

Pre-Completion Optional Practical Training (OPT)



What is Optional Practical Training (OPT)?

- 12 months of employment authorization for training directly related to your major field of study as indicated on your I-20.
- Can be used during your degree program (**pre-completion OPT**) and/or after your degree completion (**post-completion OPT**).

Training is:

Temporary: OPT authorization up to 12 months

Optional: Not a required part of a curriculum; a benefit associated with F-1 status.

In Major Field of Study: Cannot be requested in a minor/previous major or certificate program if different than current major

Authorized by USCIS (U.S. Citizenship & Immigration Services)

Job offer is not necessary for employment authorization approval!



Pre-Completion OPT Eligibility Requirements

- ✓ **Have been continuously enrolled full-time for at least one full academic year (fall and spring semester) in active nonimmigrant status OR will be completing one academic year within 90 days of applying for pre-completion OPT;**
 - Have a passport and I-94 indicating F-1 and D/S
- ✓ **Enrolled full-time (or authorized RCL) in the semester you apply for OPT;**
 - Enrollment for summer is not required for pre-completion OPT, unless you will be completing your degree in the summer semester
 - You must be registered for credits that require on-campus presence in your final semester.
- ✓ **Have not completed more than 364 days of full-time Curricular Practical Training (CPT) at your current degree level;**
- ✓ **Have not completed a higher degree level in the U.S. than your current degree level;**
- ✓ **Have not utilized an equivalent of 12 months of OPT work authorization for the same degree level or higher degree level; AND**
- ✓ **Intend to get a job, internship, or volunteer position directly related to your major field of study.**



...but what about CPT?

- Curricular Practical Training (CPT) is a temporary training authorization for an “alternative 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.”
- Please visit the [ISSS CPT Website](#) and consider attending a [CPT Workshop](#) to learn more.
- Students can also join ISSS Advising to learn more about their off-campus training authorization options.



When can I apply for pre-completion OPT?

- You are eligible to apply for pre-completion OPT up to 90 days before completing one academic year of full-time enrollment (fall and spring semester) in active nonimmigrant status and 90 days before your requested start date.
- Processing times vary and should be [checked on the USCIS website.](#)




Checking USCIS Processing Times

Check Case Processing Times

Select your form, form category, and the office that is processing your case

Refer to your receipt notice to find your form, category, and office. For more information about case processing times and reading your receipt notice, visit the [More Information About Case Processing Times](#) page.


Form *

Form Category *

Field Office or Service Center *

Get processing time



International Student & Scholar Services
UNIVERSITY OF COLORADO BOULDER

Do I need a job offer before I can apply?

No!



How do I choose my start and end dates?

- Pre-completion OPT end date must be before you complete your academic program.
- Once your pre-completion OPT application is pending with USCIS, the only way to change your requested pre-completion OPT dates is to withdraw your application and submit a new application. This will require a new filing fee.
- When selecting your dates, you need to take into consideration if you are requesting part-time or full-time pre-completion OPT.
 - Full-time pre-completion OPT is not allowed during the academic year (Fall and Spring terms), unless you have completed all coursework for the degree and are in thesis or dissertation stage.



Pre-Completion OPT Employment

- Your job, internship or volunteer work must be directly related to your major field of study (not a minor or certificate program).
- The hours you can work per week will depend if you are approved for part-time (20 hours or less) or full-time (more than 20 hours) pre-completion OPT.
- You may change employers on OPT and can have multiple jobs, internships or volunteer work if:
 - You do not exceed your allotted work hours per week
 - Each position directly relates to your major field of study
 - You submit the required pre-completion OPT relevance statement to ISSS for each training opportunity



Acceptable Training During Pre-Completion OPT

Regular Paid Employment

Payment by Multiple Short-Term Multiple Employers

Work for Hire (1099 employment)

An individual performs a service based on a contractual relationship rather than an employment relationship. Must be prepared to provide evidence showing the duration of the contract periods (hours worked per week) and the name and address of the contracting company.

Self-Employed Business Owner

Must be able to prove you have proper business licenses and must keep detailed documentation of hours worked.

