

Frequently Asked Questions about Campbellsville University MSITM and PMBA Programs

The MSITM and PMBA programs offer master's degrees with a unique learning approach. In these programs, students are required to enroll in 6 credit hours per term. MSITM program students must complete 30 credit hours or 5 semesters of study. Students in the PMBA program must complete 36 credit hours or 6 semesters of study. Both programs permit full-time or part-time Curricular Practical Training (CPT) during the course of study, including immediately upon enrollment. This FAQ has been developed to help our students understand and communicate all the key components of our programs.

Q: Do the MSITM and PMBA programs meet federal regulatory requirements for a prescribed full course of study?

A: Both programs require 6 credit hours of enrollment for students to be considered enrolled full-time. This includes one 3 credit hour hybrid course that requires an in-person residency each term and one 3 credit hour online course.

The definition of a full course of study for F-1 students can be found at **8CFR 214.2(f)(6)**. It should be noted that a full course of study is defined differently based on the classification of the institution or the academic level of study. Since the MSITM and PMBA programs are graduate level programs we will concentrate on **8CFR 214.2(f)(6)(i)(A)** which states the "successful completion of the full course of study must lead to the attainment of a specific educational or professional objective." It further states that "postgraduate study or postdoctoral study at a college or university, or undergraduate or postgraduate study at a conservatory or religious seminary," can be "certified by a DSO as a full course of study." Due to the stipulation that full time study at postgraduate level is certified by a DSO to be a full course study, the 6 credit hour enrollment requirement for the MSITM and PMBA programs meet the regulatory requirement for a full course of study at the graduate level.

Q: Is it appropriate for a graduate level program that only requires 6 credit hours of enrollment to allow half of the full time enrollment requirement to be taken online?

8CFR 214.2(f)(6)(G) states that "for F-1 students enrolled in classes for credit or classroom hours, no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken on-line or through distance education and does not require the student's physical attendance for classes, examination or other purposes integral to completion of the class." This regulation specifically allows for "one course" or "three credits" of online courses to be counted towards fulfilling the full-time enrollment requirement. If since the MSITM and PMBA programs only require 6 credit hours of enrollment to be full-time, one 3 credit hour course can be online.

Further, our hybrid courses are considered to be in-person courses, not online. The regulatory definition for an online course is one that is “principally” taught with electronic technology. A literal definition of “principally” would mean more than half. As currently designed, our hybrid courses are taught over 16 weeks which equates to 48 hours of instruction. Each of our hybrid courses require a weekend residency of 24 hours of instruction with additional individual or project work assigned. This equates to more than half of the class being taught in-person. As such, our hybrid courses are in-person courses, not online distance education courses.

Q: Does a program that allows for Curricular Practical Training (CPT) immediately upon enrollment meet the regulatory requirements for Practical Training?

A: Our MSITM and PMBA programs allow students to engage in full-time CPT from the beginning of their program provided they have completed one full academic year of study. **8CFR 214.2(f)(10)** states that “practical training may be authorized to an F-1 student who has been lawfully enrolled on a full time basis, in a Service-approved college, university, conservatory, or seminary for one full academic year.” **8CFR 214.2(f)(10)(i)** goes on to state that “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.” This regulation has three very critical points.

One, it clearly specifies that a student must complete one full academic year of study before becoming eligible for CPT unless the student is enrolled in a graduate program that requires participation in CPT during the first academic year of study. The regulation does not require that the academic year of study be completed at the current institution or in the current program of study. All of our students authorized for CPT have met the one full academic year requirement and are eligible for CPT.

Two, the regulation specifies that the CPT opportunity must be integral to the program of study. Integral can be defined as forming a necessary base or core, or being of central importance. Both the MSITM and PMBA programs offer participation in CPT as an integral part of the curriculums. Both programs emphasize the need for previous or current work experience. Both offer the BA 500 course as an option for those who wish to use CPT during the program of study.

