

Curricular Practical Training (CPT): Information and Recommendation Form

What is Curricular Practical Training (CPT)?

CPT is a benefit of F-1 status that permits employment at an off-campus internship. To qualify for CPT, the internship must relate to your declared major, and you must receive academic credit by enrolling in EXPL 205 or 206 (Connecting Academic and Intern Experiences, for summer or academic year internships, respectively). F-1 students who have an off-campus internship must receive CPT before beginning their internship. To be eligible for CPT, students must be in F-1 status and have completed at least one academic year immediately prior to the internship period.

Do I Need CPT?

Yes, for any job or internship performed while physically in the United States which doesn't meet Department of Labor criteria as a volunteer position (see below), and which does not fall under the campus employment benefit. You must have CPT for any form of payment or compensation, including stipends, housing, food, transportation, gifts, etc. This includes off-campus employment or internships funded by the Kenyon Summer Internship Stipend Fund. Unpaid or remote internships may also need CPT.

Unpaid Internships

Whether an internship is paid or compensated is not the sole factor to determine whether CPT is needed. Activities that are truly altruistic or voluntary in nature, where the student is donating their time and is not benefiting professionally from the experience, may be considered volunteering and may not need CPT. Activities that provide benefit to the hiring organization, or that students will list as professional experience on a resume, likely need CPT, even if they are unpaid. **We strongly recommend CPT for unpaid internships for the student's protection in the event USCIS disagrees with the student's and/or employer's assessment that an unpaid activity meets the Department of Labor's test for an unpaid internship.** See the addendum (page 5) of this document for more information on the difference between volunteering and unpaid internships.

Remote Internships

If you have a remote internship and will be physically located in the U.S. while doing the internship, you need CPT for this internship, even if the company/organization you are interning for is not a U.S. entity. What matters is where you are physically located and that you have authorization through CPT to be working at an internship.

If you are physically outside of the U.S. and doing a remote internship with a U.S. organization, you do not need CPT. When you are outside the U.S., F-1 employment regulations are not applicable.

If you are unsure...

Come talk with CGE staff if you are unsure whether you need CPT, **before** you begin an internship. The U.S. government is very strict about unauthorized employment, and unauthorized employment, even if unintentional or done unknowingly, can have severe consequences in the future.

Eligibility for CPT

An F-1 student is eligible for CPT if:

- By the time the CPT/internship begin, they have completed at least two semesters of study with an active SEVIS record and I-20, immediately prior to the internship
- The student receives a written offer for an internship that relates to their declared major
- The student enrolls in EXPL 205 or 206, and completes all required coursework (including, for summer internships, the EXPL 205 class meeting held in April)

For questions about CPT eligibility, please contact the CGE. CPT may be issued for part-time or full-time employment during the summer, and for part-time employment during an academic semester. Part-time CPT is capped at 20 hours/week.

Responsibilities While on CPT

Once you have been issued CPT, you must abide by CPT regulations to ensure you remain in valid F-1 status. These include:

- Work at your internship only within the dates of CPT authorization. Do not begin your internship early, and if your internship end date is extended, you must speak with the CGE about the feasibility of extending your CPT end date before that end date passes.
- If you have been issued part-time CPT, do not exceed 20 hours of work per week.
- Update the CGE within 10 days of any change to your residential address during your CPT employment.
- Keep good records of your internship, including dates and hours/week worked, job duties, and how the position relates to your major.
- Complete and submit all required work for EXPL 205 or 206. To have worked legally through CPT, you must pass EXPL and earn academic credit for the course.
- If your internship is paid, you will likely need to file a tax return. Watch for a W-2 or other tax forms from your internship in the January/February after your internship.

Limits to CPT and Impacts on OPT

CPT is an excellent tool for F-1 students to gain work experience while they are students. After graduation, F-1 students may apply for Optional Practical Training (OPT) to work in fields related to their major. Students who use 12 months or more of full-time CPT are ineligible for OPT. Part-time CPT does not affect OPT eligibility.

At Kenyon, students may enroll in EXPL 205 or 206 no more than four times. This means that F-1 students may enroll in EXPL and use CPT for an off-campus internship a maximum of four times during their Kenyon career.

How to Apply for CPT Authorization

1. Obtain a written internship offer and job description from your employer. The offer should be a letter written on company letterhead or an email letter from an official organization email address. The following information must be indicated in the offer letter:
 - Your internship position title
 - Dates of employment
 - Number of hours per week you will work
 - Supervisor's name, title, contact information
 - Employment address (if not the same as the address indicated on the letterhead)
 - If the offer letter does not include a job description, please obtain one
2. Enroll in EXPL 205 (summer internships) or 206 (semester internships). You can learn more about EXPL and find the enrollment forms on [the CDO website](#).
3. Complete the Recommendation for CPT Form on page 5 of this document. You should complete Part I, and ask your academic advisor or department chair to complete Part II.
4. Submit the following items to the Center for Global Engagement:
 - Internship offer letter and job description
 - Recommendation for CPT form, signed by your advisor or department chair
 - Signed form – Student Acknowledgement: Maintaining F-1 Status with CPT Authorization (pages 6-7 of this packet)
 - [I-94 record](#) (Select “get most recent record”)
5. Once all documents are received and EXPL enrollment is confirmed, the CGE will process your CPT application in approximately 2-3 business days. When approved, the CGE will email you an updated I-20 with CPT authorization listed at the top of page 2. If you would like to pick up a hard copy of this I-20 from the CGE, we can prepare one for you. You can show this I-20 to your employer as proof of your CPT authorization.
6. **DO NOT BEGIN YOUR INTERNSHIP UNTIL YOU RECEIVE YOUR CPT I-20.** Beginning an internship before receiving CPT authorization is a status violation. Successfully complete all course requirements for EXPL 205 or 206 to make the CPT legal!

