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Foreign National Access Management (FNAM)

OPERATIONS MANUAL

Office of Protective Services

Foreign National Access Management Program

NASA Advisory Implementing Instruction (NAI) 1600.4

MAY 2016







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National Aeronautics and Space Administration

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Foreign National Access Management Operations Manual

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Note: This operations manual provides implementing instructions for NASA's foreign national access management policies and processes. All references to such requirements contained in NASA Policy Directives (NPDs), NASA Procedural Requirements (NPRs), NASA Advisory Implementing Instructions (NAIIs), or other guidance should be verified by reviewing the cited authority directly.

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MESSAGE FROM THE Associate Administrator



The National Aeronautics and Space Administration (NASA) is leading the world on a journey to Mars, in collaboration with American industry and international partners. In carrying out this bold mission, the agency seeks to work with the best minds of the world in a multitude of disciplines including science, technology, engineering and mathematics.

NASA is the world's premier space agency in part because of the many and innovative ways we have developed to collaborate with partners large and small.

This Operations Manual provides implementing guidance for Foreign National Access Management (FNAM) at NASA. It outlines processes and best practices, supported by real-life examples, which support the proper and consistent execution of FNAM at all NASA Centers and Facilities. The guidance provided in this Operations Manual was developed with the support and input of stakeholders across the Agency to ensure NASA's missions and daily business continue unhindered. This guidance facilitates the valuable work our international partners perform while protecting NASA's, and the Nation's, unique capabilities and sensitive technologies.

As NASA employees and contractors, we are entrusted with access to impressive resources, talent, capabilities and technologies, all of which demand our careful stewardship. I encourage each member of the NASA community, whether you manage foreign national access or you work with foreign nationals, to take the time to familiarize yourself with this manual and adhere to the processes as they apply to you.

A handwritten signature in blue ink that reads "Robert M. Lightfoot Jr." The signature is fluid and cursive.

Robert M. Lightfoot Jr.,
Associate Administrator





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1 Introduction

The Foreign National Access Management

(FNAM) Program is devoted to maximizing cooperation and collaboration with our international partners and ensuring compliance with all applicable United States laws and regulations governing our partnerships. Through the consistent and effective management of foreign nationals' physical access to our Centers, facilities, and installations (henceforth referred to as Centers), and logical access to our information technology (IT) framework, risks are mitigated to the nation, Agency, and NASA's critical infrastructure.

The Office of Protective Services (OPS) has created a robust FNAM program to address findings and recommendations concerning how NASA manages foreign national access. This Operations Manual is a tool that all NASA personnel, Government and contractor, can reference for clear, operational-level direction and standard processes to implement FNAM requirements of the governing policy contained in NASA Procedural Requirements (NPR) 1600.4. These standard processes are designed to ensure that access to NASA assets is granted in accordance with all applicable U.S. Government mandates and NASA policies.

Protecting NASA's personnel, facilities, technology, and data is the responsibility of each of our employees and contractors. This responsibility is achieved by following the processes and guidelines detailed in this manual.

This FNAM Operations Manual provides the minimum processes and information that all Centers should follow. Centers may institute additional policy requirements, more stringent than Agency policy requirements, which should be documented as part of their Center's policy. Centers that require a deviation from these processes in order to address a unique situation must seek a waiver through the standard waiver process identified in NPR 1600.1.

- 1.1 What Is an Asset?
- 1.2 What Is Access?
- 1.3 What Is a Visit?
- 1.4 Who Is a Foreign National?
- 1.5 Who Is a Lawful Permanent Resident (LPR)?
- 1.6 What Are Designated Countries?
- 1.7 Who Is Responsible for Foreign Nationals?

INTRODUCTION



This chapter addresses the following fundamental questions:

- What is an asset?
- What is access?
- What is a visit?
- Who is a foreign national?
- Who is a lawful permanent resident?
- What are designated countries?
- Who is responsible for foreign nationals?

Later chapters will address the process to establish a foreign national's identity at NASA, types of visits and access, identity proofing requirements, and incident reporting at NASA Centers.

1.1 What Is an Asset?

In the previous section we touched upon the importance of protecting NASA's "assets." People, data, technology, buildings, property, vehicles, blueprints, contracts, records, funds, etc. are some of the things considered NASA assets. For example, NASA visitor centers are buildings that contain videos, displays, and interactive experiences related to NASA and that specific NASA Center. The building that makes up the visitor center as well as all the data and technology inside the visitor center are all NASA assets to which the public has access.

It is important to differentiate how assets are treated. We are most concerned with those assets not shared with the public. These assets must be protected because of what they can do, what they are, and how they are controlled.



