S. employer to temporarily employ a qualified foreign worker in a position that requires both (a) the theoretical and practical application of a body of highly specialized knowledge and (b) the attainment of a bachelor’s or higher degree in the specific specialty (or its equivalent) as a minimum prerequisite for entry into the position.

The Director of the Vermont Service Center denied the petition, concluding that the record did not establish that the proffered position qualifies as a specialty occupation.

On appeal, the Petitioner submits additional evidence and asserts that the Director erred in denying the petition.

Upon *de novo* review, we will dismiss the appeal.

I. LEGAL FRAMEWORK

Section 214(i)(1) of the Act, 8 U.S.C. § 1184(i)(1), defines the term “specialty occupation” as an occupation that requires:

- (A) theoretical and practical application of a body of highly specialized knowledge, and
- (B) attainment of a bachelor’s or higher degree in the specific specialty (or its equivalent) as a minimum for entry into the occupation in the United States.

The regulation at 8 C.F.R. § 214.2(h)(4)(ii) largely restates this statutory definition, but adds a non-exhaustive list of fields of endeavor. In addition, the regulations provide that the proffered position must meet one of the following criteria to qualify as a specialty occupation:

- (1) A baccalaureate or higher degree or its equivalent is normally the minimum requirement for entry into the particular position;
- (2) The degree requirement is common to the industry in parallel positions among similar organizations or, in the alternative, an employer may show that its particular position is so complex or unique that it can be performed only by an individual with a degree;
- (3) The employer normally requires a degree or its equivalent for the position; or
- (4) The nature of the specific duties [is] so specialized and complex that knowledge required to perform the duties is usually associated with the attainment of a baccalaureate or higher degree.

8 C.F.R. § 214.2(h)(4)(iii)(A). We have consistently interpreted the term “degree” to mean not just any baccalaureate or higher degree, but one in a specific specialty that is directly related to the proposed position. See *Royal Siam Corp. v. Chertoff*, 484 F.3d 139, 147 (1st Cir. 2007) (describing “a degree requirement in a specific specialty” as “one that relates directly to the duties and responsibilities of a particular position”); *Defensor v. Meissner*, 201 F.3d 384, 387 (5th Cir. 2000).

II. PROFFERED POSITION

In response to the Director’s request for evidence (RFE), the Petitioner provided the following job duties for the proffered “agile coach” position:

- Act as an Agile Coach for multiple scrum teams with a focus on guiding the teams toward improving the way they work.
- Act as a mentor to Scrum Masters and Product Owners.
- Educate all levels and roles, including senior leaders across the organization on Agile principles, process, practices and tools.
- Provide guidance on achieving high levels of Agile maturity while complying with defined Agile Core Principles and enterprise standards.
- Guide management on effective Agile Portfolio / Program management.
- Facilitate cross-team coordination and collaboration.
- Drive visibility of information that helps the team track their progress.
- Guide the team towards a culture of transparency of relevant metrics to all stakeholders.
- Foster a culture of open communication.
- Actively contribute to the Agile community.
- Contribute to the evolution of the company’s agile practices, processes and tools.
- Partner with Engagement Management to conduct Methodology Assessments.

- Partner with Engagement Management to conduct Agile Maturity Assessments and offer recommendations.

Day-to-Day Responsibilities of Beneficiary:

Responsibility	% of Time Allocated
Conducting Agile Maturity Assessment and identify areas of improvement.	15%
Guiding teams and PLC members develop and execute continuous improvement plans based on the finding of Agile Maturity Assessment.	5%
Partnering with Program Leadership Council (PLC) to ensure the program's continuous alignment to Portfolio Strategic Goals and Organizational Vision.	10%
Guiding decision making of PLC to ensure alignment to () Scaled Agile Methodology) practices.	5%
Monitoring and providing feedback at Team Level and Program Level during Daily Standup, Planning, Backlog Refinement and Retrospective meeting.	20%
Mentoring Scrum Masters and Product Owners in developing high performing agile teams.	15%
Preparing Report with specific agile metrics to measure Agile Maturity and high performances of Teams and Program.	15%
Coaching and hand holding team member who are transitioning from Waterfall to Agile.	10%
Others (responding to e-mails, attend status calls, update wiki & Rally etc.)	5%

The Petitioner stated that the minimum entry requirement for the proffered position is a bachelor's degree or higher in business management.

