Curricular Practical Training (CPT) Policy Guide

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 (ISSS) with the chief purpose of achieving a **curricular objective**. *CPT includes alternate work/study, internship, or any other type of required internship or practicum.*

WHO IS ELIGIBLE FOR CPT?

- Students who have been in lawful F-1 status for one academic year (two consecutive full time semesters) and have a current <u>ACTIVE</u> SEVIS record. Full-time enrollment as a student on a previous visa, such as H4 may count toward full-time enrollment.
- CPT opportunity MUST be directly related to a student's declared major.
- Students who have a job/internship/volunteer opportunity that is not employment driven.
- UAC: Students transitioning from the U Asia Campus must have completed two consecutive semesters at the University of Utah main campus in F-1 status before eligible
- Obtaining a grade below C-, NC grade, failure to enroll, or otherwise failing to complete a CPT course will disqualify a student to apply for CPT the following semester.
- The two-semester rule and GPA requirement for FULL-TIME CPT trumps the summer rule, meaning even if it is summer semester, you must meet the two requirements to apply for full-time CPT. The only exception to this is if the graduate department requires FULL-TIME CPT in the first or second semester of all students in its program.
- Exception to the two-semester requirement rule: Only allowed for graduate students in a degree program that requires immediate participation in an internship of all students in its program. Approval from ISSS to participate in the first academic year is still necessary and must be noted in the course catalog for the CPT course. If required by department, CPT may be full-time or part-time.

MOST COMMON REASONS FOR CPT DENIAL

This list is provided to assist F-1 students prepare their CPT application to ensure the CPT process can be as smooth as possible. In depth information for each can be found throughout the CPT policy guide. ISSS is happy to review a new CPT request with updated information if the initial request was denied.

- Learning objectives not sufficiently providing the relationship between the program of study and the internship opportunity
- Insufficient offer letter
- Incorrect start/end date
- Missing enrollment (must be enrolled in the course by the add/drop deadline for each semester, no exceptions)
- Incorrect course registration (refer to CPT Approved Course List)
- Purpose of the internship (i.e. employment is not accepted)
- Not meeting GPA requirements (when applicable)

CPT APPLICATION CHECKLIST

- ☐ Do you have a declared major?
- ☐ Did you attend the university for at least two consecutive semesters?
- ☐ (highly recommended) Did you attend the CPT workshop and/or meet with an ISSS advisor?
- ☐ Have you discussed your internship opportunity with your department advisor?
- ☐ Is this an off-campus internship opportunity? (If on-campus position, please refer to the On-Campus Work for Students)
- ☐ Do you have an offer letter that has all the required information? (see page 5)
- ☐ Are you enrolled in the CPT/internship course for the semester you are applying for CPT? (BUS 5880/CSIP, please refer to the BUS 5880/CSIP Course Options)
- ☐ Did you enroll in the CPT course before the add/drop deadline?
- ☐ Did you submit your Last Semester Notification to ISSS (only if applicable)?
- ☐ Please remember that ISSS asks for **10 business day processing time once you and your advisor submit the request**. We recommend that you plan ahead and submit your CPT request at least three weeks before your anticipated internship start date.

CPT WILL NOT BE GRANTED:

- CPT will not be granted to students who have completed their program requirements and are using CPT to extend an additional semester. This is considered to be delaying graduation in order to participate in CPT.
- CPT will not be granted if a student has a pending reinstatement request or a hold that prevents registration.
- CPT will not be granted if the student applied for CPT in the previous semester and either did not register for the internship course OR did not receive a passing grade of C- or higher or CR (if chosen CR/NC).

GENERAL CPT GUIDELINES

When is CPT Authorization Required?

- If the internship is off-campus and the employer is not affiliated with the university
- If the internship is off-campus, and the employer is affiliated with the university but does not provide direct services to student
- If the internship is located on campus, but offered through a third party that does not provide direct student services
- F-1 students may work as volunteers on a part-time basis for public service, religious or humanitarian objectives. CPT is NOT required for this. If you are interesting in volunteering, please visit the Study in the States Volunteering website at https://studyinthestates.dhs.gov/2013/12/volunteering-in-the- united-states
- Please review "Volunteering and Unpaid Internships" guide for more information.

Employer

CPT is employer specific. You may only work for the employer listed on the I-20. Before you change employers while on CPT, or work for multiple employers during a semester, you will need to submit a separate CPT application for each request. It is the student's responsibility to ensure your employment information is accurately reflected on your CPT I-20.

Part-Time vs. Full-Time

CPT may be authorized for either part-time or full-time, providing a student meets all eligibility requirements.

