

## **Curricular Practical Training (CPT) Protocol Revisions** (Released 12/22/2020) (Effective for all CPT with a start date of 05/06/2021 or later.)

International Student and Scholar Services (ISSS) recently conducted a comprehensive review our [Curricular Practical Training](#) (CPT) protocol for international students holding F-1 nonimmigrant status. The results of that review indicate that ISSS's previous interpretation of the federal government's CPT regulations and our derivative CPT policies differ from the current policies of our peer institutions, as well as recent government interpretations and guidance regarding CPT.

*Based on the results of the ISSS internal review, ISSS is instituting comprehensive changes to our CPT protocol effective for any CPT that is to start on May 6, 2021 or later.* These changes will have an impact on our international students in F-1 status, as well as their academic departments. Given the significant pressures and concerns brought about by the COVID-19 pandemic and related federal immigration policies, including a drastic drop in international student numbers and increasing concerns about immigration issues overall, ISSS postponed introducing a change to CPT policies during an already difficult time.

### **Reasons for Change in CPT Protocol**

However, in light of recent communications from the [Student Exchange and Visitor Program \(SEVP\)](#) and the expected stabilization of other immigration policies, now is the time for ISSS to move forward on instituting this change in our CPT protocol. At a recent meeting with our SEVP field representative, ISSS was informed that SEVP is reviewing universities' CPT protocols as part of the [recertification](#) process and that institutions whose protocols do not reflect [recent SEVP guidance](#), will have their recertification process red-flagged for being non-compliant, jeopardizing the university's SEVIS certification and the ability to continue to sponsor international students for F-1 status. (In November 2020, CU Boulder applied to SEVP for recertification.)

The recent SEVP guidance states in part:

*CPT accommodates individuals enrolled in a program of study that requires participation in an internship or practicum. It is not a supplemental training experience but rather an "integral part of an established curriculum" meaning it is a required part of the degree or program of study. The regulation makes this clear by defining CPT as an "internship, cooperative education or any other type of required internship or practicum...."*

This guidance, as well as our internal comprehensive review of the federal regulations related to CPT necessitate the change in CU Boulder's CPT protocol for all CPT authorizations that have an effective date after the end of the Spring 2021 semester. While we understand the negative impact this may have on our international students in F-1 status who would like to take advantage of off-campus training opportunities, this change is required in order to maintain compliance with federal rules and ensure that CU Boulder can continue to sponsor international students for F-1 nonimmigrant status.

We fully understand the impact this change is going to have on our international students, their academic departments, as well as recruitment efforts. We also understand the timing may add stress to an already difficult pandemic environment. Unfortunately, for the reasons explained above, ISSS can no longer postpone implementation of this change in CPT protocol. CU Boulder currently does not have any students who have been authorized CPT for the Summer 2021 term. We also have a record low number of students who will be eligible for CPT for the Summer 2021 term due to recent declines in our

international student numbers. Lastly, [pre-completion Optional Practical Training](#) remains another option for off-campus training for many international students in F-1 status.

## The Basics of CPT

### *What is Curricular Practical Training (CPT)?*

CPT is temporary permission authorized by ISSS for international students in F-1 nonimmigrant status to engage in off-campus training. CPT is not for employment. It is for practical training. CPT must be integral to the student's major and the experience must be part of their program of study.

Per the relevant federal immigration rules, specifically the Code of Federal Regulations, 8 CFR 214.2(f)(10)(i), CPT is employment 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." CPT can only be authorized *prior* to a student's degree completion for an experience that is "**directly related to a student's major field of study**" and considered to be "**an integral part of an established curriculum.**"

### *Student Eligibility*

To be eligible for CPT, a student must be a degree-seeking student in valid F-1 status. In addition, the student must have completed one full academic year of continuous full-time enrollment in lawful nonimmigration status. Per 8 CFR 214.2(f)(10)(i), the only exception to this is if a student is in a graduate program that **requires** immediate participation in an internship and the requirement is documented in the [University Catalog](#). CPT is only available prior to completion of a student's degree program. A student must continue to maintain a full course of study in F-1 status during CPT. CPT can be authorized for training that is part-time (20 or fewer hours per week) or full-time (over 20 hours per week).