Employment through an Agency

Volunteers or Unpaid Interns

You may work as a volunteer or an unpaid intern, so long as this does not violate U.S. labor laws.

All work/training done on pre-completion OPT must relate to your major field of study!



Marijuana (Cannabis) Related Industries

A legal permanent resident or anyone on immigrant or non-immigrant visas should stay away from marijuana use or anything associated with it as it may have a negative immigration consequences. This includes working in industries associated with marijuana and cannabidiol (CBD) (e.g. working in a lab extracting CBD oils for medical purposes).

Please review these articles and videos:

- [Legal Colorado Marijuana Workers Denied Citizenship Over Work](#)
- [Colorado's 9News: Marijuana can disqualify you for citizenship](#)
- [Unless You're a Citizen, Legal Marijuana Isn't for You](#)



Impact of Pre-Completion OPT on Post-Completion OPT Eligibility

- Any practical training (both pre- and post-completion OPT) is counted cumulatively with only a total of 12 months allowed for practical training (not including STEM Extension).
 - Part-time pre-completion OPT (20 hours per week or less) is deducted from post-completion OPT at a half-time rate.
 - Full-time pre-completion OPT (more than 20 hours per week) is deducted from post-completion OPT at a full-time rate.
- Even if you end up not working during some or all of your authorized period of pre-completion OPT, the time will still be deducted from the time available for post-completion OPT.



If I am authorized for pre-completion OPT, can I still work on-campus?

- Pre-completion does not impact your on-campus employment.
- Students can work on pre-completion OPT and on-campus simultaneously; you are still subject to the F-1 student related on-campus work hour restrictions and eligibility requirements.



Do I need to worry about unemployment days on pre-completion OPT?

- There is no limit to unemployment days while in your authorized period of pre-completion OPT.
- ***Remember!*** The time you are authorized for pre-completion OPT will deduct from the 12-month post-completion OPT period based on the pre-completion OPT start and end date granted by USCIS. You cannot recoup any loss of post-completion OPT time, even if you do not end up working during the pre-completion OPT period for which you have been approved.



Pre-Completion OPT Application Process



Resources Available

- First, review our [Pre-Completion OPT website](#).
- It's full of information and guides! Please use these! They will help you.



Does USCIS accept electronically filed applications?

- Yes!
- **Important:** before electronically filing the Form I-765 with USCIS online, students must first submit the Pre-Completion OPT I-20 Request Form to ISSS and ISSS must make the pre-completion OPT recommendation in SEVIS.
- If a student first submits the USCIS online application and then requests the pre-completion OPT recommendation I-20 from ISSS, the pre-completion OPT application will be denied.



Pre-Completion OPT I-20 Request Process

1. Complete the [Pre-Completion OPT I-20 Request Form](#) and upload the required documentation for the request.
 - After ISSS receives your request form, please allow 2-5 business days for processing.
 - Once ISSS has reviewed your materials, an I-20 recommending pre-completion OPT will be issued to you.
2. Submit your complete application including all required evidence to USCIS by electronically filing the Form I-765 with USCIS online.



What evidence do I need to provide with my pre-completion OPT online application?

Evidence (as listed in online filing system)	Example	Notes
2 x 2 photo of you	Passport Photo	See “Photo Requirements”: U.S. Department of State photo requirements . DOS also has a photo check tool that you can use to check the photo ahead of time.
Form I-94	Entry I-94 Or Change of status I-797 Approval	Download your most recent I-94 here: https://i94.cbp.dhs.gov/
Employment Authorization Document	Passport biographical page	
Previously authorized CPT or OPT	I-20(s) (for CPT) and/or EAD (for OPT) and/or screenshot of SEVIS employment history screen (provided by ISSS advisor)	Leave empty if no prior OPT or CPT.
Form I-20	Newest I-20 with post-completion OPT recommendation	This is only referring to the recommending I-20, not prior I-20s.

Other Required Application Materials

- Form I-765:
 - Form I-765 is the formal document filed to request Pre-Completion OPT authorization from USCIS.
 - When filing online, the USCIS online filing system will auto-generate your I-765 after you answer a series of questions.
 - The system uses logic that limits the questions you will need to answer based on prior answers, diminishing the opportunity for errors.
 - ISSS advisors are happy to review the draft I-765 upon request before you electronically file your application.
- **Application Fee: subject to change**
 - You will submit payment on a secure webpage through the USCIS online application. ISSS understands that once you submit payment, your application will be submitted to USCIS.





