

International Student Resource Center

Curricular Practical Training Update: Summary of Policy Changes by SEVP – August 2026

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8 September 2026

CPT – Background

Curricular Practical Training (CPT) is allowed under F-1 regulations (8 CFR 214.2(f)(10)(i)). Students in F-1 status may accept curriculum related training that is defined as "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." ((8 CFR 214.2(f)(10)(i))

The internship or training experience must be related to the student's major program, and be "integral" to the established curriculum.

Prior to a broadcast message issued on August 12, 2026 (see Appendix A), the regulatory interpretation accepted by SEVP allowed CPT to be approved for any credit-bearing internship experience related to the academic major, or any experience required of all students in the program in order to meet graduation requirements. This is supported in previous documents and memos, including the Practical Training Fact Sheet (2019).

In addition – the previously available SEVP DSO training included this information regarding CPT:

> *Topic 1: Basic Guidelines for CPT*
>
> CPT is only available to F-1 students when it is an integral part of an established curriculum. 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.***

Change in SEVP interpretations of the CPT regulations

The two memos issued by SEVP in August of 2026 (see Appendices A and B) set forth significant changes in how the regulation is now being interpreted by SEVP.

First – they define a far narrower definition of "integral" to mean required – without which, the student would not be able to graduate and receive the degree. This removes the option for CPT required by a course, related to the academic major and taken for academic credit, if it is not required for graduation.

Second – they state that a signed cooperative agreement between the employer offering the internship experience, and the school, is required in order for an internship offer to meet the CPT eligibility requirements.

Confusingly, as of September 7, the SEVP Study in the States website states that "CPT requires a signed cooperative agreement **or letter from the employer**." (https://studyinthestates.dhs.gov/sevis-help-hub/student-records/fm-student-employment/f-1-curricular-practical-training-cpt)

This is also stated on the ICE website: "CPT requires a signed cooperative agreement **or a letter from your employer**." (https://www.ice.gov/sevis/practical-training)

DSO / Institutional Liability

The August 12 memo explicitly states that DSOs and institutions may be held liable for improper CPT usage.

> **Potential liability:** Improper CPT authorization, such as for non-integral purposes, may subject both the institution and individual DSO to administrative or legal consequences. This includes withdrawal of SEVP certification and potential penalties for providing false information or misrepresenting the nature of the training. (Broadcast Message 2608-01)

This language is of great concern to DSO's and schools alike. Many institutions are changing the eligibility criteria for CPT to match the more restrictive interpretation found in these two memos – although it is critical to remember that the regulatory language has not changed.

New policy limits on CPT

Many schools now are implementing policies that only allow CPT for programs that show the work experience as a graduation requirement for all students enrolled in the program. Some schools will now only approve CPT if there is a signed contract (cooperative agreement) between the school and the employer. International students who may be affected by these changes should discuss any plans for CPT with their academic departments AND their DSO immigration advisor.

CPT FAQs:

QUESTION:I am in a doctoral program and am enrolling in a thesis research course for credit to complete necessary research on my thesis. I have been offered an internship with a Genetics research company and would have access to a large data set that is directly related to my dissertation topic. Would this course meet the requirements for CPT under this new interpretation?

ANSWER: This will depend on your school's CPT policies. If the employer and school will agree to sign a cooperative agreement, and if the research course is required by your academic program, and explicitly requires an internship experience, then it may comply with SEVP's new interpretation regarding CPT definitions and requirements.

QUESTION: I am a nursing student with required clinical rotations at a local hospital. Can I continue in this major? I can't graduate without completing these rotations.

ANSWER: Assuming the hospital and school have a signed cooperative agreement, CPT should be approvable in this scenario because the rotations are a degree requirement for all students in the program and not elective.

QUESTION: I completed an internship under a CPT authorization last year. I was enrolled in a course for academic credit, and it did require the work experience, but there was no signed agreement between my school and the employer. Will I be considered to have lost my legal status because I participated in this internship?

ANSWER: This is uncertain – though under SEVP's previous interpretations (listed above), your participation would have been compliant. We recommend you consult with your school's DSO, and consider consulting with an immigration attorney as well.

QUESTION: I am a music student, and we are required, as a condition of graduation, to do 50 hours of paid internships involving concerts and performances. Will we be able to continue to be approved for CPT for these "gigs"?

ANSWER: It is helpful that the performances are required for graduation. Ultimately this will depend on your school's interpretations of the new policy memos, and whether or not they will require signed cooperative agreements from your host organizations, or whether they will accept just an internship offer letter. Consult with your academic department and your DSO.

QUESTION: My department offers three different plans for an MBA degree - one plan is research-based, one plan is internship-based and one plan is study abroad-based. Within the internship plan, an internship is required for degree completion. If I were enrolled in the internship plan, would I be eligible for CPT?

