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Curricular Practical Training (CPT) for F-1 Students

Overview

Curricular Practical Training (CPT) is defined as employment which is an **integral part of an established curriculum**, including: “alternate work/study, internship, cooperative education, or any other type of required internship or practicum which is offered by sponsoring employers through cooperative agreements with the school.” *Source: [8 CFR 214.2(f)(10)(i)].*

Curricular Practical Training (CPT) is not employment authorization. CPT is authorization to engage in experiential learning that is directly related to the major program of study in an off-campus location.

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

Types of CPT

There are two types of CPT: required and not required. Required CPT is when the academic program mandates practical work experience to graduate. Not required or optional CPT is when the practical work experience is for credit and directly related to your field of study.

Requirements for Required CPT

- You must be enrolled in a CPT course.
- The designated CPT course must have been set up and approved. (add link here to csu approved list)
- You must have declared a major if you are an undergraduate student.
- If you wish to engage in CPT during Fall, Spring, or Summer semester, you must be registered for the CPT course during that term.
- Failure to complete the CPT course will result in your falling out of legal F-1 status.
- Be aware that adding a CPT course may have an impact on your tuition and fees.
- CPT will not be authorized for experiential learning in an academic minor.

Requirements for Non-Required CPT

- You must be enrolled in a CPT course.
- The designated CPT course must have been set up and approved. (add link here to csu approved list)
- You must have declared a major if you are an undergraduate student.
- If you wish to engage in CPT during Fall, Spring, or Summer semester, you must be registered for the CPT course during that term.
- Students who are engaged in thesis/dissertation work and have finished their coursework are still eligible for CPT, one term at a time if the CPT is an integral part of their thesis/dissertation or research.
- Non-required CPT will not be allowed in the student's final term unless you need to register for other courses which are required for the completion of your academic program.
- Failure to complete the CPT course will result in your falling out of legal F-1 status.
- Be aware that adding a CPT course may have an impact on your tuition and fees.
- CPT may not be used as a “bridge” while waiting for OPT employment authorization.



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- CPT may not be used to extend an academic program or as the basis for deferring graduation.
- CPT will not be authorized for less than one (1) academic semester; in other words, CPT will not be granted in increments of weeks or months.
- CPT will not be authorized for experiential learning in an academic minor.

Part-Time vs. Full-Time CPT

Part-time CPT: Employment for 20 hours or less per week is considered part-time. You must be simultaneously enrolled in classes full-time to maintain lawful F-1 status.

Full-time CPT: Employment for more than 20 hours per week is considered full-time. Please be aware that 12 months or more of full-time CPT will cancel your eligibility for Optional Practical Training (OPT). Student enrolled at CSU are not eligible for CPT 12 months of CPT. All programs at CSU have a limited number of CPT opportunities.

- Business student have only 1 internship elective in their program of study.
- MCIS student have only 2 credits of internship.
- Engineering students must show proof of that the internship is integral for degree completion.
- Nursing, Education, Social Work, and Psychology students are eligible for 2 or more semesters of part time CPT.

During the academic year (fall and spring semesters), you must be simultaneously enrolled full-time to maintain lawful F-1 status.

Eligibility Criteria

To be eligible for CPT, you must:

- Have been lawfully enrolled on a full-time basis for one academic year (i.e. two full consecutive terms). If you are a graduate student in the Social Work Program, this requirement is waived.
- Be in lawful F-1 status
- Have a job offer
- Not be enrolled in an intensive English language training program

NOTE: CPT is processed and authorized term by term. Contact your academic department regarding your department's specific guidelines and follow those guidelines for CPT applications. Please note that your department has discretion in recommending CPT. CSU International Center has final approval and/or denial of the CPT application.

CPT and Full-Time Enrollment Requirement

- If you are engaged in CPT during the academic year (fall and spring semesters), you must be simultaneously enrolled full-time to maintain lawful F-1 status, unless it is your last term of enrollment.



