



U.S. Immigration and Customs Enforcement

U.S. Immigration and Customs Enforcement Student and Exchange Visitor Program

SEVP Policy Guidance 1312-08: F-1 Internship with an International Organization

Issue Date: Click here to enter a date.

Effective Date: Click here to enter a date.

Supersedes: Current “F-1 Employment International Intern”

Status: Draft

Purpose/Background: This document gives the Student and Exchange Visitor Program’s (SEVP) interpretation of the internship with an international organization regulation for F-1 students¹ (*8 CFR 214.2(f)(9)(iii)*) to guide SEVP adjudicators.

An F-1 student participating in an internship with an international organization must comply with *8 CFR 214.2(f)(9)(iii)* and should comply with its interpretation in this guidance to maintain nonimmigrant status. Where more restrictive, the student should comply with school policies.

Attachments: [SEVP Fact Sheet 1312-08A: F-1 Internship with an International Organization Processes](#)

Definitions:

- 1. Internship with an international organization (IO).** An internship in the United States with “a public international organization in which the United States participates pursuant to any treaty or under the authority of any Act of Congress authorizing such participation or making an appropriation for such participation.”²
- 2. Reasonable commuting distance.** Within 75 miles³

Policy:

¹ This guidance pertains only to adult, postsecondary F-1 students. All use of the term “student(s)” refers to adult, postsecondary F-1 student(s). F-2 dependents are prohibited from employment (*8 CFR 214.2(f)(15)(i)*). Future guidance will address employment for secondary and minor, postsecondary F-1 students.

² Within the meaning of *59 Stat.* 669, International Organization Immunities Act, as defined in [22 U.S.C. 288](#).

³ This distance is considered an acceptable limit for a student commuting between school and employment. Any distance greater than 75 miles would be considered a “red flag” for adjudicators and a DSO should be prepared to explain the rationale for approval.

1. **Employer.** An IIO must be with an international organization on the list of approved international organizations per [8 CFR 316.20\(b\)-\(c\)](#).
2. **Location.** Employment with an IIO must be within [reasonable commuting distance](#) of the school.
3. **Hours.** If a student violates regulatory limitations on the number of hours worked on a weekly basis, a DSO must terminate⁴ the student's SEVIS record. There is no limit on the number of hours that a student who has IIO employment authorization may work; however, the student must be enrolled in a full course of study and make normal academic progress.
4. **Duration.**
 - 4.1. **Start.** A student may begin an IIO after meeting the following conditions:
 - Is in F-1 status and is found eligible ([section 5.1](#)), as determined by the designated school official (DSO).
 - Has a written offer of employment from a qualifying international organization, and the employment is within the scope of the organization's sponsorship.⁵
 - Has received a DSO recommendation for IIO employment in the Student and Exchange Visitor Information System (SEVIS) and (as needed) receives a letter from the DSO to get a Social Security number.⁶
 - Has submitted a [Form I-765, "Application for Employment Authorization,"](#) to U.S. Citizenship and Immigration Services (USCIS) and, if favorably adjudicated, received a Form I-766, "Employment Authorization Document" (EAD). The student may not begin IIO employment until receipt of an EAD.
 - 4.2. **Continuation.** Authorization for IIO employment is valid for up to one calendar year, as requested, or to the student's program end date, whichever occurs first. The dates of validity are on the EAD.
 - A student who needs to continue an IIO beyond the duration of the original authorization must receive a recommendation in SEVIS from the DSO and reapply with USCIS.
 - A student must not continue an IIO if the current authorization has expired, regardless of whether a new Form I-765 is pending. A student hoping to renew the authorization should apply early enough to allow time for the adjudication process.

⁴ Using the SEVIS Termination reason of "*Unauthorized Employment*"

⁵ USCIS determines if the employment is within the scope of the organization's sponsorship with the Form I-765 submission.

⁶ For more information, see SEVP Policy Guidance 1311-02: F-1 and M-1 General Employment.

- A DSO may deny a request to recommend renewal of IIO authorization for a student who is not maintaining good academic standing (i.e., is on academic probation).

4.3. End. A student’s IIO employment authorization ends as follows:

- When a student fails to maintain status⁷
- When a student transfers from one school to another ([section 4.5](#))
- At the expiration of the current authorization or the student’s program end date, whichever occurs first (except as noted in [section 4.4](#))

4.4. IIO and a new program of study at the same school. As an exception to [section 4.3](#), a student may continue employment with an IIO beyond the program end date if all of the following conditions are satisfied:

- The student’s IIO employment authorization end date extends beyond the program end date,⁸
- As indicated in SEVIS, the student intends to begin a new program of study or change educational levels at the next required session or within five months of the current program end date, whichever occurs first, and⁹
- The student has a valid EAD.

