

The Item Bank and the new naturalization system: a critical assessment



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Specifically, it is part of the action "monitoring and highlighting issues in the procedure for granting citizenship" and is published in view of the first examinations for acquiring the Certificate of Knowledge Adequacy for Naturalization (Π.Ε.Γ.Π.) on May 16 2021, with the aim of raising some of the important issues concerning the upcoming written test included in the new naturalization system.

Which Greek citizen knows the name of the Greek queen who was the sister of Kaiser William II of Germany? Who among those who hold Greek citizenship knows if the last Greek queen was named Aliki or how many members of the Ralli's family were elected as prime ministers? You may of course wonder why Greek citizens should know the answers to the above questions; and, more to the point, what such questions have to do with Greek citizenship in the first place. And yet, the above questions are included in the Item Bank, through which the Greek state, based on the new naturalization system that the Ministry of Interior put in place since May 2021, will assess whether the applicants for Greek citizenship are integrated into Greek society. In other words, the

Greek state considers such questions as necessary knowledge for someone who wants to become a Greek citizen. It considers them, that is, knowledge that all Greek citizens should have.

The Item Bank, of course, is not just about history and it is not the only thing that is changing in the naturalization system. With the Law 4735/2020¹ and various ministerial decisions, a series of changes (e.g., labour/financial presumptions²) have been gradually introduced that have created a new and not at all encouraging landscape in the naturalization procedures³. Notwithstanding the variety of the changes, this report focuses on the Item Bank, not least because it is the heart of the new system. Based on the draft published by the Ministry of Interior, the Bank consists of essentially two parts: one concerns the language (comprehension and production of oral and written speech), the other is cognitive and is divided into four thematic units (geography, history, culture, political institutions). Obviously, everything pertains to Greece as a second home. It is important to remember that the bill for the Item Bank and the change in the naturalization process was initiated by the previous government (SYRIZA-ANEL, 2015-2019) with the aim of making the process more “objective”. Indeed, through the use of more predictable and standardized evaluation tools - the Item Bank- the then leadership of the Ministry of Interior and the Special Secretariat for Citizenship aimed primarily at the evaluation process and tried to address the "problem" of the discretion of many Committee members during the interviews. Despite any good intentions, however, it was clear from the very beginning that this ‘objective’ shift towards the codification of the learning and cognitive criteria on the basis of which the applicants are evaluated, posed major problems in the process; problems that came in sharp focus when the good intentions were given specific content.

The recent shift is problematic for two reasons. Firstly, because it leads automatically to a process that considers that there is a "correct" integration and in fact objectively measurable – it leads that is in a process that deems that the integration/inclusion of the applicants to Greek society can be “measured”. And secondly, because the new system shapes a one-dimensional and static perception of citizenship that does not take into account the particular characteristics of the applicants (professional, geographical, class, gender), the direct experiences and the special ties that they may have formed with their new homeland in combination of course with whatever cognitive skills they bring from their previous homeland(s). To give but the simplest example, an applicant who is functionally illiterate in his/her native language is a totally different case than, and should be treated differently in an examination process from, a person who is functionally illiterate only in Greek (one of his adopted languages).

The inherent problems of this shift became much clearer when the current leadership of the Interior Ministry introduced the Items Bank. This report is based on the data we have so far collected from the naturalization process, the scientific specialization of the two authors (history,

¹ See the Press Release by Generation 2.0 for Rights, Equality & Diversity “[Generation 2.0 RED on the new naturalization law](#)”.

² See the Press Release by Generation 2.0 for Rights, Equality & Diversity “[Is naturalization finally abolished?](#)” on the imposition of strict financial criteria from the Ministry of Finance.

³ See the Press Release by Generation 2.0 for Rights, Equality & Diversity “[Naturalization disqualified](#)”.

political science, social theory, communication) as well as their experience as appointed members of the Naturalization Committees (proposed by the National Commission of Human Rights, 2017-2021).

The report consists of two parts. The first contains some brief general comments about the process, the difficulty of the questions, the estimated success rates and the social bias that characterizes many of the questions. The second part is more targeted and deals with the thematic units of geography, culture, history and political institutions; topics which we explore in detail in separate sub-chapters. The report does not assess the thematic units related to language (comprehension and production of oral and written speech), because in the way these have been structured, they actually follow the standards of the Greek language tests. They therefore need a separate analysis and one that involves specialists in the field. In the commentary of each thematic unit, we take as a given the new reality in the naturalization system, and we come up with proposals for its improvement⁴. These points are aimed at "what to do now" and not at "what should have been done", given that some form of an Item bank will constitute the reality that applicants have to face at least for the near future.

