Externship Introduction

Skill Building Programs incorporate externship as an integral part of the curriculum of each program. Emphasis is placed on the value gained through practical experience for students studying in a career field. Externship offers students the chance to gain relevant practical skills by immersing the learner in an environment where they can apply the concepts learned in the classroom.

As a required component of the academic program, the externship placement aligns with the learning objectives of the program of study. The aim is to facilitate the combination of classroom concepts with the application in the field, enhancing the professional skills and experience of the student in a successful professional environment.

In order to ensure the academic integrity and compliance with regulating agencies, CSI requires the externship placement clearly aligns with the field of study, providing the student with the opportunity to utilize 70% of the program learning objectives through a supervised practical experience. CSI requires an Externship Site Agreement, documenting the arrangement and criteria of the externship opportunity, be reviewed and acknowledged by all parties involved: the student, Externship Site and CSI. CSI evaluates all Externship Sites through an onsite visit during the program by a designated school representative. The site visit allows the student, employer and CSI the opportunity for feedback, questions and further information.

Many employers are concerned about liability related to the employment of international students in the United States. Getting permission for international students to work in the U.S. is not as difficult as many employers believe. Most international students are in the U.S. on a non-immigrant student visa F-1, and these international students are eligible to accept employment under certain conditions. These students are neither U.S. citizens nor permanent residents (“Green Card” holders). Although the U.S. Immigration Service limits the employment of international students, they are eligible to apply for permission to work under “practical training” for their academic program. For F1 International students, externship, whether paid or unpaid, requires students to receive Curricular Practical Training Authorization (CPT) in order to fulfill the externship requirement of their academic program.

Definition of Curricular Practical Training

CPT is a type of authorization that allows students to accept a paid or unpaid work experience or externship/internship in their major field of study. CPT is limited to practical training opportunities that are fulfilling a curricular academic objective. To be considered for CPT, the opportunity must not only be related to the major field of study, but also must be either required
or has to be an integral part of the academic program. USCIS prohibits the authorization of CPT issued for the primary purpose of facilitating employment. CPT cannot be utilized for a work experience or internship/externship that is solely beneficial for career development.

Authorization is written on the 2nd page of the students’ I-20 and includes the name and address of the company, beginning and ending date, full or part time, and signature of the Designated School Official (DSO). Students may not begin employment until receiving this updated I-20. Students must limit employment to the place, dates and hours that have been authorized on the second page of the I-20. Employment outside of the approved place, date and hours is in violation of USCIS requirements.

**CSI Programs with externship as a required component of the program.**

- Customer Service Specialist Program
- Hospitality Industry Professional Program
- Administrative Assistant Professional Program
- Small Business Administrator Program
- Sales and Marketing Professional Program
- CS Foundation Program
- CS Essential Program

**Part-Time vs. Full-Time CPT**

- **Part-Time CPT** - Most students are eligible for part-time CPT or employment for less than 40 hours per week.
- **Full-Time CPT** - Students may be eligible for full-time CPT or employment for up to 40 hours per week.

**Student Eligibility**

- Have been previously lawfully enrolled on a full-time basis for one academic year in the U.S.
- Continually maintained the F-1 student status in the U.S.
- Enrolled full-time at Computer Systems Institute while participating in CPT.
- CPT is an integral part of the established academic curriculum.
- CPT is not available after the completion of all required coursework.
- CPT authorization will be voided if the student drops the program.
- The student must report any termination of CPT employment. The student has to meet with the Academic Dean or Student Services to discuss their options.
- If a student is failing to meet academic requirements during the quarter he or she must meet with an Academic Dean or Designee to discuss his or her options. Failure to complete the required minimum number of Externship hours for the program course will result in failure of the course.
- Students authorized for medical leave of absence (LOA) are not eligible for CPT during the LOA time period.
- CPT may not unduly delay the program completion date for any student
- While in the CPT-eligible program, students must complete the minimum required hours of externship in the program.
Application and Authorization Procedures

The externship site cannot be more than 60 miles from the campus where the student is enrolled (or intends to enroll). Students meeting all eligibility requirements for externship must submit the following paperwork to CSI:

- A CPT Authorization Form
- An Externship Agreement
- An official job offer letter (see offer letter template for detailed requirements)
- An official job description with specific tasks and responsibilities of the externship position listed (see job description template for details)

Missing information in this letter will result in delayed processing of the CPT request.

Applying for a Social Security Card

Students must apply for a Social Security Card in order to begin employment. A Social Security Card is not available without proof of legal work authorization and proof of an employment offer letter. More details on eligibility can be found in “International Students and Social Security Numbers” document. To apply for a Social Security number, a student needs the following:

- Completed Form SS-5
- I-20 with page 2 completed and signed by DSO
- I-94
- Valid passport
- Evidence of employment (offer letter from the employer with employment start date)

A request for a Social Security Card will not be processed more than 30 days from the CPT start date.

Additional Employment Information

International students can offer employers a wide range of skills and abilities. Their education and their multi-lingual abilities make them a special asset to U.S. employers. International students have the initiative, flexibility and experience to adapt to new situations.

Practical Training is designed to allow international students the opportunity to gain work experience directly related to their major field of study. As a result, they stand to gain from the employment they receive from you, but in return, your organization benefits greatly from their unique skills and new approaches to challenges.