4.5. IIO and transferring to a new school. As an exception to [section 4.3](#), while the transfer process is pending, a student with valid employment authorization may continue employment with an IIO while enrolled at the transfer-out school until the transfer release date in SEVIS.

4.6. IIO and a pending application for change of status. As an exception to [section 4.3](#), a student may continue employment with an IIO with a pending [Form I-539, “Application to Extend/Change Nonimmigrant Status.”](#) from F-1 to another nonimmigrant status until one of the following occurs:

- Adjudication of the Form I-539¹⁰
- Expiration of the IIO employment authorization

5. Obtaining and keeping an IIO.¹¹

⁷ A DSO must terminate the SEVIS record of a student who fails to maintain status or a full course of study.

⁸ This will not occur unless the student’s program end date was shortened after issuance of the EAD.

⁹ 8 CFR 214.2(f)(8)(i)

¹⁰ As indicated by a termination of student status in SEVIS due to approval or denial of the change of status request.

¹¹ See the attached [SEVP Fact Sheet 1312-08A: F-1 Internship with an International Organization Processes](#) for information on related processes.

5.1. Eligibility. A student¹² may request an IIO, and a DSO may recommend authorization from USCIS in SEVIS if the student meets all of the following criteria:

- Is currently maintaining status and is in good academic standing
- Is not a part-time border commuter student¹³
- Is enrolled in a full course of study or on authorized reduced course load¹⁴

There are no requirements for an IIO to:

- Be educationally affiliated with the school
- Relate to the student's major area of study
- Require student demonstration of severe economic hardship

5.2. Determination of financial qualification for enrollment. When assessing the financial resources a student is required to establish prior to admission qualifying that student for nonimmigrant student status, a DSO may not consider a student's employment with an IIO as part of the financial aid the student is receiving.

6. Related issues.

6.1. General employment issues. See SEVP Policy Guidance 1311-02: F-1 and M-1 General Employment for more information on the following issues:

- Employment when the student has a lost or stolen EAD
- Replacing an EAD Card
- Reinstatement
- Obtaining a Social Security number
- Combination with other forms of employment
- Study abroad, travel, student absences and vacation

6.2. Recordkeeping and reporting issues. See SEVP Policy Guidance 1403-07: Recordkeeping and Reporting of F-1 and M-1 Student Information for more information on the following issues:

- Student recordkeeping, employment information

¹² Including a student enrolled in an English language training program of study.

¹³ 8 CFR 214.2(f)(18)(i)

¹⁴ 8 CFR 214.2(f)(6)

- Student recordkeeping, employment tracking
- Student reporting, all employment
- SEVP enforcement of student recordkeeping and reporting related to employment
- School oversight of F-1 students during employment
- DSO recordkeeping and reporting, all employment
- Means and methods of student and employer reporting
- School processes and procedures while the student is employed
- Employer reporting

References:

8 CFR 214.2(f)(6)

8 CFR 214.2(f)(8)(i)

8 CFR 214.2(f)(9)(iii)

8 CFR 214.2(f)(15)(i)

8 CFR 214.2(f)(18)(i)

8 CFR 316.20(b)–(c)

Limits of use – no private right of action: This SEVP Draft Policy Guidance applies to and is binding on all SEVP employees unless specifically exempt. Its intention is solely for the guidance of SEVP personnel in the performance of their official duties. It is not intended to, does not and may not be relied upon to create or confer any right or benefit, substantive or procedural, enforceable at law or in equity by any person, individual or other party, public or private, in any administrative, civil or criminal matter. Until issued in final form, this SEVP Draft Policy Guidance does not constitute SEVP policy in any way or for any purpose.

Rachel E. Canty
Deputy Director, External Operations
Student and Exchange Visitor Program



U.S. Immigration and Customs Enforcement

U.S. Immigration and Customs Enforcement

Student and Exchange Visitor Program

SEVP Fact Sheet 1312-08A: F-1 Internship with an International Organization Processes

Issue Date: [Click here to enter a date.](#)

Effective Date: [Click here to enter a date.](#)

Supersedes: Current “F-1 Employment International Intern”

Status: Draft

Purpose/Background: This fact sheet supplements the Student and Exchange Visitor Program’s (SEVP) Policy Guidance 1312-08: F-1 Internship with an International Organization and provides information explaining the processes related to obtaining and keeping an internship with an international organization authorization for F-1 students.¹⁵ A designated school official (DSO) authorizing an Internship with an International Organization (IIO) should review this fact sheet.

