



Curricular Practical Training (CPT) FAQ for Academic Departments and Employers

WHAT IS CPT?

Curricular Practical Training (CPT) is temporary employment authorization that is “an integral part of an established curriculum” and “directly related to an F1 student’s major area of study.” It is granted by the Office of International Student and Scholar Services (ISS) with the chief purpose of achieving a curricular objective. CPT includes 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.

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. One helpful hint in understanding CPT is to approach it primarily from a curricular perspective, and only secondarily from an employment perspective. The curriculum, not the desire for employment, should drive the use of CPT. USCIS prohibits the authorization of CPT issued primarily for the purpose facilitating employment. CPT cannot be utilized for a work experience or internship that is solely beneficial for career development.

The more an internship program is structured around a classroom or academic experience as opposed to the employer’s actual operations, the more likely the internship will be viewed as an extension of the individual’s educational experience (this often occurs where a college or university exercises oversight over the internship program and provides educational credit).

- The more the internship provides the individual with skills that can be used in multiple employment settings related to the student’s major, as opposed to skills particular to one employer’s operation, the more likely the intern would be viewed as receiving training. Under these circumstances, the intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern.

WHY CHANGE THE CPT POLICY?

Recent guidance from government agencies (SEVP Student Exchange Visitor Program, DHS Department of Homeland Security, and ICE Immigration and Customs Enforcement) recommend a tightening up of CPT approval and policy consistent with federal regulations.

Enrollment in an internship credit course establishes a link and clear tie between the student’s employment and curriculum and field of study.

HOW SHOULD CPT BE USED?

- An example of the proper use of CPT
 - A student in an MPA program has an opportunity to take an internship course as one of her electives (PADM 6XXX). The position, writing policy for the city of Orem, is considered integral to her MPA program. But, as an informed F1 student, she knows that she is restricted from any paid or unpaid employment opportunities that occur off-campus. Because of her concern, she meets with the DSO, who explains that CPT exists to allow students in this situation to complete the internship off-campus.

- An example of possible misuse of CPT
 - A student discusses with a friend, that due to a need for extra income, and how great it would look on his resume', and for career development, he wants to accept a job offer from Apple to test software. He tries to figure out how to make this work, knowing the limited options for off-campus employment. The friend suggests CPT. Although the employment can be seen as related to his computer science program, it seems that in this case, employment is driving the desire for the CPT instead of the curriculum driving the need for CPT. His program does not have a required or elective internship course as part of the curriculum, and although there may be an option of taking an internship course outside of the curriculum, it is unlikely that CPT would be approved in this case.

WHAT IS MY ROLE IN CPT?

Student: Submitter

It is the student's role to know and adhere to the rules and regulations of their visa, proactively seeking guidance regarding CPT policy, and using ISS as a resource. Registration in an internship course that is either mandatory or one that is integral and for credit, is necessary to be eligible for CPT.

ISS: Approver

It is the responsibility of International Student & Scholar Services to evaluate and approve CPT on a case-by-case basis according to federal and university rules and regulations. ISS advisers will take into consideration CPT policy, as well as the student's learning objective and academic adviser's comments, in making the determination.

Academic Adviser: Supporter

The academic adviser's role should include a discussion of the internship course requirements, any expectations, and the registration process. The academic department will make the final decision regarding the number of credits that will be required for the internship class, with the understanding that one credit our will be the minimum accepted by ISS. The adviser must indicate to ISS whether or not the internship (as described in the class catalog description) is integral to the student's program. An

adviser's comments and recommendation will be taken into serious consideration in ISS's adjudication process.

Employer: Employment Overseer

The employer's role will consist of supervision and oversight of the hours worked and the employment period start and end dates to ensure that the intern remains in compliance with the CPT authorization details found on the I-20.

FINAL REMINDER

Multiple sessions of CPT may be possible but could be seen as more related to employment than curricular training. It would be questionable for a student to repeat the same course over and over, and as such, multiple sessions of CPT should be viewed in the same way. If multiple sessions of CPT are allowed, the course must have a different syllabus, and will require a different curricular objective than any previous course taken. Multiple attempts of the course will require a new, university-level learning experience.

Students should be reminded that it is their responsibility to register for the internship course. **Failure to register for the course may cause a revocation of the CPT authorization, as well as have an adverse impact on a student's legal status in the U.S.**