NASA Headquarters

> DEFINITION

An asset is a system, object, person, or any combination thereof that has importance or value



1.2 What Is Access?

Access is defined in two distinct ways: method of access and, most importantly, permission to access. Touch, sight, and hearing are all methods by which we might access assets and are important to determining whether a visit occurs and the parameters of that visit. However, without being granted permission, access cannot occur. It is the permission to access to which this document and foreign national access management focus.

Uncontrolled access offers little, if any, protection and allows anyone the potential to access the asset without permission being granted. When access to an asset is controlled, the asset is protected and permission must be granted in order to access that asset.

Using the previous example of NASA visitor centers, the public has been granted permission for uncontrolled access to the assets inside the visitor centers. Some NASA visitor centers offer tours of the nearby NASA Center, which allow groups of visitors to enter the NASA Center to view special locations or activities on a NASA Center approved for public access. Visitors participating in these tours are granted permission to access specific areas of the NASA Center.

For additional information related specific types of visits, refer to *Chapter 4, Access*.

1.3 What Is a Visit?

A visit could be many things; it could be a guided tour of the Center, a research project that spans years conducted at a NASA Center or remotely, or it could be a short meeting of minds across a telephone or at a local coffee house. Visits are easy to define but complex to understand. A simple, key question can help you understand whether a visit is taking place or not:

Key Question:

“Is access to the asset controlled?”

If your answer to this question is “no,” then a visit is not taking place and you may stop reading here. If you answered “yes,” then a visit is taking place and the visit must be processed in accordance with policy and as outlined in this manual.

> DEFINITION

With regard to NASA assets, access is the explicit granting of permission to enter and/or use NASA facilities, interact with NASA personnel, and/or use NASA information and related information processing services.

> DEFINITION

A visit is any means by which, and any duration for which, access is obtained to non-public NASA assets.

Let's look at an example for when a visit is not occurring ("no"):

▶ **Example A**

A foreign national stops by the Kennedy Space Center Visitor Complex to see the Space Shuttle Atlantis Exhibit, ride the Shuttle Launch Experience, and purchase souvenirs



In this example, access to the visitor complex is open to the public and not controlled. A visit is NOT occurring in this situation. Let's look at another example where a visit is occurring ("yes"):

▶ **Example B**

A foreign national skilled in math modelling is interested in supporting a project to develop flight control systems for atmospheric and space flight vehicles. The project is led by a former colleague from a previous project. The meeting will take place at a restaurant they frequented in the past.



This is an example of a visit. While the location of the meeting is outside of a NASA Center, the foreign national is requesting access to persons and information that are controlled.

For more information related specific types of visits, refer to *Chapter 3, Types of Visits*.

1.4 Who Is a Foreign National?

A foreign national is any person who is a citizen of another country and who has not been granted status in the United States (U.S.) as a lawful permanent resident. For the purposes of this manual, we are concerned with those foreign nationals who require permission to access NASA assets during a visit. Foreign nationals must undergo specific processes for identity vetting and granting of access and may require an escort during their visit at NASA.



Visitors get a rare glimpse of the B-2 facility at Plum Brook Station during an open house held in the spring of 2008.

> DEFINITION

A foreign national is any person who is not a U.S. citizen, lawful permanent resident, or protected individual.



1.5 Who Is a Lawful Permanent Resident (LPR)?

Foreign nationals, after residing in the United States for a number of years and meeting requirements established by the Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS), are able to apply for status as a lawful permanent resident (LPR). Permanent residency is a declaration of intent to reside solely in the United States and grants special privileges and considerations not afforded to other foreign nationals. NASA treats LPRs similar to U.S. citizens for the purposes of identity vetting, granting of access, and escort requirements.

NASA includes protected individuals in the category of LPR. Protected individuals are non-U.S. citizens allowed into the country under “refugee,” “asylum,” “displaced person,” and “religious or political” persecution status.



1.6 What Are Designated Countries?

Specific countries have been identified as designated countries due to political sensitivities and concerns regarding potential technology transfer. The Office of International and Interagency Relations (OIIR) maintains the current list of designated countries, which includes countries with which the United States has no diplomatic relations, countries determined by the Department of State to support terrorism, countries under Sanction or Embargo by the United States, and countries of Missile Technology Concern. The current list of NASA designated countries can be found in the NASA Identity Management and Account Exchange (IdMAX) system or on the OIIR Web site.

Foreign nationals are determined to be from a designated country when they are citizens of a designated country or born in a designated country.

> DEFINITION

An LPR is any foreign person legally permitted to reside and work within the United States, to include protected individuals.

> HELPFUL TIP

The Office of International and Interagency Relations is responsible for maintaining the current, official list of designated countries of concern to NASA. For more information, visit <http://oiir.hq.nasa.gov/nasaecpl/index.html>.