General comments

Based on our experience and on data of applicants' profiles, it is almost certain that there is going to be a significant reduction in the success rates. This is due to two factors. One is that most of the questions per thematic unit do not meet the purpose of the examination which is none other than the ascertainment of the integration and participation of the applicants in Greek society. Based on the Ministry's wording, this goal means that the process must assess whether the applicants have "knowledge of our country, our culture, our institutions and our history to the extent that it will allow them to exercise their rights" and to "meet the obligations of the Greek citizen". The Item Bank in its current form, however, is more of a knowledge test, one that examines cognitive and connectivity skills than a way of determining inclusion (one example here is the combination questions in the case of geography, the questions of completing names in the case of history and political institutions, but also — even if this is outside the scope of our analysis — questions about substituting words in the language test).

The other factor that will reduce the success rate is that the Bank does not take into account the social profiles of the applicants. Most language and knowledge questions are about "high culture" and are formulated in a sophisticated language, which presupposes a vision and depth that goes far beyond the terms of adequate integration and participation in local society. To put it in a different way: judging by the plethora of questions at the Bank, it seems that most Greek citizens visit regularly museums, theatres, archaeological sites, and talk about nothing else but poetry, recycling and music. And since this is a supposed model of the daily life of Greek citizens, the

⁴ In the framework of the project "Citizenship in practice", an analytical proposal towards this direction will be provided.

Greek state can only rely on it when assessing the integration and participation of aliens who seek to become Greek citizens, i.e., people who, in the vast majority, are economic migrants working in hard labour and manual works (blacksmiths, builders, plumbers, cleaners, care for the elderly, etc.). It is needless to say that the integration of a person who works in the construction sector is usually rather different from that of his children, who may have studied at a Greek school or a university. In such cases, the children could, for example, pass a form of written test which should not of course be uni-dimensional but reflect the variety of Greek social life. Their functionally illiterate father, however, would normally have issues with such a written test.

What is more, even seemingly innocent questions about, for example, "emotional" expressions, children's use of technology, entertainment or music are posed in a way that is socially discriminatory - alienating people from low social backgrounds who do not "talk" about these issues. This bias can also be found in questions of knowledge, many of which require a level of education which one wonders if it corresponds to the knowledge provided by Greek schools. But more to the point, it has to be noted that, as the Hellenic League for Human Rights stated, "the naturalization process is not a Pan-Hellenic examination. Its purpose is to identify the integration of people and their familiarity with the country. The degree of difficulty of the questions makes it virtually impossible for the successful examination for the majority of applicants who are unable to successfully pass this level of examination. By setting the degree of difficulty to such a high level, the applicants are essentially doomed to failure and therefore to permanent alienation⁵".

But what is then the logic of the new system? From what we can understand, with the new system, the Interior Ministry does not seek to ascertain someone's integration to Greek society. What it seems to be looking for is to ascertain the existence of a specific type and level of education; one that the applicants are called to acquire on their own and with a specific learning method (memorization). For its part, the state authorities offer simply to the applicants the questions and the answers. The wider implication of this logic is that (as the new system seems to implicitly be saying), the ideal citizen is someone with enough education and familiarity with the written language who can read and memorize the correct answers. The following analysis identifies this pattern in the most critical part of the new naturalization system, the written test. The improvement proposals that accompany the analysis of each thematic unit have as their main goal the reconnection of the questions with the experiences of the applicants and a wider understanding of one's integration in Greek society.

Geography

The good knowledge of the geography of Greece has been a distinct field of examination for the applicants of naturalization in Greece, both in the previous system and in the new one. However, the shift in the current system brings significant changes in the field. It does so for two reasons. First, geography is completely detached from the experience of applicants becoming just a

⁵ See the press release of the Hellenic League for Human Rights "[Regarding the Item Bank on Naturalization](#)".

knowledge test that recalls a school test. Second, the news system shrinks the perception of geography, as it puts the emphasis on pairing places on the map and not on the geographical significance of the mentioned places or their importance for the country at large. At the same time, the content of the test is so strict that it becomes prohibitive for anyone who is unable to memorize (even if one does not find memorization as a learning method problematic—and we do—we should remember that it is not equally effective for all people and all ages). We will look at these two points in a little more detail.

