U.S. Citizenship and Immigration Services

Non-Precedent Decision of the Administrative Appeals Office

In Re: 42219841

Date: APR. 8, 2026

Appeal of Service Center Operations (SCOPS) Decision

Form I-140, Immigrant Petition for Alien Workers (Extraordinary Ability)

The Petitioner seeks classification as an alien of extraordinary ability in the sciences. *See* Immigration and Nationality Act (the Act) section 203(b)(1)(A), 8 U.S.C. § 1153(b)(1)(A). This first preference classification makes immigrant visas available to those who can demonstrate their extraordinary ability through sustained national or international acclaim and whose achievements have been recognized in their field through extensive documentation.

Service Center Operations (SCOPS) denied the petition, concluding that although the Petitioner satisfied three initial evidentiary criteria for this classification, she did not show, as required, her sustained national or international acclaim and demonstrate that she is among the small percentage at the very top of the field of endeavor. The matter is now before us on appeal pursuant to 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

Section 203(b)(1)(A) of the Act makes visas available to immigrants with extraordinary ability if:

(i) the alien has extraordinary ability in the sciences, arts, education, business, or athletics which has been demonstrated by sustained national or international acclaim and whose achievements have been recognized in the field through extensive documentation;

(ii) the alien seeks to enter the United States to continue work in the area of extraordinary ability; and

(iii) the alien's entry will substantially benefit prospectively the United States.

The term "extraordinary ability" refers only to those individuals in "that small percentage who have risen to the very top of the field of endeavor." 8 C.F.R. § 204.5(h)(2). The implementing regulation at 8 C.F.R. § 204.5(h)(3) sets forth a multi-part analysis. First, a petitioner can demonstrate sustained acclaim and the recognition of achievements in the field through a one-time achievement (that is, a major, internationally recognized award) or qualifying documentation that meets at least three of the ten categories listed at 8 C.F.R. § 204.5(h)(3)(i) – (x) (including items such as awards, published material in certain media, and scholarly articles).

Where a petitioner meets these initial evidence requirements, we then consider the totality of the material provided in a final merits determination and assess whether the record shows sustained national or international acclaim and demonstrates that the individual is among the small percentage at the very top of the field of endeavor. *See Kazarian v. USCIS*, 596 F.3d 1115 (9th Cir. 2010) (discussing a two-part review where the documentation is first counted and then, if fulfilling the required number of criteria, considered in the context of a final merits determination); *see also Amin v. Mayorkas*, 24 F.4th 383 (5th Cir. 2022); *Visinscaia v. Beers*, 4 F. Supp. 3d 126, 131-32 (D.D.C. 2013); *Rijal v. USCIS*, 772 F. Supp. 2d 1339 (W.D. Wash. 2011).

II. ANALYSIS

A. Evidentiary Criteria

Because the Petitioner has not claimed or established her receipt of a major internationally recognized award, she must satisfy at least three of the alternate regulatory criteria at 8 C.F.R. § 204.5(h)(3)(i)-(x). The Petitioner claimed to have satisfied seven of these criteria as well an eighth criterion through her submission of comparable evidence. *See* 8 C.F.R. § 204.5(h)(4). SCOPS determined she met five, relating to membership, published material about her, judging the work of others in her field, authorship of scholarly articles in professional publications, and leading or critical role.[1] *See* 8 C.F.R. § 204.5(h)(3)(ii), (iii), (iv), (vi), and (viii). Therefore, SCOPS proceeded to a final merits determination.

On appeal, the Petitioner maintains that she also meets the criteria relating to awards and original contributions. *See* 8 C.F.R. § 204.5(h)(3)(i) and (v). In addition, she reiterates that she meets the display criterion through her submission of comparable evidence. *See* 8 C.F.R. § 204.5(h)(3)(vii) and 8 C.F.R. § 204.5(h)(4). Because SCOPS determined the Petitioner has fulfilled at least three of the criteria at 8 C.F.R. § 204.5(h)(3), we will review the evidence relating to all of the claimed criteria in a final merits determination.