ANSWER: Ultimately this will depend on your school's interpretations of the new SEVP policy memos, but there is a strong case that since an internship is required for degree completion under this curriculum, CPT should be authorizable.

QUESTION: My degree program doesn't have an internship requirement but I really want to get practical training in my field before I graduate. Do I have any options?

ANSWER: Yes. While CPT may not be possible according to new SEVP's interpretation, know that there are still options for you to pursue experiential learning opportunities during your academic program. Some options to explore with your school include on-campus internships, traditional unpaid internships with nonprofit organizations, internships abroad, and planning ahead to apply for Pre-Completion OPT.

Appendix A: Broadcast Message 2608-01

Broadcast Message: Reminder of Liability for DSOs Regarding CPT Authorization

To: PDSOs and DSOs at SEVP-certified schools

Date: August 12, 2026

BCM Number: 2608-01

General Information

The Student and Exchange Visitor Program (SEVP) reminds all designated school officials (DSOs) of their responsibilities regarding curricular practical training (CPT) authorization as well as increased program oversight concerning the proper use of CPT. SEVP has observed a rise in CPT authorizations that do not meet regulatory requirements, specifically those not constituting an integral part of an established curriculum. As a result, the program is increasing its scrutiny of CPT approvals to ensure compliance with federal regulations. Please carefully read and review the following information:

• **CPT must be integral to the curriculum:** DSOs can only authorize CPT when the training is an integral part of an established curriculum and is directly related to the student's major area of study. CPT cannot be authorized solely for the purpose of employment or for experiences that are not required or otherwise formally recognized as part of the academic program. SEVP reserves the right to request documentation and other evidence from DSOs to identify whether CPT is indeed a core and essential part of the students' studies, without which, they would be unable to complete their degree. While SEVP recognizes that the school, not the U.S. government, defines what is and is not required to complete a degree, SEVP is also committed to identifying and investigating schools that attempt to undermine or purposely bypass federal regulations or oversight. DSOs are reminded that F nonimmigrant students are, by their own attestation under penalty of perjury, here in the United States "solely for the purpose of pursuing a full program of study." If SEVP suspects that school officials are abusing CPT to create work opportunities rather than academic studies, they may be subject to additional scrutiny and action from SEVP and Homeland Security Investigations (HSI), to include potential withdrawal of the school's SEVP certification.

• **DSO certification and legal responsibility:** When you sign or re-sign the Form I-20, "Certificate of Eligibility for Nonimmigrant Student Status," to authorize CPT, you are certifying under penalty of perjury that all information is true and correct to the best of your knowledge. This includes confirming that CPT is required or otherwise integral to the students' curriculum.

Potential liability: Improper CPT authorization, such as for non-integral purposes, may subject both the institution and individual DSO to administrative or legal consequences. This includes withdrawal of SEVP certification and potential penalties for providing false information or misrepresenting the nature of the training.

Actions requested: After reviewing the above information, DSOs should:

1. Carefully review all CPT requests and your institution's current academic requirements across all fields of study.

2. Ensure that CPT is only authorized when it is truly integral to the program. Only authorize CPT if its absence would make the attainment of a degree an impossibility and if the work associated with CPT is required for all students pursuing that degree.

3. Maintain thorough records supporting the curricular necessity of each CPT authorization.

4. Consult with your SEVP field representative if you have questions about a specific case. Employers, DSOs, students and members of the public can report suspected employment fraud, practical training fraud, or other instances of foreign students or certified schools abusing federal regulations directly to SEVP via email at SEVPFraud@hsi.dhs.gov.

For questions about this message, please contact the SEVP Response Center (SRC) via phone at 703-603-3400 or 1-800-892-4829 or via email at SEVP@ice.dhs.gov. The SRC is open Monday through Friday, 8 a.m. to 6 p.m. ET, except for federal holidays. Thank you for your attention to this important matter and for your continued commitment to regulatory compliance. Disclaimer The Broadcast Message is not a substitute for applicable legal requirements, nor is it itself a rule or a final action by SEVP. It is not intended to, does not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any administrative, civil, or criminal matter.

Appendix B: Broadcast Message: 2608-02

Broadcast Message: Guidance for Designated School Officials regarding Curricular Practical Training
To: PDSOs and DSOs at SEVP-certified Schools

Date: August 24, 2026

BCM Number: 2608-02

General Information
On August 12, 2026, the Student and Exchange Visitor Program (SEVP) issued Broadcast
Message 2608-01. This broadcast informed all Designated School Officials (DSOs) that SEVP has observed a rise in Curricular Practical Training (CPT) authorizations that appear to violate regulatory requirements which permit CPT only where the training is an integral part of an established curriculum. Accurate and timely reporting by schools and students allows SEVP to manage the Student and Exchange Visitor Information System (SEVIS), a critical tool in SEVP's mission to protect national security and ensure the integrity of the nation's educational and cultural exchange programs. Failure to comply with SEVP regulations may result in an institution losing certification to enroll foreign students.
The guidance below provides additional information on how CPT operates as an integral and required part of an educational experience.