Geography is completely disconnected from the experiential experience of the applicants: One of the main characteristics of the qualitative (open) questions of the oral interview (previous system) especially in the field of geography was that the applicants could answer by using their own experience as stimuli. The simple question "have you travelled around Greece? Do you know other cities?" and supplementary questions often provided a good picture of the applicants' knowledge of the country. But even when the answer was no, the connection of the questions with a particular place (e.g., Where is Attica on the map? What mountains do we have here in Attica?) created a familiar ground which framed the questions that followed (e.g., Have you seen on TV....? Have you heard from your friends who have travelled...? Do you know which products are produced only in Greece and where they are grown...?). The main advantage of this approach was that part of the predefined questions were adapted to everyday life and greatly facilitated the understanding by the evaluation committee, not only of the knowledge of the applicants, but also of their degree of observation and their overall experience of the environment. The Item Bank as a method cancels this possibility (and not only in the field of Geography). In fact, it essentially undermines the reasons why geography is a criterion for inclusion - and invites the participants to answer a series of questions that does in no way prove their experiential relationship with the geography of the country.

The field of geography as a field of knowledge is shrinking and becomes more rigorous without justification. Through the interview system, the applicants were asked about the population, the cities, the location, the borders—their extent and form—the seas that surround Greece, the islands, the climate, the hydrography, the terrain (See the book Greece, *The Second Homeland*). In the context of the previous examination, these sub-fields constituted the heart of the geographical knowledge and the emphasis was on the scope and not on details. In the new system the thematic unit of geography consists of 70 subjects. As a whole, these limit geography to a formal and detailed knowledge of geographical departments, administrative districts, prefectures, capitals, seas, rivers and lakes (only topics 18, 19 and 50 deviate from this direction). The use of the map is also of particular interest here. The first part of the questions, which does not involve the use of the map, is based on the possibility of photographically storing all the information of a political and physical map (geographical districts, prefectures, capitals, rivers, lakes, mountains), and includes even questions as to where the rivers meet the seas (with the exception of topics 4 to 8, 10, 13 and 14 which take the form of an almost open question). The second part includes the use of a map and the possibility of choosing an answer. We consider this more appropriate for the objectives of the examination process. The shift from the openness

of geography to the matching of prefectures-capitals, etc. and their positions on the map is accompanied by another element that should concern policymakers: the importance of such knowledge. The questions selected for the Items Bank give the message that the geography of the country is not connected in any way with the historical, social, political, economic, cultural life of the country, i.e., that is with its people.

Proposal:

Based on the above, and since the experiential factor is excluded from the examination system, it is proposed that authorities rework the thematic unit of geography by: (a) replacing part of the questions with more open-ended questions and an expanded use of the map, and (b) matching the places with their qualitative characteristics, that is with information that goes beyond the map. Geography, to say it once more, does not concern exclusively places as such, but also the relations of people with them.

Culture

In recent years, applicants for naturalization have been asked to answer questions about the country's cultural life with references to cultural production from antiquity to the present, to customs and traditions, as well as to practices related to religious customs. The relevant questions during the interviews in the old system put the emphasis on important personalities (mainly philosophy, literature, poetry), archaeological sites and other places of culture, customs and the way of celebrating important holidays (in some cases religious), as well as on music, newspapers, TV channels and so on. As it is a field in which direct experience is paramount ('Which archaeological sites have you visited? What music do you listen to? Where do you read the news?'), in the practice of evaluation, the applicants' experience is considered as a strong indicator of integration. On the other hand, since "culture" as a category involves infinite meanings and contents (e.g., popular-high, national-global), its delimitation by a series of questions often contains not only subjective choices on the part of the examiners, but also strategies (or arbitrariness). In this sense, this is an area in which the Item Bank is important in limiting the range of subjective choices and possible arbitrariness on the part of the examiners. However, it seems to be achieving the opposite, by having a very narrow understanding of "culture" and by largely ignoring the profile of applicants and the experiential factor. What is more, the new system retains one of the apparently problematic points of the previous one, namely the use of questions on religious practices for assessing the integration of the applicants. We will look at these two points in a more detail.

