

Extract from SEVP's revised Online DSO Training

Lesson 4: Curricular Practical Training

Introduction

Curricular practical training (CPT) is defined to be alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with a school.

Topic 1: Basic Guidelines for CPT

CPT is only available to F-1 students when it is an integral part of an established curriculum. **In practical terms, “integral part of an established curriculum” means an opportunity must be required by the curriculum or, if not required, the student must receive credit for the training.**

This Topic outlines the basic guidelines of CPT.

After completing this Topic, you will be able to:

- Understand what types of opportunities can be classified as CPT
- Understand the basic guidelines for CPT

F-1 students must be enrolled for one academic year before they are eligible for CPT. There is an exception to this requirement — graduate students whose programs require immediate participation in CPT.

In calculating the required one full academic year needed to be eligible for CPT, students can include time spent in other programs of study, if there was no break between the programs.

There is no restriction on the number of hours a student can work per week while in CPT.

Part-time CPT (20 hours or less per week) does not impact eligibility for OPT.

Once a student has completed 12 months of full-time CPT, he or she becomes ineligible for optional practical training, or OPT (which is covered in the next Topic) at that educational level. For example, if a student completes 12 months of full-time (40 hours or more per week) CPT as an undergraduate, the student is not eligible for OPT at the undergraduate level.

F-1 students are required to maintain status (status includes enrolling in a full course of study) while completing CPT. If a student seeks authorization for full-time CPT, you should ensure that the CPT opportunity is considered full-time enrollment by the school prior to authorizing it in SEVIS. It is common for schools to consider a full-time internship as full-time enrollment but you should confirm this is the case.

There is no restriction on compensation during CPT. Compensation is not a consideration when determining whether an opportunity qualifies as CPT.

May 4, 1992

Attn: Student School Officers

Subject: Curricular Practical Training

Ref: CO 243.69 of January 22, 1992

The following is a clarification of curricular practical training as requested by certain field offices:

Curricular practical training by definition may be alternative work/study, cooperative education or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreement with the school. Curricular practical training offered through institutionally-sponsored cooperative education, internships, and work/study programs is usually optional and not-for-credit.

Curricular practical training may also be offered through course work as an integral part of the established curriculum. When offered through course work, curricular training must either be for credit (in the case of an elective course) or required.

An eligible F-1 student may take part in as much curricular practical training as the curriculum permits. There is no set ceiling for curricular practical training. However, the student forfeits post-completion practical training after having engaged in twelve (12) months or more of full-time curricular practical training (part-time employment does not count). Post-completion practical training is limited to no more than twelve (12) months (with no deduction for time in curricular practical training).

[reported in 69 Interpreter Releases 587 (May 11, 1992)]

File CO 243.69-C

January 22, 1992

Attn: Student-School Officers

Designated PRC Contact Officers

Subject: PRC National Protection Program Update

F-1 Curricular Practical Training Update

...

8 CFR 214.2(f)(10) Practical Training

(I) *For-credit curricular practical training.* For-credit curricular practical training may be mandatory or elective. The training program must be listed in the school's course catalog with the assigned number of credits and name of the faculty member teaching the course clearly indicated. There should also be a description of the course with the course objectives clearly defined. Students enrolled in such a course may work out the details of their specific projects within the established course objectives under the supervision of the instructor.

(II) *Non-credit curricular practical training.* Certain types of educational programs, such as hotel management, nursing, law, engineering, and teaching, routinely require their students to undertake non-credit internships. Students are often not remunerated for their participation in these training programs. Non-credit internships or practicum which are required for graduation [are] recognized as curricular practical training.

[reported in 69 Interpreter Releases 187 (February 10, 1992)]

56 Fed. Reg. 55608, 55610 (October 29, 1991)

INS Final Rule, supplementary information

Curricular Practical Training. 8 CFR 214.2(f)(10)(i).

