



Curricular Practical Training

How F-1 Students Work
Off-Campus During School

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F-1 students are all required to receive a practical training authorization before they can legally start working off campus. As long as you are under F-1 visa, you are not allowed to work without an authorization.

There are two types of F-1 practical training: curricular practical training (CPT) and optional practical training (OPT). In this chapter, we will demystify the first one—curricular practical training.

According to [8 CFR 214.2(f)(10)(i)], CPT is defined as employment, which is an integral part of an established curriculum (in other words, when you are still enrolled in school), including:

- Work
- Internship (paid or unpaid)
- Cooperative education experience
- Any other type of required internship or practicum which is offered by sponsoring employers through cooperative agreements with the school.

CPT is available only prior to the completion of your degree program and you must have a secured job offer supported by an official offer letter at the time of application. CPT employment may not delay completion of the academic program.

Curricular Practical Training (CPT) General Regulations

- Training relates directly to the student's major area of study.
- Training is an integral part of the school's established curriculum.
- Designated school official (DSO) authorized CPT in SEVIS, and the authorization prints on the student's Form I-20.
- Occurs before the student's program end date on the Form I-20.
- CPT must be authorized before the student can begin work.
- Authorization is for one specific employer and for a specific period of time.
- Student must secure the training opportunity before CPT can be authorized.
- Student can have more than one CPT authorization at the same time. The work hour from multiple CPT programs will accumulate.
- You can work on CPT either full-time (more than 20 hours per week) or part-time.
- Students who accumulate 12 months (365 or more days) of full-time CPT authorization, lose

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their eligibility for Optional Practical Training (OPT).

Part-time CPT authorization, or fewer than 12 months of full-time CPT authorization, does not affect OPT eligibility. *Multiple overlapping, part-time CPTs will count as full-time CPT days for OPT eligibility.*

- When you enroll at the graduate level, your designated school official (DSO) may authorize CPT during your first semester if your program requires this type of experience. Ask your DSO for details
- Your DSO will provide you a new Form I-20, “Certificate of Eligibility for Nonimmigrant Student Status,” that shows that the DSO has approved you for this employment.
- CPT requires a signed cooperative agreement or an official offer letter from your employer.

Regulations and Policy

Complex rules apply to CPT because the training opportunity must comply with both:

- Federal regulations (see **general regulations above**)
- School policies regarding internships, experiential learning, etc. (The students need to contact the designated school officials to obtain more info)

Eligibility

A DSO can authorize CPT for an F-1 student enrolled at an SEVP-certified college, university, conservatory, or seminary if the student:

- Has been lawfully enrolled on a full-time basis for at least a full academic year.
Note: An exception exists for students in graduate studies whose programs require earlier training.
- Is not studying English as a second language.
- Has secured a training position

Each school also has their very specific policies concerning CPT eligibilities. *Any student who is planning to get CPT is required to talk to DSO before applying.*

CPT and Unpaid Internships

It is not uncommon for students to confuse unpaid internships with volunteering (and therefore conclude that no work authorization is necessary for engaging in an unpaid internship). However, there is a difference between volunteering and engaging in an unpaid internship.

- Volunteering refers to donating time with an organization whose primary purpose is charitable or humanitarian in nature, without remuneration or any other type of compensation. For more information about volunteering please see “Employment vs. Volunteering” section on the **your school's international center website**.
- Internships, both paid and unpaid, are primarily offered by the private sector and related to the intern's major field of study. The U.S. Department of Labor has guidelines for those seeking an unpaid internship: <https://www.dol.gov/whd/regs/compliance/whdfs71.html>

The following six criteria must be met for an internship to be considered a legitimate unpaid internship (and not employment below minimum wage, in violation of Department of Labor

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laws):

- The internship, even though it includes actual operation on the facilities of the employer, is similar to training which would be given in an educational environment.
- The internship experience is for the benefit of the intern;
- The intern does not displace regular employees, but works under close supervision of existing staff;
- The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
- The intern is not necessarily entitled to a job at the conclusion of the internship; and
- The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

CPT authorization is strongly recommended for all unpaid internships, whether the student does or does not need to provide employment authorization documents to the company. You should get CPT for unpaid internship for the following reasons

- CPT authorization by the university serves to demonstrate that this practical experience is part of the curriculum.
- CPT authorization is a way of reporting in SEVIS the student's activity, employment, and location where they are working and therefore maintaining their status.
- If ever a student is doing a job on an unpaid basis that someone would be hired and paid for, employment authorization in the form of CPT, OPT, etc. is advised.
- If the unpaid internship at some point changes into a paid one (or if your employer decides to compensate you for your work in any way – for example, give you a monetary gift), you won't be able to accept the payment if your internship was not authorized as CPT. Please keep in mind that

F-1 students cannot be retroactively remunerated or in any way compensated for work done in an unpaid internship if they did not obtain work authorization prior to when the work was performed.

If the position is unpaid and for some reason it is not possible for you to obtain CPT authorization, please make sure that your prospective supervisor is aware of U.S. Department of Labor regulations concerning unpaid internships and that you have assurances (preferably written) to that effect before you accept the position. We also recommend that at the end of your internship you ask your employer to provide you with a letter confirming that there was no remuneration or any other type of compensation provided in any form during the dates you were participating in the internship. Please keep such a letter for your permanent records.

CPT Process Overview

Step	Player	Action
1	Student	<ul style="list-style-type: none">• Requests CPT using the school's established processes. (Each school has a CPT page specifically describing the eligibility, requirement, documents preparation, etc. The students are required to go through that, evaluate your situation, and contact DSO to start the application)
2	DSO (Designated student official)	<ul style="list-style-type: none">• Reviews requests and determines student's eligibility for CPT.

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| 3 | DSO | <ul style="list-style-type: none"> Authorizes CPT in SEVIS for a specific employer. Prints and signs Form I-20 with CPT authorization. |
| 4 | Student | <ul style="list-style-type: none"> Apply for a Social Security Number for tax purpose at your local Social Security Office Begins work on or after the CPT start date. Before you start working, show your original copy of I20 to your employer or send them scanned copy as proof. Keep the original copy with you securely until you receive Green Card one day in the future. If you lose or can't find your I20, contact school office and ask their help to request a new one. <p>Note: The student cannot start work prior to the start date. All work must end by the CPT end date. Unlike OPT that issues you employment authorization card, CPT's authorization is the new I-20 with the CPT information on it.</p> |

EMPLOYMENT AUTHORIZATIONS				
TYPE	FULL/PART-TIME	STATUS	START DATE	END DATE
CPT	PART TIME	APPROVED	07 SEPTEMBER 2018	20 DECEMBER 2018

EMPLOYER INFORMATION			
TYPE	AUTHORIZATION DATES		
CPT	07 SEPTEMBER 2018 - 20 DECEMBER 2018		
EMPLOYER NAME	START DATE	END DATE	CITY & STATE
	07 SEPTEMBER 2018	20 DECEMBER 2018	

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Sources: <https://internationalcenter.umich.edu/students/f1-students/cpt>
<https://studyinthestates.dhs.gov/sevis-help-hub/student-records/fm-student-employment/f-1-curricular-practical-training-cpt>