B. Final Merits Determination

Given the structure of the regulations and the two-step analysis described in *Kazarian*, the satisfaction of three evidentiary criteria alone does not automatically or presumptively establish eligibility. In a final merits determination, we evaluate whether a petitioner has demonstrated, by a preponderance of

[1] SCOPS concluded that the Petitioner did not satisfy the criteria relating to awards and original contributions. *See* 8 C.F.R. § 204.5(h)(3)(i) and (v). In the "Analysis of Criteria" section discussing the initial evidence requirements, SCOPS' decision did not address the Petitioner's claim she meets the display criterion through her submission of comparable evidence. *See* 8 C.F.R. § 204.5(h)(3)(vii) and 8 C.F.R. § 204.5(h)(4).

the evidence, their sustained national or international acclaim,[2] that they are among the small percentage at the very top of their field of endeavor, and that their achievements have been recognized in the field through extensive documentation. Therefore, we analyze an individual's accomplishments and weigh the totality of the evidence to determine if their successes are sufficient to demonstrate extraordinary ability in the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act; 8 C.F.R. § 204.5(h)(2), (3); *see also Kazarian*, 596 F.3d at 1119-20.[3]

Here, SCOPS concluded that, although the Petitioner met the initial evidence requirements, she did not show she garnered sustained national or international acclaim and that she is among that small percentage who have risen to the very top of the field.

On appeal, the Petitioner contends that the record is sufficient to establish, by a preponderance of the evidence, her "extraordinary ability in the field of healthcare ethics and medical communication in global health." She asserts that SCOPS did not properly analyze her awards, memberships, media coverage, judging, original contributions, authorship of scholarly articles, conference presentations, letters of support, leading roles, and sustained acclaim in her field. The Petitioner further argues that SCOPS failed to follow specific guidance provided in the *USCIS Policy Manual*. Below, we will evaluate the totality of the evidence, based on the documentation presented to SCOPS, in the context of the final merits determination.

The record indicates that the Petitioner received her Bachelor of Medical Science degree (2010) from [redacted] in the United Kingdom and her Master of Business Administration degree (2016) from [redacted] in Kazakhstan. She stated that in Kazakhstan she worked as Head of Marketing and Business Development at the [redacted], Project Manager at [redacted], and Lecturer in [redacted] program manager at [redacted]. The Petitioner arrived in the United States in 2021 and has served as a Russian-English medical interpreter for [redacted], Cultural Responsiveness Committee member for the [redacted] project, a volunteer with The Beads of Courage Neonatal Intensive Care Unit (NICU) Program at the [redacted] in California, a language access trainer with the Extension for Community Healthcare Outcomes (ECHO) tele-mentoring program, and founder of [redacted] (an interpreter and translation service for families navigating linguistic and cultural barriers in healthcare). In September 2024, the Petitioner began her Ph.D. studies in Global Healthcare Ethics and position as a graduate assistant at [redacted].

As discussed further below, the Petitioner has not demonstrated that her achievements to date reflect a "career of acclaimed work in the field" as contemplated by Congress at H.R. Rep. No. 101-723, 59 (Sept. 19, 1990). Nor has she shown that she has risen to that small percentage at the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2). The commentary for the proposed regulations implementing section 203(b)(1)(A)(i) of the Act provides that the "intent of Congress that a very high standard be set

[2] *See generally* 6 *USCIS Policy Manual* F.2(A)(1), https://www.uscis.gov/policy-manual (stating that the definition of "sustain" is "to support or maintain, especially over a long period of time . . . To persist in making (an effort) over a long period of time").

[3] *See generally* 6 *USCIS Policy Manual supra*, at F.2(B)(2) (stating that USCIS officers should evaluate the evidence together when considering the petition in its entirety to determine if a petitioner has established by a preponderance of the evidence, the required high level of expertise required for this immigrant classification).

for aliens of extraordinary ability is reflected in this regulation by requiring the petitioner to present more extensive documentation than that required" for lesser classifications. 56 Fed. Reg. 30703, 30704 (July 5, 1991). Here the Petitioner has not established that she meets these very high standards. *See Amin v. Mayorkas*, 24 F.4th at 386-87 (stating that the narrow definition reflects the stringency of the extraordinary ability standard).