The proposed rule defined curricular practical training as one where students are awarded academic credits. Many commenters pointed out that certain types of educational programs, such as hotel management, nursing, law, engineering, and teaching, routinely require their students to undertake non-credit internships. Students are often not remunerated for their participation in these training programs. Some commenters urged the Service to broaden the definition of curricular practical training to include these types of non-credit training programs that are an integral part of an established curriculum. Other commenters suggested even broader definitions that would include unsponsored employment directly related to the student's area of study.

Although the Service disagrees that unsponsored, optional employment should be categorized as curricular practical training, the Service is persuaded that required non-credit internships are part of the established curriculum. The final definition of curricular practical training, therefore, includes required noncredit internships or practicum.

On a related matter, a large group of commenters pleaded for an exception to the nine-month in status requirement for practical training for certain graduate students. They stated that many graduate students are enrolled in programs which require immediate participation in internships. They maintained that the nine-month in status requirement interferes with the students' academic programs. The Service concurs and provides in the final rule, 8 CFR 214.2(f)(10)(i), for exceptions for compelling circumstances.

CPT extracts from the Foreign Affairs Manual

9 FAM 402.5-5(N)(3) (U) Employment as Part of Curricular or Alternate Work/Study Practical Training for F-1 Student

(CT:VISA-1; 11-18-2015)

(U) A student enrolled in a college or other academic institution having alternate work/study courses as part of the curriculum within the student's program of study may participate in and be compensated for such practical training when authorized for curricular practical training (CPT) by the designated school official (DSO). Students may not begin such training before endorsement of their electronic SEVIS record by the DSO with such authorization. Periods of actual off-campus employment in a work/study program are considered practical training. Students who have engaged in a full year of curricular practical training will not receive authorization to engage in optional practical training after completion of the course of study. However, for graduates of colleges, universities, and seminaries, the maximum aggregate of curricular practical training may not exceed the duration of the course of study.

9 FAM 402.5-5(N)(4) (U) Practical Training

(CT:VISA-354; 04-26-2017)

a. (U) Students are eligible for practical training only after they have completed a full academic year in an approved college-level institution, with the exception of graduate students whose program requires them to participate immediately in curricular practical training. Optional Practical Training (OPT) is training that is directly related to an F-1 student's major area of study. It is intended to provide a student with practical experience in his or her field of study during or upon completion of a degree or certificate program and is authorized through the recommendation of the designated school official and the filing of Form I-765 with USCIS. Curricular Practical Training (CPT) is employment that is an integral part of a student's specified curriculum. In most cases, CPT involves internships and similar work experience specifically required by the student's program of study. The DSO must authorize CPT before the student begins work. See the SEVP website for more information on Practical Training.

b. (U) Any authorization for employment for purposes of practical training is suspended in the event of a strike at the place of employment.

CPT Regulatory and Interpretive History

Looking back in time can provide helpful context in understanding today's regulations. Here is a compilation of Curricular Practical Training (CPT) and CPT-like regulatory language, federal register supplementary information, and agency policy guidance (if any), for the 2002, 1991, 1987, 1983, and 1978 rulemakings relating to CPT and CPT-like predecessors. As you'll see, the basic form of the current regulation began in 1991. However, there were certain related elements in prior rules as well.

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Current Rule

Source: 2002 *Final* SEVIS Rule: 67 Fed. Reg. 76256 (December 11, 2002), amending 8 CFR 214.2(f)(10)(i)

Current Rule Text

“An F-1 student may be authorized by the DSO to participate in a curricular practical training program that is an integral part of an established curriculum. Curricular practical training is defined to be alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with the school.”

- Agency guidance arising from the current 2002 rule:
 - [SEVP Online DSO Training](#): "In practical terms, 'integral part of an established curriculum' means an opportunity must be required by the curriculum or, if not required, the student must receive credit for the training." - "Compensation is not a consideration when determining whether an opportunity qualifies as CPT."
 - SEVP's [web page on practical training](#): "CPT must relate to your major and the experience must be part of your program of study." - "CPT requires a signed cooperative agreement or a letter from your employer."
 - SEVP's [Broadcast Message 1501-04: Post-secondary F-1 Student Employment Reminder](#), sent to schools on January 29, 2015, included the following statement regarding CPT: "CPT must be integral to the student's program of study and with an employer formally authorized by the school through a cooperative agreement."

