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FROM: Tomas Gonzalez-Torres
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SUBJECT: Revised Memo on U.S. Citizenship Requirements for Space Grant
Program Participants Receiving NASA Internship and Fellowship (NIF)
Awards

This memo documents the Office of STEM Engagement (OSTEM)'s application of the U.S. Code of Federal Regulations (CFR) [National Space Grant College and Fellowship Program at 14 CFR §1259](#) to citizenship requirements for awards made by the Space Grant consortia.

Background:

Grantees (or sub-award recipients) in the NASA Space Grant College and Fellowship Program (Space Grant Program) have routinely solicited guidance from OSTEM regarding U.S. citizenship requirements for Space Grant Program participants (both students and faculty) to ensure compliance. This memo provides additional guidance and clarity to ensure compliance with the Space Grant fellowship program outlined at 14 CFR §1259.500, and supersedes the previous guidance provided in the memo dated June 25, 2020, (Subject: U.S. Citizenship Requirements for Space Grant Program Participants Receiving NASA Internship and Fellowship (NIF) Awards).

U.S. Citizens:

Per the Space Grant Program regulations at 14 CFR §1259.503(a), "Fellowships shall be awarded only to Nationals of the United States." (See below for the definition of a "fellowship"). The term "National of the United States" is defined in 14 CFR §1259.101(c) as "a citizen of the United States or a native resident of a possession of the United States." It does not refer to or include a citizen of another country who has applied for United States citizenship. Therefore, fellowships shall only be awarded to U.S. Nationals, meaning that U.S. citizenship is required for all participants who are receiving any fellowship under the Space Grant Program. This also means that permanent residents (i.e., green card holders) are ineligible to receive a fellowship.

Space Grant consortia institutions may use terms other than “fellowship” for their Space Grant Program opportunities (e.g., research opportunity, experience, or activity, etc.). However, the citizenship requirements outlined in this memo are applicable to all activities/awards that fall under the definition of a fellowship provided below, regardless of the terminology used and regardless of the funding category used within a consortium’s budget table (i.e., any activity that meets the below definition of a fellowship within or outside of the NIF budget category must follow this citizenship requirement).

Internships (defined below) may be awarded by Space Grant recipients, and individuals who are awarded such internships must follow the badging, security, and citizenship requirements in effect at the specific location (i.e., NASA Center/facility, educational institution, or industry site) where the intern will report for the experience.

It should be noted that OSTEM no longer administers scholarships (defined below); however, Space Grant recipients may award scholarships to its sub-awardees with its Program award funds. NASA has determined that the regulations cited above do not apply to scholarships. In other words, scholarships awarded by Space Grant recipients do not have the same U.S. citizenship rules as fellowships. Thus, a Space Grant recipient may award scholarships to sub-awardees who are not U.S. citizens.

Finally, any restrictions on NASA-provided funds used in any category listed above (i.e., fellowships, internships, and scholarships) are applicable to any non-NASA funds associated with the same category that are used for cost-matching purposes per 14 CFR §1259.201(a)(1).

Guidance for Non-U.S. Citizens:

Non-U.S. citizens may participate in the Space Grant Program and its components in accordance with the guidelines provided in the section above (*i.e., U.S. Citizens*). Non-U.S. citizens may also benefit from Space Grant funding via participation in specific Program activities (e.g., attending a Program event at a museum or science center), unless such participation violates any of the guidance, in whole or part, contained in this memo.

Guidance for Faculty:

Faculty members participating in the Higher Education (HE), Pre-College (PC), or Institutional Engagement (IE) components of the Space Grant Program are not required to be U.S. citizens. However, if these same faculty members use Space Grant consortium funds to make awards to individuals, such awards shall be issued in accordance with the guidance contained in this memo.

Also, the citizenship rules do not apply to faculty who are non-U.S. citizens and who contribute other efforts to the Program, unless such participation violates any of the guidance, in whole or part, contained in this memo. Therefore, a non-U.S. citizen

faculty member may contribute their time or efforts towards the Program and receive Space Grant funding for providing such program support.

Definitions:

- **Internships** are educational hands-on traineeships that provide unique research and/or operational experiences for educators, high school, undergraduate, and graduate students at/through a NASA Center, educational institution, or industry location. Internships may occur virtually, in-person, or both (hybrid). Internships integrate participants with career professionals emphasizing mentor-directed, degree-related, project task completion.
- **Fellowships** are opportunities awarded to qualified students at the graduate level of education in fields related to space needed to help advance NASA's mission. Fellowship awardees receive experiences that provide educational and training assistance from qualified faculty.
- **Scholarships** are funds awarded on the basis of financial need, or academic or other achievements and generally are awarded to undergraduate students.

Effective Date:

The guidance set forth in this memo applies to new awards under the Space Grant Opportunities in NASA STEM Fiscal Year (FY) 2025-2028 Notice of Funding Opportunity (NOFO), and all subsequent Space Grant NOFOs. At all times, Space Grant consortia institutions and their affiliates are responsible for complying with the directions set forth in this memo. However, this does not preclude consortia from following this guidance sooner.

Please contact the Space Grant Manager if you have further questions at hq-space-grant@mail.nasa.gov.