Regarding the Petitioner's service as a judge of the work of others in her field, an evaluation of the significance of her experience is appropriate to determine if such evidence is indicative of the extraordinary ability required for this highly restrictive classification. *See Kazarian*, 596 F. 3d at 1121-22.[4] Participation in the peer review process does not automatically demonstrate that an individual has sustained national or international acclaim. While the Petitioner contends that she has "served as a manuscript reviewer for the *Journal of Clinical Medicine of Kazakhstan*" and evaluated "scholarly submissions for scientific rigor and relevance," she has not offered evidence demonstrating that her occasional participation in the peer review process is indicative of sustained national or international acclaim in the fields of clinical medicine or global healthcare ethics. Further, the Petitioner did not demonstrate how her judging experience differentiates her from others in the field, show the significance of reviewing manuscripts for the aforementioned journal, or otherwise provide context regarding her service as a peer reviewer. *See Hamal v. United States Dep't of Homeland Sec.*, No. 21-5160, 2023 WL 1156801, at *2 (D.C. Cir. Jan. 31, 2023) (finding the petitioner did not provide needed context for his judging experience and the response to his work).

In addition, the Petitioner contends that she has "served as faculty for the American Academy of Pediatrics ECHO program," entitled "Integrating Language Access into Your Practice for Children and Youth with Special Health Care Needs (CYSHCN)." She asserts that she "delivered educational sessions to healthcare professionals, assessed their comprehension and application of the material, and provided feedback and guidance to ensure faithful adherence to best practices in language access and culturally responsive care." In addition, the Petitioner explained that "[h]er responsibilities included evaluating the work of professionals in allied fields, effectively acting as a judgement of their performance in achieving the program's learning outcomes, thereby establishing her recognized expertise and leadership in this specialized domain." She provided a letter from G-V-R-, Project Director of Family Voices, who indicated that the Petitioner was appointed "as faculty for the Integrating Language Access into Your Practice for the CYSHCN ECHO program, organized by the American Academy of Pediatrics. This initiative directly enhances the capacity of healthcare providers nationwide, ensuring that they deliver competent, culturally responsive, and linguistically accessible care to families of CYSHCN who communicate in languages other than English."

The Petitioner, however, did not provide information from the American Academy of Pediatrics about how it selects faculty for the CYSHCN ECHO program. As such, the Petitioner has not shown that her selection is prestigious or exclusive, or otherwise indicative of sustained national or international acclaim at the very top of her field. *See Job v. Jaddou*, No. 4:22-CV-03017, 2024 WL 2963795, at *4 (S.D. Tex June 12, 2024) (upholding mere service on a review board, without more, cannot evince extraordinary ability).

[4] *See also generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(1) (providing that the second step requires USCIS to evaluate the person's judging participation to determine whether it was indicative of the person being of that small percentage who has risen to the very top of the field of endeavor and enjoying sustained national or international acclaim).

Furthermore, the Petitioner has not demonstrated that the *Journal of Clinical Medicine of Kazakhstan* and American Academy of Pediatrics reserve their invitations for those who have sustained national and international acclaim or for those who are among that small percentage at the very at the very top of their field. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2). This context is relevant, as reviewing the work of others based on subject matter expertise would not provide strong support for the petition. Possessing expertise in a field is a considerably lower threshold than having sustained acclaim at the very top of the field. At issue here is the extent to which the Petitioner's judging activities have required, reflected, or resulted in her national or international acclaim.

The Petitioner has not shown that peer review and professional evaluations of the type she performed are an opportunity reserved for the most accomplished and recognized researchers and scholars, rather than a service expected of active members of the research or academic community in her field. Finally, the evidence in the record does not demonstrate that the Petitioner has received any independent acclaim or recognition for her service as a peer reviewer. Without this or other evidence differentiating her from others in her field, the Petitioner has not shown that her level and frequency of peer review and professional evaluations contribute to establishing her sustained national or international acclaim or place her among that small percentage at the very top of the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2).

The Petitioner also provided documentation of her membership with the National Council on Interpreting in Health Care, the American Society for Bioethics and Humanities, the Association for Practical and Professional Ethics, the Association for Behavior Analysis International, and the American College of Healthcare Executives (ACHE), but she did not provide evidence that they require outstanding achievements of their members or other information to demonstrate that these memberships are exclusive, or otherwise indicative of sustained national or international acclaim at the very top of her field. *See Hamal v. U.S. Dep't of Homeland Sec.*, No. CV 19-2534 (RC), 2021 WL 2338316, at *4 (D.D.C. June 8, 2021), *aff'd sub nom. Hamal v. United States Dep't of Homeland Sec.*, No. 21-5160, 2023 WL 1156801 (D.C. Cir. Jan. 31, 2023) (upholding plaintiff did not contextualize his membership to demonstrate sustained national or international acclaim).