What does "culture" mean?

The thematic unit of culture includes 70 questions that are divided into two parts. In the first part, most of the questions follow a schematic chronological sequence from the prehistoric and Palaeolithic period, to antiquity, to the Byzantine period and from there to the neoclassical (there are also some questions about Greek mythology). It is probably needless to say that this

classification - along with the content of questions that mainly concern buildings and monuments - reveals an understanding of culture in terms of art history. In this context, it requires the examinees not only to know through familiarity and learning about the production of each period, but also to recognize it in depictions of buildings, sculptures and other objects, which are definitely not a part of the applicants' daily lives. This approach (which was also present in the interview system but here becomes much more decisive) sets as a condition of cultural integration the interest, not only for the cultural history of Greece, but also for the history of art in general. To give but a simple and typical example: it is not enough for someone to have visited the Acropolis but he/she should be able to talk about it as if he/she was an expert.

The second part includes questions about the contemporary cultural production of the country and in particular about music, cinema, literature, poetry, sports and practices related to religious holidays. With the exception of the latter, which will be discussed separately, we consider the remaining questions as being generally compatible with the objectives of the process, as the relevant questions refer to a wide array of communication channels (television, radio, internet) and in various formats (movies, documentaries, etc.), without requiring exhaustive knowledge of these subfields. The important difference between this second part and the first is that it does not only address the knowledge one acquires if one spends many hours in an archaeological site or museum or reads art books, but also the knowledge that one acquires as a result of his/her everyday experience. It is therefore a much safer indicator for assessing cultural participation and understanding.

Religion and customs (questions 63-70)

It was mentioned above that the inclusion in the item Bank of questions on religion is one of the most problematic issue of the new system; and indeed one that characterised also the previous one. The experience from the interviews shows the active interest of the applicants to know the religious customs regardless of their own relationship with religion. Nevertheless, the inclusion of such questions in the new system shows the inability of state authorities to think of the citizen independently of religious practices and, therefore, to respect the condition of religious neutrality that has been actually part of the very directives that the Ministry of Interior following EU directives has been sending to the Naturalization Committees for some years now.

Proposal:

Based on the above, it is proposed: (a) to limit the questions of the first part concerning the monuments of the pre-modern historical periods and to rewrite them in order to be more connected with how cultural monuments are integrated in the daily life of the citizens (e.g. "Which monument are usually visited by Greeks when traveling to Istanbul "instead of "If the church of Hagia Sophia in Istanbul is a 'Basilica with a dome'", Topic 21), (b) to enrich the questions concerning the modern cultural life of the country based on knowledge that is diffused by widely available channels and (c) to remove completely the questions that concern "Greek religious customs".

History

History is a distinct field in the examination process. As with geography but also with political institutions, this was the case also with the previous system. Both in the old and the new systems, history is considered an indicator of one's integration into the social life of the country. However, compared to other fields, the evaluation of ones' historical knowledge has inherent problems (this also applies to culture, which has now become a separate field). The type of historical knowledge to be evaluated, but also the way in which we evaluate this historical knowledge, given that there are many different views on historical issues, are elements that make the assessment of historical knowledge a very difficult task. Until now, the Naturalization Committees have been examining the degree to which the candidate had a basic knowledge of the facts and figures of Greek history. The aim was to see the extent to which an applicant was able to describe some events that marked Greek history and to refer to personalities associated with them, without necessarily focusing on exact dates, and detailed information. In addition, the emphasis was on modern Greek history and the way in which events and developments of the last two centuries (Greek Revolution, 1922 - Asia Minor Catastrophe - refugees, the 1940s and the Occupation, the Civil War, the junta, etc.) affected the social and political conditions of modern Greece. This emphasis certainly did not prevent the existence of questions on other topics of Greek history from antiquity to the present (Alexander the Great, Athens of Pericles, the Fall of Constantinople, etc.). According to directives from the Interior Ministry, the Committees had to assess only the acquaintance/knowledge of the candidate and not of course his /her personal opinion about a historical person or event. Although it is a field where there could be (and there was) considerable arbitrariness due to the discretion of the members of the Naturalization Committees, the rich composition of the latter (from 3 to 5 members with rather different profiles) ensured some balance.