Three, the accepted interpretation of the practical training regulation has never set a limit on the amount of CPT a student could engage in at one level of study. Any interpretation that **8CFR 214.2(f)(10)** limits CPT/OPT to 12 months at one level of study is not consistent with **8CFR 214(f)(10)(i)** which states that students who complete “one year **or more** of full time curricular practical training are ineligible for post-completion

academic training." This language acknowledges the possibility of **more** than one year of practical training authorized as CPT. Additionally, the regulation only discusses ineligibility for post-completion OPT based on one year of full-time curricular practical training. Further, the information on U.S. Immigration and Customs Enforcement website (<https://www.ice.gov/sevis/practical-training>) regarding practical training also discusses 12 months of full-time CPT, noting, "If you have 12 months **or more** of full-time CPT, you are ineligible for OPT, but part-time CPT is fine and will not stop you from doing OPT." Nowhere is there any information indicating that part-time CPT (or full-time CPT authorized for fewer than 12 months) limits CPT to 12 months. Historically, USCIS has always approved 12 months of OPT for students who used less than 12 months of full-time CPT (literally millions of approvals). In addition, all U.S. institutions of higher education with cooperative education programs at the undergraduate level require more than 12 months of full-time CPT to complete the program of study. Clearly, if the intent was to limit CPT/OPT to 12 months total per degree level those OPT applications would not have been approved and institutions would not have coop program designed the way they are.

Q: What are the SEVIS approved instructional sites for Campbellsville University?

A: Campbellsville University currently maintains two SEVP approved instructional sites, one in Campbellsville, Kentucky (NOL214F10723000) and one in Louisville, Kentucky (NOL214F10723001). The full addresses are as follows:

Campbellsville

1 University Way, Campbellsville, KY 42718

Louisville

2300 Greene Way, Suite 100, Louisville, KY 40220

Due to the unique nature of our MSITM and PMBA programs, our students have the flexibility to live and work in many places. As a result, Campbellsville University conducts residencies for our hybrid courses in Elgin, Illinois, Jacksonville, Florida, Harrodsburg, Kentucky, Costa Mesa, California and Lathrop, California.

According to **SEVP Policy Guidance 1003-03: Reporting Instructional Sites**, 50% or more of a program must be offered before it is required to be added to the institutional I-17 as a site location. Because Campbellsville University certifies that less than 50% of the MSITM and PMBA programs take place at these locations, these sites were not added to our institutional I-17. After consultation with our SEVP Field Unit representative, we decided to go ahead and apply for these locations to be added to our I-17 as site locations. Those applications are still being processed by SEVP. While waiting for adjudication of these locations, and since SEVP Policy Guidance 1003-03 clearly establishes that these sites do not need to be added to our I-17, many of our students will be attending residencies for our hybrid courses at these locations. We understand that such a set up can cause confusion but we certify that these students are pursuing a full course of study. The addresses for each of our other locations are:

- 1151 N. State St., Elgin, Illinois, 60123-1404
- 8787 Baypine Rd., Jacksonville, Florida, 32256-8528
- 170365 Harlon Rd., #3H3J, Lathrop, California, 95330-8739
- 2701 Fairview Rd., Costa Mesa, California, 92626-5563
- 1150 Danville Rd., Harrodsburg, Kentucky, 40330-9623
- 4420 Dixie Highway, Suite 230, Louisville, Kentucky 40216-2986

Q: Who teaches the courses/residencies?

A: All residencies for our hybrid courses are taught by Campbellsville University faculty. We made an institutional decision to conduct these residencies strategically throughout the country to give our students greater flexibility when it comes to where they live and work. We bring our faculty to these locations instead of requiring our students to return to Kentucky, but all instruction is provided by Campbellsville University faculty.

Q: Who should be contacted with further questions about the MSITM and PMBA programs?

A: Anyone who has further questions about the MSITM and PMBA programs for Campbellsville University should contact one of the following Principle Designated School Officials:

Campbellsville University – Campbellsville Campus

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