1. How is CPT defined in regulation?
A foreign student may be authorized by a DSO to participate in a CPT program that is an integral part of an established curriculum. Curricular practical training is defined as 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.

2. How is CPT different from Optional Practical Training?
Optional Practical Training (OPT) is training that is not an integral part of a student's established curriculum. OPT is not intended to fulfill requirements of a student's program of study and successful program completion does not require participation in OPT; it is optional. In contrast, CPT fulfills an integral element of an established curriculum and successful completion is contingent on participation in CPT. As defined by Merriam-Webster, "integral" means "essential to completeness" as in, "an integral part of the curriculum."

3. Can CPT be offered as a part of an elective course?
In any instance where an elective course is optional, making the CPT optional, the integral and required aspects of CPT would not be met. CPT is an integral part of an established curriculum and the practical training is required for all students

participating in that curriculum, regardless of citizenship.

4. Because CPT is allowed only where the training is an integral part of an established curriculum, does that mean that all students enrolled in the established curriculum must participate in and complete practical training?
Yes. Unlike OPT, participation in CPT is not optional for any student participating in an established curriculum that the school has determined requires CPT as an integral part of the educational experience. This means that all students — foreign and American — are required to participate in practical training if they are enrolled in an established curriculum where practical training is integral. While auditing and investigating schools to ensure compliance, SEVP has noted that some institutions have described CPT as if it is optional practical training and not integral, despite clear regulatory requirements. SEVP has also discovered that some institutions have not required all students enrolled in the same established curriculum to participate in practical training, despite clear regulatory requirements that CPT is permitted only where the practical training is an integral part of an established curriculum. Prior broadcast messages have clearly made this distinction between CPT and OPT and reminded DSOs of the integral and required elements of CPT.

5. Are foreign students required to proactively request CPT authorization from their DSO?
Yes. Foreign students must make an official request for authorization for CPT to their DSO so that the school can confirm that the student is participating in an established curriculum where practical training is integral, make a determination that the training is directly related to the student's major area of study, and update the student's SEVIS record to ensure that DHS can conduct proper oversight as required under federal law. A DSO's failure to maintain these verification and record-keeping requirements may face significant SEVP sanctions. 8 C.F.R. §§ 214.2(f)(10)(i); 214.3(l)(2); 214.4(a)(2).

6. Must all CPT be conducted by sponsoring employers that have established cooperative agreements with the school?
Yes. Schools should only enter into cooperative agreements with legitimate, bona fide employers who are able to provide a quality practical training experience to students. CPT students should have access to practical training managed by an employer who has entered into a cooperative agreement with a school where it is agreed the employer will sponsor the school's students for specific training such as an alternative work/study, internship, cooperative education or any other type of required internship or practicum that is specific to the student's major area of study. Students are not expected to obtain EADs for this training which is an integral and required part of the curriculum.

7. As a DSO, what are my options if I believe I am being pressured by school leadership to make questionable, improper, or otherwise noncompliant decisions

and attestations on behalf of foreign students?
DSOs serve a critical role in upholding the integrity of the nation's foreign student program and serve as important partners with the federal government. If you believe you are being asked, directed, coerced, or otherwise pressured to make attestations you feel do not comply with regulations; we want to hear from you. The new SEVP tipline serves as a confidential avenue for you to relay these concerns for further review by SEVP and Homeland Security Investigations (HSI). Please contact the SEVP Response Center (SRC) via phone at 703-603-3400 or 1-800-892-4829 or via email at SEVP@ice.dhs.gov. The SRC is open Monday through Friday, 8 a.m. to 6 p.m. ET, except for federal holidays.

Disclaimer
The Broadcast Message is not a substitute for applicable legal requirements, nor is it itself a rule or a final action by SEVP. It is not intended to, does not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any
administrative, civil, or criminal matter.

Appendix C: CPT Regulations: 8 CFR 214.2(f)(10)(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 their Form I-20 or successor form with the DSO endorsement. To grant authorization for a student to engage in curricular practical training, a DSO will update the student's record in SEVIS as being authorized for curricular practical training that is directly related to the student's major area of study. The DSO will indicate whether the training is full-time or part-time, the employer and location, and the employment start and end date. The DSO must sign, date, and return the Form I-20 or successor form to the student prior to the student's commencement of employment indicating that curricular practical training has been approved.