



FALL 2022:
CURRICULAR
PRACTICAL
TRAINING (CPT)
INFO SESSION



AGENDA

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What is CPT?

- **Curricular Practical Training (CPT)** is defined in the U.S. Code of Federal Regulations "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."
- **Information about CPT can be found at these websites:**
 - <https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular>
 - <https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular#eligibility>
 - <https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular#for-middlebury-institute-students>
 - <https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular/apply#for-middlebury-institute-of-international-studies-at-monterey-st>
- **Optional Practical Training (OPT)** is temporary employment directly related to the student's major area of study and is applied to and approved by USCIS. It can be used prior to and immediately after the degree program completion. If CPT is not possible then *pre-completion* OPT *might* be an option.

Eligibility for CPT



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- Be in valid F-1 status.
- Have been in full-time academic status for one full academic year (two semesters).
 - *Exception: if a degree program REQUIRES a practicum/internship of all students in that program to earn the degree then it may be possible to grant CPT in the first two semesters.*
- The training is an integral part of the school's established curriculum:
 - Earn academic credit towards the degree program for the opportunity; **OR**
 - The degree program requires a practicum/internship to earn the degree. (Only four (4) Institute programs require this).
- Employment relates **directly** to the student's major field of study.
- One year (12 months) of full-time (2080 hours or more) CPT eliminates a student's eligibility for Optional Practical Training (OPT).



Eligibility for CPT continued

- A Designated school official (DSO) authorizes CPT in SEVIS, and the authorization prints on the student's I-20. (At Middlebury, the DSOs are in ISSS.)
- The training opportunity must be obtained before CPT can be authorized.
- CPT can only be authorized before the student's program end date on the I-20.
- CPT must be authorized before the student can begin work. Engaging in training without authorization is a violation of the student's F-1 status and could lead to the loss of status.

Eligibility for CPT continued



- Authorization is employer/position specific and for a specific period of time:
 - CPT can be granted for the length of the semester, the length of the course (if shorter than the semester) or the length of the training experience - whichever is shorter.
 - A separate CPT application is required for each term.
 - If CPT is requested in the January term and the Spring term with the same employer/position, ISSS will grant continuous authorization from January to the end of the Spring term. Both requests must be submitted at the same time for this.
 - Part-time CPT (20 hours or less per week) will be granted during the Academic year
 - *EXCEPTION: if CPT is required for the degree program and must be done full-time then we can grant it full-time during the academic year.*
 - CPT may be authorized full-time (21 hours per week or more) during the summer.
 - Students can have more than one CPT authorization at the same time; however, each employer must be authorized and this requires a CPT application for each employer/position and all other requirements must be met for each CPT request.

When is CPT needed and when is it not?



- CPT is needed for:
 - Regular paid positions in the U.S.
 - Off-campus internships, alternative work experiences that are directly related to a student's major field of study - generally all paid.
- CPT is **not** needed for:
 - Truly unpaid or volunteer opportunities in the U.S. unless CPT is required by the employer to substantiate the internship as an internship per US Department of Labor regulations.
 - Employment that is deemed 'on-campus work' (paid by MIIS)
 - If the position is for 20 hours or less during the academic year
 - It can be full-time during summer/official breaks
 - Employment done outside of the U.S.

CPT cannot be issued for freelance or self-employment opportunities (these are sometimes presented as 1099 Employments)

When is CPT needed and when is it not? continued



- **CPT is NOT needed if the internship is with certain International Organizations. This requires a separate type of work authorization from CPT:**
 - This is a type of work authorization is issued to F-1 students who have been offered an internship with a recognized International Organization and it takes place in the U.S.
 - F-1 students can apply for this type of off-campus work authorization at any point during their program of study (does not need to wait a full year).
 - F-1 student must maintain their F-1 status for the duration of the position.
 - Student needs to have an off-campus written offer from an approved international organization.
 - This type of off-campus work authorization is approved by USCIS.
 - Student will work with ISSS office to obtain an I-20 with off-campus recommendation, and then submit application to USCIS.
 - Student needs to have an EAD card prior to starting an internship.
 - 59 Stat. 669, International Organization Immunities Act, see 22 USC 288 for the [list of organizations](#).



CPT Application Processes

- The CPT application processes can be found at <https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular/apply>.
- Use the [CPT Internship Application](#) if you are applying for CPT based upon enrollment in a course, *other than the Fieldwork course*, that requires participation in an off-campus experience. Courses include, but are not limited to:
 - International Professional Service Semester (IPSS)
 - DPP Independent Practicum

Important Note Before Starting your Application:

- You will be required to upload the following documents in the CPT application:
 - An offer letter from the organization or company. Please contact your internship host in advance of completing this application if you do not already have an offer letter with the required information. Go to this link for the required information: https://www.middlebury.edu/office/sites/www.middlebury.edu.office/files/2022-04/Fieldwork%20Supplemental%20Letter.pdf?fv=VPuv5_z8.
 - [CPT Recommendation Letter](#), completed by the course instructor.
 - Unofficial Transcripts, printed from BannerWeb, which shows enrollment in the course for which you are requesting the CPT approval.