### *Current CPT Protocol & Process at CU Boulder*

The current ISSS CPT protocol is detailed on [our website](#). Under ISSS's current protocol, students must complete the CPT Agreement Form and upload an offer letter. The CPT Agreement Form is signed by the student, their supervisor, Career Services and an International Student Advisor. With our current CPT policy, the training does not have to be required for the degree or for a course credit to be considered as "an integral part of an established curriculum."

## CPT Regulations and Guidance

The federal regulations and guidance on CPT are not as comprehensive as desired; the CPT regulations, as with many regulations, are subject to interpretation. It is the university's responsibility to create a clear, consistent protocol that is rooted in the regulatory wording. Federal agency guidance (in this case that of SEVP) is used when creating institutional protocols, e.g. what constitutes enrollment during a period of CPT and determining how to document CPT is an integral part of an established curriculum.

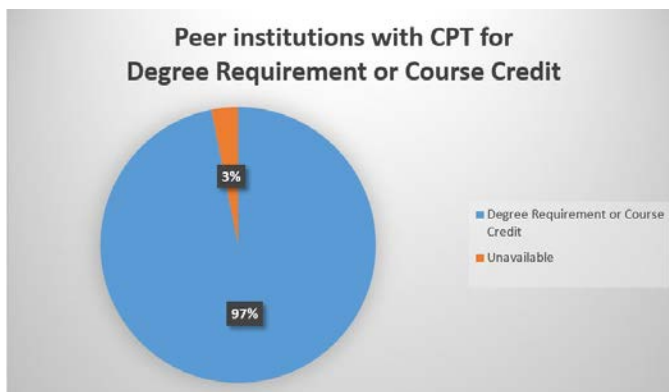
F-1 students must continue to pursue a full course of study while on CPT. The [SEVP Online DSO Training, Module 4, Lesson 4 - Curricular Practical Training](#) states that, "F-1 students are required to maintain status (status includes enrolling in a full course of study) while completing CPT." Moreover, the [SEVP Online DSO training, Module 4, Lesson 4 – Curricular Practical Training](#) also states that, "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." Lastly as mentioned above, [recent SEVP guidance](#) also reinforces this interpretation.

## CU Peer Institution Comparison

Although there is some flexibility in interpretation regarding CPT, both SEVP and USCIS can review and question universities' CPT practices. Therefore; it is important to ensure that CU Boulder's CPT protocol is in line with the regulations and our peer institutions.

ISSS compared the published CPT processes of 34 institutions that CU Boulder considers as its peer group for comparison. This list of peer institutions comes from the Association of American Universities (AAU) public institutions provided by the Office of Data Analytics at the University of Colorado Boulder (<https://www.colorado.edu/oda/institutional-research/institutional-level-data/peer-comparisons/aau-peer-institutions>). The focus of this comparison was to learn about our peer institutions CPT protocols and whether they authorize CPT only if the internship is required for the degree or for a course credit to be considered as "***an integral part of an established curriculum***" to meet immigration regulations.

ISSS found that 97% of our peer institutions only authorize CPT if it is a degree requirement or for course credit towards the student's degree.