Marshall Space Flight Center

1.7 Who Is Responsible for Foreign Nationals?

Every NASA employee and contractor who collaborates or works with a foreign national is responsible for complying with all foreign national access management, export control, physical, and IT security requirements. Protecting NASA personnel, facilities, technology, and data is the responsibility of each NASA employee and contractor.

When a foreign national applies for access to NASA, the host, requestor, and sponsor are responsible for identifying the need for that foreign national to access NASA assets and any restrictions that must be followed during the visit.

Once the request has been submitted and sponsored, the Center International Visit Coordinator (IVC) is responsible for verifying the identity of the foreign national and conducting name and fingerprint checks through appropriate databases. The IVC works with Center Export Administrators (CEA), the Headquarters Export Administrator (HEA), Counterintelligence Special Agents (CISA), and other persons who are responsible for reviewing the access request prior to authorizing the foreign national's visit.

Escorts are responsible for ensuring foreign nationals who require escort adhere to the requirements of their visit. From the moment a foreign national requiring escort arrives at the Center until leaving the Center, the foreign national is monitored by the escort. The escort works closely with the host and other program and project personnel to ensure all requirements of the visit are met.

> HELPFUL TIP

Protecting NASA personnel, facilities, technology, and data is the responsibility of each NASA employee and contractor.

> HELPFUL TIP

Escorts are responsible for ensuring foreign nationals who require escort adhere to the requirements of their visit.



2 FNAM Process

The **IdMAX system** is the only system used at NASA for processing access requests. For user guides detailing how to use the system, refer to the Identity, Credential, and Access Management (ICAM) Portal (<https://icam.nasa.gov>).

The FNAM process covers all the steps necessary to grant access to a foreign national; to include pre-visit, identity vetting, authorization, enrollment, and issuance of a credential. The sections in this chapter will provide information and guidance for the activities that make up each of these steps. The steps detailed below are matched to the FNAM Workflow available on the ICAM Portal at <https://icam.nasa.gov>. The IVC is the lead in this process; however, the host, requestor, and sponsor each have specific responsibilities throughout each step of the FNAM process. Other roles and offices play a part in the FNAM process as depicted in the following table.

- 2.1 Pre-Visit
- 2.2 International Visit Coordinator (IVC) Review
- 2.3 Enrollment
- 2.4 Credential Production and Issuance
- 2.5 Processing Timeframes



Security Patrol at the White Sands Test Facility

FNAM PROCESS



TABLE 1. Role and Activity RACI Matrix

Processing Activity	Role									
	Foreign National	Host	Requester	Sponsor	IVC	CCS/CCPS	CI/CT	Center ECS	Agency Export Control	Badging Office
STEP 1: Pre-Visit	C	C	R	R						
Create Identity	C	C	R,A	I						
Sponsor Request				R,A						
STEP 2: International Visit Coordinator (IVC) Review		I		I	R,A	R	R	R	R	
Identity Proofing and Verification		C,I		C,I	R,A					
Security Review		C,I		C,I	A	R				
Counterintelligence/Counterterrorism (CI/CT) Review					C		R,A			
Export Control Review		C,I		C,I	C			R,A	R,A	
Final Authorization				I	R,A					
STEP 3: Enrollment	R									R,A
STEP 4: Credential Production and Issuance	C									R,A

R = RESPONSIBLE, A = ACCOUNTABLE, C = CONSULTED, I = INFORMED

Responsible. Those who do the work to achieve the task. There is at least one role with a participation type of responsible, although others can be delegated to assist in the work required.

Accountable. The individual ultimately answerable for the correct and thorough completion of the deliverable or task, and who delegates the work to those responsible. In other words, an accountable must sign off (approve) work that responsible provides. There must be only one accountable specified for each task or deliverable.

Consulted. Those whose opinions are sought, typically subject matter experts, and with whom there is two-way communication.

Informed. Those who are kept up-to-date on progress, often only on completion of the task or deliverable, and with whom there is just one-way communication.

The reviews performed by Counterintelligence/Counterterrorism (CI/CT) and Agency Export Control are for foreign nationals from designated countries and high-level protocol visits.



Launch at Wallops Flight Facility

2.1 STEP 1: Pre-Visit

Prior to any visit, it is important that certain activities be completed by the foreign national. The foreign national must obtain a visa sufficient for the purpose of the visit, must be sponsored, and must begin the process in accordance with the processing timeframes in [Section 2.5, Processing Timeframes](#), that identity vetting and review can be performed by the IVC. Failure to complete any of these activities will result in the denial of the access request.

The host or sponsor should work with the foreign national to ensure these activities are completed and to obtain information necessary to complete the access request. This information should include identity data for the visiting foreign national, the purpose of the visit, and the access requirements that will be needed during the visit. Obtaining this information up front ensures the timely completion of the access request. Having this information ready allows the foreign national's identity to be created, the access request to be submitted and sponsored, and the Access Control Plan (ACP) to be completed.

