CURRICULAR PRACTICAL TRAINING (CPT) GUIDANCE

SECTION I: PURPOSE

Under certain circumstances, Missouri S&T is permitted to grant temporary authorization to international students on a F-1 visa to work off-campus in paid internships, co-ops, employment, and other positions that provide practical training related to their Missouri S&T academic programs.

SECTION II: REGULATIONS AND GUIDANCE

Code of Federal Regulations

8 CFR 214.2(f)(10)(i)

(10) Practical training. Practical training may be authorized to an F-1 student who has been lawfully enrolled on a full time basis, in a Service-approved college, university, conservatory, or seminary for one full academic year. This provision also includes students who, during their course of study, were enrolled in a study abroad program, if the student had spent at least one full academic term enrolled in a full course of study in the United States prior to studying abroad. A student may be authorized 12 months of practical training, and becomes eligible for another 12 months of practical training when he or she changes to a higher educational level. Students in English language training programs are ineligible for practical training. An eligible student may request employment authorization for practical training in a position that is directly related to his or her major area of study. There are two types of practical training available:

(i) Curricular practical training. An F-1 student may be authorized by the DSO to participate in a curricular practical training program that is an integral part of an established curriculum. Curricular practical training is defined to be alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with the school. Students who have received one year or more of full time curricular practical training are ineligible for post-completion academic training. Exceptions to the one academic year requirement are provided for students enrolled in graduate studies that require immediate participation in curricular practical training. A request for authorization for curricular practical training must be made to the DSO. A student may begin curricular practical training only after receiving his or her Form I-20 with the DSO endorsement.

The NAFSA Advisor Manual provides the following guidance

“A good general principle is to approach CPT primarily from the curricular perspective, and only secondarily from the employment perspective. That is to say, the school's curriculum, not the student's desire for employment, should drive CPT policy development. CPT policies and procedures should be clearly established and then followed consistently.”

The SEVP training for designated school officials (DSOs) 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."
SECTION III: SCOPE AND APPLICABILITY

This guidance governs the authorization of employment for CPT for all international students on an F-1 visa while the students are enrolled at Missouri S&T. This guidance applies to F-1 students regardless of the particular academic credential they are pursuing and regardless of whether they are undergraduate or graduate student.

SECTION IV: DEFINITIONS

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


b) **Curricular practical training or CPT** - Type of work authorization that eligible F-1 students may request from a U.S. college or university while enrolled there. The regulations state that a student may participate in a "curricular practical training program" that is "an integral part of an established curriculum" and "directly related to the student's major area of study." Curricular practical training is defined as "alternate 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."

c) **DSO or Designated School Official** - Anyone who officially represents an American college or university in matters dealing with F-1 affairs and maintaining a student's record in SEVIS.

d) **F-1 student** - An individual who is enrolled at Missouri S&T and is in the United States on an F-1 student visa.

e) **I-20** - An immigration document that F-1 students must maintain throughout their stay in the United States. CPT authorizations are documented within the I-20 as proof that the F-1 students have received the appropriate authorization to work for a designated period and employer.

f) **International Affairs or IA** - The Office of International Affairs at Missouri S&T

g) **Optional practical training or OPT** – Type of temporary work authorization for employment directly related to the student’s major area of study that eligible F-1 students may request by applying through USCIS. Two types of OPT may be requested – pre-completion OPT and post-completion OPT. OPT is available for up to 12 months total, but students in STEM fields may request a 24-month extension.

h) **SEVIS** - Student and Exchange Visitor Information System, which is a web-based system for maintaining information on non-immigrant students and exchange visitors in the U.S. The system is administered by the Student and Exchange Visitor Program (SEVP) which is part of the Department of Homeland Security (DHS). CPT authorizations are approved through this system.
i) **SEVP** - Student and Exchange Visitor Program which is part of the National Security Investigations Division. SEVP acts as a bridge for government organizations that have an interest in information on nonimmigrants whose primary reason for coming to the United States is to be students.

j) **USCIS** - United States Citizenship and Immigration Services.

**SECTION V: ELIGIBILITY**

**A. Student Eligibility**

1. A student must be in valid F-1 status at the time of the CPT authorization request and must maintain F-1 status throughout their CPT term.

2. A student must be in good standing academically and not on probation or academically deficient.

3. F-1 students are eligible for CPT if the F-1 student has been lawfully enrolled in an academic program on a full-time basis for one full academic year, either at Missouri S&T or in another USCIS-approved college, university, conservatory, or seminary in the United States.

