U.S. Citizenship and Immigration Services

Non-Precedent Decision of the Administrative Appeals Office

In Re: 41989986

Date: APR. 2, 2026

Appeal of Service Center Operations (SCOPS) Decision

Form I-129, Petition for a Nonimmigrant Worker (Extraordinary Ability – O)

The Petitioner, a university, seeks to classify the Beneficiary as a global engagement programs coordinator of extraordinary ability. This O-1 nonimmigrant visa classification is available to individuals with extraordinary ability through sustained national or international acclaim and whose achievements have been recognized in the field through extensive documentation. *See* Immigration and Nationality Act (the Act) section 101(a)(15)(O)(i), 8 U.S.C. § 1101(a)(15)(O)(i).

Service Center Operations (SCOPS) denied the petition concluding that the Petitioner did not show the Beneficiary satisfied at least three of eight possible forms of documentation. The matter is now before us on appeal. 8 C.F.R. § 103.3.

The Petitioner bears the burden of proof to demonstrate eligibility by a preponderance of the evidence. *Matter of Chawathe*, 25 I&N Dec. 369, 375-76 (AAO 2010). We review the questions in this matter de novo. *Matter of Christo's, Inc.*, 26 I&N Dec. 537, 537 n.2 (AAO 2015). Upon de novo review, we will dismiss the appeal.

I. LAW

As relevant here, section 101(a)(15)(O)(i) of the Act establishes O-1 classification for an individual who has extraordinary ability in the sciences, arts, education, business, or athletics that has been demonstrated by sustained national or international acclaim, whose achievements have been recognized in the field through extensive documentation, and who seeks to enter the United States to continue work in the area of extraordinary ability. Department of Homeland Security (DHS) regulations define "extraordinary ability in the field of science, education, business, or athletics" as "a level of expertise indicating that the person is one of the small percentage who have arisen to the very top of the field of endeavor." 8 C.F.R. § 214.2(o)(3)(ii).

Next, DHS regulations set forth alternative evidentiary criteria for establishing a beneficiary's sustained acclaim and the recognition of achievements. A petitioner may submit evidence either of "a major, internationally recognized award, such as a Nobel Prize," or of at least three of eight listed categories of documents. 8 C.F.R. § 214.2(o)(3)(iii)(A)-(B). If the petitioner demonstrates a criterion

does not readily apply to the beneficiary's occupation, it may submit comparable evidence to establish eligibility. 8 C.F.R. § 214.2(o)(3)(iii)(C).

The submission of documents satisfying the initial evidentiary criteria does not, in and of itself, establish eligibility for O-1 classification. *See* 59 Fed. Reg. 41818, 41820 (Aug. 15, 1994) ("The evidence submitted by the petitioner is not the standard for the classification, but merely the mechanism to establish whether the standard has been met.") Accordingly, where a petitioner provides qualifying evidence satisfying the initial evidentiary criteria, we will determine whether the totality of the record and the quality of the evidence show sustained national or international acclaim such that the individual is among the small percentage at the very top of the field of endeavor. *See* section 101(a)(15)(o)(i) of the Act and 8 C.F.R. § 214.2(o)(3)(ii), (iii).[1]

II. ANALYSIS

Because the Petitioner did not indicate or establish the Beneficiary has received a major, internationally recognized award, it must demonstrate the Beneficiary satisfies at least three of the alternate regulatory criteria at 8 C.F.R. § 214.2(o)(3)(iii)(B)(*1*)-(*8*). SCOPS determined the Beneficiary fulfilled only two (judging under 8 C.F.R. § 214.2(o)(3)(iii)(B)(*4*) and scholarly articles under 8 C.F.R. § 214.2(o)(3)(iii)(B)(*6*)) of the four claimed categories of evidence. The Petitioner maintains on appeal that the Beneficiary meets the same two additional criteria.[2]

A. Published Materials

The regulation at 8 C.F.R. § 214.2(o)(3)(iii)(B)(*3*) requires "[p]ublished material in professional or major trade publications or major media about the alien, relating to the alien's work in the field for which classification is sought, which shall include the title, date, and author of such published material, and any necessary translation." USCIS first determines whether the published material was related to the person and the person's specific work in the field for which classification is sought.[3] USCIS then determines whether the publication qualifies as a professional publication, major trade publication, or major media publication.[4]

