Understanding Curricular Practical Training (CPT)

CPT stands for Curricular Practical Training. CPT is an off-campus work authorization for a position that enhances your studies.

Federal Regulation on CPT:

"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."

- CPT can only be used while you are enrolled as a student or in between active semesters.
- CPT is authorized with a specific employer for a specific amount of time.
- CPT can be paid or unpaid.

Am I eligible to apply for CPT?

- Are you "in status" as an F-1 student?
- Are you registered as a full-time student?
- Are you in Good Standing academically with the university?
- Have you been an academic student in the United States for at least two consecutive semesters?

If you answered "yes" to all four questions, then you are eligible to apply. Students in English language training programs are not eligible.

Does my training qualify for CPT?

- Is it "directly related to the your major area of study"?
- Will you enroll in a credit-bearing course, such as a 499?

If you answered "yes" to both questions, then this opportunity meets CPT requirements. If not, please review the next section, "Is it a CPT or Is It a Job?", and then make an appointment with your DSO.

Is It a CPT or Is It a Job?

There are many employment opportunities available in the Shoals area. However, many are not suitable to CPT, even if it is directly related to your major. It is can be difficult to understand. Below are some questions to help evaluate the opportunity.

Is it approved for a credit-bearing class in your major?

Yes? Great! If your academic department accepts the internship for university credit hours, then it qualifies for CPT.

No? Consider these questions.

1 ☐ Yes ☐ No

Does the title say "internship" or something similar?
This can indicate how the business/organization is thinking of the position.

2 ☐ Yes ☐ No

Does it have an end date?
A CPT is a training opportunity, not a job. If an employer is choosing someone for long-term work, then they want an employee, regardless of the job title.

3 ☐ Yes ☐ No

Will you be trained and supervised?
A CPT is a training opportunity, not a job. The purpose of the position ought to have as its first priority helping you to grow. If the job description is asking you to work independently on tasks that you already know how to do or can easily reason out on your own, you are not being trained. You are working. The business/organization is hiring an employee to fulfill a labor need in their operations.

In addition, because CPT is a training opportunity, having a CPT intern may make *more work* for the paid employees of the business/organization because someone should be training and supervising you.

4 ☐ Yes ☐ No

Does the job description require a specific degree or education level?
A CPT must be directly related to the curriculum you studied in your major. If the job description specifically asks for applicants with education in your major, that is a good indicator that the content of the work will use knowledge and/or skills from your curriculum. However, if the job description requires only a high school diploma, the position is probably too general to be a worthwhile training opportunity, especially if you are pursuing a Master's degree.

5 ☐ Yes ☐ No

If an intern were not chosen, would the business hire an employee?

According to federal regulations, a nonimmigrant should not replace a US citizen or permanent resident as a paid, regular employee, full-time or part-time.

6 ☐ Yes ☐ No

Will you be paid?

CPT can be paid or unpaid. However if there is a significant amount of money associated with the position, this can indicate how the business/organization is thinking of the position. Employees are offered a salary and sometimes benefits because they are a part of the business/organization's long-term operation. It is not standard in the USA to pay a temporary intern a lot of money or to work on commission.

If the intern is paid, it should be in US dollars and by check. Reputable businesses, even small ones, follow accounting, record-keeping and reporting procedures that are compliant with the US government's requirements.

Consider these questions and bring them to your DSO to discuss.

OIA Practices and Policies Regarding CPT

The UNA Office of International Affairs (OIA) authorizes CPT by the semester dates, because CPT is curriculum-based.

OIA will renew a CPT authorization for additional semester(s) but the same review procedure is followed – no shortcuts.

OIA will not re-authorize CPT employment at the same employer beyond a cumulative 12 months.

OIA will not authorize a student whose academic standing is Warning, Probation or Active Suspension. The only exception is when such a student is enrolled in a department-approved, credit-bearing course.

Regarding a student who graduates and takes a break (longer than summer) before a new Program of Study: OIA will not authorize immediate CPT for such a student. The break (longer than summer which is Annual Vacation) is as an interruption of studies that requires a new academic year of study for eligibility.