As is the case with "culture", changing the way history is examined could help reduce arbitrariness. But as was the case again with "culture", the new system seems to be achieving the opposite. The first reason for this is because with the new system the perception of history shrinks, as the emphasis is placed on dates, politicians, matching persons and positions, rather than on their importance for the country and its citizens. Second, the questions are disconnected from everyday life and turned into a field of dry knowledge and even multiple-choice questions. Third, the level of many questions is disproportionately high. Many are even put in a problematic way, either because they use difficult language or because it is not clear what the question is. Some are also pedagogically problematic. For example, in a question with many sub-questions, best practices suggest that the sub-questions (or their possible answers) do not refer to different historical eras. Yet there are many such questions (indicatively questions 1, 9, 10, 16, 16, 30, 32, 43). Other questions ask for definitions (e.g., 5, 6, 13, 15, 26, 27, 28, 29, 37, 51) and they do so in subjects that are not easy to define and which still cause disagreement among historians (e.g., National Schism, Sisachtheia, etc.).

In other words, the content of the test becomes much more rigorous, and the level becomes prohibitive for many applicants. In fact, the content is such that many students or graduates of

Greek universities would find it difficult to answer, if at all. In a sense, such a failure would be desirable because what the young citizens of this state are taught in universities (and in schools) is that historical knowledge does not mean knowledge of dates or enumeration of information. They are also taught that utilitarian knowledge and the memorizing of information is something harmful (and certainly that this is not the goal of the learning process). In fact, in theory at least, this is something that everyone seems to agree on — teachers, scholars, parents, administrative authorities, and so on. More striking is the fact the Bank contains subjects that are rarely taught in the circular education that the Greek state provides to Greek citizens (e.g., post-war decades, dictatorship, the metapolitefsi and so on and so forth). In other words, the new system not only requires from the applicants a knowledge that we mistakenly believe that those who have gone to the Greek school should have, but even more.

This process can only lead to applicants trying to memorize the "correct" answers. In fact, this also applies to the questions that ask the applicants to give a short definition or analysis (see for example questions, about the "Seisachtheia", the "Acrites" in history) and to those which, according to the Ministry, can be answered with a simple "right" and "false". That the goal is memorization was made evident and clearer when the Ministry published the "correct" answers. It goes without saying, that here lies of course, the risk of judging someone's personal (and maybe different) point of view.

Proposal:

Based on the above, it is suggested to: (a) reprocess many of the questions and reword them so that they are more easily understood by people with different levels of education and experiences, (b) put the emphasis on modern Greek history and to reduce questions that concern periods that are very little known to people who have not been to a Greek school or university, (c) remove multiple choice questions in which the choices relate to different historical periods producing confusion to applicants and (d) to have people with experience and specialization in history teaching to school students participate in the Committee that produces the questions.

Political institutions

The same problems as the ones mentioned above characterize the questions on the political institutions. It is important to remember that an adequate familiarity with the institutions and the fundamental principles of the political system is a critical parameter that proves the active and effective participation of applicants in the political life of the country. In general, with the old system, the Naturalization Committees considered two things. The first was the degree of familiarity of the candidate regarding (a) the manner of election or appointment of persons holding some sort of political power, the jurisdiction and the role of them but also of the institutions exercising state power (Parliament, President of the Republic, Government, etc.), (b) the basic administrative structures of the Greek state (central administration, regional and local governments) and (c) the process and types of elections, the participation of Greece in international organizations (EU, UN, etc.). Secondly, the committees evaluated the understanding

of current political issues (e.g., the voting of a bill that captured the interest of the general public, the recent memoranda, the management of the pandemic, etc.), as well as of institutions with which citizens deal on a daily basis (e.g., KEP, public services, tax authorities etc.). Being in touch with current affairs was an indicator of the participation of potential citizens in the public life of the country, but also of the good knowledge of their rights and obligations. In many cases, the questions posed by the examiners took into account the particular characteristics of the candidates (professional, geographical, class, gender), their immediate experiences, as well as the special ties they had formed with their new homeland. For example, different questions were asked by the Committees in Crete and in the case of a land worker there, and others by the Committees in Athens in the case of a private employee or a builder.