The Petitioner provided a letter of support from A-R-, a member of the ACHE, who asserted that the Petitioner was selected "for membership in the ACHE, an honor granted only to a select group of distinguished healthcare professionals. This membership is a testament to her leadership and the meaningful contributions she has made in advancing healthcare access and ethics." A-R-'s letter, however, did not point to membership bylaws or other evidence to corroborate these claims. Unsupported assertions have no evidentiary value and are insufficient to establish a filing party has satisfied their burden of proof. *See Matter of Mariscal-Hernandez*, 28 I&N Dec. 666, 673 (BIA 2022). The Petitioner's evidence relating to her ACHE membership is not sufficient to demonstrate her sustained national or international acclaim or to place her among that small percentage who have risen to the very top of her field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2). *See also Donskoy v. United States Citizenship & Immigr. Servs.*, No. 21-CV-04757-CRB, 2021 WL 5240224, at *5 (N.D. Cal. Nov. 11, 2021) (upholding the petitioner's membership did not demonstrate the requisite level of achievement or sustained acclaim to establish extraordinary ability).

The Petitioner further contends that she served as a committee member for the [redacted] project and member of the ECHO tele-mentoring program. The record, however, does not include bylaws, official criteria, or other objective evidence indicating the specific requirements for their membership. *See Nelson v. U.S. Citizenship & Immigr. Servs.*, No. CV 21-10334-LTS, 2022 WL 20583561, at *5 (D. Mass. June 15, 2022) (finding letters that nowhere specify what kind of outstanding achievement in the field is required are not probative). *See also Tapia v. Jaddou*, No. 8:23-CV-813-CEH-AAS, 2025 WL 2780815, at *3 (M.D. Fla Sept. 30, 2025) (finding that it is reasonable for USCIS to require objective evidence of membership requirements). Here, the Petitioner has not shown that her memberships are reserved for those who have sustained national and international acclaim or for those whose achievements place them among that small percentage at the very at the very top of their field. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2).

Likewise, authorship and publication of original research do not automatically show sustained national or international acclaim and place an individual at the top of their field. The Petitioner provided evidence that she authored two scholarly articles in *E3S Web of Conferences* in 2020 and one in *Gazzetta Medica Italiana* in 2021. In addition, the Petitioner provided a letter from Dr. G-B-, Director of the Center for African Studies at [redacted], stating that the Petitioner authored a chapter in his forthcoming book, entitled [redacted], "which is currently being collated and expected to be published." The publication of this book chapter in 2026 post-dates the filing of the petition. *See* 8 C.F.R. § 103.2(b)(1), (12). Depending on a journal's level of recognition, as demonstrated by evidence in the record, there may be an elevated level of prestige or acclaim associated with publication in a particularly highly ranked journal.[5] The Petitioner, however, did not provide sufficient support for her claim that publication in the aforementioned journals and book are accomplishments that elevate her to that small percentage at the very top of her field. *See* 8 C.F.R. § 204.5(h)(2). Nor has the Petitioner shown that her limited publication record is consistent with sustained national or international acclaim in the field. *See* section 203(b)(1)(A)(i) of the Act.

As authoring scholarly articles is often inherent to the work of scientists and researchers in academia, the citation history or other evidence of the influence of an individual's articles can be an indicator to determine the recognition they have received in the field and whether such recognition has been sustained. Such an analysis at the final merits determination stage is appropriate pursuant to *Kazarian,* 596 F. 3d at 1122. Here, the Petitioner submitted information showing that her article in *E3S Web of Conferences*, entitled "[redacted]," has received one citation. The Petitioner, however, has not offered statistical evidence or other objective metrics indicating that the number of citations received by this article, or her other scholarly articles, conference presentations, and book chapter sets her apart from others in her field or otherwise demonstrates her sustained national or international acclaim in the field of healthcare ethics and medical communication in global health. Nor has the Petitioner shown that her published work has received recognition at a level consistent with being among that small percentage at the very top of her field. *See* 8 C.F.R. § 204.5(h)(2).

