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Optional Practical Training (OPT) is defined in the F-1 regulations as “temporary employment authorization for practical training directly related to a student’s major field of study.” Standard OPT is available for a cumulative maximum of 12 months of employment authorization per higher degree level completed in the U.S.

There are two types of OPT:

- [Pre-Completion OPT](#): Off-campus work authorization during a student’s degree program.
- [Post-Completion OPT](#): Off-campus work authorization after completion of all degree requirements or after completion of all coursework (excluding thesis or dissertation credits).

Below is information that will guide you through each step of the **pre-completion** OPT application and authorization process.

SECTION 1 INTRODUCTION TO PRE-COMPLETION OPT

This section will review eligibility requirements, the application timeline, and options for your pre-completion OPT start date. Students will better understand the general pre-completion OPT process after reading this section.

How do I know if I am eligible for pre-completion OPT?

In order to be eligible to apply for pre-completion OPT, you must:

- Currently be in the U.S. in valid F-1 status;
- Have a valid passport and I-94 record indicating F-1 and D/S (duration of status);
- Have been continuously enrolled full-time for at least one full academic year (fall and spring semester) OR will be completing one academic year within 90 days of applying for pre-completion OPT;
- Be enrolled full-time at CU Boulder (or an authorized equivalent) with an on-campus presence in the semester in which you apply for pre-completion OPT;
- Have not completed more than 365 days of full-time CPT at the current degree level
- Have not previously completed a higher degree level in the U.S.;



- Have not previously been approved for 12 months of OPT at the current degree level or a higher degree level; AND
- Only pursue employment directly related to your major field of study.

Please note: You must be registered for credits that require on-campus presence in your final semester.

When can I apply for pre-completion OPT?

You are eligible to apply for pre-completion OPT up to 90 days before you will have completed one academic year (fall and spring semester) in active nonimmigrant status. USCIS has a processing time for OPT of 2-5 months. ISSS recommends choosing a start date at least 2 months in the future to account for USCIS processing times.

- For students who started their F-1 SEVIS program in the Spring 2022 semester, the first day you can apply for pre-completion OPT is September 15, 2022 – 90 days before completing an academic year in F-1 status. Your requested start date must be after December 14, 2022.
- For students who started their F-1 SEVIS program in the Fall 2022 semester, the first day you can apply for pre-completion OPT is February 9, 2023 – 90 days before completing an academic year in F-1 status. Your requested start date must be after May 10, 2023.
- For students who started their F-1 SEVIS program in the Spring 2023 semester, the first date you can apply for pre-completion OPT is September 21, 2023 – 90 days before completing an academic year in F-1 status. Your requested start date must be after December 20, 2023.

Do I need to have a job before I apply for pre-completion OPT?

No. When you apply for pre-completion OPT, you are requesting authorization to work in a job directly related to your major field of study during your authorized period of pre-completion OPT. You will choose your requested start and end dates when you apply for pre-completion OPT. You are **not** required to have a job offer before applying for pre-completion OPT. If USCIS approves your request for pre-completion OPT authorization, they will provide you with your authorized pre-completion OPT start and end date.

Are there limitations to the work I can do on pre-completion OPT?

On pre-completion OPT you can have a job, internship or volunteer work that directly relates to your major field of study. 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 as long as you do not exceed your allotted work hours per week, each position directly relates to your major field of study, and you submit the required pre-completion OPT relevance statement to ISSS for each training opportunity you undertake.

Does pre-completion OPT impact my eligibility for 365 days of post-completion OPT?

Yes, use of 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 the STEM

OPT Extension). Pre-completion OPT will count against that 12-month total and reduce time available for post-completion OPT.

- Part-time pre-completion OPT (20 hours per week or less) is deducted from post-completion OPT at a half-time rate. For example, 3 months of approved **part-time** pre-completion will deduct 1.5 months from your time of post-completion OPT and you will be eligible for only 10.5 months of post-completion OPT.
- Full-time pre-completion OPT (more than 20 hours per week) is deducted from post-completion OPT at a full-time rate. For example, if you are approved for 3 months of **full-time** pre-completion OPT 3 months will be deducted from your time of post-completion OPT and you will be eligible for only 9 months of post-completion OPT.