1991 Rule

Source: 56 Fed. Reg. 55608 (October 29, 1991)

1991 Rule Text

“An F-1 student may be authorized, by the DSO, to participate in a curricular practical training program which is an integral part of an established curriculum. Curricular practical training is defined to be 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.”

- Supplementary Information preceding the 1991 rule notice:
 - “The proposed rule defined curricular practical training as one where students are awarded academic credits. Many commenters pointed out that certain types of educational programs, such as hotel management, nursing, law, engineering, and teaching, routinely require their students to undertake non-credit internships. Students are often not remunerated for their participation in these training programs. Some commenters urged the Service to broaden the definition of curricular practical training to include these types of non-credit training programs that are an integral part of an established curriculum. Other commenters suggested even broader definitions that would include unsponsored employment directly related to the student’s area of study.”
 - “Although the Service disagrees that unsponsored, optional employment should be categorized as curricular practical training, the Service is persuaded that required non-credit internships are part of the established curriculum. The final definition of curricular practical training, therefore, includes required noncredit internships or practicum.”
- Agency guidance arising from the 1991 final rule:
 - *May 4, 1992 INS field memo*: “The following is a clarification of curricular practical training as requested by certain field offices: Curricular practical training by definition may be alternative work/study, cooperative education or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreement with the school. Curricular practical training offered through institutionally-sponsored cooperative education, internships, and work/study programs is usually optional and not-for-credit. Curricular practical training may also be offered through course work as an integral part of the established curriculum. When offered through course work, curricular training must either be for credit (in the case of an elective course) or required.”
 - *January 22, 1992 INS field memo*: “(I) For-credit curricular practical training. For-credit curricular practical training may be mandatory or elective. The training program must be listed in the school’s course catalog with the assigned number of credits and name of the faculty member teaching the course clearly indicated. There should also be a description of the course with the course objectives clearly defined. Students enrolled in such a course may work out the details of their specific projects within the established course objectives under the supervision of the instructor. (II)

Non-credit curricular practical training. Certain types of educational programs, such as hotel management, nursing, law, engineering, and teaching, routinely require their students to undertake non-credit internships. Students are often not remunerated for their participation in these training programs. Non-credit internships or practicum which are required for graduation [are] recognized as curricular practical training.”

For reference: 1991 Proposed Rule: 56 Fed. Reg. 27211 (June 13, 1991)

- 1991 proposed rule text: “An F-1 student may be authorized, by the DSO, to participate in a curricular practical training program which is an integral part of an established curriculum, such as alternate work/study, internship, or cooperative education.”
- Supplementary Information preceding the 1991 proposed rule:
 - “Curricular practical training, internships, work-study programs, and cooperative programs, for which students are awarded academic credits, would still be authorized by the DSO. Curricular practical training is offered by sponsoring employers through cooperative agreement with the schools. Participants in such programs do not have to look for employment in the open market, and the sponsoring employers can rely on the schools for verification of the student’s employment eligibility. Consequently, the proposed rule acknowledges that curricular practical training is offered as an integral part of the curriculum and that participation in these programs is incident to F-1 status. No EAD is required of students seeking this type of training. A student who has received one year or more of full-time curricular practical training is ineligible for practical training after completion of studies.”

1987 Rule

Source: 52 Fed. Reg. 13227 (April 22, 1987)

1987 Rule Text

“(10) Practical Training – (i) Practical training prior to completion of studies –

(A) *General.* Temporary employment for practical training prior to completion of studies may be authorized only:

...

(2) If the student is attending a high school, college, university, seminary, or conservatory which requires or makes optional practical training of candidates for a degree in that field or for a high school diploma;”

...