III. ANALYSIS

For the reasons set out below, we have determined that the proffered position does not qualify as a specialty occupation.¹ Specifically, the record does not establish that the job duties require an educational background, or its equivalent, commensurate with a specialty occupation.²

¹ Although some aspects of the regulatory criteria may overlap, we will address each of the criteria individually.

² The Petitioner submitted documentation to support the H-1B petition, including evidence regarding the proffered position and its business operations. While we may not discuss every document submitted, we have reviewed and considered each one.

As a preliminary matter, we find that the record of proceedings lacks sufficient information regarding the proffered position. For H-1B approval, the Petitioner must demonstrate a legitimate need for an employee exists and to substantiate that it has H-1B caliber work for the Beneficiary for the period of employment requested in the petition. It is incumbent upon the Petitioner to demonstrate it has sufficient work to require the services of a person with at least a bachelor's degree in a specific specialty, or its equivalent, to perform duties at a level that requires the theoretical and practical application of at least a bachelor's degree level of a body of highly specialized knowledge in a specific specialty for the period specified in the petition.

On the Form I-129, the Petitioner requested that the Beneficiary be granted H-1B classification from October 1, 2016, to August 26, 2019. A letter from the Petitioner's claimed mid-vendor, [REDACTED] indicates that the Beneficiary will be employed by the Petitioner but physically working at its claimed end-client, [REDACTED] in New Jersey for the entire duration of the requested H-1B status period. That letter stated that the Beneficiary's "duties at [REDACTED] are needed on an on-going basis with possibility of extensions as per client requirements." The letter also stated that the Petitioner remains the Beneficiary's actual employer and is solely responsible for paying the Beneficiary, providing benefits, withholding taxes, supervising her on a daily/weekly basis, and controlling where, when, and how she performs. The Petitioner also submitted a letter from [REDACTED] a wholly-owned subsidiary of [REDACTED] stating that the Beneficiary "will perform services in accordance with the terms and conditions of the H-1B petition which [the Petitioner] filed on [her] behalf." The letter also stated that the Petitioner is the Beneficiary's actual employer and has exclusive right to hire, pay, fire, supervise, and control the Beneficiary's work.

The Petitioner submitted its subcontractor agreement with the mid-vendor, [REDACTED]. However, while the agreement states that it shall be in effect for the duration of the Master Agreement or other arrangement of similar effect, it does not provide an actual timeframe for the agreement to be in effect. Further, the Statement of Work (SOW) between the Petitioner and the mid-vendor also does not list an end date and states that it is in effect until the listed end-date, of which there is none, and shall be extended on a month-to-month basis thereafter until the completion of the project.

On appeal, the Petitioner states that the nature of the Beneficiary's work, as an agile coach, is to assist and mentor teams working on different projects and is not directly related to a single project with an individual contract. However, the Petitioner did not provide evidence of contracts or SOWs for individual projects that the Beneficiary will assist with. Here, although the Petitioner provided a letter from the claimed mid-vendor and the claimed end-client, it did not provide evidence of contracts or other agreements for projects where the services of the proffered position will be utilized. The Petitioner also did not provide evidence of any contracts or SOWs between [REDACTED] and [REDACTED] to demonstrate the existence and duration of the proffered position. As such, even if the letter from [REDACTED] states that the Beneficiary will be working on an "on-going basis with possibility of extensions as per client requirements," we cannot conclude that the proffered position will continue to exist for the duration of the requested H-1B status period.

The terms and duration of the Petitioner's contract with [REDACTED] and the terms and duration of [REDACTED] contract with [REDACTED] are unknown.

As such, we find that the Petitioner has not established that the petition was filed for non-speculative work for the Beneficiary, for the entire period requested, that existed as of the time of the petition's filing. U.S. Citizenship and Immigration Services regulations affirmatively require a petitioner to establish eligibility for the benefit it is seeking at the time the petition is filed. *See* 8 C.F.R. § 103.2(b)(1). A visa petition may not be approved based on speculation of future eligibility or after the Petitioner or Beneficiary becomes eligible under a new set of facts.³ *See Matter of Michelin Tire Corp.*, 17 I&N Dec. 248 (Reg'l Comm'r 1978). The Director's decision must therefore be affirmed and the appeal dismissed on this basis alone.

