

FOOTHILL COLLEGE

International Student Office(ISO)

F-1 Student Immigration Procedures for Participation in Cooperative Education /Curricular Practical Training

How Do Immigration Regulations Refer To Cooperative Education?

The official immigration terminology for Cooperative Education is **Curricular Practical Training (CPT)**. Frequently, CPT is referred to as “cooperative education”, “internship” or “work-study,” however the official immigration terminology is curricular practical training.

What Is Curricular Practical Training (CPT)?

Curricular Practical Training is a part of the immigration regulations of the United States that enable students in F-1 status to be employed off-campus before they complete their academic program. F-1 students who obtain authorization for CPT on their Form I-20 can work off-campus while they are enrolled in classes and/or during their summer vacation period.

What Are The Benefits Of Curricular Practical Training For Students In F-1 Status?

CPT is a wonderful opportunity to work off-campus, earn credit/units without attending class, gain experience in your major and get paid legally. Most off-campus employment pays more than on-campus employment.

Is Participation In A Cooperative Education Program Treated As Employment Under Immigration Regulations?

Yes, Cooperative Education is treated as employment. In order for international students to participate in cooperative education they must comply with immigration procedures for obtaining employment approval.

What type of employment qualifies for CPT?

The employment must be **directly related to the student’s major field of study as stated on the academic records of Foothill College**. Some majors are very narrow or specific and others are very general and broad-based. For example, a student whose major is “Travel Careers” may work only in a job related to travel but a student whose major is “Business” can work in a job related to Travel Careers or any other business function such as accounting, finance, and marketing. It is recommended that students review their academic record (transcript) in the Foothill database (SIS) to determine if their current major is listed in the database. Employment will be authorized only for the current major listed in the database.

How Many Hours Per Week May An F-1 Student Work While On CPT?

The number of hours per week that a student may work under CPT is controlled by immigration regulations and by the structure of the Cooperative Education Program of Foothill College.

Part-Time CPT. During the Fall, Winter and Spring quarters **employment must be no more than 20 hours per week** and is considered part-time curricular practical training. In such cases, the employment authorization that the International Student Advisor enters on page 3 of the student’s I-20 will specify permission to engage in “part-time” training. The number of hours per week cannot be averaged. For example, if a student works 10 hours in one week s/he cannot work 30 hours the next week to reach a weekly average of 20 hours. The student must be careful to limit the employment to no more than 20 hours **each** week.

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Full-Time CPT. Immigration regulations state that full-time CPT is any employment that is more than 20 hours per week. Full-time CPT is **not available** to students during the **Fall, Winter or Spring**

quarters; however, depending upon a variety of factors, **full-time CPT may be available during the summer vacation period**. Full-time CPT can be authorized **only** for periods that occur during the official Foothill College summer vacation period and **only** if the regulations of the Cooperative Education program allow full-time employment during that period. Students who would like to be authorized for full-time CPT during the summer should discuss their situation with a Coordinator in the Cooperative Education Office.

If a student is authorized for full-time CPT, the employment authorization that the International Student Advisor enters on page 3 of the I-20 will specify permission to engage in “full-time” employment.

Please review the section **How are the beginning and ending dates of CPT employment determined?**

If A Student Uses Curricular Practical Training Does It Affect Eligibility For The 12 Months of Optional Practical Training (Post-Completion Practical Training) That Is Available To Students When They Complete The Academic Program?

Most F-1 students at Foothill perform only part-time Curricular Practical Training. Time spent in **part-time** curricular practical training is **never deducted** from the 12 months of Optional Post-Completion Practical Training for which students are eligible when they complete the academic program. For example, if a student uses 30 months of part-time CPT at Foothill the student will be able to use 12 months of full-time Optional Post-Completion Practical Training after s/he completes the Associate degree program.