- **Part-time CPT**
  - **1-20 hours per week** (not an average).
  - Students authorized for medical reduced course load: part-time employment may be approved if it is encouraged by the student's physician in order to promote the student's health and wellness and must be reflected on the physician form.
- **Full-time CPT**
  - **21-40 hours per week** (not an average)
  - GPA requirements:
    - Cumulative **3.0 GPA** for undergraduates, or cumulative **3.5 GPA** for graduates,
    - Cumulative GPA in the recently reported semester prior to applying for **full- time** CPT in the fall, spring, or a student's last semester
    - Exceptions: May be available only for students whose programs require internship participation for completion of the program. All the grades from previous semesters must be posted on the CIS before we can review your application.

- o F-1 students are eligible for full-time CPT during the summer vacation semester regardless of GPA (unless it is their first semester).
- o Students authorized for medical reduced course load: full-time employment is not permitted.
- o WARNING: Accumulating 12 months or more of full-time CPT will eliminate eligibility for post completion OPT. Part-time CPT does not affect OPT eligibility. **Students are responsible for tracking their own full-time CPT accumulation. This is a federal regulation so ISSS is not able to make any exceptions.**

CPT Location

CPT that is physically located outside of the State of Utah is allowed only when a student is on a summer vacation semester.

If summer is your last semester, it is not considered to be a vacation semester. You may enroll below full-time due to the fact it is your last semester, however, you are required to have at least one in-person course (Last semester requirement). There may be some exceptions due to COVID-19 and DHS COVID-19 guidance from March 2020 that allows internships to be completed outside of State of Utah. Please check with ISSS advisor if you have concerns on your last semester.

Graduate and/or PhD students who are in a thesis or dissertation program: exceptions may be reviewed on a case-by-case basis

CPT and On-Campus Work

Student may participate in part-time CPT and part-time on campus work simultaneously. Combined, these two work authorizations may not exceed 40 hours per week. On-campus work cannot exceed 20 hours per week except in a summer vacation semester, regardless of whether part-time CPT is also authorized.

On-campus work may **NOT** exceed 20 hours/week during the **Fall & Spring semester**. Please see few scenarios below (hours per week):
- On-campus 20 hours + CPT 20 hours (part-time): allowed
- On-campus 18 hours + CPT 22 hours (full-time): allowed
- On-campus 22 hours + CPT 18 hours (part-time): **NOT** allowed

*During the Fall and Spring semesters, on-campus *and* CPT authorization combined cannot exceed 40 hours per week.

On-campus work may exceed 20 hours/week during the **Summer vacation semester**. Please see few scenarios below (hours per week):
- On-campus 22 hours + CPT 20 hours (part-time): allowed
- On-campus 18 hours + CPT 22 hours (full-time): allowed

* If summer is your last semester, it is NOT considered to be your vacation semester. You will need to follow Fall/Spring examples.
* If summer is your first semester and you have an exception to begin your CPT immediately, please speak with an ISSS advisor.

Offer Letter

Your offer must contain all the information requested below. Any incomplete offer letter will result in denial and the student will be asked to resubmit the CPT request with an updated offer letter.

- ☐ The letter should be written on company letterhead
- ☐ Student's official name Job title
- ☐ Job description
- ☐ The <u>exact</u> number of hours per week (not "part-time" or "full-time")
- ☐ The physical work location (office location and remote work address) Employment start date
- ☐ Exact employment start/end date
- ☐ Immediate supervisor information (name, phone number/email address)
- ☐ Signed by a representative of the company with physical signature in ink
    **If a physical wet ink signature is not possible, a digital signature from the company representative may be submitted but <u>must have time stamp.</u>

*If the original offer letter does not have all the required information above, you may submit an addendum addressing the missing information. They must either be on a letterhead signed by a representative and added to your offer letter as one document, or the company representative may email international@utah.edu with the information from their work email. There are no exceptions.

CPT Authorization Period

CPT will only be authorized for one semester at a time. Students may not begin the internship prior to the authorized start date or work past the end date listed on the I-20. A need to work beyond the listed end date will require a new CPT authorization. Working outside of the authorized dates may result in a loss of future immigration benefits. **CPT with a start date in the past will not be authorized nor will CPT dates be retroactively changed per federal regulation.**

CPT Start and End Dates

CPT will only be authorized for one semester at a time. Your start and the end date must be mentioned on the offer letter.