The Petitioner argues the Beneficiary's eligibility for this criterion based on three articles posted on gulfnews.com, zawya.com, and menafn.com. However, none of the articles reflect published material about the Beneficiary relating to her work. For gulfnews.com, the article quotes the Beneficiary about [redacted]; however, the article is not about her. *Cf.*, *Aravamuthan v. Jaddou*, No. 3:23-CV-01412-N, 2025 WL 1708126, at *4 (N.D. Tex. June 17, 2025) (upholding plaintiff's submission of an article quoting him about personal branding was not about him); *Joseph v. Dir. of Texas Serv. Ctr., United States Citizenship & Immigr. Servs.*, No. 24-40249, 2025 WL 458001, at *3 (5th Cir. Feb. 11, 2025) (upholding an article that included quotes from the plaintiff, did "not make the article about" him); *Melnattur v. United States Citizenship & Immigr. Servs.*, No. 8:21CV345, 2022 WL 18086892, at *5 (D. Neb. Sept. 12, 2022) (upholding quotes in passing or interviews about collaborative projects

[1] *See also generally* 2 *USCIS Policy Manual*, M.4(C)(2), https://www.uscis.gov/policymanual.
[2] Any ground of ineligibility that is not raised on appeal is waived. *See Matter of O-R-E-*, 28 I&N Dec. 330, 336 n.5 (BIA 2021) (citing *Matter of R-A-M-*, 25 I&N Dec. 657, 658 n.2 (BIA 2012)).
[3] *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2).
[4] *Id.*

were insufficient); *Lapteva v. Schuurmans*, No. 8:24CV83, 2025 WL 815087, at *4 (D. Neb. Mar. 10, 2025) (finding the regulation and USCIS policy clearly intend for evidence under this criterion to say something substantive about the petitioner and her work).

As it relates to zawya.com, the article reports about the [redacted], and the Beneficiary is mentioned one time in the "References" section; the article does not constitute published material about the Beneficiary. Likewise, regarding menafn.com, the article is about [redacted] with the Beneficiary mentioned one time as the developer of the survey. *Cf.*, *Gadhave v. Thompson*, No. 3:21-CV-2938-D, 2023 WL 6931334, at *4 (N.D. Tex. Oct. 19, 2023) (upholding articles only citing, quoting, or referencing the beneficiary do not qualify as about him); *Nelson v. U.S. Citizenship & Immigr. Servs.*, No. CV 21-10334-LTS, 2022 WL 20583561, at *5 (D. Mass. June 15, 2022) (upholding articles that only cited or quoted him are not about him).

Moreover, the Petitioner did not establish that the articles appeared in professional or major trade publications or major media. In evaluating whether a submitted publication is a professional publication, major trade publication, or major media, relevant factors include the intended audience (for professional and major trade publications) and the relative circulation, readership, or viewership (for major trade publications and other major media).[5] Although the Petitioner argues that gulfnews.com has "8.27 million monthly average page views," zawya.com's "official website boasts over 573,000 monthly average page views," and menafn.com's "official website boasts over 225,000 monthly average page views," the Petitioner did not contextualize these figures. Similarly, the Petitioner presented other evidence relating to rankings and statistics for the websites, such as gulfnews.com and zawya.com receiving global rankings of 75,250 and 572,842, respectively. Again, the Petitioner did not show the significance of these global rankings. The Petitioner did not establish that these particular monthly average page views or global rankings place these websites at a level consistent with "major" trade publications or media.[6] *Cf.*, *Branski v. Seng*, No. 24-CV-360, 2024 WL 4678939, at *5 (E.D. Wis. Nov. 4, 2024) (indicating that the failure to provide context to circulation figures makes it difficult to assess their significance).

For the reasons discussed above, the Petitioner did not demonstrate the Beneficiary fulfills this criterion.

B. Contributions

The regulation at 8 C.F.R. § 214.2(o)(3)(iii)(B)(5) requires "[e]vidence of the alien's original scientific, scholarly, or business-related contributions of major significance in the field." Analysis under this criterion focuses on whether the beneficiary's original work constitutes major, significant contributions in the field. *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2).

[5] *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2).

[6] The Petitioner does not claim that any of these websites qualify as professional publications, nor does the record support it.

The Petitioner argues that the Beneficiary "was invited to present her original research at prestigious international conferences." Evidence that the beneficiary's work was funded, patented, or published, while potentially demonstrating the work's originality, will not necessarily establish, on its own, that the work is of major significance in the field. *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2). Although the Petitioner offered evidence of the Beneficiary's presentations at three conferences, the Petitioner did not contextualize or show the impact of her presentations in the field. The Petitioner did not demonstrate, for example, that any of her presentations resulted in majorly significant contributions in the field. While the Petitioner contends that "[t]he fact that the Beneficiary was invited to such prestigious conferences shows the originality of her work and major significance to the industry," without supporting documentation showing the impact, influence, or effect in the field in a majorly significant manner, the Petitioner did not establish that simply presenting original work at conferences, even at prestigious ones, indicates original contributions of major significance in the field. *Cf.*, *Agrawal v. Miller*, No. 4:24CV3143, 2025 WL 2879217, at *20 (D. Neb. Sept. 12, 2025) (upholding that attendance and presentation of material at conferences is not uncommon in the scientific fields, nor is the publication of research in the field).

