

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



TO: National Space Grant College and Fellowship Program Directors

FROM: Chad R. Rowe  
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NASA Office of STEM Engagement

DATE: June 25, 2020

SUBJECT: U.S. Citizenship Requirements for Space Grant Program Participants Receiving  
NASA Internship and Fellowship (NIF) Awards

**Background:**

Grantees (or recipients) in the NASA Space Grant Program have routinely solicited guidance from the Office of STEM Engagement (OSTEM) regarding U.S. citizenship requirements for Space Grant Program participants (both students and faculty) to ensure compliance. The following guidance provides clarity to those grantees administering various components of their state's Space Grant Program.

**Guidance for U.S. Citizens:**

Per the National Space Grant College and Fellowship Program (Space Grant Program) regulations at 14 Code of Federal Regulations (CFR) § 1259.503(a), "Fellowships shall be awarded only to Nationals of the United States. "National of the United States" is defined at 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, NASA has interpreted the language stating that fellowships shall only be awarded to U.S. nationals to mean that U.S. citizenship is required for all participants (i.e., faculty or students) who are receiving a NASA Internship and Fellowship (NIF) under the Space Grant Program. This also means that permanent residents (i.e., green card holders) are ineligible to receive a NIF.

As noted in previous Space Grant solicitations, internships are defined as educational hands-on traineeships that provide unique NASA-related research and operational experiences for educators and high school, undergraduate, and graduate students. While fellowships are designed to support independently conceived or designed research by highly qualified faculty and graduate students in disciplines needed to help advance NASA's missions, fellowship opportunities are focused on innovation, and generate measurable research results that contribute to NASA's current and future science and technology goals.

It should be noted that the Office of STEM Engagement no longer administers scholarship programs; however, Space Grant recipients are not prohibited from awarding scholarships to its sub-awardees with its program award funds. As a policy matter, NASA has determined that the regulations cited above also apply to scholarships. In other words, scholarships are required to comply with the same U.S. citizenship rules as NASA internships and fellowships. Thus, a Space Grant Program grantee can only award scholarships to sub-awardees who are U.S. citizens.

Finally, the restrictions on the NASA-provided funds are applicable to any of the non-NASA funds used for cost-matching purposes per 14 CFR §1259.201(a)(1) as it relates to NIF awards.

### **Guidance for Non-U.S. Citizens:**

Regarding non-U.S. citizens, they may participate in the Space Grant Program or its components provided they are not receiving an internship or fellowship under the Program. Non-U.S. citizens may also be permitted to benefit from Space Grant funding via participation in specific Program activities (e.g., attending a Program event at a museum or science center), since those activities are not internship or fellowship opportunities.

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, since they are not receiving a fellowship or internship under the Program. However, the citizenship rules also do not apply to those non-U.S. citizens who plan to contribute efforts to the Program. Therefore, a non-U.S. citizen faculty member may contribute his or her time or efforts towards the Program and receive Space Grant funding for program support, since they are not receiving a NASA fellowship, internship, or scholarship.

OSTEM hopes that the above guidance is helpful. Please contact the Space Grant Manager if you have further questions at [hq-space-grant@mail.nasa.gov](mailto:hq-space-grant@mail.nasa.gov).