- o **START DATE:** CPT authorizations cannot be made before the first day of the semester for which they are authorized. For example, if the summer term begins on May 13, this is the earliest date that CPT can be authorized.
- o **END DATE:** CPT can be authorized through the break following a semester and must end no later than the day before the next semester begins. For example, if the fall term begins on August 19, this means that August 18 is the final day that a summer CPT can be authorized.
- o **EXTENSION:** If you wish to pursue a CPT opportunity that spans more than one semester, you must submit a CPT request for each semester. You must also be enrolled in a CPT-eligible course for each semester that you are requesting CPT.
- o **LAST SEMESTER:** Your CPT cannot be authorized beyond your program end date which will coincide with either the last day of finals (undergraduate and non-thesis graduate students)

or the program end date you declare on the Last Semester Notification e-form (graduate thesis students)

- o Approved CPT Start and End Dates for upcoming semesters based on UU academic calendar (subject to change):
  - Fall 2021: August 23, 2021 - January 9, 2022
  - Spring 2022: January 10, 2022 - May 15, 2022
  - Summer 2022: May 16, 2022 – August 21, 2022
  - Fall 2022: August 22, 2022 – January 8, 2023

Learning Objectives

All students are required to provide 3 (three) personal learning objectives to ISSS with their CPT E-form. **Learning objectives must be related to the courses students are taking on the semester they are applying for CPT and/or 3 (three) previous semesters.**

THIS INFORMATION WILL BE SHARED WITH DEPARTMENT OF HOMELAND SECURITY IF REQUESTED SO PLEASE MAKE SURE THE EXPLANATIONS ARE EASILY UNDERSTANDABLE TO ALL PARTIES

Example of learning objective:

"During the internship, I will gain a deeper understanding of principles learned in MKTG XXXX Marketing through Interactive Media by improving the company's social media presence. I will be responsible for creating content and analyzing traffic on social media platforms.

Example of courses for learning objectives:

A student applying for a Summer 2021 CPT may use courses from Summer 2021, Spring 2021, Fall 2020, and Summer 2020 for their learning objectives.

Undergraduate and Graduate non-thesis students:

- o If a student is using courses they are taking concurrently with CPT for learning objectives, the courses must be registered prior to CPT request submission.
- o **The CPT course itself, the Seminar, or the special topic/independent study cannot be used as the learning objective course. Studio courses may require additional follow up.**
- o If a student is requesting multiple periods of CPT, the curricular objectives of the new CPT occurrence cannot be the same as the previous CPT. Multiple attempts of the course will require a new, university-level learning experience.
- o Students may use one course for a maximum of two (2) learning objectives.

Graduate thesis students:

- o Students using thesis credit as their CPT course may use thesis for all three (3) learning objectives.
- o Students using thesis credit must upload their thesis summary upon CPT submission

Required Course Enrollment

Students must be enrolled in the CPT course by the add/drop deadline for the semester they wish to apply for CPT. Failure to register in CPT course by the add/drop deadline will result in denial of CPT or rescinding of former CPT approval.

- Must be on a [CPT Approved Course List](#). If the course your department recommended is not on this list, please contact ISSS with the course syllabus and be aware this may delay the review of your CPT process while we review.
- Course must be taken for academic credit
- Minimum 1 credit required by ISSS but ultimately up to the department for total credit
  - We recommend checking with your department before enrolling as it may impact your tuition benefit, scholarship, etc.
- CPT course will count toward the immigration full-time requirement

For graduate students (Masters and Ph.D.) in a thesis program, enrollment in thesis credits will be accepted for CPT authorization as long as the internship activity is necessary for your thesis research, and the experience and/or data from it will be directly and clearly used your dissertation or thesis work. However, if your CPT experience and/or data from the internship will not be directly and clearly used in your dissertation or thesis work, you should instead register for any appropriate internship course and seek CPT authorization based on that. Please speak to your department to determine the appropriate internship course.

Exception: If the CPT internship is a part of the established curriculum and required of all students in the program to graduate, an internship course is not required. An internship must be listed in the university's catalog as required of all students in the program for graduation and documented as such in any published program materials (i.e. website, program brochures, etc.). A department letter is not necessary if the above requirements are met.

Exception: For CPT Students in the Chemical Engineering program, student must sign up for CPT credit courses: CH EN 4977 or 4978 (undergrads); CH EN 6877 (grads). Students enrolled in these courses may choose to enroll in the CPT credit course the same semester as CPT employment, or the semester following CPT employment. Any student who did not enroll in the course for their CPT will be considered to have engaged in illegal work and their F-1 visa status may be at risk.

What happens if I don't enroll in the CPT course?

ISSS periodically reviews the students authorized for CPT and their course enrollments. Students who fail to enroll in the required CPT course will have their CPT authorization discontinued as well as become ineligible to apply for CPT the following semester.