Submitting Your Application

ISSS has issued me an I-20 recommending pre-completion OPT. Now what?

1. Print your newly issued I-20 with Pre-completion OPT recommendation, sign under the "student attestation" section.
2. Make any edits to the evidence submitted with your Pre-completion OPT I-20 request form as indicated by the ISSS advisor making the OPT recommendation.
3. Create a USCIS online account at myaccount.uscis.gov. Once you have created an account, you'll be able to complete the filing process.
4. Compile all required evidence including your now-signed I-20, and upload to the USCIS Online Application. Ensure all evidentiary photocopies are clear with limited imperfections (ie. Passport, I-94, I-20, etc.)
4. Submit filing fee payment through USCIS online filing system.
 - **Important:** USCIS must receive your pre-completion OPT application within 30 days of the date ISSS enters the recommendation for pre-completion OPT into your SEVIS record.



When can I start working?

- You must have your EAD in hand and be within your authorized period of pre-completion OPT to begin working.



How long will it take USCIS to process my OPT application?

- Check this processing times website

- Select *I-765 Application for Employment Authorization*
- Select *Potomac Service Center*
- Scroll down until you see *Based on a request by a qualified F-1 academic student [(c)(3)]*

Example (subject to change):



Premium Processing Option for e-filed I-765s!

- Online filing of Form I-907, Request for Premium Processing Service, is now also available to F-1 students
- Premium Processing- Expedited Processing for a fee
- Fee is subject to change.
- Guarantees some sort of adjudicative action within 30 business days of receipt
 - Does not include time for printing and mailing EAD



Case Was Changed To A Premium Processing Case

We changed your case, Receipt Number IOE9605064368, from a standard case to a premium-processing case. The premium-processing clock started on April 14, 2023. Your premium-processing receipt notice contains contact information for direct inquiries on your case. Please follow the instructions in the notice. If you move, contact the premium-processing unit directly to update your address.



What To Do While Your Application Is Pending

I submitted my pre-completion OPT application materials to USCIS. What should I do while I wait?

- Pay attention to receipt notices, mail, and electronic notifications from USCIS received via email and to your mailbox.
- Contact ISSS if your pre-completion OPT application is rejected, denied, or if you receive a Request for Evidence (RFE).
- If you have questions about your case or status of your application, please use the [USCIS online tools](#) or call the National Customer Service Number (800-375-5283).
- Wait for your EAD card to arrive by mail. You must have your EAD card in hand to begin working.



Updating Your Delivery Address

If possible, submit the change of address with USCIS ***before*** initiating the new I-765 form online for your Pre-Completion OPT application.

If you **move** from or are no longer receiving mail at the address you entered in item 5 of the I-765, and have not yet obtained your Employment Authorization Document (EAD Card):

- Use the new USCIS Enterprise Change of Address (E-COA tool) to update your address with USCIS as soon as possible.
 - Requires a [USCIS online account](#)
 - Only available in English



Can I leave the United States while my pre-completion OPT application is pending?

- You can depart the U.S. with a pending pre-completion OPT application. Be sure you have your pre-completion OPT I-20 with a valid travel signature, and an active F-1 visa for re-entry.
- Considerations:
 - If you receive an RFE you will need to respond in a certain amount of time and you may have difficulty responding to any request(s) for evidence from USCIS while you are outside of the U.S., which could result in a delay of an OPT approval or an OPT denial.
 - Travel restrictions could impede your ability to return to the U.S.; travel restrictions may change at a moment's notice. Carefully consult both the airline and the travel restrictions for the country to which you will be returning from.



USCIS Case Inquiries & Status Requests

- Check your case status using the [online tools](#)
 - Your USCIS case status will likely remain in initial review up until card production or a RFE is made.
- [Sign-up for a USCIS account](#) to view case updates
- Get a tracking number and register for Informed Delivery through USPS to get previews of the mail in transit
- Call USCIS Contact Center at 1-800-375-5283 to ask they create a service request **only** if your I-765 is pending [outside of USCIS's posted processing time](#) and [no RFE](#) has been issued.