Regarding the Beneficiary's overall citation record, the Petitioner initially provided her Google Scholar profiles and, in response to SCOPS' RFE, from July 2025. Her most recent profile reflected 89 citations to her co-authored publications, with her three highest-cited articles receiving 46, 20, and 16 citations, respectively.[7] The record, however, does not establish how many of these are self-citations by her or her coauthors. Nonetheless, this criterion requires a petitioner to establish the beneficiary's original contributions of major significance in the field. Thus, the burden is on the petitioner to identify the original contributions and explain how or why they are considered to be of major significance in the field. Here, the Petitioner did not show the significance of the Beneficiary's citations to her individual papers or that her papers received citations compared to other articles the field views as majorly significant. Documentation that published research has been highly cited relative to other works in that field may be probative of the significance of the beneficiary's contributions to the field of endeavor. *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2); *cf.*, *Gadhave*, 2023 WL 6931334, at *5 (finding the record contained little evidence that contextualized the number of citations the work had received).

Further, the Petitioner provided 2024 data from Clarivate Analytics (InCites Essential Science Indicators) regarding baseline citation rates and percentiles by year of publication highlighting the "Social Sciences, General." The Petitioner contends that "[a]ccording to a respectable research analytics company, Clarivate Analytics, [the Beneficiary's] all-time citation count places her among the top 10% of all cited researcher in the field of social sciences." However, the Petitioner again did not indicate whether it factored in any self-citations in determining these percentile rankings. Regardless, the Petitioner did not demonstrate how the Beneficiary's cumulative number of citations represents contributions of major significance in the field. Moreover, aggregate citation figures tend to reflect an individual's overall publication record rather than identifying which research or findings, if any, the field considers to be majorly significant. In addition, the documentation from Clarivate Analytics states that "[c]itation frequency is highly skewed, with many infrequently cited papers and relatively few highly cited papers. Consequently, citation rates should not be interpreted as representing the central tendency of the distribution." Therefore, considering Clarivate Analytics'

[7] Three of the Beneficiary's other articles received three or less citations, and her other eight articles received no citations.

admission of highly skewed data, the Petitioner did not show the reliability of the figures, and therefore, reflects very little, if any, probative value.

Moreover, citation frequency, which is quantitative in nature, does not reveal the reasons for the citations, which involve a qualitative analysis. In other words, a high citation number might show that others in the field have noticed the Beneficiary's work, but it does not confirm that such work or research has risen to the level of major significance. Regarding a qualitative analysis of the citations, while they may indicate some degree of interest in her research from her colleagues and peers in the field, this evidence is not sufficient without supporting material to demonstrate a degree considered to be majorly significant. *Cf., Agrawal*, 2025 WL 2879217, at *20 (upholding that plaintiff did not provide evidence demonstrating that work has been widely cited); *Bhanu v. Garland*, No. CV 22-103, 2023 WL 6119357, at *7-8 (E.D. Pa. Sept. 18, 2023) (upholding plaintiff did not demonstrate the number of citations received by his published articles reflect a level of interest in his work from relevant parties to meet this criterion); *Gadhave*, 2023 WL 6931334, at *5 (finding the record contained little evidence that contextualized the number of citations the work had received); *Jafarov v. United States Citizenship & Immigr. Servs.*, No. 23 CIV. 3372 (PAE), 2024 WL 69056, *7 (S.D.N.Y. Jan. 5, 2024) (finding the absence of detail about the actual impact of the work and the limited citations the work had thus far received meant that he did not satisfy this criterion).