Definitions: See [SEVP Policy Guidance 1312-08: F-1 Internship with an International Organization](#)

Procedures/Requirements:

1. **F-1 student requesting an IIO.** If the student requests a recommendation for employment with an IIO from a DSO and satisfactorily demonstrates eligibility ([section 5.1](#)), and provides the name and address of the prospective employer:
 1. The DSO may recommend the IIO employment in the Student and Exchange Visitor Information System (SEVIS) student record by taking the following action on the *Add Off-Campus Employment* screen:
 - In Fields 1–2, enter the requested employment start and end dates
 - In Field 3, select *International Organization* for the off-campus employment type
 - In Field 4, *Recommendation*, enter the following remark recommending the IIO:

¹⁵ This fact sheet pertains only to adult, postsecondary F-1 students. All use of the term “student(s)” refers to adult, postsecondary F-1 student(s). F-2 dependents are prohibited from employment (*8 CFR 214.2(f)(15)(i)*). Future guidance will address employment for secondary and minor, postsecondary F-1 students.

Recommended for authorization of employment as an intern with [DSO insert name and address of offering international organization] from [DSO insert requested employment start date] until [DSO insert the student's program end date or one year from the requested start date, whichever comes first].

2. The DSO will issue the student an updated and signed¹⁶ Form I-20, "Certificate of Eligibility for Nonimmigrant Student Status," reflecting the recommendation.
3. After receiving a recommendation from the DSO, a student applying for IIO employment must file a [Form I-765, "Application for Employment Authorization"](#) (electronic filing is available) with U.S. Citizenship and Immigration Services (USCIS).¹⁷
 - USCIS must receive the application within 30 days of the date the DSO enters the recommendation in SEVIS or USCIS may deny the application.¹⁸ A student who does not file on time should advise the DSO. If still within the filing period, the DSO can cancel the IIO employment request, submit a new request and provide a new printed and signed Form I-20 to the student.
 - The mailing address in the student's SEVIS record and on the Form I-20 should be identical to ensure correct delivery of the EAD.
 - A student can check the status of a pending application online at the [USCIS website](#) using the application receipt number.
4. USCIS adjudication:
 - Approval: A student who receives approval for an IIO employment will receive a Form I-766, "Employment Authorization Document" (EAD).¹⁹
 - The EAD will contain an expiration date that does not exceed the last day of the student's program of study or one year from the date of issuance, whichever comes first.
 - The student's SEVIS record automatically updates to show the employment approval. The student should request a newly printed Form I-20 from the DSO showing the employment approval on page 2.

¹⁶ Page 1, School Attestation – DSO signature, Student Attestation – student signature. The only other signature block on the form relates to authorization for temporary absence. Page 1 presents the date of the document; page 2 presents the recommendation, but the signature on page 2 does not relate to the employment recommendation.

¹⁷ While a DSO will provide advice and may assist the student in applying for IIO employment, responsibility for submitting the application belongs to the student. A student who cannot afford the application fee may apply to have the [fee waived](#) (8 CFR 103.7(c)).

¹⁸ The "Off-campus Employment Requested" date as found in the "Event History" of the student's SEVIS record, and the date found on the Form I-20, School Attestation section.

¹⁹ If the EAD needs correction or replacement, see SEVP Policy Guidance 1311-02: F-1 and M-1 General Employment.

- The student must have the EAD before beginning employment and may use the EAD as proof of employment authorization.
 - Denial: If a student's employment authorization application is denied, USCIS will send the student a written notice giving the reason(s) for the denial.
 - The student may not appeal the decision, but may file a [Form I-290B, "Notice of Appeal or Motion,"](#) to initiate a motion to reopen or reconsider the decision.
 - The student may reapply.
- 2. IIO renewal authorization.** A student continuing to meet the eligibility for an IIO beyond the current authorization expiration date may apply for a renewed authorization before the expiration, using the Form I-765 and with an appropriate fee payment. If the DSO approves, the same process outlined in [section one](#) will occur.

References:

8 CFR 103.7(c)

8 CFR 214.2(f)(9)(iii)

8 CFR 214.2(f)(15)(i)

User Manual for School Users of the Student and Exchange Visitor Information System (SEVIS): Form I-20, Version: 6.21, Section 17.3 Off-Campus Employment (pg. 148)