Case Inquiry

			
Case outside normal processing time	Did not receive notice by mail	Did not receive card by mail	Did not receive document by mail
<i>Think a case is taking longer than expected?</i>	<i>Think a notice is lost or missing?</i>	<i>Think a card is lost or missing?</i>	<i>Think a document is lost or missing?</i>

Service Request

		
Appointment Accommodations	Typographic Error	
<i>Request accommodations for an interview appointment</i>	<i>Make typographic corrections for a case</i>	



EAD: Employment Authorization Document

OPT work authorization is granted in the form of an Employment Authorization Document (EAD).

Dates of employment authorization
You CANNOT work outside of
these dates





Reporting Requirements



What am I required to report while I am on an authorized period of OPT?

- For **each** off-campus training opportunity you have during the pre-completion OPT period, you need to complete *Pre-Completion OPT Employment Relevance Statement* (available in [MyISSS portal](#)) to maintain your F-1 status.
- ISSS will review each Relevance Form submitted and let you know if there are any issues.



What if I don't get my EAD in time and I miss my internship?

- You **cannot** work without your EAD in hand. ISSS recommends planning ahead and applying early to increase your chances of receiving USCIS approval and your EAD card prior to your pre-completion OPT requested start date.



Maintaining Status on Pre-Completion OPT

An OPT authorization is automatically terminated when:

- A student in F-1 status completes a SEVIS transfer to another school
 - OPT ends on the day the SEVIS record is released to the new school
- A student in F-1 status begins study at another educational level
- A student in F-1 status finishes their degree before the end date of their pre-completion OPT
 - The student must stop working on or before their program end date and file a separate application for post-completion OPT in order to be authorized for employment after graduation.

There is no way to recover remaining OPT authorization period when it is due to a SEVIS transfer, beginning a new level of study, or termination for another reason.

Consult with ISSS to plan the timing of a future transfer and/or beginning of new level of study.



Pre-Completion OPT Documents To Keep

Maintain documentation that the work/internship is directly related to your major field of study:

- Copies of offer letters and agreements/contracts with all pre-completion OPT employers including start/ end dates, pay rate, and number of weekly work hours
- Copies of job descriptions including job title, duties, location, and supervisor's contact information
- If you worked for an agency or consultancy, keep evidence of the projects you worked on
- Keep copies of your pay vouchers/pay stubs for all periods of employment, copies of your bank statements that show direct or corresponding deposits from your employer(s), and associated W-2 tax forms.

If you engage in employment that is not paid while on pre-completion OPT, it is recommended that you keep the following:

- Copies of employment agreement or contracts with the employer including start/end dates, trainings (on location, online, etc.), responsibilities and training objectives, location of the internship/unpaid training, and supervisor's contact information
- Copies of all diplomas, completion certificates and/or certifications that you received related to the training program;
- If you worked/trained as an unpaid employee for a third party, keep evidence of the projects you worked on
- Copies of company time and attendance records that document your daily tasks in detail for all employers during the unpaid internship or training.



Can I extend my pre-completion OPT authorization?

- You remain eligible for pre-completion OPT until you complete your academic program or have used one full year of full-time approved OPT, whichever comes first.
 - Submit a new pre-completion OPT application to USCIS for each period of pre-completion OPT you request.
 - ***Reminder:*** you will need a new pre-completion OPT Recommendation and I-20 for each application you submit.



Career Services

CU Boulder Career Services empowers students and alumni to become more employable and find meaningful work by being active participants in the career development process.

- Some Features of Career Services:
 - Mock Interviews
Practice and perfect your interview skills before the real deal.
 - Resume & Cover Letter Help
Our career development advisors can help you create and edit these essential documents for applying to jobs and internships.
 - Career Fairs
Large events where you can meet with a variety of employers all at once to find jobs and internships.

Please review Career Services' website for more information



Questions?

Tel: +1 (303) 492-8057

iss@colorado.edu

Advising Services:

<https://www.colorado.edu/iss/advising>



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