The actions below identify the roles that support pre-visit information gathering, the types of information each role should gather, and recommended methods for obtaining that information. Additional resources, such as checklists, can be found in [Appendix B: Checklists](#).

2.1.1 Create Identity

During this step, all the relevant information to create an identity must be entered into IdMAX. The host, requestor, and sponsor work together, as necessary, to identify this information and/or obtain it from the foreign national. For a complete list of the data that must be obtained, and who should provide this information, refer to the pre-visit checklist in [Appendix B: Checklists](#).

Basic identity data such as full legal name, contact information, date of birth, etc. should be provided by the foreign national. This information should be easy to obtain or already at hand. Other identity data, such as the passport and visa information, should also be provided by the foreign national and every effort should be made to ensure this information is received in legible form. It is important that the passport and visa be legible so that all necessary information can be obtained from the documents and they can be compared to the actual documents during in-person enrollment.

FNAM PROCESS



> HELPFUL TIP

Providing complete, accurate, and detailed information during identity creation decreases the time needed to process and approve the access request.



It is the responsibility of the host and requestor to identify the remaining information that is work, project, or NASA-specific and relevant to the access request. Included in this should be a list of those assets to which the foreign national will require access: rooms, computers, buildings, etc. This information will be used to support completion of the ACP, which will define what access the foreign national may request.

In support of this, the work description must be clearly written to allow approvers to make an informed decision regarding the access request. Let's look at two examples of a work description with varying degrees of detail. Let's look at the first example:

▶ **Example A**

"The individual will require access to the Center to conduct research with fellow scientists."

DENIED

In this example, specific information is not provided and the request will likely be returned for additional information or denied. Let's look at another example:

▶ **Example B**

"The individual will perform research in support of the Atmospheric Infrared Sounder Project, specifically analyzing air temperature, humidity, and surface temperature data to better understand and improve weather and climate models. This support is authorized through the International Space Act Agreement with Japan. The individual will require access to Building 47 and Lab 3 to perform the research."

APPROVED

In this second example, we can see the purpose of the visit, the exact project the individual will be supporting, and the authority for that visit and access. Additional information regarding specific access needs have been included in the access request. With this information, reviewers know exactly what access they are approving.

> **HELPFUL TIP**

The work description must be clearly written with sufficient detail to allow approvers to make an informed decision regarding the access request.



Stennis Space Center



> **HELPFUL TIP**

The sponsor is the individual who acknowledges and approves the foreign national's need to visit NASA.

✓ **2.1.2 Sponsor Request**

Once the identity has been created and the request has been submitted, the sponsor reviews the request to ensure all information is complete and correct. It is the sponsor's job to make sure any incorrect or missing information is resolved. An ACP should be initiated with support from the host to ensure access needs and requirements are accurately and completely identified.

Once these activities are complete, the sponsor may approve the access request.

2.2 STEP 2: International Visit Coordinator (IVC) Review

The IVC review step of the FNAM process includes initial identity proofing, background and database checks, and reviews by other offices with interest in the access request. The IVC performs the role of gatekeeper during this step, working with the sponsor to perform an initial review of the request to confirm and ensure information is complete and enough detail is provided prior to conducting identity proofing and verification on the individual. Once the IVC has completed these activities, the access request is routed to appropriate offices for review before returning to the IVC for final authorization.

The following sections discuss the processes of identity proofing and verification and the other office reviews. While presented in a logical order, these review actions do not need to be completed in any specific order.

An IVC review checklist is available in *Appendix B: Checklists* to assist in managing these reviews.

✓ **2.2.1 Identity Proofing and Verification**

The process of identity proofing and verification establishes a claimed identity as valid and provides a measure of surety that the individual presents no undue risk to the Agency. The information necessary to complete this action was gathered by the host, requestor, and sponsor and entered into IdMAX during *Step 1: Pre-Visit*. This action consists of identity source document reviews and database checks of restricted party screening authorities.

FNAM PROCESS





Identity source document reviews focus on verifying information in the access request matches the information in the identity source documents (identification or ID). This information will be used to conduct the database checks. In situations where foreign nationals are unable to present themselves in person, copies of the requested identity source documents will be used to perform the initial checks. If the request is approved, the copies of the identity source documents will be compared to the originals when the foreign national arrives at the Center to further validate the identity source documents.

As part of both the identity source document review and database checks, the visa, contained in the passport, is verified. Prior to entry in the United States, a foreign national must obtain a visa or visa waiver. The type of visa determines the type of activities the foreign national can conduct while in the United States. When the purpose of the visit and the visa type do not match, the visit must be denied.

