



February 10, 2025

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
California Service Center  
2642 Michelle Drive  
Tustin, CA 92780



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

TEMPLE UNIVERSITY  
c/o SHARON LOUGHRAN INTERNATIONAL STUD  
1343 MARLBOROUGH STREET  
PHILADELPHIA, PA 19125



IOE0929849692

Form I-129,  
Petition for a Nonimmigrant Worker

**PREMIUM PROCESSING**

**REQUEST FOR EVIDENCE**

**IMPORTANT: THIS NOTICE CONTAINS YOUR UNIQUE NUMBER. THE ORIGINAL NOTICE MUST BE SUBMITTED WITH THE REQUESTED EVIDENCE.**

You are receiving this notice because U.S. Citizenship and Immigration Services (USCIS) requires additional evidence to process your form. Please provide the evidence requested below.

**Your response must be received in this office by May 8, 2025.**

Please note that you have been allotted the maximum period allowed for responding to a Request for Evidence (RFE). The time period for responding cannot be extended. Title 8, Code of Federal Regulations (8 CFR) § 103.2(b)(8)(iv). Because many immigration benefits are time sensitive, you are encouraged to respond to this request as early as possible, but no later than the deadline provided above. If you do not respond to this notice within the allotted time, your case may be denied. The regulations do not provide for an extension of time to submit the requested evidence.

You must submit all requested evidence at the same time. If you submit only some of the requested evidence, USCIS will consider your response a request for a decision on the record. 8 CFR § 103.2(b)(11).

If you submit a document in any language other than English, the document must be accompanied by a full and **complete** English translation. The translator must certify that the translation is accurate and he or she is competent to translate from that language to English. **If you submit a foreign language translation in response to this request for evidence, you must also include a copy of the foreign language document.**

Processing of your Form I-129 will resume upon receipt of your response. If you have not heard from USCIS within **60 days of responding**, you may contact the USCIS Contact Center at **1-800-375-5283**.

RECEIVED  
2/13/25

If you are hearing impaired, please call the USCIS Contact Center TDD at **1-800-767-1833**.

### **Introduction**

On January 30, 2025, your organization, TEMPLE UNIVERSITY (petitioner, petitioning organization, or you), filed a Form I-129, Petition for a Nonimmigrant Worker (Form I-129) with U.S. Citizenship and Immigration Services (USCIS), seeking to classify [REDACTED] (beneficiary) as an H-1B specialty occupation worker.

The H-1B classification applies to individuals who will perform services in a specialty occupation. A specialty occupation is one that requires theoretical and practical application of a body of highly specialized knowledge, and attainment of a bachelor's or higher degree in the specific specialty (or its equivalent) as a minimum for entry into the occupation in the United States.

You seek a continuation of previously approved employment without change with the same employer and requested that USCIS extend the beneficiary's stay.

You stated on the petition that you are a nonprofit university, hospital and research center with 7,780 employees. You seek to employ the beneficiary as an Assistant Professor of Instruction (NTT).

To process your petition and determine if you and the beneficiary are eligible, additional information is required. This request provides suggested evidence that you may submit to satisfy each eligibility criteria described below. You may:

- Submit one, some, or all of these items;
- Submit none of the suggested items and instead submit other evidence to satisfy the request;
- Explain how the evidence in the record already establishes eligibility; and/or
- Request a decision based on the record.

Note, however, that as the petitioner, you are responsible for providing evidence that demonstrates that you and the beneficiary meet all requirements. Evidence must show that all parties were eligible for the requested benefit when you filed the petition by a preponderance of the evidence.

Do not include with your response copies of documentation previously submitted.

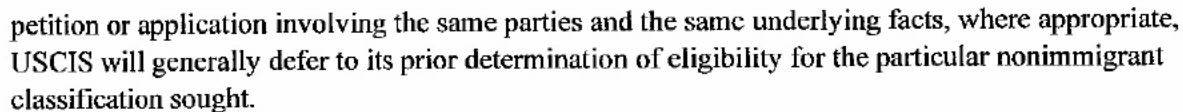
If you are submitting evidence in response to this request, USCIS recommends that you submit:

- An index of the evidence.
- Clear and legible copies of the evidence. If legible copies are not possible, you may submit the original documents. Original documents, however, will be returned only if requested.

USCIS checks all petitions filed for this classification in its Validation Instrument for Business Enterprises (VIBE) system. VIBE uses commercially available data to validate basic information about organizations petitioning to employ foreign workers. For more information about this program, visit the USCIS website at [www.uscis.gov/VIBE](https://www.uscis.gov/VIBE).

### **Prior Approvals**

USCIS acknowledges that you are requesting to extend your petition. When adjudicating a subsequent



USCIS will not defer to prior approvals where:

- There is new material regarding the duties of the position offered that affects the position's eligibility as a specialty occupation.

Therefore, USCIS will not defer to its prior approval in adjudicating this petition.

**You must establish that the beneficiary's proffered position is a specialty occupation. A specialty occupation is one that requires the theoretical and practical application of a body of highly specialized knowledge and that requires the attainment of a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, as a minimum for entry into the occupation in the United States. Directly related means there is a logical connection between the required degree, or its equivalent, and the duties of the position.**

To satisfy this requirement, you submitted:

- A description of the beneficiary's duties;
- A certified Labor Condition Application (LCA); and
- Information about your organization's products or services.