BUS 5880/CSIP Course Options

If you are planning to use one of these courses for your internship, you **must** speak with the BUS 5880 or CSIP advisor before submitting your CPT request. Please note that this option will be considered on a case-by-case basis as determined by ISSS. This course SHOULD NOT be used as a means to simply get employment.

- **BUS 5880:** For business students, registration in the Business Student Internship Program (BSIP) will occur automatically by School of Business once ISSS approves your CPT and informs them.

- **CSIP:** If an internship course is not part of your curriculum, there still may be an opportunity to participate in CPT by scheduling an internship course through Career Services. If you wish to participate in the Career Services internship Program, you must make your request through Handshake Experiences. Please see the link and instructions on how to request experience in Handshake. Please allow 2-3 business days for the review and approval. Once approved, Career Services will be in touch with you, your internship supervisor and the career coach you will be working with to finish signing up for the course.
  Request an Experience through Handshake:
  https://app.joinhandshake.com/experiences/new
  1. Login into your Handshake account
  2. Click "Career Center"→ "Experiences" → "Request Experiences" → Select Experience type, "CSIP" and Term → Follow the rest of the prompts

Required Course Grade
Student must earn one of the following grades for their CPT course:
- C- grade or higher
- "Credit" if a student elected to take an internship credit for NC/CR

Student will <u>not</u> be eligible for CPT the next semester if:
- "NC" grade if a student elected to take an internship credit for NC/CR
- Students who received W or EU without ISSS approval and did not meet the minimum course enrollment requirement for F-1 student (12 credits for undergraduate, 9 credits or 3 thesis credits for graduate)
- Grade below C-

Repeating CPT
Students may repeat CPT up to 3 (three) times if they have same position, employer and same course. Students should also consider potential negative immigration consequences to excessive CPT use. USCIS is questioning OPT and H1B applications when a student has repeatedly used CPT. Please keep in mind that any opportunities that are deemed employment driven rather than curricular, are not eligible for CPT.

- o A C- grade or better in their previous CPT course is required.
- o Accumulating 12 months or more of full-time CPT will eliminate eligibility for post completion OPT. Part-time CPT does not affect OPT eligibility. Students are responsible for tracking their own full-time CPT accumulation.
- o Please be aware that some departments may have restrictions on repeating particular courses. Students should consult with their academic advisor prior to re-enrolling in a CPT course.
- o Each CPT request will be evaluated separately to ensure it is integral to the program, and not for employment purposes.
- o Students are responsible to understand that repeat CPT with the same employer may be closely reviewed by USCIS to ensure it is an internship with academic purpose. Please meet with ISSS advisor if you have any concerns.

Making Changes to the Already Approved CPT Request

You can request to update the already authorized CPT by submitting the "Request Change to Current CPT" e-form. This form is only if you have a current CPT authorization and does not apply to past semesters or future semesters.

Examples of when this e-form may be utilized:
- Change of supervisor
- Change of CPT authorization start and/or end date
- Change to employment location
- Changes to number of work hours/week

An updated offer letter reflecting the change(s) must be submitted the request. Failure to provide proper documentation will result in denial of this request. Submission of this e-form does not mean the changes have been approved automatically. You must wait until ISSS reviews and approves the change(s) you requested and issues you a new I-20 reflecting the new information before you engage in the changed CPT.

You must submit a new CPT e-form if:
- You wish to apply for a new CPT authorization
- You wish to extend your CPT to the next semester
- You with to change the CPT employer
- You wish to change the position with the same employer

CPT in the Last Semester

ISSS recommends that you do not use your CPT to bridge into OPT employment. Please be aware that bridging may result in issues with your Post-Completion OPT application, STEM OPT, or H1B in the future as USCIS may interpret it as misuse of CPT. If your CPT internship unexpectedly becomes an offer for full-time OPT, we recommend seeking legal advice from an experienced immigration attorney. Students are responsible for understanding the risks involved with CPT in a final semester and should consult with an ISSS advisor for any questions.

> If summer is your last semester, it cannot be considered as a vacation semester.
> Fall/Spring restrictions will apply.