The examples below illustrate appropriate and inappropriate uses of visas. Additional information regarding these and other visas can be found in *Chapter 8, Visas*.

> HELPFUL TIP

Chapters 5, 6, 7, and 8 provide specific information for identity proofing, database checks, background investigations, and visas.

> HELPFUL TIP

When the purpose of the visit and the visa type do not match, the visit must be denied.



▶ Example A

Performing work for a NASA Center while attending a university on an F-1 visa. The F-1 visa (Academic Student) allows entry to the United States as a full-time student at an accredited academic institution enrolled in a program or course of study that ends in a degree, diploma, or certificate. F-1 visas do not permit working during the first year.

DENIED

▶ Example B

Attending a business meeting to kick off a new project at a NASA Center on a B-1 visa. The B-1 (Business) visa allows entry to the United States to participate in business activities of a commercial or professional nature, including, but not limited to: consulting with business associates, traveling for a professional or business convention or conference, or negotiating a contract.

APPROVED

Database checks of restricted party screening authorities are performed on each foreign national visiting NASA based on the duration of their visit. The database checks are performed prior to the visit. The only database check that cannot be performed prior to the visit is the National Criminal History Check (NCHC) or fingerprint check, as this requires the foreign national to be present for fingerprint capture. Database checks should be revalidated annually for any visit that lasts more than 1 year.

TABLE 2. Database Check Requirements Based on Visit Duration

	Short-Term Visit (29 days or less)	Long-Term Visit (30 days or more)	Annual Revalidation Recommended?
Visual Compliance	Required	Required	Yes
Federal Bureau of Investigation (FBI) Investigations File (name check search)	Required	Required	Yes
U.S. Customs and Immigration Service (USCIS) Systematic Alien Verification for Entitlements (SAVE)	Required	Required	Yes
National Criminal History Check (NCHC) (fingerprint check)	Not Required	Required	Yes

> HELPFUL TIP

Database checks should be revalidated annually for any visit that lasts more than 1 year.

> DEFINITION

A visit is any means by which, and any duration for which, access is obtained to non-public NASA assets.



A foreign national who needs a Personal Identity Verification (PIV) credential must undergo additional identity vetting and background investigation requirements, as described in NPR 1600.4. Additional information about these requirements can be found in later chapters of this document.

Once the identity has been proofed and verified, the IVC will work with other offices to review the access request prior to authorizing the request and visit.

> **HELPFUL TIP**

The IVC serves as the liaison between all offices performing reviews of foreign national access requests.

✓ **2.2.2 Security Review**

The review conducted by the Center Protective Services Office includes an approval action. If sufficient cause exists, the access request may be denied.

The review conducted by the Center Protective Services Office addresses any security concerns or issues relevant to the Center. Necessary escort requirements are determined and the ACP is updated and reviewed prior to the denial or approval of the request.

The Center Protective Services Office, supported by the IVC, will coordinate reviews with other offices such as the Center protocol office for high-level protocol visits (HLPV), Center public affairs office for media representatives, and other offices as appropriate.



FNAM PROCESS



2.2.3 Counterintelligence/Counterterrorism (CI/CT) Review

The review conducted by CI/CT, on Designated Country and/or country of interest visitors, does not include an approval action. This review is conducted to address potential CI/CT concerns that, if identified, may influence the final authorization decision of the IVC. For more information on the CI/CT review, refer to NPR 1660.1.

2.2.4 Export Control Review

The review conducted by export control includes an approval action. If sufficient cause exists, the access request may be denied.

Review of the access request by export control begins with the Center Export Control Staff (ECS). The ESC reviews the countries of birth and citizenship, visa type, purpose of the visit, and the requested access to ensure they are all consistent and appropriate. The purpose of the visit and the requested access are further reviewed to ensure all appropriate limitations and/or authorizations, based on requirements to access programs or information are included in and covered by the ACP, or appropriate export authorization.

The access request is sent to the Agency Desk Officer and the Export Control and Interagency Liaison Division (ECILD) for review if any of the following are true:

- The foreign national is born in or a citizen of a designated country;
- A NASA-sponsored J-1 visa is involved; or
- The foreign national is a high-level protocol visitor.

Agency Desk Officers review access requests for foreign nationals who meet at least one of these conditions. The review is conducted based on the Agency Desk Officer's respective Mission Directorate programmatic requirements, any country-specific foreign policy issues/circumstances, and general compliance with Agency policies and agreements. If the request is denied, an explanation is provided for the denial. If the request is approved, it moves forward to ECILD for review.

Reviews conducted by ECILD starts with a review of the restricted party screening authorities database check results to verify the foreign national does not exist in any list owned by those authorities. The existing list of conditions and provisos for the access request are reviewed and any necessary additional requests are added to the access request before final



Summer Interns at the NASA IV&V Facility

> HELPFUL TIP

Additional information on the export control review process can be found in the Export Control Program Operations Manual, NAI 2190.



approval. If the request is denied, an explanation is provided or a request is made for additional information.