Regarding a student who completes an OPT and begins a new Program of Study: OIA will not authorize immediate CPT for such a student. OIA views OPT as an interruption of studies that requires a new academic year of study for eligibility.

Regarding a student who graduates and begins a new Program of Study in the same major in the next session: OIA considers such a student to have satisfied the academic year of study for eligibility.

Regarding a student who graduates and begins a new Program of Study in a different major in the next session: OIA will not authorize immediate CPT for such a student. A new Program of Study in a different major requires a new academic year of study necessary for eligibility.

Frequently Asked Questions (FAQ)

How long does CPT authorization take?

It takes 7-10 business days for the UNA Career Center and the Office of International Affairs to process work authorizations. You must plan ahead and you should inform your employer of your special requirements as an F-1 student. Start the authorization process as soon as possible. Do not wait until the beginning of the semester.

What if my employer wants me to start right away?

You must tell your employer that you cannot begin work until you are authorized on your I-20. You will need to explain to your employer that it takes 7-10 business days to process CPT paperwork. You will violate your F-1 visa status if you start your CPT work without proper authorization from your DSO.

Can I begin training or volunteering in the position before the CPT I-20 is ready?

No. This puts your valid visa status at risk and your employer in jeopardy with U.S. Department of Homeland Security. Protect your valid visa status; do not do this. You cannot begin until you receive the new I-20 for CPT and it is the start date listed on the I-20.

I've been offered an unpaid internship. Do I have to apply for CPT?

Yes. All work must be authorized by your DSO.

My internship is required for my degree and I am registered for course credit. Do I have to apply for CPT?

Yes. All work must be authorized by your DSO.

Will CPT affect my OPT?

You can have as much CPT as you qualify for while you are a student in valid F-1 visa status. However, if you accrue more than 365 days of full-time CPT, then you become ineligible for Optional Practical Training (OPT). This means that you cannot have OPT. Part-time CPT does not affect OPT eligibility.*

Note: The "365-Day Rule" only applies to full-time CPT. You can accrue more than 365 days of part-time CPT without affecting your eligibility for Optional Practical Training.

Note: UNA authorize full-time CPT only in specific circumstances: an internship required for degree completion, a break between semesters when a student is not enrolled in classes or for graduate students.

** This statement is true and has been the accepted practice by USCIS for many years. However, in 2017, USCIS began counting days of part-time as though they added up to full-time days and deducting those days from the OPT authorization. This practice immediately created problems for students and DSOs. It seems that many of those decisions were reversed. However, in July 2018, USCIS updated Form I-765 to ask for evidence of previous CPT and OPT authorizations. It is unknown at this time what their intention is in collecting this information. OIA cannot predict USCIS interpretations but feels that it is important that each student be aware of current issues and questions.*

How long is my authorization for CPT?
Look at the dates on page 2 of your I-20. In addition, because UNA OIA requires enrollment in either an internship course or a Co-Op course, each authorization for CPT will end with the last date of the semester. CPT must then be reauthorized if you wish to continue.

Can I apply for OPT and CPT at the same time?
Yes, but CPT cannot be used to start your OPT employment early. CPT cannot be a "bridge" to OPT.

Can I have a job on campus and apply for CPT?
Yes. The employment rules governing on-campus work and off-campus work are separate. Again, this can be added up to a lot of work hours. We recommend that you discuss the employment with your academic advisor. Your first priority is to be a successful student.

Can my CPT be in another state or part of Alabama?
It depends on meeting your face-to-face enrollment requirement. Discuss this option with your DSO.

What does my employer need to do?
You should request an offer letter on the employer's official letterhead containing very specific information:

- a description of job duties (a brief statement or list of your responsibilities is sufficient)
- a starting date and ending date (CPT is time-specific)
- number of hours per week you will work (part-time is 20 hours per week or less, full-time is 21+)
- name and address of the employing company
- supervisor's name and contact information

What does my UNA advisor or professor need to do?
Sign the letter the DSO provides to you. This confirms that the training will be a real world application of what you are learning in the classroom.

Note: If you submit a complete CPT application, the processing for the Office of International Affairs is much smoother. An incomplete application causes delays.