4. F-1 students in language training programs, such as Missouri S&T's Applied Language Institute, or other independent language training programs, are not eligible for CPT.

5. Undergraduate students must have selected their major area of study (cannot be undecided or multi-disciplinary studies).

6. CPT is available only while the student is in F-1 status and before completion of the student's degree program.
   - Degree completion for undergraduate and non-thesis master's students is defined as having met the minimum course requirements for the degree as listed in the course catalog. For example, as of 2021, a bachelor of science degree in an engineering field may require a minimum of 128 credit hours with specific requirements related to general education courses and degree specific courses, along with other requirements such as a minimum GPA. A student who has met all these requirements would be considered to have completed their degree and would no longer be eligible for CPT.

   - Degree completion for thesis master and doctoral students is defined as having met minimum degree requirements as listed in the course catalog, in addition to any additional course and/or research requirements necessary to satisfactorily complete their thesis or dissertation. When requesting CPT, the course(s) related to a student’s CPT experience must be included on the student’s Form 1A/5A on file with Graduate Studies and must show as an incomplete requirement. Students should contact their Graduate Studies Advisor to determine if any Form 1A/5A updates are needed prior to submitting an application for CPT. Thesis master and doctoral students who have successfully defended their thesis or dissertation are no longer eligible for CPT, but may be eligible to apply for OPT.
7. Students should carefully consider their ability to complete all degree requirements no later than the end date on their I-20 before applying for CPT. Students approved for CPT are not eligible for a program extension. Students who have been approved for a program extension are not eligible for CPT. CPT may not be used to delay degree completion.

8. A student who completes one degree level and changes to a higher education level (e.g., the student completes a bachelor’s degree and begins a master’s degree program), becomes eligible for an additional period of CPT.

B. Employment Eligibility
An eligible student may request authorization for CPT for a training opportunity that is directly related to the F-1 student’s major area of study at Missouri S&T and that is commensurate with the student’s degree level.

The training must be “an integral part of an established curriculum”. The student and advisor must be able to document that the work experience being requested through CPT meets at least one of the following criteria:

- The work experience is required of all students in the degree program
- The work experience is required for a specific track or course
- The work experience is required before completing an educational objective

CPT may be full-time (20 hours or more per week) or part-time (20 hours or less per week).

Missouri S&T requires that all co-ops and internships be paid, both part-time and full-time.

The academic advisor, program advisor, faculty advisor, or department chair in the student’s major department must review the offer letter to evaluate whether the position is integral to the student’s major/program curriculum. CPT authorization will not be granted without signed certification from the advisor that the training experience is integral to the curriculum in the student’s major area of study.

1. **Offer Letter**

The F-1 student is required to obtain a written offer of practical training/employment on company letterhead that includes the following:

- Company name
- Start and end dates of employment
- Designation of full-time or part-time and number of working hours per week
- Wage / salary information (all co-ops and internships / CPT must be paid)
- Physical work address
- Position title
- Job description and position responsibilities
- How the practical training relates to the student’s major field of study

2. **Dates**

CPT approval is employer and date specific. A student may work only for the employer listed on the student’s I-20 and for the dates of authorization listed on the I-20. If the student is considering a change in
employment, the student should meet with their international student advisor and COER representative to discuss the student’s specific situation before making any employment changes.

**a. Start Date**

The CPT start date may be no earlier than the day after the end of final exams of the previous semester and no later than the last day to enroll for the semester CPT is requested.

**b. End Date**

The CPT end date during fall and spring semesters may be no earlier than the last day of classes for the semester (not including final exams). Summer semester is not typically a required semester. When summer semester full-time enrollment is not required for a student, the end date may be any date that meets the requirements below.

The CPT end date may be no later than the day before the next semester begins or the date the student completes their degree program. **The program end date is important because the student’s CPT and employment must end on or before the student’s program end date.**

If a student is requesting CPT during the final semester of their degree program, the date used for determining when the student completes their program will be determined as follows:

- For undergraduate and non-thesis students, the last day of final exams of the semester will be the program end date.
- For thesis and dissertation students, the student may select from these options for program end date:
  - Because the student must be enrolled in academic credit for CPT and/or if the student is enrolled in a lecture course, the program end date may be the last day of final exams of the semester.
  - If the student is not enrolled in a lecture course, the date when their thesis or dissertation is accepted by Graduate Studies (library submission date) may be the program end date.
  - If the student has an assistantship, the final date of the assistantship may be the program end date.