Moreover, it also cannot be found that the proffered position qualifies as a specialty occupation as the Petitioner has not satisfied any of the supplemental, additional criteria at 8 C.F.R. § 214.2(h)(4)(iii)(A).

A. First Criterion

We turn first to the criterion at 8 C.F.R. § 214.2(h)(4)(iii)(A)(I), which requires that a baccalaureate or higher degree in a specific specialty, or its equivalent, is normally the minimum requirement for entry into the particular position. To inform this inquiry, we recognize the U.S. Department of Labor's (DOL) *Occupational Outlook Handbook (Handbook)* as an authoritative source on the duties and educational requirements of the wide variety of occupations that it addresses.⁴

³ The agency made clear long ago that speculative employment is not permitted in the H-1B program. For example, a 1998 proposed rule documented this position as follows:

Historically, the Service has not granted H-1B classification on the basis of speculative, or undetermined, prospective employment. The H-1B classification is not intended as a vehicle for an alien to engage in a job search within the United States, or for employers to bring in temporary foreign workers to meet possible workforce needs arising from potential business expansions or the expectation of potential new customers or contracts. To determine whether an alien is properly classifiable as an H-1B nonimmigrant under the statute, the Service must first examine the duties of the position to be occupied to ascertain whether the duties of the position require the attainment of a specific bachelor's degree. See section 214(i) of the Immigration and Nationality Act (the "Act"). The Service must then determine whether the alien has the appropriate degree for the occupation. In the case of speculative employment, the Service is unable to perform either part of this two-prong analysis and, therefore, is unable to adjudicate properly a request for H-1B classification. Moreover, there is no assurance that the alien will engage in a specialty occupation upon arrival in this country.

Petitioning Requirements for the H Nonimmigrant Classification, 63 Fed. Reg. 30,419, 30,419-20 (proposed June 4, 1998) (to be codified at 8 C.F.R. pt. 214). While a petitioner is certainly permitted to change its intent with regard to non-speculative employment, e.g., a change in duties or job location, it must nonetheless document such a material change in intent through an amended or new petition in accordance with 8 C.F.R. § 214.2(h)(2)(i)(E).

⁴ All of our references are to the 2016-2017 edition of the *Handbook*, which may be accessed at the Internet site <http://www.bls.gov/ooh/>. We do not, however, maintain that the *Handbook* is the exclusive source of relevant

On the labor condition application (LCA)⁵ submitted in support of the H-1B petition, the Petitioner designated the proffered position under the occupational category “Computer Systems Analysts” corresponding to the Standard Occupational Classification code 15-1121.⁶

The *Handbook* states the following with regard to the educational qualifications necessary for entrance into positions located within this occupational category:

A bachelor’s degree in a computer or information science field is common, although not always a requirement. Some firms hire analysts with business or liberal arts degrees who have skills in information technology or computer programming.

Education

Most computer systems analysts have a bachelor’s degree in a computer-related field. Because these analysts also are heavily involved in the business side of a company, it may be helpful to take business courses or major in management information systems.

Some employers prefer applicants who have a master’s degree in business administration (MBA) with a concentration in information systems. For more technically complex jobs, a master’s degree in computer science may be more appropriate.

Although many computer systems analysts have technical degrees, such a degree is not always a requirement. Many analysts have liberal arts degrees and have gained programming or technical expertise elsewhere.

information. That is, the occupational category designated by the Petitioner is considered as an aspect in establishing the general tasks and responsibilities of a proffered position, and we regularly review the *Handbook* on the duties and educational requirements of the wide variety of occupations that it addresses. To satisfy the first criterion, however, the burden of proof remains on the Petitioner to submit sufficient evidence to support a finding that its particular position would normally have a minimum, specialty degree requirement, or its equivalent, for entry.

⁵ The Petitioner is required to submit a certified LCA to us to demonstrate that it will pay an H-1B worker the higher of either the prevailing wage for the occupational classification in the “area of employment” or the actual wage paid by the employer to other employees with similar experience and qualifications who are performing the same services. See *Matter of Simeio Solutions, LLC*, 26 I&N Dec. 542, 545-46 (AAO 2015).