Even if you do not work during some or all of your authorized period of pre-completion OPT, the USCIS authorized time will still be deducted from the time available for post-completion OPT.

Does pre-completion OPT impact my eligibility for the 24-month STEM OPT Extension if I am qualified for STEM OPT?

No, a USCIS authorized period of pre-completion OPT does not reduce time available for the 24-month STEM Extension. However, you must be in an active period of post-completion OPT to apply for STEM OPT so please plan to ensure you have time remaining to use for post-completion OPT if you will be applying for STEM OPT. ISSS recommends you leave at least 3 months of post-completion OPT available to ensure you have enough time to apply for both post-completion OPT and then the STEM OPT extension.

Is there a limit to unemployment days I am allowed while on pre-completion OPT?

There is no limit to unemployment days while in your authorized period of pre-completion OPT. However, the time you are authorized for pre-completion OPT will deduct from the 12-month post-completion OPT period upon the pre-completion OPT start date granted by USCIS. You cannot recoup any loss of post-completion OPT time, even if you do not work during the pre-completion OPT period for which you have been approved. For example, if you are approved for 3 months of full-time pre-completion OPT you will be eligible for only 9 months of post-completion OPT, even if you do not work using the pre-completion OPT benefit.

Your authorized period of pre-completion OPT does not impact the 24-month STEM OPT extension, if you are eligible for STEM OPT.

Does pre-completion OPT impact my on-campus employment?

No, pre-completion does not impact your on-campus employment. Students can work on pre-completion OPT and on-campus; you are still subject to the on-campus work hour restrictions and eligibility requirements.

Can I take advantage of both pre-completion OPT and CPT simultaneously?

Yes. It is possible to take advantage of both the pre-completion OPT benefit (authorized by USCIS) and the [CPT benefit](#) (authorized by ISSS) and at that the same time. However, on pre-completion you may have multiple training or internships as long as they each relate to your major field of study so it is not necessary to have both if authorized for pre-completion OPT.

How do I choose my requested start and end date for pre-completion OPT?

Your pre-completion OPT requested start date must be **after** you have completed one academic year and your pre-completion OPT end date must be **before** your F-1 program end date or last date of enrollment (whichever is sooner). For the fall and spring semesters, the last day of enrollment is the last date of exams listed on the CU Boulder [academic calendar](#). You can request a minimum of one day and up to one-year of pre-completion OPT at a time.

Once you have submitted your pre-completion OPT application to USCIS and it is pending with USCIS, the only way to change your requested pre-completion OPT dates is to withdraw your pre-completion OPT application and submit a new application, including another filing fee. Once your pre-completion OPT is approved you cannot change your pre-completion OPT dates.

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.

If a student receives an EAD for 12 months of pre-completion OPT but finishes his or her course of study early, can the student continue to use the EAD issued for pre-completion OPT after their program end date?

No. If the EAD was issued for pre-completion OPT, then the EAD is only valid for OPT prior to a student's degree completion. 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.

Only the USCIS authorized pre-completion OPT time that occurs prior to the student's program end date will be deducted from the allotted post-completion OPT time. A student will not lose any unused pre-completion OPT time if they completed their program prior to the end date on their pre-completion EAD card.

- For example, if a student applied for part-time pre-completion OPT from January 02, 2022, to January 01, 2023, but finished the course of study on June 1, 2022, the student would still have nine months of OPT available (the six months of part-time pre-completion OPT would deduct 3 months of the total amount available at that education level).

Am I allowed to have part-time or full-time pre-completion OPT?

If you are eligible for pre-completion OPT you can request part-time pre-completion OPT (20 hours per week or less) during the academic year. Both part-time and full-time pre-completion OPT (more than 20 hours a week) are allowed during official school breaks (spring break, summer vacation, Thanksgiving break, and winter vacation). 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.

If summer is your final semester and you are registered for your final coursework in a summer term, you are still allowed to take advantage of full-time pre-completion OPT in the summer, despite being enrolled. However, keep in mind that on-campus presence is required in a

student's final term, even if the final term falls over the summer. Also, your pre-completion OPT end date will be based on your last day of enrollment in the summer term.

