

Curricular Practical Training Policy

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SECTION I. PURPOSE

Under certain circumstances, the University of St. Thomas is permitted to grant temporary authorization to international students to work off-campus in paid or unpaid internships, employment and other positions that provide practical training related to their St. Thomas academic programs. Facilitating these opportunities is consistent with the university's objectives to ensure students are well-prepared for the workforce and able to obtain employment in their chosen fields upon graduation from St. Thomas.

The grant of work authorization by St. Thomas is governed by federal law and regulations. This policy is intended to ensure that St. Thomas maintains compliance with applicable law and regulations concerning the off-campus employment of international students enrolled at St. Thomas.

SECTION II. SCOPE AND APPLICABILITY

This policy governs the authorization of work for all international students on an F-1 visa while the students are enrolled at St. Thomas. This policy applies to F-1 students regardless of the particular academic credential they are pursuing and regardless of whether they are an undergraduate or graduate student.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

- a. ***F-1 student*** means an individual who is enrolled at St. Thomas and is in the United States on an F-1 student visa.
- b. ***OISS*** means the Office of International Students and Scholars.
- c. ***SEVIS*** stands for the Student and Exchange Visitor Information System, which was established by the U.S. government to maintain information on non-immigrant international students and scholars during their stays in the United States. CPT authorizations are approved through this system.
- d. ***I-20*** is an immigration document which F-1 students must maintain throughout their stay in the United States. CPT authorizations are documented within the I-20 as proof that F-1 students have been authorized to work for a designated time period.
- e. ***Curricular practical training (CPT)*** is a type of work authorization which eligible F-1 students may request from a U.S. college or university while enrolled there. CPT applies to employment opportunities in programs that are an integral part of an established

curriculum, such as 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 U.S. college or university in which the student is enrolled.

- f. *USCIS* means the United States Citizenship and Immigration Service.

SECTION IV. CURRICULAR PRACTICAL TRAINING

A. Eligibility

1. Eligible F-1 Students

F-1 students in English language training programs, such as ELS or other independent language training programs, are ineligible for CPT. Other F-1 students are eligible for CPT if the F-1 student has been lawfully enrolled in an academic program on a full-time basis for one full academic year, either at St. Thomas (including in an international student pathway program) or in another USCIS-approved college, university, conservatory, or seminary in the United States.

Time enrolled in a study abroad program counts towards the one-year requirement if the student spent at least one full academic term enrolled in a full course of study in a USCIS-approved college, university, conservatory, or seminary in the United States prior to studying abroad.

A student must be in F-1 status at the time of the CPT authorization request. Students are not permitted to request CPT authorization until they have fulfilled the requirement for one academic year of full-time enrollment. Undergraduate students also must have selected their major area of study. The one academic year of study does not have to be at St. Thomas and does not have to be in F-1 status. F-1 students who completed a degree at another institution and are obtaining a new degree at St. Thomas can use their time (up to one year) spent in a recently completed degree to count towards the one year of full-time academic study. If requesting CPT authorization at the beginning of a graduate degree program, the request will not be authorized prior to the first day of classes at St. Thomas.

2. Maximum Duration of CPT

An F-1 student who meets the other requirements for CPT authorization may be authorized for a total of 12 months of full-time CPT (more than 20 hours/week), and becomes eligible for another 12 months of full-time CPT when the F-1 student changes to a higher educational level (e.g., the student completes a Bachelor's degree and begins a Master's degree program, or moves from a Master's to a doctoral program). F-1 students who exceed 12 months of full-time CPT will not be eligible for Optional Practical Training (OPT), which is training that F-1 students otherwise might be eligible for post-graduation. Part-time CPT (20 hours/week or less) is unlimited and will not affect eligibility for OPT. However, OISS grants CPT authorizations for only one academic term at a time (Fall, Spring, Summer), regardless of whether the CPT is part-time or full-time. J-term can be combined with Fall or Spring without additional registration. Students have sole responsibility to ensure compliance with any limits on their CPT and to monitor their eligibility for OPT. St. Thomas is not responsible for monitoring full-time CPT duration or OPT eligibility. A student exceeding 12 months of full-time

CPT per degree level will do so at their own risk and potential harm to their current and/or future immigration status.