**Specialty Occupation Determination:** You must establish that the proffered position is a specialty occupation as defined above.

**Duties of the Offered Position:** USCIS does not use the job title, by itself, when determining whether a particular position qualifies as a specialty occupation. USCIS considers the duties of the offered position to evaluate in which occupation the beneficiary will be providing services.

You described the duties of the proffered position in generalized and abstract terms that do not provide sufficient information to assess which occupation the position is in. For example, it is not apparent what the beneficiary's role will be when performing "teaching to total 36 credits across the fall, spring

and summer semesters," "administrative duties that will become part of her 36-credit workload," "contribute a minimum of four hours of service weekly," and "contribute to the intellectual life of the department and college by attending speaker series and other similar activities." Terms such as "teaching," "administrative duties," "service," and "contribute" provide little insight into the beneficiary's role within these tasks.

In addition to providing evidence relating to the specialty occupation qualifying criteria discussed below, provide evidence that describes the duties of the proffered position. Evidence may include, but is not limited to:

- A detailed statement from your company to:
  - Explain the duties the beneficiary will perform;
  - Indicate the percentage of time devoted to each duty;
  - State the education, experience, training, and special skills required to perform these duties; and
  - Explain how the educational requirements relate to the position.

**Qualifying Criteria:** To qualify as a specialty occupation, the position must meet at least one of the following criteria.

1. A U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent, is normally the minimum requirement for entry into the particular occupation;
2. A U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent, is normally required to perform job duties in parallel positions among similar organizations in the employer's industry in the United States;
3. The employer, or third party if the beneficiary is staffed to the third party, normally requires a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent, to perform the job duties of the position; or
4. The specific duties are so specialized, complex, or unique that the knowledge required to perform the duties is normally associated with the attainment of a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent.

USCIS will discuss each of the qualifying criteria for specialty occupation below. With your response, identify which of the specialty occupation qualifying criteria you believe has been satisfied. If you believe the offered position satisfies multiple criteria, identify the evidence that you believe satisfies each criterion. For purposes of criteria (1) through (4) above, normally means conforming to a type, standard, or regular pattern, and is characterized by that which is considered usual, typical, common, or routine. Normally does not mean always.

### **1. Degree is Normally Minimum Requirement for Occupation**

You may establish eligibility by showing that a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, is normally the minimum requirement for entry into the particular occupation.

In your cover letter you indicate that you are eligible under this criterion. However, you have not submitted evidence to support this claim or to explain how you reached this conclusion.

You may still submit evidence to establish eligibility under this criterion. Evidence may include, but





is not limited to:

- Relevant documentation from an informative career resource, such as the Department of Labor's Occupational Outlook Handbook (OOH), which describes the duties, work environment, education, training, skills, and other qualification requirements for the occupation. Include a statement describing how the particular position relates to the occupation listed in the career guide and how the information in the career guide demonstrates that a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent, is normally the minimum requirement for the particular occupation.
- Any evidence you believe will establish that a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent, is normally the minimum requirement for entry into the particular occupation.

## **2. Degree Normally Required in Industry**

You may establish eligibility by showing that the requirement of a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, is normally required to perform job duties in parallel positions among similar organizations in your industry in the United States.

You did not submit any evidence for this criterion. Thus, you have not established eligibility under this criterion.

You may still submit evidence to establish eligibility under this criterion. Evidence may include, but is not limited to:

- Job postings or advertisements showing a degree requirement of a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, is normally required to perform the job duties in parallel positions among similar organizations in your industry in the United States. Any job postings or advertisements should be supported by documentation of the following:
  - The date and source of the job posting or announcement;
  - A detailed description of the duties of the position and the educational, training, and experience requirements of the position;
  - The company or firm offering the position in these job postings or announcements is within your industry and is similar to your organization; and
  - The job postings or advertisements represent the industry standards for the position.
- Letters from an industry-related professional association indicating that similar organizations normally employ and recruit individuals with a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, for parallel positions.
- Copies of letters or affidavits from firms or individuals in the industry attesting that similar organizations normally employ and recruit individuals with a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, for parallel positions. Any letter or affidavit should be supported by documentation of the following:
  - The writer's qualifications as an expert;
  - How the writer's conclusions were reached; and
  - The basis for the writer's conclusions, supported by copies or citations of any materials used.

## **3. Employer or Third Party Normally Requires Degree**

You may establish eligibility by showing that you, or a third party if the beneficiary will be staffed to that third party, normally require a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent, to perform the job duties of the position.

You did not submit any evidence for this criterion. Thus, you have not established eligibility under this criterion.

