



Pre-Completion Optional Practical Training (OPT)

What is Optional Practical Training (OPT)?

- One year (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.

It is a benefit associated with F-1 status.

In Major Field of Study: Cannot be requested in a minor/previous major 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 valid passport and I-94 indicating F-1 and D/S
- ✓ **Enrolled full-time (or authorized RCL) in 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 (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 processing times.
- For students who started their F-1 program in...
 - **Fall 2020 or Earlier:** You can apply for pre-completion OPT now.
 - **Spring 2021 semester:** the first day you can apply for pre-completion OPT is September 16, 2021 – 90 days before completing an academic year in F-1 status. Your requested start date must be after December 15, 2021.
 - **Fall 2021 semester:** the first day you can apply for pre-completion OPT is February 3, 2022 – 90 days before completing an academic year in F-1 status. Your requested start date must be after May 4, 2022.



Pre-Completion OPT Employment

- Your job, internship or volunteer work must directly relate 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



Do I need a job offer before I can apply?

- 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.

How do I choose my start and end dates?

- 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 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.



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.

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 and you may only work the hours you are authorized (part-time=20 hours per week or less, full-time=more than 20 hours a week)



Unable to Work in 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](#)



What impact does pre-completion OPT have on my standard 12 months of 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 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 OPT 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 end up not working 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.



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.
- [Pre-Completion OPT Guide](#)
- [Sample I-765 for Pre-Completion OPT](#)



Does USCIS accept electronically filed applications?

- Yes and we will discuss this further during this presentation. It is important to note that before electronically filing the Form I-765 with USCIS online or filing by mail, 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.**



Pre-Completion OPT I-20 Request Process

- 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 next.
- After you complete the Pre-Completion OPT Request 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 either by mail or 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 materials do I need to provide with my pre-completion OPT application materials?

- The materials that you will submit to USCIS depend on whether you are electronically filing the Form I-765 with USCIS online or mailing your completed application to USCIS.
- To receive your I-20 recommending pre-completion OPT, please complete the [Pre-Completion OPT I-20 Request Form](#). On the form, you'll be asked if you are planning to apply for pre-completion OPT by mailing your materials to USCIS or by electronically filing the Form I-765 with USCIS online. If you are going to apply through electronic filing, ISSS recommends that you do not start the USCIS online application until after you receive the I-20 recommending pre-completion OPT from ISSS. For this reason, if you indicate that you will be electronically filing the Form I-765 with USCIS online, 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.
- If you indicate that you will be mailing your materials to USCIS then ISSS will ask you to upload a copy of your completed [Form I-765](#) to the ISSS Pre-Completion OPT I-20 Request Form. You should type your information into the I-765 form, print, and sign the I-765 in black ink.



The following documents are required for the application to USCIS and must be uploaded to the Pre-Completion OPT I-20 Request Form that ISSS reviews:

- Current I-94 Record, you will have one of the following:
 - Electronic I-94: Majority of students will have an electronic I-94. Download a copy from the [Customs and Border Protection I-94 website](#)
 - Paper I-94 Card: Most common with land crossings, given to student at Customs and Border Protection. Include photocopies of the front and back of your I-94 card
- Clear (color) copy of your valid passport ID page(s) and any renewal, extension, amendment, or correction pages
- Clear (color) copy of most recent U.S. entry visa or change of status I-797 approval notice. Exception: Canadians do not need provide a visa copy
- [Form I-765](#) if you will be submitting your application materials by mail to USCIS. Optional to upload if you will be electronically filing the Form I-765 with USCIS online.



The following documents are required for the application to USCIS but optional to upload in the Pre-Completion OPT I-20 Request Form that ISSS reviews:

- If mailing your application to USCIS, you will need to mail printed paper copies of these materials. If electronically filing the Form I-765 with USCIS online, 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.
- Application Fee: \$410
 - If mailing your complete application to USCIS, you can choose to pay with a money order, check, or credit card. If you choose to pay with a Credit Card, you will fill out and include the [Form G-1450](#) with your materials. This form authorizes a credit card payment. USCIS accepts: Visa, MasterCard, American Express, or Discover. If you choose to pay with a Personal Check/Money Order Payment: Make it payable to “U.S. Department of Homeland Security”
 - Do NOT abbreviate name to DHS or USDHS; Sign and date the check (month/day/year) on the front of the check (do not sign the back of the check); on the memo line, indicate—OPT and your I-94 number.
 - Please note that if you are electronically filing the Form I-765 with USCIS online, you will submit payment on a secure webpage. 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.

Continued...

