U.S. Citizenship and Immigration Services

Non-Precedent Decision of the Administrative Appeals Office

In Re: 43122067

Date: MAY 27, 2026

Appeal of U.S. Citizenship and Immigration Services (USCIS) Decision

Form I-140, Immigrant Petition for Alien Workers (National Interest Waiver)

The Petitioner, a supply chain manager, seeks employment-based second preference (EB-2) immigrant classification as a member of the professions holding an advanced degree, as well as a national interest waiver of the job offer requirement attached to this classification. *See* Immigration and Nationality Act (the Act) section 203(b)(2), 8 U.S.C. § 1153(b)(2).

USCIS denied the petition, concluding that although the Petitioner qualified for the underlying EB-2 classification as a member of the professions holding an advanced degree, the record did not establish that a waiver of the required job offer, and thus of the labor certification, would be in the national interest. 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

To qualify for the underlying EB-2 visa classification, a petitioner must establish they are an advanced degree professional or an individual of exceptional ability in the sciences, arts, or business. Section 203(b)(2)(A) of the Act.

An advanced degree is any U.S. academic or professional degree or a foreign equivalent degree above that of a bachelor's degree. 8 C.F.R. § 204.5(k)(2). A U.S. bachelor's degree or foreign equivalent degree followed by five years of progressive experience in the specialty is the equivalent of a master's degree. *Id*.

If a petitioner establishes eligibility for the underlying EB-2 classification, they must then demonstrate that they merit a discretionary waiver of the job offer requirement "in the national interest." Section 203(b)(2)(B)(i) of the Act. *Matter of Dhanasar*, 26 I&N Dec. 884, 889 (AAO 2016), provides

the framework for adjudicating national interest waiver petitions. *Dhanasar* states that USCIS may, as matter of discretion,[1] grant a national interest waiver if the petitioner demonstrates that:

- The proposed endeavor has both substantial merit and national importance;
- The individual is well-positioned to advance their proposed endeavor; and
- On balance, waiving the job offer requirement would benefit the United States.

Id.

II. ANALYSIS

As a threshold matter, we affirm that the Petitioner qualifies for the underlying classification as an advanced degree professional. The Petitioner provided her diploma, transcripts, and foreign academic credential evaluation showing that she obtained a U.S. equivalent of a bachelor's degree in international trade. The Petitioner also provided employment letters demonstrating that she worked at [redacted] as a raw material planner from 2009 to 2014, and has worked for [redacted] from 2014 to present, first as a supply network planner and then as a supply & demand synchronization manager.

The remaining issue to be determined is whether the Petitioner has established that she is eligible for the national interest waiver. USCIS concluded that the Petitioner's proposed endeavor has substantial merit but not national importance under the first prong of the *Dhanasar*'s analytical framework.[2] Specifically, USCIS found that the Petitioner did not establish her endeavor would have a broad impact on the field or significant positive economic effects commensurate with national importance.

On appeal, the Petitioner contends that USCIS' decision "rests on an incomplete analysis of the evidentiary record." The Petitioner's primary claims are that USCIS did not sufficiently analyze the expert opinion letter's "detailed discussion of industry-wide diffusion, workforce impact, and alignment with national economic and supply-chain objectives" and that USCIS did not evaluate the Economic and National Impact Addendum in the record.

Upon review, we agree with USCIS' decision. In determining whether the proposed endeavor has national importance, we consider its potential prospective impact. *Id. Dhanasar* instructs that "we look for broader implications" to determine if an endeavor is of national importance. *Id.* Furthermore, we determined in *Dhanasar* that the petitioner's teaching activities did not rise to the level of having national importance because they would not impact his field more broadly. *Id.* at 893. Similarly, here, while the services the Petitioner intends to provide may be of value to her employing company and its clients, she has not established through independent evidence that her endeavor will impact the field of supply chain management more broadly. *See id.* at 889; *see also Matter of Chawathe*, 25 I&N Dec. at 375-76.

[1] *See Flores v. Garland*, 72 F.4th 85, 88 (5th Cir. 2023) (joining the Third, Ninth, Eleventh, and D.C. Circuit Courts of Appeals in concluding that USCIS' decision to grant or deny a national interest waiver is discretionary in nature).
[2] USCIS also concluded that the Petitioner did not establish eligibility under the second or third prong of *Dhanasar*.

