International Student & Scholar Services (ISSS)

Internal Policies & Procedures

Curricular Practical Training (CPT) for F-1 Students

Updated 07/30/2019
Policy Effective for CPT approvals occurring for Fall 2019 or later.

Title: Curricular Practical Training (CPT) for F-1 Students.

Applicable Regulations: 8 CFR 214.2(f)(10)

Effective Date: 07/30/2019

Applies: CU Denver & Anschutz Campuses

Sources:
- NAFSA Manual Sections: 3.J
- CU Denver’s Academic Internships Administrative Policy (http://www.ucdenver.edu/life/services/ExperientialLearning/forfaculty/internships/Pages/PoliciesGuidelines.aspx)
- Department of Labor’s Information on Volunteers (https://webapps.dol.gov/elaws/wd/flsa/docs/volunteers.asp)
- Student Employee Work Hours Administrative Policy (http://www.ucdenver.edu/about/departments/HR/HRPoliciesGuidelines/Documents/StudentWorkHoursPolicy.pdf)
Definition

What is considered Practical Training?

Practical training can provide valuable work experience by sharpening and adding to the skills you are learning in school. There are two types of practical training available for F-1 students: curricular practical training (CPT) and optional practical training (OPT). [8 CFR 214.2(f)(10)]

What is Curricular Practical Training?

An F-1 student may be authorized by the Designated School Official (DSO) to participate in a curricular practical training (CPT) program that is an integral part of an established curriculum. 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 the school. [8 CFR 214.2(f)(10)(i)] Student and Exchange Visitor Program (SEVP) has stated: “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.” [SEVP Online DSO Training]

International Student & Scholar Services (ISSS) interpretation of regulation and guidance on CPT:

International Student & Scholar Services (ISSS) interprets “an integral part of an established curriculum” as it is related to the major and bound to the curriculum through cooperative agreements between the university and the employer. Enrollment in credit IS normally required. Unpaid internships would also fall under the umbrella of curricular practical training (CPT). One of the following are the specific options students can gain approval for CPT:

- Practical Training Experience is required for a student’s degree
- Practical Training Experience is required to earn internship/practicum/independent study credit for which a student will be registered
- Practical Training Experience will provide research that is necessary for the student’s thesis or dissertation.
- Practical Training Experience will yield a project for a particular course that is required by the student’s degree program

When is credit enrollment NOT required for Curricular Practical Training (CPT) Approval?

If the practical training experience or employment is required for the degree completion, then a student may gain approval for Curricular Practical Training (CPT). For CPT to be considered ‘required for the degree’ it must be documented as such in an official university publication or catalog.

When IS credit enrollment required for Curricular Practical Training (CPT) Approval?

In ALL other instances other than what is listed in the previous section above, enrollment IS required for approval of Curricular Practical Training (CPT)

What type of Credit is Required for Curricular Practical Training?

IF enrollment is required, students must enroll at least one course that is tied to the curricular practical training (CPT) experience. Course types can include but are not exclusive to internship, practicum, thesis, dissertation, or some other required coursework that is directly tied to the curricular practical training (CPT) experience. Ex. Coursework with a final project that is directly connected to the course.

- CU Denver students enrolling in Internship credit may be required to gain written approval from the Experiential Learning Center (ELC) for the curricular practical training (CPT) experience. All schools,

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colleges and academic programs that must gain approval from the ELC are found in **CU Denver’s Academic Internships Administrative Policy**.

- CU Anschutz students are not required to comply by **CU Denver’s Academic Internships Administrative Policy**

For CPT experiences that require enrollment, enrollment is required during the following semesters to cover the semester and surrounding break periods:

- **Fall Semester CPT** approval period includes the day after Summer semester ends through the day before the start of the Spring semester. **Requires Fall enrollment.**
  - **Example:** A student could be approved for Fall Semester CPT from August 1st through January 19th. In this example, the academic calendar lists the Summer semester end date as July 31st and the Spring semester start date as January 20th.

- **Spring Semester CPT** approval period includes the day after Fall semester ends through the day before the start of the Summer semester. **Requires Spring Enrollment.**
  - **Example:** A student could be approved for Spring Semester CPT from December 15th through June 7th. In this example, the academic calendar lists the Fall semester end date as December 14th and the Summer semester start date as June 8th.

- **Summer Semester CPT** approval period includes the day after the Spring semester ends through the day before the start of Fall semester. **Requires Summer Enrollment.**
  - **Example:** A student could be approved for Summer Semester CPT from May 16th through August 16th. In this example, the academic calendar lists the Spring semester end date as May 15th and the Fall semester start date as August 17th.