Additional information on the export control review process can be found in the Export Control Program Operations Manual, NAII 2190.

✓ **2.2.5 Final Authorization**

The final action of the IVC Review is to authorize the access request. The IVC review ensures there are no issues raised by the security, CI/CT, or export control reviews. If there are no issues with the access request, authorization can be granted.

However, if any questions or concerns exist, the IVC should coordinate those issues with the sponsor and/or office performing the review action to come to a final decision regarding the access request. While denial of the access request may be appropriate, additional controls, such as escort requirements or access restrictions, can be placed on the foreign national's visit to ensure remaining concerns or risks are successfully mitigated. If sufficient controls can be identified, the access request may be authorized. If no mitigating controls can be implemented to alleviate concerns, the request will be denied.

2.3 STEP 3: Enrollment

During enrollment, an enrollment official will facilitate the capture of biometric data (fingerprints, photograph) and document data of the foreign national. The process to capture biometric and document data follows existing processes as detailed in the ICAM Portal (<https://icam.nasa.gov>) and other Federal guidance.

Of special concern during this process is the documentation that must be provided by the foreign national. The foreign national must provide their passport, which should be compared to the copy provided earlier as part of the activities in *Section 2.1.1, Create Identity*. The passport should also be scrutinized to determine its validity.

FNAM PROCESS



> HELPFUL TIP

Enrollment officials are located at your Center's badging office.



Foreign nationals are required to provide the following original visit authorization documents:

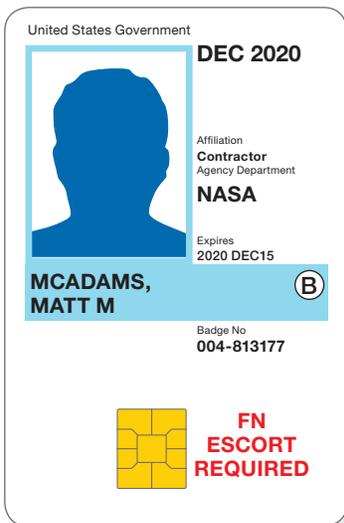
1. Visa, or Electronic System for Travel Authorization (ESTA) receipt for visa waivers; and
2. Admission stamp, or paper Form I-94, Arrival/Departure Record, with an Admitted-Until Date or “D/S” (duration of stay).

The visit authorization documents should be scanned and reviewed to validate their authenticity and validity.

Refer to *Chapter 5, Identity Proofing*, for additional information regarding these documents.

2.4 STEP 4: Credential Production and Issuance

The process to produce and issue credentials to foreign nationals follows existing processes as detailed in the ICAM Portal (<https://licam.nasa.gov>) and other guidance. Foreign nationals are issued credentials that clearly identify the cardholder as a foreign national.



PIV Issued to a Foreign National
Escort Required



Non-PIV Issued to a Foreign National
Escort Required

FNAM PROCESS



Prior to credential issuance, the credential should be inspected for the following mandatory elements:

1. A light blue color band through the name of the applicant;
2. A light blue color border around the photograph of the badge holder; and
3. A red “FN” printed on the badge.

Credentials will display a “B” inside a white circle in the light blue color band through the name of the applicant.

Additional elements that may be printed on the foreign national badge include the following:

1. For foreign nationals requiring escort, red lettered “**ESCORT ONLY**” printed across the middle of the badge; or
2. For international partners, a flag of the applicant’s country of citizenship.

Placement of the various elements will depend on the specific type of credential being issued.

2.5 Processing Timeframes

It is the intent of the FNAM Program, through the standardized processes in this operations manual, to achieve consistent processing timeframes across the Agency. In the past, there was no metric to track how long the FNAM process took—pre-visit through credential issuance. Table 3 lists out-processing times for standard access requests. Standard access requests cover the majority of access requests and allow persons performing these functions to accomplish other tasks or multiple identity transactions over a period of time during normal business hours, Monday to Friday. These timeframes assume all necessary information is accurate and verifiable.

Situations requiring expedited processing timeframes must be submitted to and approved by the Center Chief of Security (CCS)/Center Chief of Protective Services (CCPS) or through other Center-established processes as approved by the CCS/CCPS. The host, requester, and sponsor will work in special coordination with the IVC to expedite the request. This expedited access request should only be used for last minute requests, for HLPVs, or other situations as determined by the CCS/CCPS.



> HELPFUL TIP

Foreign nationals are required to carry their passport with them at all times. It is recommended that the foreign national supply their passport for review prior to receiving their badge.