CPT Application Processes continued

- Use the [Fieldwork Enrollment Application](#) if you need to enroll in the Fieldwork Course for your off-campus internship for CPT.
 - Prior to the course, students arrange for their own internship or fieldwork, which they then undertake at the same time they are enrolled in the course. This course satisfies the credit-bearing course requirement for CPT authorization eligibility, as long as the experience directly relates to the student's major field of study, and the student meets all other eligibility criteria.

Important Note Before Starting your Application:

- You will be required to upload a supplemental letter from the organization or company. This Supplemental Letter contains information needed to request enrollment in the Fieldwork course and is also used by ISSS for the CPT approval process. Please contact your internship host in advance of completing this application if you do not already have an offer letter with the required information. Go to this link for the required information: https://www.middlebury.edu/office/sites/www.middlebury.edu.office/files/2022-04/Fieldwork%20Supplemental%20Letter.pdf?fv=VPuv5_z8.
- Once your application has been submitted, please note that you will receive two emails:
 - One from the instructor of the course, confirming enrollment in the course
 - The second from ISSS, once the CPT has been approved. Please allow 7-10 business days from the date of enrollment in the course for ISSS to process the CPT request.



CPT Approval Process

- ISSS encourages you to begin the process as soon as possible. Students are encouraged to submit all documentation in a timely manner prior to their requested CPT start date. From the time a completed application is submitted, it can take 7 to 10 working days before an approval is issued.
- International Student and Scholar Services (ISSS):
 - Reviews CPT application and supporting documentation submitted by student.
 - Upon approval, will issue I-20 with CPT authorization for student.
 - Student will receive an email from ISSS once the I-20 has been issued, along with information about how to maintain status while engaging in off-campus training.
 - If CPT cannot be approved, ISSS will email the student.
- More complete information can be found at:
<https://www.middlebury.edu/office/international-student-and-scholar-services/students/student-employment-information/curricular#for-middlebury-institute-students>



- A student approved for CPT will be issued an updated I-20 with off-campus training authorization.
- The I-20 with CPT approval will become your current, valid I-20.
- **Keep ALL previous I-20s for your records.**
- If you engage in an internship that is paid, you MUST obtain a social security number (SSN), if you don't already have one. For more information on the SSN, go to: <https://www.middlebury.edu/office/international-student-and-scholar-services/living-us/social-security-information>
- You will also likely have tax filing requirements for the tax year you work in (filing will occur in April of the following year - i.e. if you work in 2022 you file taxes in April of 2023)
- If you end your internship early, or decide NOT to engage in the internship, you must notify ISSS so that we can shorten or cancel your CPT authorization.

When CPT is not an option: Pre-completion Optional Practical Training (OPT)



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- A student is eligible to engage in pre-completion OPT provided the off-campus training starts after the completion of one academic year spent in F-1 study.
- OPT is 12 months in length (per degree level)
- OPT can be used both during and after a student's degree program.
- **Any OPT used during a student's degree program (called pre-completion OPT) counts against the time remaining for OPT after the student's degree program (post-completion OPT).**
 - Part-time pre-completion OPT (up-to, but not exceeding 20 hours/week) counts against the 12 month eligibility at a half-rate.
 - Full-time pre-completion OPT (more than 20 hours) counts against the 12 month eligibility at a full-rate.

When CPT is not an option: Pre-completion Optional Practical Training (OPT) continued



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- A student does not need to have a job offer to apply for OPT.
- OPT is open authorization, meaning that it is not specific to one offer of training, and a student can use OPT approval to engage in multiple instances of off-campus training provided:
 - Each opportunity is directly related to the student's major area of study
 - Each instance of employment is reported to ISSS (for reporting purposes to SEVIS)
 - The student does not exceed 20 hours/week of work if approved for part-time authorization in the academic year.
- OPT can be used for many different types of employment, including (but no limited to) freelancing, self-employment, full-time (at-will employment), internships, employment through an agency.
- OPT approval requires an application to the U.S. Citizenship and Immigration Services (USCIS) plus a filing fee.
- An application for pre-completion OPT can be submitted *no earlier than 90 days from the requested start date* and can take about 3 months to be approved by USCIS.
- Contact iss@middlebury.edu if you want to explore this option.

How to Contact ISSS:

➤ **Website:** <http://go.middlebury.edu/iss>

➤ **Email:** iss@middlebury.edu

If you email ISSS, be aware that it may take 3-5 business days to respond as we juggle competing priorities. Please do not email us multiple times about the same issue or write to individual staff members, as that only makes it more complicated for us to respond in a timely way.

➤ **ISSS Advisor appointments:** [via Calendly](#) (online scheduling software - the link to Calendly can be found on our website.)

Please only schedule an appointment after you've consulted and reviewed carefully other available Middlebury resources such as the ISSS website or emails we have sent.

➤ **Phone:** 802-443-5858

NOTE: Due to the vacancy in ISSS at Monterey, this is the Vermont-based ISSS phone number and Vermont is in Eastern Time +3 hours ahead of California.