Full-time Curricular Practical Training is not deducted from the 12 months of Optional Post-Completion Practical Training **UNLESS** the student uses a cumulative total of 12 months or more of **full-time** curricular practical training. If you are authorized for 12 months or more of **full-time** curricular practical training during your education at the Associate level you will lose eligibility for any type of Optional Practical Training (including Post-Completion Practical Training) when you complete you Associate level program. If you use any less than 12 months of full-time Curricular Practical Training you do not lose any Optional Post-Completion Practical Training. Also, if you go on to a Bachelor level program you will again be eligible for CPT and OPT no matter how much you used at the Associate level.

For example, if a student uses 8 months of part-time CPT and 6 months of full-time CPT while at Foothill College the student will be able to use 12 months of full-time Optional Post-Completion Practical Training after s/he completes the Associate degree program. However, if a student uses 12 months or more of **full-time** CPT while at Foothill College student will lose all eligibility for any Optional Post-Completion Practical Training after s/he completes the Associate level program because the student will have previously used a total of 12 months of full-time CPT.

What Are The Eligibility Requirements for CPT?

It is important to emphasize that F-1 students are not eligible to begin cooperative education employment until CPT has been authorized on page 3 of the student’s I-20 by the Coordinator, International Student Advising in the International Student Office (ISO). Furthermore, students should work only within the dates stated on page 3 of the I-20 and only for the employer stated on page 3.

An F-1 status student is eligible for CPT if s/he:

- Has been in F-1 status for the previous nine (9) consecutive months, and
- Has continuously pursued a full-course of study (12 units per term, except summer), and
- Has complied with immigration transfer procedures if s/he has changed schools in the United States, and
- Has complied with all immigration regulations regarding employment if s/he has been employed in the United States, and
- Has a cumulative GPA of at least 2.00 and is not on academic probation, and

- Has enrolled in a CO-OP Ed class for the quarter in which s/he plans to be employed off-campus; and
- Has met with a CO-OP Ed Coordinator and met the CO-OP Ed program requirements. Information about the CO-OP Program is available on Foothill web pages (www.foothill.fhda.edu/programs/coop) and in the CO-OP Ed office in 4208, 4128 or 4144; and
- Has obtained an offer of employment in writing that meets immigration and Cooperative Education Program requirements.

How are the beginning and ending dates of CPT employment determined?

The beginning and ending dates of CPT are determined by a variety of factors including the length of the academic terms at Foothill College, the structure of the Cooperative Education Program, the period of employment/training established by the employer and immigration regulations.

As CPT is based upon enrollment in an academic class, the period of authorized CPT employment generally is controlled by the beginning date and ending date of an academic quarter. Generally speaking, CPT employment may begin no earlier than the first day of classes of the quarter in which the student enrolled in the CO-OP class and must end no later than the last day of the same quarter.

The employer and/or the Cooperative Education Program may authorize a beginning date that is after the first official day of classes and may authorize an ending date earlier than the last day of classes of the academic quarter. When this occurs, the authorized employment period will be based upon immigration regulations. These regulations are likely to result in the shortest period of employment authorization.

Do Students Have To Enroll In 12 Units In The Quarters For Which They Have Been Approved For CPT?

Students MUST be enrolled in a full-time unit load (12 units) during each Fall, Winter and Spring quarter even if they have been authorized for curricular practical training. The units a student earns for Cooperative Education are counted in determining full-time enrollment. For example, if a student enrolls in two (2) COOP units the student must enroll in other classes totaling an **additional** ten (10) units in order to maintain lawful immigration status.

During the summer vacation period students must enroll in one CO-OP class for at least one unit but do not need to enroll in any other classes. During summer, students do not have to be enrolled in 12 units.

What are the CPT/CO-OP Application and Authorization Procedures?

It cannot be emphasized enough that students who apply for CPT must not begin the CPT employment until the employment is authorized in writing on page 3 of the student's I-20. The authorization is valid only if it is entered on the I-20 by a Designated School Official in the International Student Office. Also, students may work only within the dates authorized on the I-20.

To apply for CPT/COOP students must follow the procedure described below in the order below.