You may still submit evidence to establish eligibility under this criterion. Evidence may include, but is not limited to:

- An organizational chart showing your hierarchy and staffing levels with corresponding educational and experience requirements for the positions. The educational requirements should include the field of study (e.g. computer science) in addition to the educational level (e.g. bachelor's degree).
- Copies of present and past job postings or announcements for the proffered position showing that you normally require applicants to have a minimum of a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent.
- Documentary evidence of your past employment practices for the position, including:
  - Documentation which lists the number of employees hired in the most recent two years for the position;
  - Copies of employment or pay records identifying past and present employees in this position;
  - Copies of degrees and/or transcripts to verify the level of education and field of study of each individual hired for this position in the last two years. Additionally, provide evidence to establish the duties that the individuals performed, such as official position descriptions, job offer letters, job postings, or performance reviews; and
  - An organizational chart or diagram, showing your organizational structure and staffing levels.
- Documentation that lists the educational, experience, training, and skills requirements of the offered position, such as official position descriptions, job offer letters, or job postings.
- Copies of contracts, work orders, or other similar evidence showing that you, or a third party if the beneficiary is staffed to a third party, normally require applicants to have a minimum of a U.S. bachelor's or higher degree in a directly related specific specialty, or its equivalent.

#### **4. Duties are so Specialized, Complex, or Unique that Degree is Normally Required**

You may establish eligibility by demonstrating that the specific duties of the offered position are so specialized, complex, or unique that the knowledge required to perform these duties is normally associated with the attainment of a U.S. bachelor's degree or higher in a directly related specific specialty, or its equivalent.

The evidence you submitted is insufficient to establish eligibility under this criterion.

The job duties, as described, do not appear to be of such specialization, complexity, or uniqueness as to normally require at least the attainment of a U.S. bachelor's degree in a directly related specific specialty, or its equivalent. You have not sufficiently detailed how the duties of the proffered position are more specialized, complex, or unique as compared to the duties normally associated with Health Specialties Teachers, Postsecondary.



You may still submit evidence to establish eligibility under this criterion. Evidence may include, but is not limited to:

- An explanation of the specific duties, and how those duties are so specialized, complex, or unique that they are normally associated with the attainment of a U.S. bachelor's degree or higher in a directly related specific field of study; if applicable, provide an explanation of what differentiates your products and services from other employers in the same industry. Be specific and provide documentation to support any explanation of specialization, complexity or uniqueness.
- Copies of letters or affidavits from firms, individuals, professional associations, or customers attesting that the duties are so specialized, complex, or unique that a U.S. bachelor's level of education, or higher, in a directly related specific specialty is normally a prerequisite for entry into the offered position. Any letter or affidavit should be supported by documentation of the following:
  - The writer's qualifications as an expert;
  - How the writer's conclusions were reached; and
  - The basis for the writer's conclusions, supported by copies or citations of any materials used.
- Copies of trade publications or other articles about your company that demonstrates that the specific duties of the offered position are so specialized, complex, or unique that a U.S. bachelor's level of education, or higher, in a specific specialty is normally a prerequisite for entry into the position.
- Copies of contracts, work orders, or other similar evidence that demonstrate the specific duties of the offered position are so specialized, complex, or unique that they are normally associated with the attainment of a U.S. bachelor's or higher degree in a directly related specific specialty or its equivalent.

**PLACE THE ATTACHED COVERSHEET AND THIS ENTIRE LETTER ON TOP OF YOUR RESPONSE.**

Sincerely,

John M. Allen  
SCOPS Deputy Associate Director of Adjudications

**PREMIUM PROCESSING  
COVERSHEET  
SCANNING REQUIRED  
PLEASE RETURN THE REQUESTED INFORMATION AND  
ALL SUPPORTING DOCUMENTS WITH  
THIS PAGE ON TOP TO:  
USCIS TSC  
Attn: RFE/NOIT/NOIR/NOID RESPONSE  
6046 N Belt Line Rd. STE 111  
Irving, TX 75038-0011**

If your response is 25 pages or less, you have the option to reply by fax at (802) 860-6932.  
If you have any questions, you may contact the Premium Processing Team via e-mail  
at: [CSC-PREMIUM.PROCESSING@USCIS.DHS.GOV](mailto:CSC-PREMIUM.PROCESSING@USCIS.DHS.GOV)  
or call our toll-free number (866) 315-5718.

Please check the appropriate box regarding if there is a new Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative, additional fees, additional forms, etc. Please place the new Form G-28, additional fees, additional forms directly under this sheet.

**Yes, there is:**

<input type="checkbox"/> <b>A New G-28</b>	<input type="checkbox"/> <b>Additional Fees</b>
<input type="checkbox"/> <b>Additional Forms</b>	<input type="checkbox"/> <b>Other:</b>

If you have moved, write your current address in the blank area below. Please be sure to write clearly.

<b>(Select appropriate check box)</b>	
<input type="checkbox"/> <b>Applicant/Beneficiary</b>	<input type="checkbox"/> <b>Petitioner</b>
<b>New Address:</b>	

As required by Title 8, Code of Federal Regulations (8 CFR) section 265.1, *Reporting change of address*:  
Except for those exempted by section 263(b) of the Act, all aliens in the United States required to register  
under section 262 of the Act must report each change of address and new address within 10 days of such  
change in accordance with instructions provided by USCIS.

**REQUEST FOR EVIDENCE**

Form I-129, Petition for a Nonimmigrant Worker