The Petitioner describes herself as a supply chain manager with "16 years of experience in inventory optimization, demand forecasting, and supply synchronization across the consumer-packaged goods (CPG) and automotive sectors." The Petitioner's proposed endeavor is to "impact U.S. supply chain infrastructure and operations across the CPG industry" by implementing her project, "Predictive Demand and Inventory Intelligence Framework: A Strategic Initiative for CPG Industries." The Petitioner claimed that this framework will directly benefit organizations to "reduce sectoral inventory excess, release warehouse capacity and increase operational fluidity by transitioning inventory decisions from reactive balancing to predictive governance" and broadly impact the nation by "sector-wide adoption across organizations" and serving as "national reference models for inventory planning."

However, the record does not offer adequate support for her claims. As contemplated by *Dhanasar*, "[a]n undertaking may have national importance for example, because it has national or even global implications within a particular field, such as those resulting from certain improved manufacturing processes or medical advances." *Dhanasar*, 26 I&N Dec. at 889. Although the Petitioner offered her own professional plan regarding her supply chain management initiative, "Predictive Demand and Inventory Intelligence Framework" (PDIIF), her initial filing lacked important details such as how this framework is an innovative or improved process compared to other standard methodologies currently used in the field, and how she plans to market and distribute the proposed framework in order that it is widely adopted by supply chain industries and becomes the national model in the United States as claimed. The reference letters from the Petitioner's work colleagues in the initial filing praised her work-related skills and abilities but did not address the details of her PDIIF initiative and its future impact rising to the level of national importance.

In response to the request for evidence (RFE), the Petitioner submitted a revised professional plan, a timeline of the professional plan, and new reference letters. Although the Petitioner's professional plan discusses various objectives of her supply chain framework, the record still did not sufficiently corroborate the endeavor's potential for generating an impact in the field that is commensurate with national importance, such as interests by government agencies or other industries besides her own employer. The Petitioner claimed that the new reference letters are from "recognized leaders in the global supply chain and consumer goods industries," but they are largely letters from the Petitioner's colleagues who once again attest to successful execution of various projects during the course of her employment and improving the supply chain management methods for her employer and the employer's clients.

Similarly, the expert letter reiterates the Petitioner's plans to implement her PDIIF initiative and enhance the U.S. supply chain infrastructure within CPG and Automotive sectors. However, the professor does not go into details regarding the framework, such as its unique characteristics or innovations that are different from other methodologies used in the standard supply chain management or already exist in the industry. Instead, the expert opinion discusses the Petitioner's qualifications (certificates, licensures, and professional affiliations), prior experience in supply chain management, the importance of the supply chain industry and the national priorities, and peer recognition from the reference letters previously submitted with her initial filing. Instead of meaningfully engaging with the Petitioner's endeavor and describing its prospective impact with persuasive details, the opinion

merely repeats and summarizes the information already presented in the record by the Petitioner.[3] By comparison, in *Dhanasar,* we gave significant weight to "probative expert letters from individuals holding senior positions in academia, government, and industry that describe the importance of hypersonic propulsion research as it relates to U.S. strategic interests" and "detailed expert letters describing U.S. Government interest" in Dr. Dhanasar's specific research. *Dhanasar*, 26 I&N Dec. at 892. Here, the Petitioner has not provided similar evidence, such as the type of expert opinion evidence or letters from government entities specifically mentioning the Petitioner's endeavor, detailing how her specific endeavor impacts a matter that is a subject of national initiatives, or discussing the government's interest in promoting the use of her innovation or solutions.

The Petitioner also submits on appeal the Economic and National Impact Addendum previously included in her RFE response. Although we agree with the Petitioner that USCIS did not mention this addendum in its decision, an omission of a specific document is not necessarily outcome determinative or legal or factual error. When USCIS provides a reasoned consideration to the petition, and has made adequate findings, it will not be required to specifically address each claim a petitioner makes, nor is it necessary for it to address every piece of evidence a petitioner presents. *See Amin v. Mayorkas*, 24 F.4th 383, 394 (5th Cir. 2022); *Martinez v. INS*, 970 F.2d 973, 976 (1st Cir. 1992); *aff'd Morales v. INS*, 208 F.3d 323, 328 (1st Cir. 2000); *see also Pakasi v. Holder*, 577 F.3d 44, 48 (1st Cir. 2009); and *Kazemzadeh v. U.S. Atty. Gen.*, 577 F.3d 1341, 1351 (11th Cir. 2009).