1. Read this packet of information in full.
2. Attend a Practical Training Workshop Offered by the International Student Office. The workshop schedule is in the International Student Office and on our webpage (www.international.fhda.edu) under Announcements, Events & Workshops. Students must complete steps 1 and 2 before completing the remaining steps.
3. Obtain an offer of employment from an employer. A sample letter is included in this packet. It is suggested that the employer follow the format and contents of the sample letter. The offer of employment must meet the following requirements:

- a. It must be an original document signed by an official of the organization and must be on letterhead;
 - b. It must include the beginning and ending dates of the employment. It must begin no earlier than the first day of the quarter and end no later than the last day of the quarter;
 - c. The letter must indicate the number of hours of work each week. The letter can state the specific number of hours of work each week or can indicate “20 hours per week or less” for part-time employment or “21 hours per week” or more for full-time employment. Students should review the information about full-time and part-time employment that is in this packet;
 - d. It must include the student’s name as the employee;
 - e. It must include a description of the duties that the student will perform. The duties must be related to the student’s major.
4. Meet with an International Student Advisor in the International Student Office and request the advisor to complete an Authorization to Enroll in the Cooperative Education Program. During this meeting the advisor will determine if you meet the immigration eligibility requirements for CPT. The advisor also will determine if the employer letter meets the immigration requirements. If the employer letter does not meet the requirements you will not be allowed to continue with the process until you obtain a letter that does meet the requirements. You must bring the employer letter to the meeting with the advisor.
 5. Meet with a CO-OP Program Coordinator and obtain a completed COOPERATIVE EDUCATION PROGRAM APPLICATION.
 6. Register for a CO-OP class.
 7. Submit the following materials to the International Student Office:
 - a. the completed Cooperative Education Program Application signed by an advisor in the Cooperative Education Program
 - b. Immigration Form I-538. You must complete items 1 – 8 (Section A) and sign and date the form. **DO NOT** complete section B. An I-538 and detailed instructions for completing the I-538 are included in this packet.

If all the paperwork is complete and you meet all of the criteria for CPT, the International Student Office will **authorize curricular practical training on the last page (page 3) of your I-20**. The authorization on the I-20 will include the name and location of the employer and the number of hours of authorized employment per week.

You are not authorized to begin the CPT employment until the Coordinator, International Student Advising authorizes the CPT in SEVIS and issues you page 3 of an I-20 that contains the name of the CPT employer and the dates of the employment.

Do I Need To Provide Any Materials or Documents to the Department of Homeland Security (DHS) To Get Approval For CPT/COOP?

No, you do not need to submit anything to DHS and you will not receive any approval or notification from DHS. The International Student Advisor is authorized to approve CPT. The advisor will notify DHS through SEVIS that CPT has been authorized.

When May I Begin Working?

You must not begin work until an International Student Advisor enters the CPT authorization on page 3 of your I-20. Also, must not begin working before the beginning date entered by the advisor on the CPT authorization on page 3.

When Must I Stop Working?

You must not continue working after the ending date entered by the advisor on the CPT authorization on page 3 of your I-20.

May I Change Employers During the Authorized CPT Period?

CPT and Cooperative Education is authorized for a specific employer. You cannot change employers during the authorized period unless you complete the entire application and authorization process again, including authorization of the new employer on page 3 of your I-20.

Am I Required to Submit Any Immigration Documents To The Employer?

When you begin work, you and your employer must complete a form entitled *Employment Eligibility Verification* (INS Form I-9), which the employer retains. The I-9 must be updated each time you receive a renewal of your work permission. In order to complete the I-9 the employer may request a copy of your I-20, passport and I-94.

Will I Have to Pay Social Security and Other Taxes ?

In general, F-1 students who have been in the USA less than five years are exempt from Social Security (FICA) taxes and Medi-Cal. Your earnings are subject to applicable federal, state and local taxes. Students must file a tax return on or before April 15 each year. The information that you provide on the tax form will determine if any of the withheld taxes can be refunded.