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- Students can be enrolled part-time in their last term before program completion, but only if they receive [Authorization for Under Enrollment](#) from the International Center.
- Please note that non-required CPT is only allowed in your final term if you are registered for other courses which are required for the completion of your academic program.
- If the fall or spring term during which you are engaged in CPT is not your last term of enrollment, you must be registered in full-time coursework, in addition to any CPT courses.
- Full-time enrollment means 12 credit hours for undergraduate students and 9 credit hours for graduate students.
- The full-time enrollment requirement means that most students must limit their CPT during the academic year to local jobs or to working for their employer remotely, usually on a part-time basis.
- There are some exceptions, notably Masters/Doctoral students who have completed all their coursework and are now registered for thesis/dissertation/ hours only.
- Full-time CPT is allowed during the fall and spring semesters, the full-time enrollment requirement is likely to make employment outside of the Cleveland area highly impractical in most situations.

Documentation Needed to Apply

CPT Workshop Completion

CPT Student Information Form, completed and signed

CPT Advisor Recommendation Form, completed and signed

Proof of course registration

Copy of Program of Study showing the internship as either required or non-required

A copy of the job offer letter from the employer. The letter must:

- Be written on the company's letterhead
- Be addressed to you
- Include job title
- Provide job description
- Specify the employment address (street, city, state, and zip code)
- Specify if the employment is full- or part-time (if part-time, the number of hours per week you will work)
- Specify the exact dates of CPT employment (keep in mind that CPT can only be authorized one term at a time).

Please note: the job offer letter must have ALL the information listed above, or your CPT application cannot be processed. We recommend that your employer uses the sample offer in the CPT Application Packet.

How to Apply for CPT

1. Attend CPT Workshop
2. Gather the required documentation and submit your complete CPT request to the International Center in Main Classroom 412. * **Incomplete requests will not be accepted.**
3. The International Center will send your CPT recommendation to SEVIS electronically to generate a new I-20. The CPT work authorization will be printed on page 2 of the new SEVIS I-20.
4. The International Center will notify you when your new I-20 is available.
5. Bring your Viking Card ID to the International Center front desk to pick up your new I-20.



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6. Sign your name on the new I-20. Be sure to keep a record of all I-20s issued to you.
NOTE: You are authorized to be employed only for the employer, location, and time-period specified on the new I-20. It is not possible to extend or shorten your CPT within the term of authorization. If you would like to edit your CPT employer email the International Center at intlcenter@csuohio.edu. A new job offer letter must be attached with the email.

CSU International Center Approval for CPT

International Center will not accept incomplete CPT applications

You must attend a CPT workshop for every CPT request

CPT starts the same day the semester starts of the term that CPT is approved for (no exceptions)

CPT ends the week prior to the start of the next term (no exceptions)

CPT is approved for courses that require experiential learning only (i.e. internships, co-op, student teaching, etc...) Independent study is not an approved CPT course

Allow at least 5 business for processing and final approval of CPT

U.S. Department of Homeland Security Address Notification Requirement

You are required to update your address in [Campusnet](#) within 10 days of any change while you are in F-1 status.

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 payment or any other type of compensation.

For more information about volunteering please see "[Employment vs. Volunteering](#)" (create CSU version of [this page](#)) section on the CSU International Center web site.

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.htm>

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 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;



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- The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may be impeded;
- The intern is not necessarily entitled to a job after the internship; and
- The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship

Do F-1 students need CPT authorization to participate in unpaid internship?

CPT authorization is needed for all internships, whether the student does or does not need to provide employment authorization documents to the company. The F-1 regulations are written in such a way that CPT is an authorization to do practical training as part of the curriculum for the academic program, and as such is significant in more ways than simply for the employer to verify employment eligibility. CPT authorization is more than just permission to get paid.

The International Center strongly recommends CPT authorization for unpaid internships 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 paid 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.
- Based on the above, we recommend that you apply for CPT authorization if you have an internship offer (paid or unpaid) that meets CPT eligibility criteria.

