

# Office of International Student Services

## Campus Employment, Practicum, Internship, Fieldwork, Student Teaching, Observation & Volunteering

What does this mean for our international F-1 community and you as their academic professors and adviser?



Foreign F-1 students can be at risk for violation of their visa status or deportation if they are engaged in improper off campus work.

## Off Campus Authorization- Curricular Practical Training (CPT)

All off campus employment for F-1 students must be authorized!

### Employment vs. Volunteering

United States Citizenship and Immigration Services (USCIS) defines an employee: "An individual who provides services or labor for an employer for wages or other remuneration." Remuneration can include, housing, food [coffee, pizza], gifts, etc.



Department of Labor (DOL) defines a volunteer as an individual who performs hours of service for a public agency; for civic, charitable, or humanitarian reasons, without promise, expectation or receipt of compensation for services rendered.

### What does this mean?

- Volunteer services in a religious, charitable or nonprofit organization are "generally" a safe place for an F-1 to volunteer their services. (No SS#)
- Volunteer, internship, practicum, student teaching, and fieldwork services in the medical, dental, business, or educational fields generally require a CPT authorization. (SS# or ITIN Tax # needed for authorization or clearance of service.)

### Unpaid Internship- Why does my student need employment authorization?

- Is the internship properly unpaid within DOL rules?
- Does it meet the six-factor test for volunteer training?\*
- If U.S. citizens, engage in unpaid internships that should be paid there is no risk but for international students, there is great risk for immigration violation and deportation.

Six-factor test

## What is CPT?

- CPT is defined as employment, which is integral or directly related to the student's field of study
- CPT is available only prior to the completion of student's degree.
- Student must have a (job, internship, volunteer, practicum, or field) offer at the time of application.
- Student is limited to part-time while school is in session (exceptions can occur if full-time is required to meet graduation requirements).
- Student must be full-time for one academic year (optional CPT).
- Student must received prior approval of academic department and OISS prior to beginning work.

## RECOMMENDATIONS

- CPT is recommended for all off campus practicums, internships, student teaching, volunteering, and fieldwork.
- CPT can be unpaid or paid practical training.
- Gaining a benefit as a result of employment (such as experience), may be considered by USCIS as "other remuneration." The OISS recommends CPT for all our international F-1 students.
- If CPT is not possible, we recommend that students get a letter from their employer confirming that they are receiving NO compensation of any kind for their service.

## \*\*Six-Factor Test

(ALL criteria must be met for unpaid training)

1. The training, although in employer's facilities, is similar to that given in vocational school.
2. The training is for the benefit of the trainees.
3. The trainees do not displace a regular employee, but works under close supervision.
4. The employer that provides the training derives no immediate advantage from activities of trainee. \*
5. The trainees are not necessarily entitled to a job after completing the training period.
6. The employer and trainee understand that the trainee is not entitled to wages for the time spent in training.

All six factors must be satisfied. \*Number four is the most problematic. Generally it is impossible for an employer to NOT gain some advantage from the work done by the student. This then becomes unauthorized "employment" for DOL and USCIS.

**The "safe" rule is: if the trainee will provide the employer with beneficial service, even unpaid, then proper work authorization should be required.**



### Application Process for CPT

1. CPT Application
2. Academic department recommendation & letter of employment
3. Internship course registration
4. Authorization is issued by OISS

(Applying for CPT is free)



**CPT Sample Letter of Employment**

**(PLEASE USE COMPANY LETTERHEAD)**

**ABC Company**  
 123 Main Street  
 Riverside, CA 12345

**Date:**

**To Whom It May Concern:**

I am pleased to inform you that Mr. JD International has been offered the position of Systems Analyst Intern for ABC Company located at 123 Main St. Riverside, CA 12345. The length of employment for this position is from (date) unit (date).

His responsibilities will include \_\_\_\_\_ (DETAILED POSITION DESCRIPTION) \_\_\_\_\_.

Mr. International will work under the supervision of Dr. Smith. He can be contacted at (987) 654-3210 or by email at [drsmith@ABCcompany.com](mailto:drsmith@ABCcompany.com).

Sincerely,

**John Doe, Department Head**  
 ABC Company



**Basic Work Authorization for International F-1 Students**

1. On-campus employment. *F-1 students maintaining status may work up to 20 hours per week while school is in session and full-time during school breaks (as long as they intend or have registered for the following term. No USCIS approval required.*
2. Curricular Practical Training (CPT). USCIS approval required.
3. Optional Practical Training (OPT). Generally a 12-month work permit used at the completion of a degree program but can be used prior but caution is advised. USCIS approval required. \*STEM
4. Economic Hardship.
5. No unauthorized employment allowed.