A Note of Caution

Working improperly or without authorization is a serious violation of your status. You should consult with an International Student Advisor before beginning **any** employment. **It is your responsibility to comply with all Immigration regulations that apply to F-1 students.** Staff in the International Student Office is responsible for advising and counseling you regarding your responsibilities. If you fail to comply with your responsibilities, you may not be eligible for benefits normally granted to F-1 students. Finally, please remember that **you cannot begin your curricular practical training employment until you first obtain written authorization on your I-20 from the International Student Office.**

INSTRUCTIONS FOR COMPLETING FORM I-538

Form I-538 is a required part of your application and is included in this packet of materials. You must complete and sign **Section A, items #1 – #8 before** you meet with an Advisor in the ISO. Please **do not** complete any part of Section B, items #9 - #11.

Please print or type the information. Do not use your handwriting.

Items number 1 and 2: These are self-explanatory. Please fill-in the correct information.

Item number 3: Enter the number that is on your immigration Form I-94. It is the small card that the immigration inspector gave you when you entered the U.S. Sometimes it is referred to as an arrival or departure card. The number has eleven (11) digits.

Item number 4: This refers to the **first date** on which you **entered** the U.S. in **F-1** status. It will be stamped on the first I-94 you received or on your first I-20. Also, it is stamped inside your passport. It **is not** the date you received your visa at the U.S. Consulate.

Item number 5: Your level of education is stated in Section 4 of the most recent Foothill I-20 that was issued to you.

Item number 6: This refers to your major. This is the major that is entered in the Foothill student database (SIS) as your major. If the major in SIS is not the same as the major entered in Section 5 of your most recent Foothill I-20 and/or is not the same as what you believe is your current major, please notify the staff when you submit your documents to our office.

Item number 7: For “proposed employment” simply enter the name of your major. For the beginning date enter the employment start date stated in the letter issued by your CPT employer. For the ending date enter the employment end date stated in the letter issued by your CPT employer.

Item number 8:

A. Curricular or work/study. In this section you must enter any Curricular Practical Training that was authorized on your I-20 at Foothill or at any other school. A sample entry follows:

CPT (part-time) 9/8/98 – 12/20/98

CPT (full-time) 5/25/99 – 9/3/99

CPT (part-time) 1/6/00 – 5/20/00

If you did not do CPT, enter “none” in this section.

B. Post Completion of studies. Even though the heading of this section refers only to “post completion of studies” you must include all post and pre-completion practical training previously **approved by DHS/INS** that was not curricular practical training. A sample entry follows:

Pre-completion Practical Training (part-time) 1/3/97 – 6/5/97

Post-completion Practical Training (full-time) 5/7/98 – 9/7/98

If you did not do OPT enter “none” in this section.

C. Sign or date the form at the bottom of **Section A**.

SECTION B, Numbers 9 – 11: DO NOT COMPLETE ANY PART OF SECTION B

Sample Curricular Practical Training Letter from Student's Employer

{Date}

To Whom It May Concern:

This letter is written to support the application for curricular practical training of {student's name}.

{student's name} is a {job title} and will be working for {name of company} beginning on {date employment begins}. We expect to continue to employ {student} through {date employment ends}. This period of employment corresponds to the time allowable for {student's name} curricular practical training period and is needed for {student's name} to complete the training we provide. {student's name} duties will include: {description of duties relating the task to be performed}.

(Employer should select only one of the following two sentences. In Fall, Winter and Spring terms the student should work no more than 20 hours per week.)

The student will be employed no more than 20 hours per week.

The student will be employed more than 20 hours per week.

Sincerely,

{name and title of company officer}

Components of Sample Letter from Prospective Employer

Paragraph 1: This paragraph should introduce the letter and state its purpose.

Paragraph 2: State the occupation of the student trainee and the date that his/her employment with your company will begin and end. You should also give a detailed description of the duties of the student's occupation, relating these duties to the student's current major field of study.

Paragraph 3: Any work over 20 hours is considered full-time.

Presentation: The letter should be on employer letterhead.