The questions of the Item Bank concern only the first of the above two axes. To be sure, the questions on the political institutions could correct the problems that did exist in practice during the interviews in the Naturalization Committees. That said, many of the questions, at least as they have been published so far, are mainly legal/administrative (for example, questions 53, 54, 60, 64). Others are of a very high standard and use a complicated wording that does not seem to be taking into account the usual educational level of the applicants (indicative questions: 16, 17, 49, 50, 51, 52, 58, 61, 62 etc.) In other words, although these questions are supposed to assess the involvement of applicants in the political and social fabric, at the moment they are questions about the functioning of the institutions, the Ministries' jurisdictions (and the different caps worn by police chiefs!). In other words, they do not concern current political issues or the experience of Greek citizens. And they certainly do not take into account the particular characteristics of the applicants, nor their different living conditions. To give but a simple example: applicants living in Athens are definitely more likely to recognize the pictures of the e.g., Supreme Court or the Presidential Hall, than those living in the Pyrgos region of Ilia. Also, the questions do not take into account at all the collective "action" of some applicants, i.e., their participation in social organizations or collective bodies (such as unions, NGOs, foundations, informal groups, associations of persons, e.g., the Parents/Teachers association, etc.) which are very important indicators of the participation and the integration of someone in his/her second home.

Proposal:

Based on the above, it is suggested: (a) to reprocess and rephrase many of the questions (especially those that have a strong legal aspect), so that they are more easily understood by people who have different levels of education and professional experience (b) to formulate questions on current affairs (which should also be prioritized whenever the Bank is updated), (c) to remove or reduce multiple choice questions that use "True" or "False" (d) to include people and organizations with experience in the naturalization procedures (members of the Administration, members of the old Committees, NGOs, etc.). in the drafting of the relevant questions.

Epilogue

The present report has highlighted some of the significant problems of the written test⁶ that is the new reality in the new naturalization system. In addition to the inherent problems posed by the attempt to “codify” the process, the Items Bank, as currently published, is socially biased, contains very difficult questions (both in terms of content and wording), and mainly disconnects the questions from the experiences and the life of the applicants. In essence, there is nothing “objective” in the logic of the new system, despite the fact that the expectation of this “objectivity” was the supposed cause for the changes brought to the naturalization system. In addition, the new system seems to seek to institutionalize a highly problematic feature of the Greek educational system, namely the word-for-word memorization. The whole process is also institutionally rather tentatively organized, as evidenced by the fact that only very recently the correct answers were given, while at least in the language questions a few days later the “correct” answers changed⁷. This in itself proves the problem that characterize many questions in the sense that they do not have a “correct” answer. What is more, there were also many issues with the administrative organization of the system. Although, for example, the first written tests took place on 16/05/2021, there were big delays in the search for staff from the field of education who would oversee the process of the language tests (even those who were hired did not have time to “prepare”). There was also insufficient care for the access of the applicants to the Item bank (not everyone has a personal tablet/computer and, even if they do, the mobile access to the Item bank is not user-friendly), while there was great ambiguity as far as the oral interview that would follow the written test is concerned. The same went for its overall role in the evaluation process.

In conclusion, the main problem of the Item Bank is that it does not meet its own objectives. The integration of the applicants in Greek society and the virtues that one who seeks Greek citizenship should have, are not proven in any way by their ability to correctly answer the questions of the Item Bank. The first step that needs to be taken in order to improve the process is a reassessment of the questions contained in the Items Bank, or at least the deletion of the most problematic ones. The next step is to address the issue of the applicants’ preparation for the exams. The indifference towards the preparation of those who wish to become Greek citizens (let us not forget that these are mostly people for whom Greece is not their “second home”, but the “first”) should be addressed by creating basic structures or by strengthening the existing ones (preparation with lessons, production of manuals, offer of equipment etc.). Since naturalization becomes an examination process, the least that the state authorities should do is to put some weight on this preparation. In a later stage, we shall see how such improvements within the given conditions that the new naturalization system created can lead to the reconnection of the evaluation of integration with Greek society and its people.

⁶ See the information publication by Generation 2.0 for Rights, Equality & Diversity [“The Details of the Procedure of the Exams for the Certificate of Knowledge Adequacy for Naturalization \(P.E.G.P.\)”](#)

⁷ See the information publication by Generation 2.0 for Rights, Equality & Diversity [“Changes to the answers of the topics in the Database Questions”](#)



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