SECTION 2

APPLYING FOR PRE-COMPLETION OPT

This section provides a material guide to applying for pre-completion OPT. Included in this section are detailed instructions, a list of documents and materials that you need to compile, and information about what happens after you fill out the [Pre-Completion OPT I-20 Request Form](#). ISSS has a list of OPT resources on the right-hand side of the [Pre-Completion OPT website](#). Please review these resources.

How do I file my Pre-Completion OPT application with USCIS?

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. This is very important. 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, as the regulations require the recommendation be entered into SEVIS prior to the pre-completion OPT filing.

It is possible to mail your application materials to USCIS instead of filing your application electronically with USCIS. The instructions below are for online filing. If you wish to mail your application materials to USCIS, please reach out to ISSS for instructions.

- USCIS has confirmed that an electronically filed pre-completion OPT application is less likely to be rejected. This is because the USCIS online filing system uses logic that limits the questions you will need to answer based on prior answers, diminishing the opportunity for errors.
- Once the application is submitted online with final payment, students will immediately receive a receipt number and receipt notice. This means that you will not face a [receipt notice delay](#). A paper copy receipt notice will also be mailed to you.
- Payment will be made on a secure website using a credit or debit card. This means that you'll be able to confirm receipt of payment at the time of application. Once you submit payment, your whole application will be submitted to USCIS. Please make sure that you are ready to submit your entire pre-completion OPT application (including the required pre-completion OPT recommendation I-20 from ISSS, passport photos, and any other supporting documents) when you get to the payment screen.
- Additional evidence can be uploaded to the application after submitting. However, ISSS urges students to ensure that they submit a complete application at the time of submission to USCIS. ISSS wants to reiterate that you must first receive the I-20 recommending pre-completion OPT from ISSS before submitting your complete application to USCIS online.

How do I apply for pre-completion OPT?

The first step in applying for pre-completion OPT is to complete the [Pre-Completion OPT I-20 Request Form](#) and upload the required documentation for the request. We will review that documentation below. You will be required to enter your graduate program advisor or academic



advisor's name and email address on the DocuSign form. Once you complete your section of the form, it will automatically route to your advisor based on the information you have provided. After your academic advisor completes their section of the form, it will automatically be routed to ISSS for processing. 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.

You will then need to submit your complete application to USCIS by electronically filing the Form I-765 with USCIS online. Please see further instructions below.

ISSS wants to reiterate that you must first receive the I-20 recommending pre-completion OPT from ISSS before submitting your completed documents to USCIS.

What happens while ISSS is reviewing my pre-completion OPT I-20 Request Form and attached materials?

- ISSS will review your application materials and will contact you if any questions arise.
- ISSS will recommend part-time or full-time pre-completion OPT based on your request form.
- ISSS will issue an I-20 recommending pre-completion OPT to you. You must print, sign the I-20 by hand with an ink pen, and include a copy of the I-20 in your application that you submit to USCIS. ISSS wants to reiterate that you must first receive the I-20 recommending pre-completion OPT from ISSS before submitting your application documents to USCIS.
- Please note that ISSS only recommends that your pre-completion OPT application be approved; the final decision is made by USCIS.

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

Remember that you must first receive the I-20 recommending pre-completion OPT from ISSS before submitting your completed documents to USCIS.

To receive your I-20 recommending pre-completion OPT, please complete the [Pre-Completion OPT I-20 Request Form](#).

You will need to upload the following materials to the USCIS online application system. Documents can be uploaded in the following formats: JPG, JPEG, PDF, TIF, or TIFF. Photos can be uploaded as a JPG, JPEG, or PNG.



Evidence (as listed in online filing system)

Example

Notes

2x2 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	Download your most recent I-94 here: https://i94.cbp.dhs.gov/
Employment Authorization Document	Valid passport biographical page	If you were not previously issued an EAD, you must upload a copy of a government-issued identity document (such as a passport).
Proof of Enrollment	Transcripts, or enrollment verification letter	
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 pre-completion OPT recommendation	This is only referring to the I-20 recommending OPT, not any prior I-20s

Additional Notes:

- If you have a prior SEVIS ID number, ISSS recommends including the prior SEVIS ID in the additional information section.
- If you have completed less than 1 full year in F-1 status (e.g. started program in H-4 status), ISSS recommends that you upload proof of prior immigration status as well as transcripts showing that you completed 1 academic year of full-time enrollment



What is the Form I-765?