3. Eligible Positions for CPT Authorization

An eligible student may request authorization for CPT in a position that is directly related to the F-1 student's major area of study at St. Thomas and must be commensurate with the student's degree level.

The F-1 student is expected to obtain a written offer from the CPT provider that describes the position being offered to the student for CPT authorization. The offer letter must contain the proposed dates for the CPT, the position title, position responsibilities, number of hours per week, address where the work will take place, and payment (if the position is paid).

The academic advisor in the student's major department (for undergraduate students) or program advisor (for graduate students) must review the offer letter to evaluate whether the position is integral to the F-1 student's major/program curriculum. CPT authorization will not be granted without a signed certification from the academic or program advisor that the position is integral to the student's major area of study.

B. Registration Requirements

F-1 students will not be considered for CPT authorization unless they are registered in a degree program at St. Thomas for the academic term for which CPT authorization is requested.

1. Undergraduate Students

- a. Students must register for a course that requires an internship to complete that course. Examples can include experiential learning or internship courses. The number of credits that relate to that course may coincide with the number of hours the student is working during that term, referring to the course catalog guidelines.
- b. Courses that do not require an internship in order to complete the assignments for that class will not be eligible for CPT.
- c. A student applying for CPT work permission must be enrolled for the course listed in Section 1.a above during the academic term during which the CPT will occur (Fall, Spring, Summer). J-term can be combined with Fall or Spring without additional registration. If the CPT is expected to extend beyond the designated academic term, the F-1 student must register for one of the above courses for each subsequent term in which the student wishes to continue CPT (up to 12 months total).

2. Master's Students

- a. Students must register for a course that requires a practical training experience to complete that course. Examples can include an internship, practicum or experiential learning course. Courses that do not require an internship, practicum or experiential learning in order to complete the assignments for that class will not be eligible for CPT.
- b. A student applying for CPT authorization must be enrolled for the course listed in Section 2.a above during the academic term during which the CPT will occur (Fall,

Spring, Summer). J-term can be combined with Fall or Spring without additional registration. If the CPT is expected to extend beyond the designated academic term, the F-1 student must register for one of the above courses for each subsequent term in which the student wishes to continue CPT (up to 12 months total).

3. Doctoral Students

- a. Students must register for a course that requires a practical training experience to complete that course. Examples can include an internship, practicum, thesis/dissertation or experiential learning course. Courses that do not require an internship, practicum, thesis/dissertation or experiential learning in order to complete the assignments for that class will not be eligible for CPT.
- b. A student applying for CPT authorization must be enrolled for the course listed in Section 3.a above during the academic term during which the CPT will occur (Fall, Spring, Summer). J-term can be combined with Fall or Spring without additional registration. If the CPT is expected to extend beyond the designated academic term, the F-1 student must register for one of the above courses for each subsequent term in which the student wishes to continue CPT (up to 12 months total).

C. Processing and CPT Authorization by OISS

Upon receipt of a properly completed offer letter, signed certification from the academic or program advisor, and proof of the F-1 student's registration for the designated academic term, OISS will temporarily authorize CPT through SEVIS for the academic term. The F-1 student must wait to begin working until the CPT authorization process is complete and the student has received an updated I-20 containing the CPT authorization, which the student must provide to their CPT provider.



Appendix A to Curricular Practical Training Policy

CPT Procedures

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SECTION I. OUTLINE OF CPT PROCEDURES

Application procedures can be found online at <https://www.stthomas.edu/oiss/currentstudents/cpt/>.

SECTION II. CPT FORM FOR STUDENTS

The CPT form students must complete and submit to seek approval from their academic or program advisor can be found online at <https://www.stthomas.edu/media/internationalstudentservices/immigrationpdfs/2019CPTForm.pdf>.

SECTION III. COURSES ELIGIBLE FOR CPT

A list of courses eligible for CPT will be posted on the OISS website on the website listed in Section I of these procedures.