(D) *Curricular practical training programs.* An F-1 student enrolled in a college, university, conservatory, or seminary having a curricular practical training program (such as alternate work/study, internship, or cooperative education) as part of the regular curriculum may participate in the program without obtaining a change of nonimmigrant status. Such programs shall be treated similar to practical training prior to completion of studies as defined in paragraph (f)(10)(i)(A)(2) of this section. Periods of actual off-campus employment in any such program which is full-time (no concurrent coursework) will be deducted from the total of twelve months practical training time before graduation for which the student is eligible. Periods of actual off-campus employment in any such program in which coursework and employment are engaged at the same time (“parallel programs”) will be deducted from the total of twelve months’ practical training time at the rate of 50% (one month deducted for every two months of parallel coursework and practical training). A student who participates in a curricular practical training experience for which six months or more of the practical training time prior to graduation is deducted is not eligible for practical training after completion of studies. A student may engage in practical training only after receiving the Form I-20 ID Copy endorsed to that effect.”

- *Supplementary Information preceding the 1987 final rule notice:* "Twenty commenters also questioned the placement of paragraph (10)(iii)(D)(1) regarding work-study programs in the section on practical training after completion of studies. It was requested that the Service better define the work-study concept to be more in line with previously articulated Service policy, namely that 'work-study' can be accomplished in either alternating terms or parallel terms (where a student takes classes for part of the day and works for part of the day). In addition, twenty commenters objected to the proposal that students who engage in work-study programs be barred from participating in practical training after completion of studies. The final rule retitles this section 'Curricular practical training programs' to more closely

coincide with the statement of previous Service policy, and places this section in the paragraph on practical training prior to graduation. The final rule also describes a mathematical computation which will bar participation in post-completion practical training to some, but not all, students who engage in this type of employment experience."

- *Agency guidance arising out of the 1987 final rule: INS Operations Instruction 214.2(f)(14)(vi), "Curricular Practical Training."*
 - "Curricular practical training is an integral part of an academic program which is designed to prepare students for a career by supplementing theoretical training with actual work experience. Like work-study, internship and cooperative education programs, pre-completion training as described in 8 CFR 214.(f)(10)(i)(A)(2) is also curricular practical training."
 - "The characteristics that make these two categories different are the duration of the training period and whether the training is required. In other words, required practical training under 8 CFR 214.2(f)(10)(i)(A)(2) may not be elective or longer than six months. All other kinds of co-op education, internship or work-study program are considered curricular practical training as described in 8 CFR 214.2(f)(10)(i)(D)."
 - "In making this distinction, the Service is reiterating its longstanding policy of authorizing employment for practical training; authorization will only be granted to students who need practical experience to round out their academic studies. Where a student has participated in more than six months of structured full-time training, further employment for practical training will not be granted after the student completes his or her academic studies. Such a student is considered to have had the opportunity for a meaningful work experience."

1983 Rule

Source: 48 Fed. Reg. 14575 (April 5, 1983)

1983 Rule Text

(10) Practical Training – (i) *When practical training may be authorized.* Temporary employment for practical training may be authorized only –

(A) After completion of the course of study...

(B) ...

(C) ...

(D) Before completion of the course of study if the student is attending a college, university, seminary, or conservatory which requires practical training of all degree candidates in a specified professional field and the student is a candidate for a degree in that field;

(E) Before completion of the course of study during the student's annual vacation..."

1978 Rule

Source: 43 Fed. Reg. 54618 (November 22, 1978)

1978 rule text: 8 CFR 214.2(f)(6a)

"(6a) *Practical Training.* ... An application for permission to accept or continue employment to obtain practical training must be submitted... not more than 60 days before graduation or completion of a course or courses of study... Such application may be made earlier only if the alien is attending a college, university, or seminary which certified that practical training is required of all degree candidates in a specified professional field, and that the alien student is a candidate for a degree in the field. ... A student enrolled in a college, university, or seminary having alternate work/study courses as a part of its regular prescribed curriculum may participate in such courses without obtaining a change of status and without filing an application for permission to accept employment; however, such periods of actual employment if off-campus shall be considered as periods of practical training. An applicant for practical training who has previously participated in an alternate work/study program must submit with his/her application a letter from the school stating the number of hours the applicant has participated in off-campus employment under the work/study program, a description of the applicant's duties while employed and the name and address of the employer."