Additionally, the Petitioner has not shown that her other presented works have garnered her national or international acclaim. *See* section 203(b)(1)(A) of the Act. While she offered evidence showing that she presented topics at the [redacted] (2020), [redacted]

[5] *See generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(2).

(2024), (2025), (2025), (2025), (2025), (2025), and (2025), the Petitioner did not demonstrate the significance of her specific presentations, their level of prestige or recognition, or how they have impacted her field consistent with her being among that small percentage at the very top of the field. *See* 8 C.F.R. § 204.5(h)(2).

The Petitioner presented documentation that she received a " " from the (2010), a Award from (2025), a (2025), and a " ."[6] Regarding the Petitioner's , Dr. G-M-, professor at , stated that the Petitioner "was selected as the distinguished within our Ph.D. program in Healthcare Ethics, a highly competitive position reserved for outstanding students. Only one student is selected and appointed every two years."

The Petitioner also submitted the guidelines for which state:

> Through the vision, leadership, and generosity of has created an innovative competition to engage students and faculty in shaping the University's emerging curriculum - consistent with current Strategic Plan goals. Students and faculty are invited to develop proposals for new courses, course materials, pedagogical approaches and academic initiatives which consider challenges facing new generations of students.
>
> . . . .
>
> A review committee composed of University faculty, staff, and students will evaluate all proposals from eligible applicants, submitted before the deadline and in accordance with the application guidelines below. Select applicants will be invited to pitch their ideas in a public forum, where they will be vetted by a panel comprised of faculty, staff, student leaders, community leaders, and a member of the family.
>
> The New Applicant Track includes both student and faculty applicants. Students must be currently enrolled at through the current and next academic years. Undergraduate and graduate students are eligible. Teams of students and/or faculty may

[6] In response to SCOPS' request for evidence, the Petitioner provided an October 2025 letter offering her "congratulations on being selected for a 2025 . . . Your prize amount is $2,500." While the Petitioner was named as one of fifteen "2025 New Applicant Finalists" for this prize before she filed the Form I-140 petition, the date of her selection to receive the prize post-dates the filing of the petition. *See* 8 C.F.R. § 103.2(b)(1), (12).

> apply. However, a winning team application will receive a single prize. Student applicants must secure a project co- applicant who must be employed at [redacted] as a full-time faculty or staff member.

The Petitioner, however, has not shown that her student awards from universities she attended place her among that small percentage at the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2); *see also Mishra v. Richardson*, No. 120CV991LMBTCB, 2021 WL 1566071, at *4 (E.D. Va. Apr. 20, 2021) (upholding that internal awards from the plaintiff's employer did not translate into sustained national or international acclaim). While the record includes some information about the Petitioner's awards and scholarships, she has not demonstrated their significance in her field and that they have received media coverage or other attention that rises to the level of national or international acclaim. Here, the Petitioner has not demonstrated that her various scholarships and other academic awards reflect a "career of acclaimed work in the field" as contemplated by Congress. H.R. Rep. No. 101-723 at 59. Rather, the awards indicate recognition relating to financial assistance and project proposals and do not show that she has sustained national or international acclaim in the field. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(3). USCIS has long held that even athletes performing at the major league level do not automatically meet the statutory standards for classification as an individual of "extraordinary ability." *Matter of Price*, 20 I&N Dec. 953, 954 (Assoc. Comm'r 1994). The Petitioner has not demonstrated, for instance, that she competed against accomplished faculty throughout her field, nor has she contextualized how her scholarships and student awards show that she "is one of that small percentage who [has] risen to the very top of the field of endeavor." *See* 8 C.F.R. § 204.5(h)(2).

With respect to the Petitioner's media coverage, she submitted a June 2025 article about her in *Biz.kz* entitled, "[redacted]," but the author of the material was not identified. *See Javakhadze v. Mayorkas*, No. 3:21-CV-00617-E, 2023 WL 8037730, at *6 (N.D. Tex. Nov. 20, 2023) (upholding articles did not contain the required authors). She also submitted information about *Biz.kz* which stated:

> Audience of the portal: residents of Kazakhstan and Kazakhs living abroad. Content is prepared specifically for them by journalists (Kazakhs) working or studying abroad.
>
> Age: 20-50
> Education: vocational or higher education
> Language: predominantly Kazakh
>
> Monthly average audience analytics:
> Visits: 3,929
> Page views: 3,232
> New visitors: 95.98%