**c. Example of dates**

Below is an example of how to determine the earliest start date the latest end date.

If CPT is requested for the spring semester, assuming the fall semester final exams end on December 15 and the summer semester begins on June 5, the earliest start date that may be requested for CPT is December 16 and the latest end date that may be requested for CPT is June 4 because the dates between semesters may be added to the preceding or following semester.

**3. Limitations**

**a. Full-time CPT**

Full-time CPT (20 hours or more per week) is limited to less than one year (364 days or less) cumulative. F-1 students who exceed one year or more of full-time CPT are ineligible for OPT.
b. **Part-time CPT.**

Part-time CPT (20 hours per week or less) is unlimited and will not affect eligibility for OPT. Students approved for part-time CPT are required to be full-time enrolled and attending classes at Missouri S&T.

c. **One type of CPT per request**

Only one type of CPT may be requested on each request. For example, if a student wishes to work part-time during the fall semester and full-time during the dates between semesters, two separate requests and supporting documents must be submitted.

d. **Possible risk**

High usage of even part-time CPT may lead to increased scrutiny and risk when applying for OPT, visa applications, and other benefits such as H1-B. CPT should not be used as a lead-in to OPT employment.

Students should retain records of their I-20s, CPT employment, and related academic work as they may be needed to file for future benefits.

## Section VI: Enrollment Requirements

Regulations require the training to be “an integral part of an established curriculum” and that the student maintain full-time enrollment while on CPT.

"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."

"F-1 students are required to maintain status (status includes enrolling in a full course of study) while completing CPT."

### A. Academic credit for practical training

All students authorized for CPT must enroll in an academic course for at least one credit hour related to the student's CPT. The student must be enrolled in and complete the course during the academic term during which the CPT will occur (fall, spring, summer).

Each student should discuss with their academic or program advisor the course(s) most appropriate for the student's situation, the academic outcomes required for successful completion of the coursework, and credit hours to be earned.

The course must include oversight of the student throughout the semester. This includes regular contact throughout the semester.

Courses that do not require an internship or co-op to complete the course or to receive course credit will not be eligible for CPT. Each course must be for a minimum of one credit hour.

### B. Full course of study requirements

To maintain status, an F-1 student is required to make normal progress toward completing their course of studies. This applies even during CPT.

**Students are required to maintain full course enrollment during fall and spring semesters.**
In most cases, summer is not a required enrollment period, so students would not be required to maintain full-time enrollment. Students who have been enrolled in their current degree program for less than one full academic year or who have attended Missouri S&T for less than one full academic year should meet with their international student advisor to discuss whether full-time enrollment is required during the summer semester.

C. Part-time CPT
Students approved for part-time CPT (20 hours or less per week) may fulfill full-time course enrollment requirements by selecting one of the following.

- Enrollment in 12 credit hours for undergraduate students or 9 credit hours for graduate students, including enrollment in at least one credit hour related to CPT.
- Enrollment in a reduced course load if it is the student’s final semester and the student has been approved for a reduced course load because fewer courses are needed to complete the degree program and enrollment in at least one credit hour related to CPT.
- With approval from Graduate Studies for graduate students meeting the requirements of section A.3 of Policy Memorandum II-20, enrollment in at least one credit hour as required by Policy Memorandum II-20 enrollment requirements, and enrollment in at least one credit hour related to CPT.

No more than the equivalent of one on-line/distance education class or three credits of on-line/distance coursework per semester may count toward the full course of study requirement.

D. Full-time CPT
Students approved for full-time CPT (20 hours or more per week) may fulfill full-time course enrollment requirements by selecting one of the following.

- Enrollment in a COER co-op course (2002, 3002, 5002) for zero credit hours and enrollment in at least one credit hour of academic credit related to the curricular practical training.
- Enrollment in 12 credit hours for undergraduate students or 9 credit hours for graduate students, including enrollment in at least one credit hour related to CPT.
- Enrollment in a reduced course load if it is the student's final semester and the student has been approved for a reduced course load because fewer courses are needed to complete the degree program and enrollment in at least one credit hour related to CPT.
- With approval from Graduate Studies for graduate students meeting the requirements of section A.3 of Policy Memorandum II-20, enrollment in at least one credit hour as required by Policy Memorandum II-20 enrollment requirements, and enrollment in at least one credit hour related to CPT.