Employment and Volunteering (create new page)

Overview

While the issue of volunteering may seem simple- "I'm not getting paid, so that means I am volunteering"- it is a complex area where immigration regulations and labor laws intersect. If you are interested in volunteering, you must be aware of the relevant regulations so that you do not violate any laws and participate in unauthorized employment.

If you are an international student in F-1 status, please remember that **any off campus employment for F-1 students must be authorized!** Without proper work authorization, off campus employment would be



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considered a violation of your F-1 requirements. The consequences would most likely include loss of legal immigration status in the U.S., possible deportation by the U.S. Department of Homeland Security, and great difficulty in any future attempts to acquire a visa to enter the U.S.

Per U.S. immigration regulations, 8 Code of Federal Regulations 214.1(e): "A nonimmigrant who is permitted to engage in employment may engage only in such employment as has been authorized. Any unauthorized employment by a nonimmigrant constitutes a failure to maintain status..."

Employment or Volunteering

What is the difference between an employee and a volunteer? A common misconception is that the only difference is employees get paid and volunteers do not.

According to U.S. labor laws, there is more to distinguish between employees and volunteers than whether an individual receives a regular paycheck. **Work that is unpaid may still be considered employment for F-1 status holders.**

What is an employee? The definition of an employee used in the context of immigration regulations is as follows: "An individual who provides services or labor for an employer for wages or other remuneration". Please note that the term "remuneration" is very broad and includes a variety of non-monetary benefits, such as free housing, food, gifts, etc.

What is a volunteer? According to the Department of Labor, a volunteer is: an "individual who performs hours of service... for civic, charitable, or humanitarian reasons, without promise, expectation or receipt of compensation for services rendered."

To be considered a volunteer, the work performed by the individual must meet the following criteria:

- No expectation of compensation
- The volunteer cannot displace a genuine employee,
- The services provided by the volunteer should not be the same services for which he or she was previously paid and/or expects to be hired and paid for in the future
- Services are performed for a non-profit organization for public service, religious or humanitarian objective.
- Work at a for-profit entity is considered employment and must be for pay. The only exception is made for training programs where the trainee functions, to some degree, like an employee, but is under close supervision and provides no significant measurable work for the employer. The trainee must not take the place of a paid employee. For example, students who are considered student interns may engage in unpaid internships at for-profit organizations.

Volunteering or Unpaid Internship

Please note that there is a difference between volunteering and engaging in an unpaid internship.



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As explained above, **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.** F-1 students are free to engage in volunteer work as long as it meets the above criteria. For example, it would be okay to volunteer at a local homeless shelter, charitable food pantry, or American Red Cross.

Unpaid internships, on the other hand, do not usually qualify as “volunteer” activity. **Internships, both paid and unpaid, are primarily offered by the private sector and related to the intern’s major field of study.** For more information about unpaid internships, please see “Curricular Practical Training (CPT) for F-1 Students” (link to website)

U.S. Department of Labor Rules for Volunteering

U.S. Department of Labor is concerned both with the protection of jobs for United States citizens, and with the prevention of exploitation of workers. They have created laws to ensure that employment that should be paid is not done for free. While both you and the employer may be happy with an unpaid arrangement (for example, you may be eager to work even on an unpaid basis in a company to gain job experience), this may be considered an unfair arrangement in cases where the work is normally performed by a paid person and both the company and the employee are benefitting from the employment.

To determine whether an individual is a true volunteer engaged in “ordinary volunteerism,” the Department of Labor considers several factors. No single factor is determinative. The factors include:

- Is the entity that will benefit/receive services from the volunteer a nonprofit organization?
- Is the activity less than a full-time occupation?
- Are the services offered freely and without pressure or coercion?
- Are the services of the kind typically associated with volunteer work?
- Have regular employees been displaced to accommodate the volunteer?
- Does the worker receive (or expect) any benefit from the entity to which it is providing services?