- [Form G-1145](#) (Only if mailing your complete materials to USCIS): Place this form on the top of your application if you would like to receive an email/text message when USCIS accepts your application at the Lockbox.
 - Clear copies of the front and back of any Employment Authorization Documents (EADs) issued previously by USCIS. You would only have this if you had a previous work authorization adjudicated by USCIS (Pre-completion OPT, Post-completion OPT, STEM OPT, or Severe Economic Hardship).
 - Photocopies of the I-20 ISSS issued with the pre-completion OPT recommendation, along with any previous I-20s from a different SEVIS ID than you have now and/or copies of CPT authorization I-20s (if applicable).
- Two identical color U.S.-style passport photographs taken within the last 30 days. If electronically filing the Form I-765 with USCIS online, you will only need to upload one photograph.
 - 2" x 2" on plain white or off-white background in accordance with [Department of State photo requirements](#). You cannot be wearing glasses, hats, or head coverings unless a personal or doctor's statement is submitted.
 - Do not cut, trim, or otherwise alter the photos.
 - Do not reuse old photos or photos used in passport/visa applications.
 - If USCIS requests new photos, it will delay OPT application processing.
 - Gently write your name and I-94 number on the back of each photo in case they are separated from the application.



The Form I-765

The Form I-765 is the document by which you are formally requesting pre-completion OPT authorization from USCIS.

The Form I-765

- **If mailing your materials to USCIS for processing**, you will need to include a paper copy of your complete Form I-765. You will need to sign this form by hand with a black ink pen. It is your responsibility as the F-1 applicant to ensure that you have filled out your I-765 correctly. ISSS will review your I-765 for completeness, not accuracy. Included in this section is also an example of a completed I-765.
- **If 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.



What resources should I reference while filling out my Form I-765?

- Please review the I-765 instructions on the [USCIS website](#) and prepare a complete pre-completion OPT application. Here is a [sample I-765](#). Please note that this is one example. Student circumstances may differ and require different answers. Please be sure to review the USCIS I-765 instructions, read the I-765 carefully, and reach out to ISSS if you are still unsure.
- Written instructions can also be found on the [ISSS Pre-Completion OPT website](#).





Submitting Your Application

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

- Now you will submit your materials to USCIS either by electronically filing the Form I-765 with USCIS online or by mailing your materials to USCIS. Instructions for each option are listed below.
- First, make any edits that ISSS has recommended to your pre-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.
 - If filing by mail, ensure all forms are signed by hand with black ink.
 - If electronically filing the Form I-765 with USCIS online, an electronic signature will be required.
 - No matter how you file, 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.



Option 1: Mail your complete Pre-Completion OPT application materials to USCIS:

- It is your responsibility to mail all the required pre-completion OPT application materials to the USCIS Lockbox or Service Center that processes applications for your eligibility category and place of residence. The Pre-Completion OPT eligibility category is: (c)(3)(A).
- The address depends on the mailing service you choose to use to mail the application.
- ISSS recommends that you use a mailing service that provides detailed tracking information (FedEx, UPS, or DHL). You can also use the U.S. Postal Service.
- I-765 filing addresses are available on the [USCIS website](#).
- Make sure that you have signed your Form I-765 by hand with a black ink pen.
- Please do not include any staples in your pre-completion OPT documents/application. Please use a paperclip or a binder clip to keep all your documents together.
- Please print your documents single-sided. Having your documents double sided will not result in a denial of your application, but USCIS does prefer all documents to be single sided.



Option 2: Electronically file your complete Pre-Completion OPT application materials:

- 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.



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 pre-completion OPT processing time by going to the USCIS [processing times website](#) selecting "I-765 Application for Employment Authorization" under "Form" and "Potomac Service Center" under "Field Office or Service Center". There you will be able to see their estimated time range for processing all OPT applications. Generally speaking, it takes 2 – 5 months for pre-completion OPT applications to be adjudicated by USCIS. Please note: filing your application with USCIS online does not expedite the [USCIS processing times](#).



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 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.



USCIS Case Inquiries & Status Requests

ISSS will not have any updates regarding your OPT application beyond what information USCIS provides. In addition to the National Customer Service Center phone line, 800-375-5283, USCIS offers several [online tools](#).

- Check your case status online
 - Your USCIS case status will likely remain in initial review up until card production or a Request for Evidence is made.
- You can [sign-up for a USCIS account](#) to view case updates
- Submit an online case inquiry or service request
- 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 if your I-765 is pending [outside of USCIS's posted processing time](#) and no Request for Evidence has been issued

Case Inquiry

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

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

- 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.



Updating Your Delivery Address

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):

- You must update your address information in the [USCIS Online Change of Address System](#)
- Questions regarding the address change should be directed to the National Customer Service Center (NCSC) at 1-800-375-5283
 - Have your receipt notice number ready when contacting the NCSC



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

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



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>