⁶ The Petitioner classified the proffered position at a Level I wage (the lowest of four assignable wage levels). We will consider this selection in our analysis of the position. The “Prevailing Wage Determination Policy Guidance” issued by the DOL provides a description of the wage levels. A Level I wage rate is generally appropriate for positions for which the Petitioner expects the Beneficiary to have a basic understanding of the occupation. This wage rate indicates: (1) that the Beneficiary will be expected to perform routine tasks that require limited, if any, exercise of judgment; (2) that she will be closely supervised and her work closely monitored and reviewed for accuracy; and (3) that she will receive specific instructions on required tasks and expected results. U.S. Dep’t of Labor, Emp’t & Training Admin., *Prevailing Wage Determination Policy Guidance*, Nonagric. Immigration Programs (rev. Nov. 2009), available at http://flcdatcenter.com/download/NPWHC_Guidance_Revised_11_2009.pdf. A prevailing wage determination starts with an entry-level wage and progresses to a higher wage level after considering the experience, education, and skill requirements of the Petitioner’s job opportunity. *Id.*

Many systems analysts continue to take classes throughout their careers so they can learn about new and innovative technologies. Technological advances come so rapidly in the computer field that continual study is necessary to remain competitive.

Systems analysts must understand the business field they are working in. For example, a hospital may want an analyst with a thorough understanding of health plans and programs such as Medicare and Medicaid, and an analyst working for a bank may need to understand finance. Having knowledge of their industry helps systems analysts communicate with managers to determine the role of the information technology (IT) systems in an organization.

U.S. Dep't of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook*, 2016-17 ed., Computer Systems Analysts, <http://www.bls.gov/ooh/computer-and-information-technology/computer-systems-analysts.htm#tab-4> (last visited Mar. 1, 2017).

The *Handbook* indicates, at most, that a bachelor's or higher degree in a computer or information science field may be a common preference, but not a standard occupational entry requirement. In fact, this chapter notes that many computer systems analysts only have liberal arts degrees and programming or technical experience. *See id.* Thus, the *Handbook's* report is insufficient to conclude that simply by virtue of its occupational classification the position qualifies as a specialty occupation.

When the *Handbook* does not support the proposition that a proffered position is one that meets the statutory and regulatory provisions of a specialty occupation, it is incumbent upon the Petitioner to provide persuasive evidence that the proffered position more likely than not satisfies this or one of the other three criteria, notwithstanding the absence of the *Handbook's* support on the issue. In such case, it is the Petitioner's responsibility to provide probative evidence (e.g., documentation from other objective, authoritative sources) that supports a finding that the particular position in question qualifies as a specialty occupation. Whenever more than one authoritative source exists, an adjudicator will consider and weigh all of the evidence presented to determine whether the particular position qualifies as a specialty occupation.

The letters from the claimed mid-vendor and end-client do not specifically list a minimum entry requirement for the proffered position. The letters also do not identify a specific specialty or any course of study required to perform the duties of the proffered position. As recognized in *Defensor*, 201 F.3d at 387-88, it is necessary for the end-client to provide the minimum educational requirements necessary to perform those duties. As the nurses in that case would provide services to the end-client hospitals and not to the petitioning staffing company, the petitioner-provided job duties and alleged requirements to perform those duties were irrelevant to a specialty occupation determination. *See id.* Here, it is not clear that the end-client requires that the person in this position have a bachelor's degree in a specific specialty.

The Petitioner has not provided documentation from a probative source to substantiate its assertion regarding the minimum requirement for entry into this particular position. Thus, the Petitioner has not satisfied the criterion at 8 C.F.R. § 214.2(h)(4)(iii)(A)(1).

B. Second Criterion

The second criterion presents two alternative prongs: “The degree requirement is common to the industry in parallel positions among similar organizations *or, in the alternative*, an employer may show that its particular position is so complex or unique that it can be performed only by an individual with a degree[.]” 8 C.F.R. § 214.2(h)(4)(iii)(A)(2) (emphasis added). The first prong casts its gaze upon the common industry practice, while the alternative prong narrows its focus to the Petitioner’s specific position.