TABLE 3. Standard Processing Timeframes

Processing Activity	Standard Processing Timeframe
2.1 STEP 1: Pre-Visit	2 days
2.1.1 Create Identity	1 day
2.1.2 Sponsor Request	1 day
2.2 STEP 2: International Visit Coordinator (IVC) Review	4–6 days
2.2.1 Identity Proofing and Verification	2 days
2.2.2 Security Review	1 day
2.2.3 Counterintelligence/Counterterrorism (CI/CT) Review	0 days
2.2.4 Export Control Review (including Agency Desk Officer and Agency Export Control reviews, when required)	2 days (normal) 4 days (designated)
2.2.5 Final Authorization	1 day
2.3 STEP 3: Enrollment	1 day
2.4 STEP 4: Credential Production and Issuance	0 days (Non-PIV) 5 days (PIV)
Total Time	9–14 days

TABLE 4. Expedited Processing Timeframes

Processing Activity	Expedited Processing Timeframe
2.1 STEP 1: Pre-Visit	2 hours
2.1.1 Create Identity	1 hour
2.1.2 Sponsor Request	1 hour
2.2 STEP 2: International Visit Coordinator (IVC) Review	14–31 hours
2.2.1 Identity Proofing and Verification	4 hours
2.2.2 Security Review	1 hour
2.2.3 Counterintelligence/Counterterrorism (CI/CT) Review	0 hours
2.2.4 Export Control Review (including Agency Desk Officer and Agency Export Control reviews, when required)	8 hours (normal) 24 hours (designated)
2.2.5 Final Authorization	1 hour
2.3 STEP 3: Enrollment	1 hour
2.4 STEP 4: Credential Production and Issuance	0 hours (Non-PIV)
Total Time	17–34 hours (3–4 days)

> **HELPFUL TIP**

Standard visit requests for foreign nationals should be submitted no less than 2 weeks ahead of the visit date.

> **HELPFUL TIP**

Requests for expedited processing of a foreign national visit must be coordinated through the CCS/CCPS.





3 Types of Visits

It is NASA policy to facilitate, authorize, and control all types of visits that result in granting access to NASA facilities, technology, and information. NASA employees and contractors are responsible for complying with all foreign national access management requirements, as well as export control and physical and IT security requirements. These requirements apply to foreign travel, hosting foreign and domestic visitors, and the conduct of meetings on and off NASA Centers.

Organizations, such as programs or projects, are responsible for following all security procedures and preventing the inadvertent transfer of export-controlled information and potential export control violations when hosting foreign national visitors for any type of visit. It is the organization's responsibility to ensure all security requirements and export compliance protocols are followed prior to, during, and at the conclusion of the visit. It is recommended that the organization appoint a host for the visit. The host is responsible for managing foreign national visitors and working with the Center ECS (ideally the program/project export control representative) in planning and conducting the visit.

For additional information regarding hosting meetings with foreign nationals, refer to Section 2.7 of the Export Control Program Operations Manual, NAI 2190. Checklist C in NAI 2190 provides a list of activities related to hosting meetings with foreign nationals. The Export Control Program Operations Manual can be found on the Export Control Policies and Procedural Guidance Web site at https://inside.nasa.gov/web/insidenasa/information_resources/export-control-interagency-and-liaison-division/policyandproceduralguidance.

- 3.1 Public Tours
- 3.2 Special Request Tours
- 3.3 Special Events
- 3.4 Short-Term Visits
- 3.5 Long-Term Visits
- 3.6 Meetings and Conferences
- 3.7 Access to Multiple Centers (Center-to-Center Visits)
- 3.8 High Level Protocol Visit (HLPV)

TYPES OF VISITS

3 Types of Visits

In [Section 1.3](#) we identified a key question, which allows us to determine whether a visit will take place or not. Now that we know a visit will occur, we need to identify the type of visit. The following sections describe the types of visits and actions that should be taken when these visits occur.

3.1 Public Tours

NASA Centers host a large number of visitors for public tours each year. Public tours, sometimes referred to as “windshield tours,” are offered through the Center’s visitor center or associated facility to the general public and allow escorted access to areas of a Center approved for public access. Tour groups can be made up of multiple small groups (individuals, families, etc.) or large groups of visitors (school group, travel group, etc.). What are examples of a public tour?

▶ Example A

A “NASA Tram Tour” or “Level 9 Tour” conducted by Space Center Houston at Johnson Space Center.

YES

▶ Example B

A request by the Center’s public affairs office to walk a celebrity through the Space Launch System manufacturing and assembly areas at Michoud Assembly Facility.

NO

There are no Agency requirements for processing identities of the participants on an organized public tour. The decision to require identity vetting of foreign nationals on a public tour should be made based on existing Center-specific policies or at the risk determination of the CCS/CCPS.