The Form I-765 is the form where you are formally requesting pre-completion OPT authorization from USCIS. When electronically filing the Form I-765 with USCIS online, you will not fill out a paper copy of the Form I-765. The USCIS online filing system uses logic that limits the questions you will need to answer based on prior answers, diminishing the opportunity for errors. You will not be required to submit a copy of your I-765 to ISSS for review. The ISSS advisor who issues the I-20 recommending pre-completion OPT welcomes the opportunity to review your draft I-765 before you make payment and submit your complete application to USCIS.

When filling out your online application, please be sure to select the proper eligibility category: (c) (3) (A) Pre-Completion OPT.

SECTION 3 SUBMITTING YOUR PRE-COMPLETION OPT APPLICATION

This section provides instructions for submitting your complete OPT application materials to USCIS.

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

- First, make any edits that ISSS has recommended to your post-completion OPT application materials and review all your materials for completion and accuracy.
- Compile all the USCIS application materials that were listed in section 3. Ensure they are complete and accurate.
- Now you will submit your materials to USCIS.

To electronically file the Form I-765 with USCIS online, individuals must first create a USCIS online account at myaccount.uscis.gov. Once you have created an account, you'll be able to complete the filing process. Within your USCIS account, you will be able to:

- Upload your documents;
 - Documents can be uploaded in the following formats: JPG, JPEG, PDF, TIF, or TIFF. Photos can be uploaded as a JPG, JPEG, or PNG.
 - File names must contain only English characters (e.g. ABC). Special characters (e.g. @, #, \$, &) are not allowed. You will receive an error message if the file format or file name do not meet the standards above.
- Pay the \$410 fee;
 - Payment will be made on a secure website using a credit or debit card. This means that you'll be able to confirm receipt of payment at the time of application. ISSS understands that once you submit payment, your whole application will be submitted to USCIS. Please make sure that you are ready to submit your entire pre-completion OPT application (including the required pre-completion OPT recommendation I-20 from ISSS, passport photos, and any other supporting documents) when you get to the payment screen.
- Once you submit your application through the online system, you should:
 - Receive your receipt notice and receipt number immediately within your USCIS account;
 - Be able to track the status of your case;

- Communicate with USCIS through a secure inbox; and
- Respond to Requests for Evidence (RFE).

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 in your authorized period of pre-completion OPT to begin working.

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

You can check USCIS's OPT processing time by going to their [processing times website](#), selecting "I-765 Application for Employment Authorization" under "Form", selecting "Based on a request by a qualified F-1 academic student [(c)(3)]" under "Form Category", and selecting "Potomac Service Center" under "Field Office or Service Center." There you will be able to see their estimated time range for processing OPT applications.

SECTION 4 WHILE YOUR PRE-COMPLETION OPT APPLICATION IS PENDING

This section provides an overview of what to expect while your pre-completion OPT application is pending. Included is a checklist of what to be watching for, reminders, and travel information.

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

- Pay attention to receipt notices, mail, and notifications from USCIS.
- Contact ISSS if your pre-completion OPT application is rejected, denied, or if you receive a Request for Evidence (RFE).
- If you move or are no longer receiving mail from the U.S. address you entered in item 3 of the I-765 (or that you provided in the USCIS online filing system) and you have not yet received your Employment Authorization Document (EAD Card), you must update your address information in the [USCIS Online Change of Address System](#).
- 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.

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 active visa.

There are a few things to be aware of if traveling with a pending OPT application:

- If additional information is needed for your OPT application, USCIS will mail you a request for evidence (RFE). 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.

- Future travel restrictions could impede your ability to return to the U.S.; travel restrictions may change at a moment's notice. You will need to carefully consult both the airline and the travel restrictions for the country to which you will be returning to the U.S. from.

SECTION 5

PRE-COMPLETION OPT REPORTING REQUIREMENTS

This section reviews your reporting requirements while on an approved period of pre-completion OPT.