Finally, the Petitioner references a few recommendation letters. However, the letters are not sufficiently persuasive. The letters generally highlight the Beneficiary's work and opine on its importance but not elaborate and demonstrate how her work is considered to be majorly significant. For example, J-V-P- indicated that "[p]olicymakers and cultural institutions rely on these findings to develop more nuanced strategies for digital engagement."[8] J-V-P- did not, for instance, identify any strategies that were developed, if any, based on the Beneficiary's findings or how the overall field has been significantly impacted or influenced in a major way. *Cf., Visinscaia*, 4 F. Supp. 3d at 134 (finding the term "major significance in the field" can be reasonably interpreted to mean that there must be some impact "in the field as a whole"); *see also Hristov v. Roark*, No. 09-CV-2731, 2011 WL 4711885, at *11 (E.D.N.Y. Sep. 30, 2011); *Skokos v. United States Dep't of Homeland Sec.*, No. 209CV00193RLHPAL, 2010 WL 11538054, at *4 (D. Nev. Jan. 13, 2010), *aff'd sub nom. Skokos v. U.S. Dep't of Homeland Sec.*, 420 F. App'x 712 (9th Cir. 2011).

Similarly, R-F- claimed that the Beneficiary's "work has led to a reconceptualization of national identity and self-representation in the Palestinian context." In discussing the effect in the field, R-F- referenced her presentations and panel discussions. However, R-F- did not elaborate and detail how the presentations or panel discussions resulted in any measurable impact of the Beneficiary's work in the field. As indicated above, simply authoring material or making conference presentations is insufficient to meet this criterion without evidence that the findings or research from publications or conferences caused majorly significant contributions. *Cf., Agrawal*, 2025 WL 2879217, at *20 (upholding that attendance and presentation of material at conferences is not uncommon in the scientific fields, nor is the publication of research in the field).

Detailed letters from experts in the field explaining the nature and significance of the beneficiary's contribution may also provide valuable context for evaluating the claimed original contributions of

[8] Although we discuss a sample of letters, we have reviewed and considered each in the record.

major significance, particularly when the record includes documentation corroborating the claimed significance. *See generally* 2 *USCIS Policy Manual*, *supra*, at M.4(C)(2). Submitted letters should specifically describe the beneficiary's contribution and its significance in the field and should set forth the basis of the writer's knowledge and expertise. *Id.* Here, the letters point to the Beneficiary's work but do not demonstrate how the field views it as original contributions of major significance in the field, such as widespread impact or influence. *Cf., Gadhave*, 2023 WL 6931334, at *5 (finding testimonial letters contained mostly general, conclusory statements about the value of the person's research without explaining in detail specific ways in which his contributions have already been widely applied or replicated to serve the industry); *Jafarov*, 2024 WL 69056, at *8 (finding testimonial evidence spoke largely in generalities and did not evidence the tangible impact of his work in the field); *Noroozi v. Napolitano*, 905 F. Supp. 2d 535, 544 (S.D.N.Y. 2012) (upholding reference letters with limited detail on satisfaction of regulatory criterion insufficient to form the basis for required evidence).

For the reasons discussed above, considered both individually and collectively, the Petitioner did not demonstrate the Beneficiary meets this criterion.

III. CONCLUSION

The Petitioner did not establish the Beneficiary meets any of the categories of evidence discussed above. As such, the Petitioner did not demonstrate the Beneficiary satisfies at least three of the alternate regulatory criteria at 8 C.F.R. § 214.2(o)(3)(iii)(B)(*1*)-(*8*).[9] Therefore, we need not provide a totality determination to establish whether the Beneficiary has sustained national or international acclaim and is one of the small percentage who has risen to the very top of the field. *See* section 101(a)(15)(O)(i) of the Act and 8 C.F.R. § 214.2(o)(3)(ii) and (iii).[10] Accordingly, we reserve this issue.[11] Consequently, the Petitioner has not established the Beneficiary's eligibility for the O-1 visa classification as an alien of extraordinary ability. The appeal will be dismissed for the above-stated reasons, with each considered as an independent and alternate basis for the decision.

ORDER: The appeal is dismissed.

NOTICE: This constitutes the final decision in this matter. The filing of a motion will not postpone the effect of the decision. 8 C.F.R. § 103.5(a)(1)(iv). Aliens who are not lawfully present, or who are otherwise inadmissible or deportable, may be subject to the commencement of removal proceedings under section 240 of the Act through the issuance of a Form I-862, Notice to Appear. Those proceedings may result in their removal from the United States and possible ineligibility for future visas or other immigration benefits.

[9] Because the Petitioner did not show the Beneficiary fulfilled any additional criteria on appeal, we need not evaluate SCOPS' favorable determination regarding the judging and scholarly articles categories.

[10] *See also* 2 *USCIS Policy Manual*, *supra*, at M.4(B).

[11] *See INS v. Bagamasbad*, 429 U.S. 24, 25 (1976) (per curiam) (holding that agencies are not required to make "purely advisory findings" on issues that are unnecessary to the ultimate decision).