Recommendation for Curricular Practical Training

Part I: To be completed by the student

Name: _____

Employer (Company Name): _____

Is this a remote internship? Yes No

Complete Address of Employer, including zip code: _____

For remote internships, provide the U.S. address you will physically be working from:

Your declared major which this internship relates to: _____

Describe how the internship relates to your major: _____

Name of Supervisor: _____

Internship Start & End Date: (mm/dd/yy) _____

Number of hours you will work per week (maximum): _____

Position Title: _____

Have you previously been approved for CPT? Yes No

If yes, please indicate dates and whether it was full-time or part-time: _____

Part II: To be completed by the student's advisor or department chair:

A student who has been in F-1 status for one academic year is eligible, *with prior authorization from the Center for Global Engagement*, to work off-campus in a position which is directly related to their declared major. Work authorization may only be obtained by a student whose internship relates to their major and who enrolls in EXPL 205 or 206 (Connecting Academic and Intern Experiences).

I certify that this student's intended off-campus employment is directly related to their declared major.

_____ (please sign here)

_____ (printed name)

Student Acknowledgement: Maintaining F-1 Status with CPT Authorization

Direction to Student: Review this sheet and sign at the bottom to acknowledge your understanding of your responsibilities for maintaining your F-1 status with a CPT authorization.

CPT is work authorization, and the government takes unauthorized work very seriously. It is your responsibility to ensure you are working appropriately to maintain your F-1 status with CPT. CPT violations can have severe consequences on your current and future immigration status.

To have CPT issued, you must meet two F-1 regulatory requirements:

- **The internship must relate to your declared major:** The CPT application will demonstrate and document this.
- **Your internship must be “an integral part of an established curriculum”:** Demonstrate this by enrolling in, and earning academic credit from, EXPL 205 (for summer internships) or EXPL 206 (for semester internships).

To maintain your F-1 status during CPT, abide by the following rules:

- Part-time CPT is limited to 20 hours/week. There is no hourly limit/week for full-time CPT.
- Work only within the CPT authorized dates as listed on your I-20. If there is a potential for your internship end date to be extended, talk to the CGE in advance of the listed end date to see if an extension is possible. Do not work beyond your CPT end date without having received an extension or new CPT authorization.
- Complete EXPL coursework and pass the EXPL class. The deadline to submit EXPL 205 coursework is listed in the course syllabus. The deadline to submit EXPL 206 coursework is 4:30pm on the last day of the semester in which you enrolled for EXPL 206. If you do not earn EXPL credit, this is a violation of F-1 regulations.
- Report your residential address during your internship to the CGE.
- If anything changes with your internship after you receive your CPT authorization, alert the CGE immediately.

If you do not earn academic credit from EXPL 205/206, or otherwise violate your CPT authorization (including but not limited to working beyond your CPT end date), that is a violation of F-1 status that results in loss of F-1 status and requires the CGE to terminate your SEVIS record. Termination of a SEVIS record means your I-20 is no longer active and you will need to depart the U.S. immediately. To regain F-1 status, you would need to get a new SEVIS record and I-20, and return to the U.S. using the new I-20. Please note that entering with a new SEVIS record requires you to complete 2 semesters of study with the new record before becoming eligible for CPT or OPT. Additionally, 12 or more months of full-time CPT will make you ineligible for OPT.

Student Acknowledgement

By signing below, I acknowledge my understanding of CPT regulations and my responsibility to maintain my F-1 status.

Name: _____ **Signature:** _____

Date: _____

Addendum: Volunteering vs. Unpaid Internship

Under U.S. labor laws, work that is unpaid may still be considered employment that necessitates an employment authorization. For more information see [U.S. Department of Labor Fact Sheet #71](#) (updated January, 2018).

Volunteering refers to donating time to an organization whose primary purpose is charitable or humanitarian in nature, without remuneration or any other type of compensation. True volunteering does not require employment authorization.

Unpaid interns may be employees requiring employment authorization.

Employee – “An individual who provides services or labor for an employer for wages or other remuneration.”

“Remuneration” is broadly construed and includes non-monetary benefits, such as housing, food, gifts, transportation pass, etc.

Volunteer – “An individual who performs hours of service... for civic, charitable, or humanitarian reasons, without promise, expectation or receipt of compensation for services rendered.”

Is an Unpaid Intern an Employee or a Volunteer? It depends. According to the U.S. Department of Labor Fact Sheet #71 (<https://www.dol.gov/whd/regs/compliance/whdfs71.pdf>) an employment relationship exists unless the internship conditions show that the “primary beneficiary” is the student/intern.

In connection with its change in enforcement practice, the DOL issued a [new Fact Sheet](#) on internship programs under the FLSA. The Fact Sheet lists seven factors for determining whether an intern is an employee:

1. The extent to which the intern and the employer clearly understand that there is no expectation of compensation. Any promise of compensation, express or implied, suggests that the intern is an employee—and vice versa.

2. The extent to which the internship provides training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
3. The extent to which the internship is tied to the intern's formal education program by integrated coursework or the receipt of academic credit.
4. The extent to which the internship accommodates the intern's academic commitments by corresponding to the academic calendar.
5. The extent to which the internship's duration is limited to the period in which the internship provides the intern with beneficial learning.
6. The extent to which the intern's work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern.
7. The extent to which the intern and the employer understand that the internship is conducted without entitlement to a paid job at the conclusion of the internship.

No single factor is determinative, and the analysis always depends on the unique circumstances of each case.

So, is CPT authorization required for unpaid internships? Yes, if the unpaid internship is considered employment under the "primary beneficiary test." No, if the unpaid internship is not considered employment under the "primary beneficiary test."