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

While authorized for pre-completion OPT, you are still in F-1 status. Immigration regulations require you to report to ISSS how each OPT training opportunity is directly related to your major field of study.

For each job you have during the pre-completion OPT period, you will need to complete the [Pre-Completion OPT Employment Relevance Form](#) that will be reviewed by ISSS and a record will be kept of the relevance to your major.

Is there a limit to unemployment days I am allowed while on pre-completion OPT?

There is no limit to unemployment days while in your authorized period of pre-completion OPT. However, the time you are authorized for pre-completion OPT will deduct from the 12-month post-completion OPT period upon the approval date granted by USCIS. You cannot recoup any loss of post-completion OPT time, even if you do not end up using the approved pre-completion OPT benefit for which you have been approved. For example, if you are approved for 3 months of full-time pre-completion OPT you will be eligible for only 9 months of post-completion OPT, even if you do not end up using the pre-completion OPT benefit.

Your authorized period of pre-completion OPT does not impact the 24-month STEM OPT extension, if you are eligible for STEM OPT.

What documentation should I keep for my records while on pre-completion OPT?

The list below is a suggestion of records to keep regarding your pre-completion OPT employment; it is not exhaustive. Be sure to maintain documentation that the work/internship 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.

What types of employment are allowed while on an approved period of pre-completion OPT?

- Regular paid employment in a position directly related to the student's major program of study.
- Students may work for multiple employers, as long as the employment is directly related to the student's major field of study
- Payment by multiple short-term employers. SEVP guidance states "Students, such as musicians and other performing artists, may work for multiple short-term employers (gigs). The student should maintain a list of all gigs, the dates and duration."
- Work for hire. SEVP explains, "This is also commonly referred to as 1099 employment where an individual performs a service based on a contractual relationship rather than an employment individual relationship. If requested by DHS, students should be prepared to provide evidence showing the duration of the contract periods and the name and address of the contracting company."
- Self-employed business owner. SEVP indicates, "Students on OPT may start a business and be self-employed. The student should be able to prove that he or she has the proper business licenses and is actively engaged in a business related to his or her degree program."
- Employment through an agency.
- Volunteers or unpaid interns

SECTION 6 EXTENSION, TRAVEL & CHANGES WHILE ON PRE-COMPLETION OPT

Are there any options to extend my pre-completion OPT employment period?

You can only extend your pre-completion OPT benefit by applying to USCIS for a renewal of the pre-completion OPT benefit. You will remain eligible for pre-completion OPT up until you complete your academic program. You will need to submit a new pre-completion OPT application to USCIS for each period of pre-completion OPT you request. For example, if you would like to request full-time pre-completion OPT during the summer, and then would like part-time pre-completion OPT for the fall semester you will need to an I-20 recommending pre-completion OPT from ISSS by submitting two separate [Pre-Completion OPT I-20 Request Forms](#) to ISSS and then you would need to file two separate pre-completion OPT applications with USCIS.



What happens if I begin a new degree level or need a SEVIS transfer while I am on pre-completion OPT?

Consult ISSS if you are considering a [transfer of your SEVIS record](#) to another institution. Pre-completion OPT work authorization is terminated when your SEVIS record is transferred to a new school.

Can I travel while I am on an authorized period of pre-completion OPT?

Yes, you may travel while on pre-completion OPT.

Additional Travel Resources:

- [ICE Travel FAQ](#)
- [Travel Handout: Re-entry from Travel Outside the U.S. & Printing Your Electronic I-94](#)
- [Visa Renewal](#)
- [Printing a Copy of Your I-94](#)

I-94 Arrival Record

Review your [I-94 arrival record](#) every time you re-enter the U.S. to ensure that your entry was recorded properly. Check your biographical information as well as your Class of Admission (F-1) and Admit until Date (D/S).

Travel to Third-Country Destinations

Depending on the country you are traveling to and/or through, you may require a transit visa (to travel through an intermediary country on your way to your final destination) or a tourist visa to enter your final destination. Please consult the appropriate embassy or foreign consular office to determine if an additional visa is necessary. ISSS cannot give advice on visa procedures or application requirements for other countries.