1. First Prong

To satisfy this first prong of the second criterion, the Petitioner must establish that the “degree requirement” (i.e., a requirement of a bachelor’s or higher degree in a specific specialty, or its equivalent) is common to the industry in parallel positions among similar organizations.

In determining whether there is such a common degree requirement, factors we often consider include: whether the *Handbook* reports that the industry requires a degree; whether the industry’s professional association has made a degree a minimum entry requirement; and whether letters or affidavits from firms or individuals in the industry attest that such firms “routinely employ and recruit only degreed individuals.” See *Shanti, Inc. v. Reno*, 36 F. Supp. 2d 1151, 1165 (D. Minn. 1999) (quoting *Hird/Blaker Corp. v. Sava*, 712 F. Supp. 1095, 1102 (S.D.N.Y. 1989)).

As already discussed, the Petitioner has not established that its proffered position is one for which the *Handbook* (or other independent, authoritative source) reports an industry-wide requirement for at least a bachelor’s degree in a specific specialty or its equivalent. Thus, we incorporate by reference the previous discussion on the matter. In addition, there are no submissions from the industry’s professional association indicating that it has made a degree a minimum entry requirement.

In support of its assertion that the degree requirement is common to the Petitioner’s industry in parallel positions among similar organizations, the Petitioner submitted copies of advertisements for several positions entitled Agile Coach and Senior Agile Coach. One of the advertisements requires a bachelor’s degree in information sciences, business, or a related field and 10 years of experience; another advertisement requires a bachelor’s degree in information systems or computer science, or equivalent work experience, and three years of experience; and a third advertisement requires a bachelor’s degree in business, management, information systems, or engineering, or equivalent work experience. Two of the advertisements appear to accept equivalent work experience in place of a degree and require years of experience in addition to the bachelor’s degree. As noted above, the Petitioner has designated the proffered position as a wage Level I on the LCA (the lowest of four

assignable wage levels), a wage level for an entry-level position that only requires a basic understanding of the occupation, which is in contrast to some of the advertised positions that are for more senior positions. For these reasons, it cannot be found that the advertisements support a finding that a bachelor's or higher degree in a specific specialty, or its equivalent, is common to the industry in parallel positions among similar organizations.

The Petitioner has not satisfied the criterion of the first alternative prong of 8 C.F.R. § 214.2(h)(4)(iii)(A)(2).

2. Second Prong

We will next consider the second alternative prong of 8 C.F.R. § 214.2(h)(4)(iii)(A)(2), which is satisfied if the Petitioner shows that its particular position is so complex or unique that it can be performed only by an individual with at least a bachelor's degree in a specific specialty, or its equivalent.

The record here does not credibly demonstrate relative complexity or uniqueness as aspects of the proffered position. The evidence of record does not distinguish the proffered position as unique from or more complex than other agile coach or computer systems analyst positions that can be performed by persons without at least a bachelor's degree in a specific specialty, or its equivalent.

The Petitioner submitted an expert opinion letter authored by [REDACTED] Ph.D., Associate Dean-Academic Affairs at the School of Business of the [REDACTED]. [REDACTED] reviewed the same duties provided to us by the Petitioner and opined that "these duties are specialized and require the theoretical and practical application of a body of highly specialized knowledge" such as "a bachelor's degree in business administration, information technology, or a related area."

According to [REDACTED] a degree in business administration is acceptable for the proffered position. While a general-purpose bachelor's degree, such as a degree in business administration, may be a legitimate prerequisite for a particular position, requiring such a degree, without more, will not justify a finding that a particular position qualifies for classification as a specialty occupation. *See Royal Siam*, 484 F.3d at 147. Since there must be a close correlation between the required specialized studies and the position, the requirement of a degree with a generalized title, such as business administration, without further specification, does not establish the position as a specialty occupation. *Cf. Matter of Michael Hertz Assocs.*, 19 I&N Dec. 558 (Comm'r 1988). Therefore, [REDACTED] recognition that a general, non-specialty degree in business administration is sufficient for entry into the occupation strongly suggests that a bachelor's degree *in a specific specialty* is not normally the minimum entry requirement for this occupation.