- o **HOURS:** Student may choose to participate in part-time or full-time CPT in their final semester. All general rules for part-time or full-time CPT apply.
- o **Enrollment:** CPT may NOT be the only course taken in the final semester unless that specific CPT course is the only remaining requirement of the program for graduation.
  Please keep in mind; students must also have a course that requires on-campus physical presence in their last semester.
- o **LOCATION:** CPT that is physically located outside of the State of Utah is allowed only when a student is on a summer vacation semester. Please note that if summer is your last semester, it is not considered a vacation semester. Exceptions may be made for Graduate and/or PhD students who are in a thesis or dissertation program on a case by case review.
- o **GPA:** Cumulative **3.0 GPA** for undergraduates, or **3.5 GPA** for graduates, in the most recently reported semester prior to applying for **full- time** CPT. Exceptions may be available only for students whose programs require internship participation for completion of the program.
- o **AUTHORIZATION DATES:** CPT cannot be authorized beyond your program end date which will coincide with either the last day of finals or for graduate students, your thesis defense date if you select that as your program end date.

* There may be some exceptions due to COVID-19 and DHS COVID-19 guidance from March 2020 that allows internships to be completed outside of State of Utah. Please check with ISSS advisor if you have concerns on your last semester.

Transfer Students or Students Returning to School from POST/STEM OPT

- o Students returning from a period of OPT and participating in a new degree program must be enrolled in two consecutive semesters of full-time study before being eligible for CPT.
- o Students transferring their SEVIS record to the University of Utah may qualify for immediate CPT if they have met the full academic year requirement at the previous institution. A transfer student must provide a current I-20 and transcripts from the previous school to demonstrate policy compliance.

Applying for CPT

1. Read the CPT policy guide and attend a CPT workshop (highly recommended) or meet with an ISSS Advisor to discuss CPT if you have further questions
2. Meet with academic advisor to discuss the internship course eligibility
3. Discuss internship opportunity with employer and obtain an offer letter
4. **Enroll in the appropriate internship/CPT course by the Add/Drop deadline**. If you have any holds that prevents you from registering for courses, you will need to address them

as well so you can enroll in the course.

5. (if applicable) If you are applying for CPT on your last semester, please submit Last Semester Notification e-form.

6. Go to www.isss.utah.edu and login to UAtlas and complete the CPT request. Please remember that ISSS asks for **10 business day processing time once you and your advisor submit the request**. We recommend that you plan ahead and submit your CPT request at least three weeks before your anticipated internship start date.

7. The academic advisor reviews the CPT request, makes a recommendation, and submits the CPT "advisor form" through UAtlas (this can only be completed AFTER you have submitted your portion of the CPT request). ISSS will not receive your CPT application until you AND your advisor have completed the CPT form.

8. ISSS evaluates the CPT request for approval or denial.

   **Optional: If a student does not have a Social Security Number (SSN), please see this SSN guide for more details.

Students may not begin the internship prior to the authorized start date or work past the end date listed on the I-20. Working outside of the authorized dates may result in a loss of future immigration benefits.

Disclaimer: International Student & Scholar Services (ISSS) provides support and information related to U.S. immigration laws and regulations related to F and J status at the University of Utah. ISSS staff are not attorneys and any information provided by ISSS should not be construed as legal advice. Individuals are welcome to consult a qualified immigration attorney for specific legal advice, particularly in complicated cases. For a list of local Utah attorneys please visit our website here.
Employment: ISSS reviews work related requests based upon the information provided to us by the student. If USCIS later determines that the student misused the work authorization, or otherwise did not follow the required
rules and regulations, additional immigration benefits could be denied by USCIS.

4th East Ocean Road Atlantic City, New Jersey 08401 • Phone (609) 348-7100

April 1, 2020

Odafin Tutuola
1235 University Village,
Salt Lake City, UT 84108

Dear **Odafin**,

We are very pleased to offer you the position of Intern this summer with Dolp Tech. Please find the following confirmation of the specifics of your internship:

Job Title: Software Development Intern

Job Duties: Responsibilities will include developing and supporting applications using C#, JavaScript, HTML, CSS, ASP.Net, MS SQL with SQL Server databases and SSRS reporting services. You will work on our automated testing infrastructure and craft the tools that provide real-time monitoring of our service.

Start Date: May 13, 2019

End Date: August 18, 2019

Number of Work Hours Per Week: 40 hours per week

Reporting Supervisor: Amanda Rollins arollins@dolptech.com or 609-348-7100 # 105

Office Location: 28th East Bay Road Atlantic City, New Jersey 08403. The student will work remotely due to Covid-19. She will work from home at 1235 University Village, Salt Lake City, UT 84108.

Salary/Stipend: $25.00 per hour

Should you have any questions regarding the specifics of your internship, please contact me by phone 609-348-7100 # 109 or by email obenson@dolptech.com.

Sincerely

If a physical wet ink signature is not possible, a digital signature from the company representative may be submitted but must have time stamp.

Olivia Benson
Human Resources
Dolp Tech