The Petitioner's economic impact addendum projects that a widespread adoption of her PDIIF framework by companies in the United States would lead to "a cumulative GDP uplift of $55-$78 billion over five years – representing a scaling factor of 8-12x her direct $100 million in corporate savings through systemic diffusion across 40-129 potential corporate adopters." The addendum further claims that such corporate savings would translate to "approximately 250,000 new jobs, including 80,000 direct, 100,00 indirect, and 70,000 induced positions" using Bureau of Economic Analysis (BEA) Regional Input-Output Modeling System (RIMS II).[4] However, the addendum does not sufficiently detail the basis for the revenue and employment projections, and is not adequately supported by any independent evidence from BEA, which publishes the RIMS II multipliers.

For instance, Exhibit B (Data Sources & Assumptions) of the addendum merely lists the website addresses of BEA or BLS (Bureau of Labor Statistics) without providing specific multiplier charts or tables that served as the basis or rationale for various inputs and outputs in the Petitioner's economic projections.[5] Similarly, the same exhibit identifies "Key Analytical Assumptions" to include "Baseline GDP (2025): $27.1 T" and "Average multiplier: 1.6" without elaborating how these specific multiplier numbers are selected and utilized. In another instance, Exhibit D (Scenario Charts) names three different scenario charts, "Chart 1 - GDP Impact by Adoption scenario," "Chart 2 – Employment Impact Breakdown," and "Chart 3 – Regional Distribution," but the actual charts are not part of the exhibit. The Petitioner must support her assertions with relevant, probative, and credible evidence.

[3] Where an opinion is not in accord with other information or is in any way questionable, USCIS is not required to accept it or may give it less weight. *See Matter of Sea, Inc.*, 19 I&N Dec. 817, 820 (Comm'r 1988).

[4] According to BEA's website, RIMS II is a tool used by investors, planners, and elected official to objectively assess the potential economic impacts of various projects and this model produces multipliers that are used in economic impact studies to estimate the total impact of a project on a region. *See* http://www.bea.gov/regional/rims/rimsii (last accessed May 25, 2026).

[5] The addendum's Exhibit C, though marked as "tables," does not contain any tables.

See Matter of Chawathe, 25 I&N Dec. at 376. As such, we do not find this economic impact addendum persuasive or probative in establishing the endeavor's substantial positive economic effects at a level commensurate with national importance. *Dhanasar*, 26 I&N Dec. at 890.

Apart from job creation and boosting the economy, the Petitioner asserted that other positive impacts would stem from her endeavor, such as "broad societal benefits by aligning data-driven efficiency with health-conscious consumer trends and sustainable supply chain transformation" and alignment with national priorities regarding "consumer protection, transparency, and economic resilience." Throughout the proceeding, the Petitioner referred to various government policy objectives, reports, and studies addressing the importance of her endeavor in multiple areas, including economic, societal, environmental, and policy-aligned benefits. While we acknowledge that the U.S. government has been concerned with supply chain issues and such issues touch on various aspects of the nation's economy, society, and culture, the fact that a petitioner holds a position in an industry or sector that is the subject of national initiatives is not sufficient, in and of itself, to establish the national importance. Instead, USCIS must focus on "the specific endeavor that the foreign national proposes to undertake." *Id.* at 889. Although the articles and reports that the Petitioner mentions in the record provide a background to better understand the industry or field in which she will work, none of these articles or reports specifically discuss her specific endeavor or its impact, and the ripple effects that the Petitioner has claimed are too attenuated or unsupported by independent and objective evidence to demonstrate the endeavor's national importance.

Based on the foregoing, we conclude that the Petitioner has not met the first prong of the *Dhanasar*'s analytical framework. Therefore, we decline to reach whether she meets the remainder of the second and third prongs. It is unnecessary to analyze any remaining independent grounds when another is dispositive of the appeal. *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).

III. CONCLUSION

As the Petitioner has not met the requisite first prong of the *Dhanasar* analytical framework, we conclude that she has not established that she is eligible for or otherwise merits a national interest waiver as a matter of discretion.

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.