

Memorandum

To: Faculty, Staff, Academic Leadership, Internship Coordinators, Advisors

From: Office of International Programs and Compliance

Date: August 25, 2026

Subject: New DHS SEVP Guidance on Curricular Practical Training (CPT) and Institutional Compliance Responsibilities

Purpose

The U.S. Department of Homeland Security's Student and Exchange Visitor Program (SEVP) recently issued two highly important pieces of guidance concerning Curricular Practical Training (CPT) authorization for F-1 international students. These updates signal a significantly stricter enforcement posture regarding CPT eligibility and place increased responsibility on NMSU to ensure compliance with federal regulations.

This memorandum summarizes the new guidance, explains the university Liabilities, the associated compliance risks, and outlines responsibilities for faculty, staff, academic departments, and university leadership.

Background

On August 12, 2026, DHS SEVP issued Guidance 2608-01, Reminder of Liability for DSOs Regarding CPT Authorization. On August 24, 2026, SEVP issued second guidance 2608-02 for Designated School Officials (DSO) Regarding Curricular Practical Training. Together, these two communications emphasize that CPT may only be authorized when it is an integral part of an established curriculum and not merely an opportunity for employment experience.

SEVP expressly stated that it 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. As a result, SEVP is increasing its scrutiny of CPT approvals to ensure compliance with federal regulations.

Key Elements of the New DHS SEVP Guidance for CPT

I. What Is CPT?

An international 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.

II. CPT Must Be an Integral Part of the Curriculum or Program

SEVP states that CPT is permissible only when CPT constitutes an essential component of an established curriculum. The guidance interprets "integral" to mean that the training must be a core element of the educational programs rather than merely beneficial or desirable.

SEVP further indicated that it may request documentation demonstrating that CPT is a core and essential component of the student's course of study and that the **student could not complete the degree without satisfying the curricular practical training requirement.**

III. CPT Cannot Be Authorized Solely for Employment Purposes

SEVP explicitly warns that CPT may not be used primarily to create employment opportunities for students. CPT cannot be approved merely because a student has obtained a job offer or *wishes to gain professional experience.*

Internship must be subordinate to the established academic requirements for the degree.

IV. Elective Internships or Course Will Present Compliance Risks

The August 24 guidance states that where an internship course is merely optional or elective, the required and integral characteristics of CPT **cannot be satisfied**. In addition, SEVP's guidance asserts that practical training should be required as part of the curriculum rather than selected voluntarily by individual student or faculty.

V. CPT Should Be Required for All Students in the Curriculum

According to the guidance, when an academic program requires practical training, such as an internship or CPT, as an integral component of its established curriculum, all students enrolled in that program must participate in and complete the training requirement. This requirement applies equally to all students, regardless of citizenship or immigration status. Therefore, both U.S. and international students must engage in the practical training if it is a required element of the curriculum.

VI. All CPT MUST be conducted by sponsoring employers that have established cooperative agreements with the University

University may enter into cooperative agreements only with legitimate employers that can deliver quality practical training consistent with educational objectives. These agreements should provide students with supervised training opportunities, including internships, cooperative education placements, alternative work-study arrangements, or other required practicum experiences directly connected to their field of study.

The practical training must be an integral and required component of the curriculum. Accordingly, students participating in CPT under such arrangements are authorized through their academic program and are not expected to obtain separate Employment Authorization Documents (EADs) for the training.

VII. International Student Advisor's (DSO) options if DSO is being pressured by someone to make questionable, improper, or otherwise noncompliant decisions on CPT and attestations on behalf of foreign students

International Student Advisors (DSOs) are essential partners in maintaining the integrity of the F-1 student program and ensuring that Curricular Practical Training (CPT) authorizations comply with federal regulations. DSOs are responsible for verifying that CPT opportunities are directly related to a student's major field of study, constitute an integral part of the established curriculum, and meet all applicable regulatory requirements. If a DSO is asked, directed, coerced, or otherwise pressured to approve CPT or sign attestations that do not align with regulatory requirements, DSO can report the matter to the Department of Homeland Security (DHS). To support the reporting of such concerns, SEVP and Homeland Security Investigations (HSI) provide a confidential reporting TIPLINE through the SEVP Response Center. The SEVP

SRC is available Monday through Friday, from 8:00 a.m. to 6:00 p.m. Eastern Time, excluding federal holidays.

VIII. Serious Consequences of Non-Compliance

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 University SEVP certification and potential penalties for providing false information or misrepresenting the nature of the training.

1. Risks to the NMSU

Most significantly, SEVP warns that abuse of CPT authorization can jeopardize a school's certification to enroll F-1 students.

The guidance specifically notes that institutions may face:

- Increased compliance audits
- Requests for documentation
- Site visits
- Homeland Security investigations
- **Withdrawal of SEVP certification**

NOTE: Loss of SEVP certification would prevent the university from enrolling F-1 students and would have profound consequences for the institution's international education mission.

2. Risks to Students

Improper CPT authorization may raise questions regarding a student's maintenance of lawful F-1 status. Students may experience immigration complications if their CPT authorization is later found to be inconsistent with federal requirements.

3. Risks to Academic Programs

Programs that rely upon internship structures lacking clear curricular foundations may be subject to heightened review. SEVP has indicated that it will closely examine whether institutions are using CPT appropriately and whether practical training is genuinely required for degree completion.

IX. Immediate University Actions Recommended

To ensure compliance with SEVP guidance, the NMSU should:

- 1.** Conduct a comprehensive review of all CPT-related courses and programs.
- 2.** Verify that CPT experiences are clearly tied to documented curricular requirements.
- 3.** Review internship, practicum, cooperative education, and field experience courses.
- 4.** Strengthen documentation and record-retention practices.
- 5.** Provide training for faculty, staff, and academic advisors, internship coordinators, department heads, and career services staff.
- 6.** Establish consistent institution-wide CPT review and approval procedures.

X. Conclusion

The August 2026 DHS SEVP CPT Guidance represents one of the most significant CPT compliance developments in recent years. SEVP has clearly indicated that CPT authorization must be limited to training that is genuinely required, integral, and essential to an established curriculum and that institutions should expect increased government scrutiny of CPT practices.

All members of the NMSU community involved in internships, experiential learning, academic advising, and international student support should carefully review current practices and work collaboratively to ensure full compliance with federal regulations on CPT.