

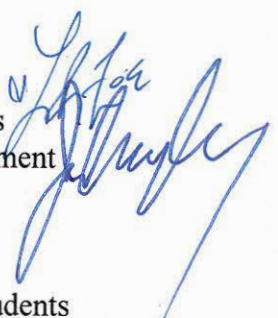
MEMORANDUM

To: Provosts and Vice Presidents of Academic Affairs
Vice Presidents of Student Affairs
Vice Presidents for Enrollment Management
Foreign Student Advisors

From: Lucinda Zoe, University Dean for Undergraduate Studies
James Murphy, University Dean for Enrollment Management

Date: May 2, 2017

Re: Full-Time Enrollment Requirements for International Students



This memorandum sets forth guidance to ensure that colleges are complying with federal immigration regulations that require international students who are in F-1 or J-1 status to be enrolled in a full-time academic program each semester.

Undergraduate Programs

I. Definition of Full Course of Study

Federal regulations require that students who are in F-1 or J-1 status be enrolled in a “full course of study” each semester. The implementing regulation to the Immigration and Nationality Act (8 U.S.C. Sec. 1101) defines a full course of study as follows:

Undergraduate study at a college or university, certified by a school official to consist of at least twelve semester or quarter hours of instruction per academic term in those institutions using standard semester, trimester, or quarter hour systems, where all undergraduate students who are enrolled for a minimum of twelve semester or quarter hours are charged full-time tuition or its equivalent (as determined by the district director in the school approval process), except when the student needs a lesser course load to complete the course of study during the current term.

8 C.F.R. Sec. 214.2(f)(6)(B).

According to the Regulations of the Commissioner of Education in New York, one credit hour is equal to fifty minutes. Except as set forth below, CUNY has determined that the number of credit hours of instruction a student is engaged in is the number of credits for which the student pays tuition. For example, if a student is charged tuition for three credits for a particular course, it counts as three credits for the purposes of determining full-time enrollment. This applies even if the course involves meetings, lab work or other course work that exceeds three credit hours.

II. Determining Credits For Courses with Clinical or Field Work Hours

Students in nursing¹ and other allied health programs, as well as teaching, frequently are enrolled in clinical or fieldwork programs for which they earn credit. In these cases, the number of credits for which the student is charged tuition may be significantly less than the number of hours the student is required to be in attendance in the fieldwork that constitutes the course. This should be handled as follows:

Unless an academic degree program includes a **written** rule that differs, in which case that rule should apply, the time spent doing clinical or fieldwork is worth half the number of credits that the same amount of classroom time is worth. In other words, 100 minutes (two credit hours) of clinical or fieldwork constitutes one credit. Thus, a course that involves 150 minutes of only clinical or fieldwork per week with no classroom component is worth half of the 3 credits, or 1.5 credits. A course that requires six credit hours (300 minutes) of field work per week is worth 3 credits. International students are required to provide proof, such as time sheets, of the time spent doing field or clinical work. A copy must be maintained in the student's file.

Some courses include both a classroom and clinical or fieldwork component. For such courses, the number of credits are calculated by adding the credit hours that the course meets to the time spent doing clinical or field work according to the formula set forth above. For example, if the course meets for 50 minutes per week and the student is required to do 200 minutes of field work per week, then the total number of credits the student earns for the purposes of determining full time status is 3 credits (1 credit for the time spent in the classroom component and 2 for the time spent doing the field or clinical work).

The formula described above applies regardless of the amount of tuition the student is charged for the clinical or fieldwork course.

In these circumstances, in order to certify that a student is full time for the purposes of maintaining F-1 or J-1 status, the Designate Student Official must receive approval from the registrar.

III. Notice to International Undergraduate Students In Courses with Clinical or Fieldwork Hours

¹ Nursing students are eligible for F-1 status, but not J-1 status.

All international undergraduate students in courses with clinical or fieldwork hours must be advised that they are required to maintain their full time status, which means that they must be enrolled in courses that are worth a total of 12 or more credit hours every semester. They should be advised that the formula above (unless the academic degree program has a different written rule that applies) will be used to calculate the number of credits they earn for the purposes of determining their full time status in clinical or fieldwork placements. They should be advised further that the number of credits required to complete their degree may be greater than the number of credits that they are earn for the purposes of determining their full time status for the purposes of maintaining their eligibility for an F-1 or J-1 visa.

Graduate Degree Programs

For graduate students, the federal regulation does not specify the number of credit hours a student must complete to be considered a full-time student. The regulation provides:

Postgraduate study or postdoctoral study at a college or university,
or undergraduate or postgraduate study at a conservatory or
religious seminary, certified by a DSO as a full course of study.

8 C.F.R. Sec. 214.2(f)(6)(A).

With the exception of a few graduate degree programs which have been approved by SED to require less than 12 credits for full-time status, all other CUNY colleges require that graduate students be enrolled in 12 credits per semester for full time status. Therefore, except for students enrolled in one of the programs requiring fewer credits, all international graduate students must be enrolled in 12 credits in order for them to maintain the F-1 or J-1 status.

The formula described above for undergraduates is used to determine the number of credits a graduate student receives for participating in field or clinical work, again, unless the degree program uses a different written rule.