This information is not sufficient to demonstrate that *Biz.kz* is a form of major media in Kazakhstan or the United States, or that coverage in this publication otherwise shows national or international acclaim in her field. Nor has the Petitioner demonstrated that the limited amount of media coverage she has received in 2025 and throughout her career is consistent with the sustained national or

international acclaim necessary for this highly restrictive visa classification. *See* section 203(b)(1)(A) of the Act. Further, she has not shown how her overall press coverage is indicative of a level of success consistent with being among that small percentage who has risen to the very top of the field of endeavor. *See* 8 C.F.R. § 204.5(h)(2). In addition, Petitioner has not established that the volume, duration, and type of media reporting on her and her activities in the field are reflective of a "career of acclaimed work in the field" as contemplated by Congress. H.R. Rep. No. 101-723 at 59. *See also Bodhankar v. United States Citizenship & Immigr. Servs.*, No. 119CV706MADCFH, 2020 WL 777211, at *5 (N.D.N.Y. Feb. 18, 2020) (finding the lack of press about the plaintiff was not consistent with national or international acclaim).

The Petitioner asserts that she has performed in leading or critical role as founder and director of [redacted], as a scholar at [redacted], as a coordinator of the [redacted] project, and as an organizer of both [redacted].[7] The Petitioner, however, has not provided evidence showing that that these roles have garnered her sustained national or international acclaim or place her among that small percentage at the very top of the field of endeavor. *See* section 203(b)(1)(A)(i) of the Act and 8 C.F.R. § 204.5(h)(2). While the Petitioner provided letters of support discussing her roles, she has not offered supporting evidence demonstrating how these roles are indicative of her high standing in the field or otherwise reflect that she has sustained national or international acclaim or recognition for his achievements. *See Agrawal v. Miller*, No. 4:24CV3143, 2025 2879217, at *23 (D. Neb. Sept. 12, 2025) (upholding that plaintiff's roles do not place her at the top of the field or demonstrate sustained national or international acclaim).

Finally, we acknowledge that the Petitioner provided letters of recommendation from others in her field.[8] Letters of this kind are helpful to explain the nature and impact of the Petitioner's contributions to the field. However, while not without weight in the final merits determination, reference letters should explain in specific terms why the authors believe the Petitioner qualifies as a person with extraordinary ability, and should be supported with sufficient corroborating documentary evidence to establish that the Petitioner is recognized as being among that small percentage at the very top of the field of endeavor and that he has garnered the required sustained national and international acclaim for her achievements. *See generally* 6 *USCIS Policy Manual*, *supra* at F.2(B)(3) (discussing the evidentiary value of letters of support at the final merits determination stage).

Dr. A-D-, a senior scientist at [redacted], stated that he worked with the Petitioner "in the [redacted] project, implemented by a consortium of 11 universities from Ukraine, Georgia, Kazakhstan, Norway, and Germany." He indicated that their "mutual association revolved around the development of one of two international postgraduate courses on [redacted] and '[redacted]' with a special focus on Eastern Europe and Central Asia." Dr. A-D- further stated that "[o]ver the course of almost two years, they collaborated extensively, meeting weekly online to develop a comprehensive curriculum for the two courses" and that the Petitioner "played a pivotal role in this endeavor, demonstrating her deep understanding of

[7] The Petitioner stated that the [redacted] was eventually "paused due to national funding constraints."

[8] While we discuss a sampling of these letters, we have reviewed and considered each one.

public health principles, and research methodologies." He also wrote that the Petitioner's "aptitude in understanding complex health issues and translating them into comprehensible lecture materials was commendable."

In addition, Dr. G-B-, Director of the Center for African Studies at [redacted], stated that he "invited her to co-author a seminal work on [redacted]. Her chapter, "[redacted]" is a pivotal contribution to the forthcoming book [redacted], which is currently being collated and expected to be published this coming summer by [redacted]." While Dr. G-B- asserted that the Petitioner's "contributions extend beyond academia into policy development, training, and direct engagement with healthcare professionals and families," he did not offer corroborating evidence or specific examples to support his claim that the Petitioner's work "has influenced national initiatives that enhance healthcare access for families with limited English proficiency."