Employment Authorization Terms

Students may engage in employment only after receiving an I-20 with CPT authorization from CSI. This work authorization is valid only for the specific employer, location, time period and on a part-time or full-time basis as approved and recorded by a CSI DSO in the issued I-20. Under no circumstances can a student begin externship until all the required approvals have been given and the CPT has been authorized in the I-20. Students cannot continue employment
beyond the date authorized on the I-20. Working improperly or without authorization is a serious violation of F-1 status that will lead to termination of status.

**Proof of Work Authorization (Form I-9)**

IRCA (the Immigration Reform and Control Act) requires that anyone hired by a U.S. employer after November 6, 1986, complete and “Employment Eligibility Verification” (INS form I-9) and present proof of U.S. citizenship, permanent residence status, or a valid passport along with a USCIS documents showing that employment has been authorized. Students in F-1 status who have been authorized to engage in Curricular Practical Training will present USCIS form I-20 (page 2) with a notation indicating the dates during which Practical Training has been authorized.

**State and Federal Taxes**

In general, F-1 students who have been in the U.S. less than five years are exempt from Social Security (F.I.C.A.) taxes. All earnings are still subject to applicable federal, state, and local taxes. All students must file a tax return on or before April 15 (or designated tax deadline) each year, which will determine if any of the withheld taxes can be refunded. Students must submit a copy of their social security card to the school in order to receive a 1098T to file for taxes.

**Reference Materials**

The *Code of Federal Regulations* (CFR) Title 8 for regulations governing practical training is as follows:

- F-1 students: 8CFR 214.2 (f) (10)

CFR Title 8 citations governing IRCA requirements are:

- F-1 students: 8CFR 274a.12 (b)(6)(iii) and 8CFR 274a.12(c)(3)(i)

**Frequently Asked Questions**

**Q:** Is there a deadline to fill out externship paperwork?

**A:** For new student enrollment process can take up to 30 days, so we recommend starting earlier to complete the process prior to the program start date. Additionally, current students have quarterly deadlines for externship changes and submissions, please refer to the academic calendar.

**Q:** How long is the program?

**A:** 1 academic year/four academic quarters/44 academic weeks

**Q:** What are the maximum hours per week a student can be authorized to work?

**A:** 40 hours, providing that it’s not interfering with the studies. Students must meet the program’s minimum externship hour requirements.

**Q:** How long does it take to obtain CPT work authorization & social security card?

**A:** The typical amount of time to obtain legal authorization to work as CPT is 30 days, though it may take longer in some cases. We recommend the moment the student applies for the program they begin to search for employment.

**Q:** What if a student cannot find a job before class begins or lose their job?
A: Everybody’s situation is different, so we recommend the student meet with student services to discuss the specific case.

Q: Isn't it illegal to hire international students because they do not have a green card?
A: No. Federal regulations permit the employment of international students on F-1 status within certain limits. This status allows students to work in jobs related to their major field of study. F-1 students can work on "practical training".

Q: Even if it's legal to hire international students, won't it cost a lot of money and involve a lot of paperwork for the employer?
A: No. The only cost to the employer hiring international students is the time and effort to interview and select the best candidate for the job. Computer Systems Institute handles the paperwork involved in securing the work authorization for F-1 students. In fact, a company may save money by hiring international students because the majority of them are exempt from Social Security (FICA) and Medicare tax requirements.

Q: How long can international students work in the United States with their student visa?
A: Each case will be unique depending on the program the student is enrolled for. Generally, it can be anywhere from 11 weeks to a year for each program. Refer to the externship packet provided to you.

Q: Don't international students need work authorization before being hired?
A: No. International students must have the work authorization before they begin actual employment, but not before they are offered employment. In fact, F-1 students must have a written job offer in order to apply for the work authorization. Students can give employers a reasonable estimate of when they expect to receive work authorization.

Q: What does the work authorization look like?
A: For Curricular Practical Training, F-1 students receive authorization from the school (NOT from USCIS) on the second page of the student's I-20.

Q: What if I want to continue to employ international students after their work authorization expires?
A: With a bit of planning ahead, an employer can apply for the international students to continue to work for them thought an H-1B petition. The H-1B category is for a total of six years (authorization is granted in two three-year periods). The H-1B is a temporary working visa for workers in a "specialty occupation" and can be obtained initially for three years and extended once for a combined total of six years (it is best to contact an immigration attorney on this process).

Q: Doesn't an employer have to prove that international students are not taking jobs from a qualified American?
A: No. American employers are not required to document that a citizen of another country did not take a job from a qualified American if that person is working under an F-1 status.
Employers must document that they did not turn down a qualified American applicant for the position only when they wish to hire foreign citizens on a permanent basis and sponsor them for a permanent resident status ("green card").

**Q: Can I hire international students as volunteer interns?**

**A:** Students must still obtain permission for practical training even if it is unpaid prior to starting. Students should check with their employers to ensure that the company is allowed by law to offer unpaid internships.

**Q: Are F-1 students subject to taxes?**

**A:** F-1 students who are non-resident aliens are not liable for Medicare/social security taxes. While employers must withhold Medicare/ Social Security taxes from employee’s wages, F-1 students who are non-residents are exempt from these taxes. An F-1 student is considered a non-resident for his or her five calendar years in the U.S. Please consult with a tax professional for more information on F-1 students and taxes.