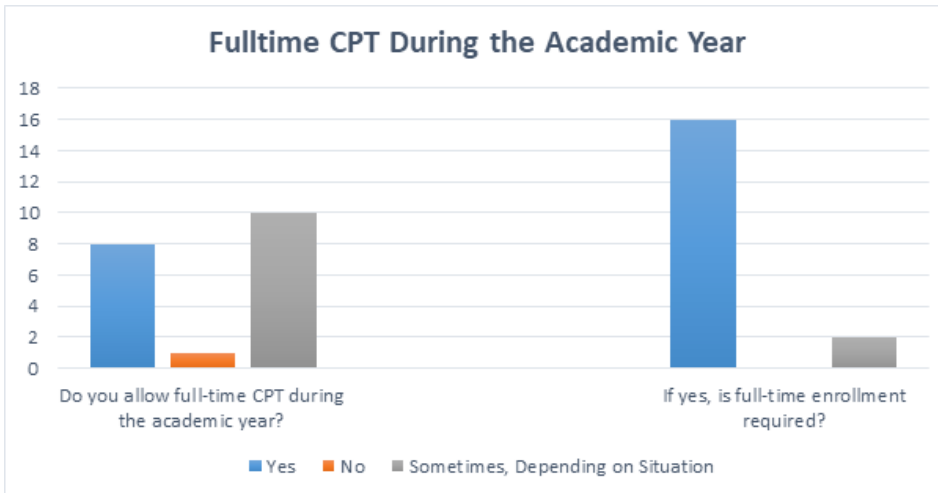
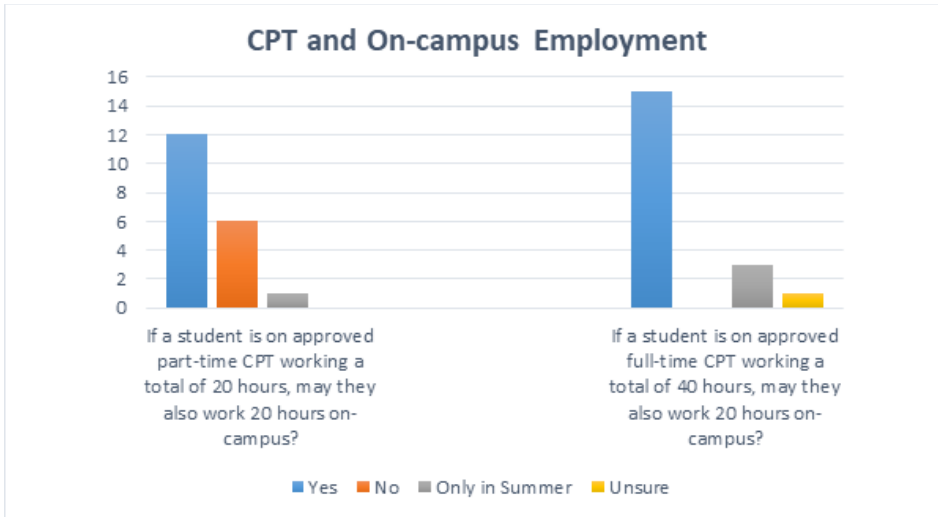


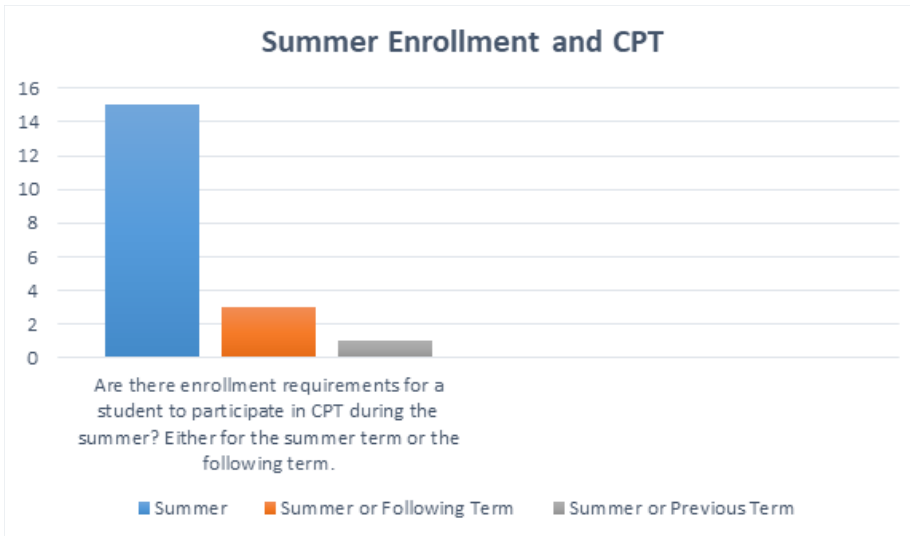
As part of our internal review, ISSS also reached out to each of the 34 peer institutions to ask them a few questions on their CPT policies. Out of the 34 schools, 19 schools responded:

- University of Pittsburgh
- University of Maryland
- Texas A&M University
- Penn State
- University of Kansas
- University of Illinois - Urbana
- University of Iowa
- University of Texas at Austin
- University of California - Los Angeles
- Iowa State University
- University of Oregon
- University of Minnesota - Twin Cities
- Indiana University
- University of Washington
- Michigan State University

- University of California - Irvine
- University of California - San Diego
- University of Michigan - Ann Arbor
- University of Missouri – Columbia

The following three graphs show the questions and responses we received from the 18 peer institutions:





### **New Protocol Changes Effective for CPT with Start Date of 05/06/2021 or Later**

Based on our extensive analysis of the federal regulations and SEVP guidance addressing CPT and our peer institutions' protocols for CPT, ISSS has determined it necessary that for any CPT starting May 6, 2021 or later to apply the following protocol (detailed below).

#### ***Primary Change in New CPT Protocol***

The primary change in the CPT protocol is that for a student to be authorized for CPT, they must meet one of the following requirements. These parameters also apply to graduate students enrolled in only thesis and/or dissertation credits.:

- Be enrolled in an internship course for credit that counts towards their degree. Enrollment in the course must be concurrent with the training. An example is the [CINE 3940 course](#) offered in the Cinema Studies program. *or*
- Their degree must require an internship and that requirement is clearly documented in [the University Catalog](#), i.e., all students in the program must complete an internship to obtain the degree. An example is the [School of Education's master's degree program in Curriculum & Instruction – Literacy Education Track with CO Reading Teacher Endorsement](#) which requires enrollment in EDUC 5285, Reading Clinic Procedures K-12.

#### ***Eligibility Requirements under New CPT Protocol***

As mentioned above, CPT training must be an "integral part of an established curriculum" and make a direct contribution to the advancement of the student's degree. Note that CPT can only be authorized for one semester at a time and does not impact on-campus employment work hours.

For international students to request CPT, they must meet all of the following requirements. For those who do not meet these requirements, [pre-completion Optional Practical Training](#) may be an option to accept a paid internship or employment opportunity.



- Be a degree-seeking student in valid F-1 status and enrolled full-time except that during the summer semester full-time enrollment is not required;
- Have completed one full academic year (Fall & Spring semester) of continuous full-time enrollment in lawful nonimmigrant status (for example: H-4, F-1 or L);
  - Summer enrollment does not count towards the one-year full-time enrollment requirement.
  - For those completing their first academic year, all grades must be posted to MyCUInfo for both semesters without any incomplete grades on the transcript before CPT may be authorized. "In Progress" grades for thesis and dissertation credits are acceptable.;
- Have good academic standing with College/School/Department, which means no suspension from Main Campus;
- Have not met all your degree requirements, as CPT cannot be used as a reason to extend your academic program;
- Have an internship, practicum or training offer in major field of study (not minor or previous major); and
- Must show enrollment in an internship course for credit that counts towards degree or degree must require an internship and that requirement is clearly documented in [the University Catalog](#)

ISSS will be publishing detailed information on the new CPT protocol and the processes involved on the [ISSS website](#) in early January. We will also include this information in our February edition of the [ISSS News](#). In the meanwhile, ISSS is available at [iss@colorado.edu](mailto:iss@colorado.edu) to answer any questions.

*ISSS would like to thank ISSS team member Stephanie Zubrowski for her invaluable research and analysis and contribution to the drafting of the new CPT policy.*

Citations:

(n.d.). Retrieved July 12, 2018, from <https://www.colorado.edu/oda/institutional-research/institutional-level-data/peer-comparisons/aau-peer-institutions>

(n.d.). Retrieved June 12, 2018, from <https://am.nafsa.org/>