The record does not include sufficient information relevant to a detailed course of study leading to a specialty degree and the Petitioner has not established how such a curriculum is necessary to perform the duties it claims are so complex. While a few related courses may be beneficial in

performing certain duties of the position, the Petitioner has not demonstrated how an established curriculum of such courses leading to a baccalaureate or higher degree in a specific specialty, or its equivalent, is required to perform the duties of the proffered position.

Additionally, we again note that the Petitioner has designated the proffered position as requiring only a Level I wage, that requires only a basic understanding of the occupation.⁷ Given the *Handbook's* indication that computer systems analyst positions do not normally require at least a bachelor's degree in a specific specialty, or the equivalent, for entry, it is not credible that a position involving limited, if any, exercise of independent judgment, close supervision and monitoring, receipt of specific instructions on required tasks and expected results, and close review *would* contain such a requirement. Thus, the record lacks sufficiently detailed information to distinguish the proffered position as unique from or more complex than positions that can be performed by persons without at least a bachelor's degree in a specific specialty or its equivalent. As the Petitioner does not demonstrate how the proffered position is so complex or unique relative to other agile coach positions that do not require at least a baccalaureate degree in a specific specialty or its equivalent for entry into the occupation in the United States, it cannot be concluded that the Petitioner has satisfied the second alternative prong of 8 C.F.R. § 214.2(h)(4)(iii)(A)(2).

C. Third Criterion

The third criterion of 8 C.F.R. § 214.2(h)(4)(iii)(A) entails an employer demonstrating that it normally requires a bachelor's degree in a specific specialty, or its equivalent, for the position. The Petitioner did not submit any evidence of previous or current employees in the same position as the Beneficiary's proffered position. Therefore, the Petitioner has not satisfied the criterion at 8 C.F.R. § 214.2(h)(4)(iii)(A)(3).

D. Fourth Criterion

The fourth criterion at 8 C.F.R. § 214.2(h)(4)(iii)(A) requires a petitioner to establish that the nature of the specific duties is so specialized and complex that the knowledge required to perform them is usually associated with the attainment of a baccalaureate or higher degree in a specific specialty, or its equivalent.

⁷ The issue here is that the Petitioner's designation of this position as a Level I position undermines its claim that the position is particularly complex, specialized, or unique compared to other positions *within the same occupation*. Nevertheless, it is important to note that a Level I wage-designation does not preclude a proffered position from classification as a specialty occupation. In certain occupations (doctors or lawyers, for example), such a position would still require a minimum of a bachelor's degree in a specific specialty, or its equivalent, for entry. Similarly, however, a Level IV wage-designation would not reflect that an occupation qualifies as a specialty occupation if that higher-level position does not have an entry requirement of at least a bachelor's degree in a specific specialty or its equivalent. That is, a position's wage level designation may be a consideration but is not a substitute for a determination of whether a proffered position meets the requirements of section 214(i)(1) of the Act.

The Petitioner asserts that the job duties of the proffered position are specialized and complex. We refer to our earlier comments and findings with regard to the implication of the Petitioner's designation of the proffered position in the LCA as a Level I wage, and hence one not likely distinguishable by relatively specialized and complex duties. We have also reviewed the Petitioner's description of duties for the proffered position and the claimed mid-vendor's and claimed end-client's letters. The Petitioner has not sufficiently explained how these duties require the theoretical and practical application of a body of highly specialized knowledge, and the attainment of a bachelor's or higher degree in the specific specialty (or its equivalent) as a minimum for entry into the occupation in the United States. The Petitioner has not demonstrated that its proffered position is one with duties sufficiently specialized and complex to satisfy 8 C.F.R. § 214.2(h)(4)(iii)(A)(/).

Because the Petitioner has not satisfied one of the criteria at 8 C.F.R. § 214.2(h)(4)(iii)(A), it has not demonstrated that the proffered position qualifies as a specialty occupation.

IV. CONCLUSION

The appeal must be dismissed because the Petitioner did not establish that the proffered position is a specialty occupation.

ORDER: The appeal is dismissed.

Cite as *Matter of A-A-, Inc.*, ID# 242075 (AAO Mar. 21, 2017)