**What is not considered Curricular Practical Training?**

Opportunities that would not fit the definition of curricular practical training (CPT) and fall under the realm of Volunteering, as defined by the Department of Labor (DOL) would not need CPT approval. DOL states: “Individuals who volunteer or donate their services, usually on a part-time basis, for public service, religious, or humanitarian objectives, not as employees without contemplation of pay, are not considered employees of the religious, charitable or similar non-profit organizations that receive their service.” For more information, refer to the DOL website on volunteers. [DOL Information on Volunteers]

**Conditions |**

**Student Eligibility**

- Must be maintaining immigration status as an F-1 student at the University of Colorado Denver | Anschutz Medical Campus, and be engaged in a full-course of study as defined by their academic program and SEVP guidance on full-course of study. [8 CFR 214.2(10)]
- Must have been studying in a full-time capacity in a non-immigrant status for at least one academic year [8 CFR 214.2(10)].
  - One Academic Year is defined as two semesters studying at full-time status.
  - Studying at full-time status does not exclude other non-immigrant VISA statuses eligible for enrollment such as F-2, J-1, J-2, H-4, H-1, TN, etc.
  - Transfer students may meet the requirements if they have been studying in an academic program and meet the requirements for one-academic year.
  - Students moving from OPT to an academic program at the university would meet the one academic year requirement.
- Students must be in good academic standing as defined by school or college.

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• If practical training experience is not a requirement for academic program, enrollment in university credit defined as internship, practicum, thesis, dissertation, or some other required coursework that is tied to the curricular practical training (CPT) experience is required.

• F-1 students at the University of Colorado Denver | Anschutz Medical Campus are required to receive written authorization from ISSS.
  o CU Denver students enrolling in Internship credit may be required to gain written approval from the Experiential Learning Center (ELC) for the curricular practical training (CPT) experience. All schools, colleges and academic programs that must gain approval from the ELC are found in CU Denver’s Academic internships Administrative Policy.
  o CU Anschutz students are not required to comply by CU Denver’s Academic internship Administrative Policy.

• Students studying Full-Time in the ESL Academy are not eligible to participate in CPT.

Duration
• After eligibility requirements have been met, CPT can be used throughout period student is pursuing a full course of study of their academic program and if they continue to meet eligibility requirements.

• Curricular Practical Training cannot be used after the date of completion on the I-20, unless a new academic program has begun.

• Part-Time CPT | 20 hours/week or below
  o Unlimited (once met eligibility requirements)
  o Does not affect eligibility for OPT

• Full-Time CPT | 20+ hours/week
  o 365 days of Full-Time CPT will make a student ineligible for OPT at the same degree level

Hours per week
• Once eligible, students can participate in Part-Time (20 hours or less/week) or Full-Time (20+ hours/week) Curricular Practical Training within the dates the I-20 is active.

• Participation in 365 days or more of Full-Time (20+ Hours/week) will render a student ineligible for Optional Practical Training (OPT).

Additional Information on Combining On-Campus Employment and Curricular Practical Training (CPT) |

In some instances, students will want to combine CPT and On-Campus employment to allow the opportunity to work more than 20 hours/week on-campus during the Fall or Spring semesters. Students can work through on-campus employment approval for more than 20 hours/week during scheduled breaks such as summer and winter breaks without additional approval.

For more information on on-campus employment refer to the On-Campus Employment for F-1 Students policy. Additionally, Students must comply with the Student Employee Work Hours Administrative Policy and the Work-Study Student Employee Handbook.

On-Campus Employment and Curricular Practical Training are considered by SEVP as two separate approvals, and approval for these can be allowed simultaneously. For example, a student may only work 20 hrs/week with on-campus employment during the fall and spring semesters, and work any number of additional hours by utilizing curricular practical training (CPT) since employment through CPT is integral to an established curriculum as defined above in this policy.

In order for a student employee to utilize CPT to work more than 20 hours per week for an on-campus employer during the fall and spring semesters the following additional requirements are required:
• The work/position cannot be part of a financial aid package or a term of receiving a scholarship, fellowship, or assistantship.

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• Must follow all other requirements of CPT eligibility requirements and utilize one of the following options for CPT approval:
  o Practical Training Experience is required for a student’s degree
  o Practical Training Experience is required to earn internship/practicum/independent study credit for which a student will be registered
  o Practical Training Experience will provide research that is necessary for the student’s thesis or dissertation.
  o Practical Training Experience will yield a project for a particular course that is required by the student’s degree program