Furthermore, Dr. D-E-H-, Chief Medical Officer for [redacted], asserted that the Petitioner's "aptitude for identifying opportunities that optimize value is unmatched" and that "her portfolio boasts collaborations with governments, embassies, universities, research institutions, and leading industries on a global scale." Dr. D-E-H- further indicated that the Petitioner's "predominant areas of focus encompass public health, health administration, medical education, and operational medicine."

Also, Dr. K-A-, executive vice president of research and development at [redacted], discussed his collaboration with the Petitioner involving autism research. He stated:

> As an Autism Project Coordinator, [the Petitioner] took it upon herself to translate an extensive range of literature into Russian and Kazakh, bridging a crucial gap for countless families and professionals in the region. Collaborating closely with the [redacted], [the Petitioner] was instrumental in integrating global best practices and forging partnerships with specialists dedicated to supporting children with speech and comprehension challenges. This work provided invaluable resources to countless families and professionals in the region, ensuring they were equipped with the most current, scientifically-backed insights.

These letters summarize aspects of the Petitioner's work involving global health and praise her skills and contributions as a public health scientist and global health ethics researcher, but they do not demonstrate that her achievements have been widely recognized in her field or otherwise show that she has garnered sustained acclaim at the very top of her field. Overall, while the recommendation letters attest to the Petitioner's significant skills and accomplishments, they do not establish her extraordinary ability when considered in the totality of the evidence. The letters do not show that the Petitioner has achieved national or international acclaim from the field or attracted a level of attention placing her at the very top of her field. *See Jafarov v. USCIS*, No. 23 CIV. 3372 (PAE), 2024 WL 69056, at *9 (finding testimonial letters were insufficient to establish his relative status in the field and do not compare him to others).

Further, the letters' authors did not provide sufficient information and explanation to show that the Petitioner is viewed by the overall field, rather than by a solicited few, to be among the upper echelon

or that she has garnered recognition on a national or international scale, consistent with being among the small percentage at the very top of the field of endeavor. *Mishra v. Richardson*, No. 1:20-cv-991 (LMB/TCB), 2021 WL 1566071, at *3 (E.D. Va. Apr. 20, 2021) (finding that none of the plaintiff's letters point to evidence of extensive documentation of his accomplishments to show sustained national or international acclaim). Although the letters highlight the Petitioner's work, they do not reflect a career of acclaimed work in the field, garnering the required sustained national or international acclaim. *See Bodhankar v. USCIS*, No. 1:19-CV-706 (MAD/CFH), 2020 WL 777211, at *5 (N.D.N.Y. Feb. 18, 2020) (finding the submitted letters failed to establish the plaintiff's contributions resulted in significant acclaim).

The record as a whole, including the evidence discussed above, does not establish the Petitioner's eligibility for the benefit sought.[9] Here, the Petitioner seeks a highly restrictive visa classification, intended for individuals already at the top of their respective fields, rather than those progressing toward the top. *Matter of Price*, 20 I&N Dec. at 954 (concluding that even major league level athletes do not automatically meet the statutory standards for classification as an individual of "extraordinary ability"); *Amin v. Mayorkas*, 24 F.4th at 394 (stating that extraordinary ability is such an elite level of accomplishment); *Lapteva v. Schuurmans*, No. 8:24CV83, 2025 WL 815087, at *1 (D. Neb. Mar. 10, 2025) (stating that EB-1 visa are intended to be available to only an exceedingly small amount of individuals with extraordinary ability).

In this case, the Petitioner has not shown the significance of her work is indicative of the required sustained national or international acclaim or it is consistent with a career of acclaimed work in the field. *See* section 203(b)(1)(A)(i) of the Act. The evidence related to her awards, memberships, media coverage, judging, original contributions, authorship of scholarly articles, presented work, and leading roles reflects that she has received some recognition for her contributions and expertise in her field but falls short of establishing that she satisfied the requirements for this classification at the time of filing. While the Petitioner need not establish that there is no one more accomplished to qualify for the classification sought, the record is insufficient to demonstrate that she is among the small percentage at the top of her field. *See* 8 C.F.R. § 204.5(h)(2).

III. CONCLUSION

For the reasons discussed above, the Petitioner has not established her eligibility as an alien of extraordinary ability.

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] *See generally* 6 *USCIS Policy Manual*, *supra*, at F.2(B)(2) (providing that some evidence weighs more favorably on its own, while other evidence is more persuasive when viewed with other evidence).