No more than the equivalent of one on-line/distance education class or three credits of on-line/distance coursework per semester may count toward the full course of study requirement.

E. Enrollment/Courses for CPT
Students must register for a course that requires an internship or co-op to complete that course. The student must be registered in the appropriate course before the I-20 with CPT authorization will be created.

Academic departments may choose to develop cooperative training or internship course(s) which require a work-based learning experience and which is an integral part of the student's degree program or select
from other courses that allow academic outcomes that can be customized based on each student’s situation such as special problems, independent study, or research.

Whether a student enrolls in a co-op course, internship course, or other course such as special problems, independent study, or research, consideration should be given to developing goals for the student to learn a new skill or develop a project at the worksite.

The course must include oversight of the student throughout the semester. This includes regular contact throughout the semester.

Each course must include the requirement for the student to participate in an internship or co-op in order for the student to complete the course and receive credit. Each course must be for a minimum of one credit hour.

The goal is to work toward all departments who wish to offer students the opportunity for an internship or co-op to have an internship course for all level of students (XX02 for undergraduate, XX85 for graduate). The target date to have these courses available is FS2022.

In the meantime, current courses may be considered as long as they are able to include the requirement for a work experience as part of the course criteria. Following are examples of courses that might be considered.

**Undergraduate Students**

- 2002 or 3002: Cooperative Engineering Training /Cooperative Work Training- On the job experience gained through cooperative education with industry, with credit arranged through the departmental cooperative advisor. Grade received depends on the quality of reports submitted and work supervisor’s evaluation. Pass-fail grading option only. IND 0.0-6.0 credits (NOTE – minimum of one credit hour required for CPT. Student will be automatically enrolled in the 2002/3002 course by COER/Registrar’s Office after student has registered the CPT experience with COER.)

- 3085 Internship - Internship will involve students applying critical thinking skills and discipline specific knowledge in a work setting based on a project designed by the advisor and employee. Activities will vary depending on the student's background and the setting. IND 0.0-6.0 credits. (NOTE – minimum of one credit hour required for CPT.)

- 4085 Internship - Internship will involve students applying critical thinking skills and discipline-specific knowledge in a work setting based on a project designed by the advisor and employee. Activities will vary depending on the student's background and the setting. IND 0.0-6.0 credits. (NOTE – minimum of one credit hour required for CPT.)

**Graduate Students**

- 5000: Special Problems-- Problems or readings on specific subjects or projects in the department. Consent of instructor required, IND 0.0-6.0 credits. (NOTE – minimum of one credit hour required for CPT, when deciding between special problems and research, non-thesis master’s degree students should select special problems, while thesis or dissertation students should select research.)
• 5002: Cooperative Engineering Training /Cooperative Work Training- On the job experience gained through cooperative education with industry, with credit arranged through the departmental cooperative advisor. Grade received depends on the quality of reports submitted and work supervisor’s evaluation. Pass-fail grading option only. IND 0.0-6.0 credits (NOTE – minimum of one credit hour required for CPT.)

• 5085 Internship – Students apply critical thinking skills and discipline specific knowledge in a work setting based on a project designed by the advisor and employer. Activities will vary depending on the student's background and setting. Requires major report and formal presentation to sponsoring organization. IND 0.0-6.0 credits. (NOTE – minimum of one credit hour required for CPT.)

• 5099: Research/Research Special Topics/Special Research and Thesis- Investigations of an advanced nature leading to the preparation of a thesis or dissertation. Consent of instructor required. IND 0.0-15.0 credits. (NOTE – minimum of one credit hour required for CPT. When deciding between special problems and research, non-thesis master’s degree students should select special problems, while thesis or dissertation students should select research.)

• 6000: Special Problems-Problems or readings on specific subjects or projects in the department. Consent of instructor required. IND 0.0-6.0 credits. (NOTE – minimum of one credit hour required for CPT.)

• 6085: Internship – Students will apply critical thinking skills and discipline specific knowledge in a work setting based on a project designed by the advisor and employee. Activities will vary depending on the student's background and the setting. Requires a major report. IND 0.0-15.0 credits. (NOTE – minimum of one credit hour required for CPT.)

• 6099: Investigations of an advanced nature leading to the preparation of a thesis or dissertation. Consent of instructor required. IND 0.0-15.0 credits. (NOTE – minimum of one credit hour required for CPT.)

