



Study Abroad and Applying for OPT Policy

As indicated on Part 3 of the I-765 form, students are required to apply for OPT in the United States. ***The College has determined that F-1 students studying abroad for either the full academic year or the spring semester may not apply for OPT while abroad.*** The logistics of applying for OPT while abroad involve an extraordinary amount of risk for program participants that the College does not support. F-1 students will need to make a decision to either study abroad or remain on campus and apply for OPT.

Here is an outline of the risks associated with applying for OPT and studying abroad:

- Independent Travel Approval Process
 - Study abroad programs are not supporting independent travel.
 - Study abroad programs are requiring students to sign a COVID-19 waiver that says independent travel is either not allowed or strongly discouraged. Violating a program's COVID policies and procedures could result in dismissal from the program or disciplinary action.
 - If students are unable to continue with their semester abroad, this would affect their visa status as they would not be able to continue their studies at Haverford for the semester. This could lead to a SEVIS termination.
- Program Requirements
 - Study abroad programs include mandatory exams, field trips, and other activities that students are not allowed to miss.
 - Study abroad programs have strict absence policies that could result in students failing a course if they miss more than one class.
 - If a student fails a course, no credit is awarded, so this could put a student behind in their major/minor/graduation requirements.
 - If a student is dismissed from their study abroad program, they would not be able to return to Haverford's campus mid-semester to resume their studies.
- Travel and Accommodations
 - International flights are still frequently cancelled or rescheduled on a moment's notice. If a student's flight is cancelled or significantly delayed, this would likely result in a student missing more classes, which would trigger the study abroad program's absence policy. This could result in a lower grade, failing the course, or dismissal from the program.
 - Students would pay thousands of dollars out-of-pocket for all flight, hotel, and COVID testing, plus the cost of the OPT application.
- COVID-19
 - Students need a negative COVID test to enter the United States and would need to be tested again to re-enter their study abroad program's country.
 - If a student tests positive for COVID while in the United States, they are required to quarantine for up to 10 days. This would result in missing more classes, a mandatory exam, etc. Again, study abroad programs have strict attendance policies, so this could result in failing a course.

- The pandemic is still very much ongoing, so students are expected to quarantine when they return to their study abroad programs. Study abroad programs have been conducting in-person programming, so they are not set up for virtual learning in the same way. There are no guarantees students would be able to continue with their coursework virtually.
- Countries around the world have implemented various forms of lockdown throughout the pandemic, and these lockdowns have sometimes been implemented overnight. If a student's study abroad country goes into lockdown while they are in the United States, their re-entry into that country may be impossible.
- High Risk of OPT Application Denial Due to Not Being In the United States during Adjudication. The language in the OPT application make it clear that students should be in the United States when they apply for OPT:
 - [USCIS Instructions for Form I-765](#) states that: "Certain foreign nationals who are in the United States [emphasis added] may file Form I-765, Application for Employment Authorization, to request employment authorization and an Employment Authorization Document (EAD)..."
 - The Form I-765 also states that the primary purpose of Form I-765 "is to determine eligibility for certain aliens who are temporarily in the United States [emphasis added] requesting an Employment Authorization Document."
 - Form I-765 also requires the applicant to state his or her "Current Immigration Status or Category," assuming that the applicant is in the United States.
 - The OPT regulation at [8 CFR 214.2\(f\)\(10\)](#) states that practical training "may be authorized to an F-1 student..." This could be interpreted by an adjudicator to mean that students must be in F-1 status at the time, and, although they are in valid SEVIS status while on an official study abroad program, they might not be seen to be "in F-1 status," since being physically present in the United States is a condition of holding "status."
- Risk of SEVIS Termination if Dismissed from Study Abroad Program - If a student is dismissed from their study abroad program for any reason, and since they will not be able to resume studies mid-semester at Haverford, their SEVIS record would be terminated and they would need to return to their home country/depart the United States.

Due to all of these risk factors, students are not permitted to apply for OPT while studying abroad.