F. Late Registration Fees

Any student registering after the close of the regular registration period shall pay a late fee in addition to all other fees in the amount equivalent to one (1) hour tuition fee. Any questions related to late registration fees should be address to the Registrar’s Office and/or Cashier’s Office.

Section VII: Application Process

Applications for CPT during the summer and fall semesters are accepted by International Affairs beginning on the last day to drop a course for the spring semester. Applications for CPT for the spring semester are accepted by International Affairs beginning the last day to drop a course for the fall semester. For example, if the last day to drop a course for the spring semester if April 16, the first day to submit a request for CPT authorization for the summer or fall semester is April 16.
CPT authorization is granted for one academic term at a time (fall, spring, summer), regardless of whether the CPT is part-time or full-time. The dates between semesters may be combined with fall, spring, or summer terms.

Submission of a CPT request to International Affairs does not guarantee approval nor imply authorization has or will be granted.

Only one type of CPT (full-time or part-time) and one academic term may be requested on each request. For example, if a student wishes to work part-time during the fall semester and full-time during the dates between semesters, two separate requests and supporting documents must be submitted.

The CPT start date may be no earlier than the day after the end of final exams of the previous semester and no later than the last day to enroll for the semester CPT is requested. The CPT end date during fall and spring semesters may be no earlier than the last day of classes for the semester (not including final exams.) Summer semester is not typically a required semester. When summer semester full-time enrollment is not required for a student, the end date may be any date meeting the requirements listed in Section V, B.2 Dates. The CPT end date may be no later than the day before the next semester begins or the date the student completes their degree program. Employment must end or before the student's completion date. Section V, B.2 Dates of this document provides detailed guidance related to start and end dates.

Students should begin the CPT request process a minimum of 30 days prior to the requested CPT start date. Each student is responsible for securing signatures from the academic department and Graduate Studies (graduate students only). Once the fully completed form with approvals from the advisor, course instructor, department chair, and Graduate Studies (graduate students only) and an offer letter meeting the requirements are provided to International Affairs, the request will be reviewed for completeness and eligibility. If all requirements are met, the student's international advisor will forward the request to Career Opportunities and Employer Relations (COER) for their review and approval. COER requires registration of the internship or co-op before approval is given. Students should plan for at least ten business days processing time after approval is received from COER. Incomplete information or missing documents may delay processing or require follow-up.

After approval is received from COER, IA will process authorization for CPT through SEVIS. The student's I-20 will be updated to list specifically the dates and employer CPT is authorized for.

The student must wait to begin working until the CPT authorization process is complete and the student has received the updated I-20 containing CPT authorization. CPT approval is employer and date specific. A student may work only for the employer listed on the student's I-20, for the dates of authorization listed on the I-20, and for the number of hours approved (full-time or part-time).

Students wishing to extend CPT past the end date listed on page 2 of the I-20 or wishing to request CPT authorization for a new employer must complete the request process again. Any student who has not received the updated I-20 with approval should stop working on or before the end date listed on page 2 of the I-20. Working past the end date or for an employer other than listed on the I-20 is a violation of F-1 visa status.

Instructions for students applying for CPT, along with the form to apply, are available online at https://international.mst.edu/international-student-services/employment-opportunities/.
Section VIII: Maintaining Status During CPT

Students must continue to maintain valid F-1 status while on CPT. This includes

- Full-time enrollment
  - Reduced course load for final semester and/or Policy II-20 guidelines apply.
  - Please see Section IV. B. Enrollment Requirements for additional information.
- Updating/maintaining their local address in Joe'SS to list the physical address where the student lives within ten days of any change
- Notifying International Affairs and COER of any change in employment
- Working only during the CPT approved dates listed on their I-20, for the employer listed on the I-20, and for the hours approved (full-time or part-time)

Students have sole responsibility to ensure compliance with any limits on their CPT and to monitor their eligibility for OPT. Missouri S&T is not responsible for monitoring full-time CPT duration or OPT eligibility. A student exceeding 12 months of full-time CPT per level will do so at their own risk for potential future benefits. Each student is responsible for maintaining valid F visa status.

Section IX: Questions / Additional Information

Information about CPT is available online at https://international.mst.edu/international-student-services/employment-opportunities/.

For any questions related to CPT, contact International Affairs at 573-341-4208 or ia@mst.edu or contact the international student advisor directly. A list of international student advisors and assigned student groups is available online at https://international.mst.edu/about/meettheteam/.