Public tours can present unique opportunities for foreign nationals to gain access to a Center, access which they might have no other means to obtain. Your Center’s counterintelligence office can provide information on surveillance and information gathering techniques employed by visitors to gather intelligence.

Public tours should be periodically reviewed by the Center ECS and the CISA to determine if activities viewable by the public are still acceptable from a risk perspective, and modified as needed.



> HELPFUL TIP

For additional information regarding hosting meetings with foreign nationals, refer to section 2.7 of the Export Control Program Operations Manual, NAI 2190. Checklist C in NAI 2190 provides a list of activities related to hosting meetings with foreign nationals.

> DEFINITION

Public tours are offered through the Center’s visitor center or associated facility to the general public and allow escorted access to areas of a Center approved for public access.

> HELPFUL TIP

Public tours should be periodically reviewed by the Center ECS and the CISA.

3.2 Special Request Tours

In some cases, a group may request a special request tour to access additional areas on, or information at, a Center. A special request tour is not a public tour as it may include access to additional areas or information not available on a public tour. All participants of the special request tour must be processed as visitors and their access request reviewed according to the areas and information to which they will be given access. What are examples of special request tours?

▶ **Example A**

A request by an employee to bring a group of students through the food services lab at Johnson Space Center.



▶ **Example B**

A “Bus Tour,” “Up-Close Launch Control Center Tour,” or “Up-Close Explore Tour” conducted by Kennedy Space Center Visitor Complex.



When foreign nationals are participating in a special request tour, the IVC should review the access request with export control, counterintelligence/counterterrorism, and other relevant offices in order to make an informed decision to approve or deny the tour and the foreign national individuals participating in the tour. If the tour is approved, restrictions on the access requested or additional requirements may be imposed by the CCS/CCPS on the entire tour group or individuals in the group. Preventative measures may be imposed by the CCS/CCPS or Center export control (as appropriate) on the areas of concern, such as removing an export-controlled model or covering sensitive equipment. The IVC should report any restrictions or additional requirements to the tour organizer/host to ensure the group adheres to the restrictions and meets the additional requirements.



> HELPFUL TIP

As a visitor to NASA, all foreign nationals participating in a special request tour are required to undergo appropriate identity vetting and credentialing in IdMAX.



Goddard Space Flight Center



▶ Example

A tour group requests access to a food services lab or a spacecraft testing facility with export controlled hardware, it will need to be verified that no foreign nationals are included in the group. If the group includes foreign nationals, their identities will need to be verified and reviewed before they can be granted access. If the foreign nationals are denied access, the entire group may be denied or those foreign nationals who were not approved may be required to separate from the group for the additional tour location.

3.3 Special Events

Special events are occasions where access to non-public areas may be made available to select individuals or groups of individuals. Events can vary in size and scope from a small-group party to a launch or test, to public access days such as an open house.

Event participants should be processed based on the nature of the event, the duration of the access, and the type of access allowed. The CCS/CCPS determines what processing requirements must be met for special events.

For example, when a Center hosts a public access day, it is most likely not feasible to process the identities of every visitor. It may be decided that certain areas of the Center should be locked down and made inaccessible during the public access day while others remain open to access. To reduce risks, additional security staff or event staff may be employed to monitor certain areas and ensure no unauthorized access is obtained.

As another example, when a Center hosts a launch or a system test firing, various individuals (e.g., NASA personnel, U.S. and foreign dignitaries, business partners and investors in the endeavor, etc.) want to view the event from within the Center's controlled perimeter. The individuals requesting access to view the launch should have their identities processed prior to granting access. Foreign nationals should be processed according to Agency policy to include escort requirements as appropriate.

Centers should establish plans for special events to describe any special considerations, security protocols, and requirements that may be implemented for the purpose of the special event. The decision for how to handle identity processing for an event should be documented in the event plan and made in compliance with existing Agency policies and Center-specific requirements.

> DEFINITION

Special events are occasions where access to non-public areas may be made available to select individuals or groups of individuals.

> HELPFUL TIP

An important part of mitigating risks during special events is ensuring an event plan is in place which details the specific security requirements necessary to execute the event and mitigate risk.



Open House at
Goddard Space Flight Center

3.4 Short-Term Visits

Short-term visits last for 29 days or less in a 365-day period and individuals processed for short-term visits are termed foreign national visitors. Foreign national visitors may be issued a visitor badge daily or a non-PIV credential for the duration of the visit, at the discretion of the Center. Visit durations are cumulative for a 365-day period and begin the first day of affiliation—if access begins June 15, 2015, all visit days that occur between June 15, 2015 and June 14, 2016 count toward the duration.

Typically, access to logical resources is not permitted during short-term visits. When logical access is required during a short-term visit, the individual must be processed using the requirements of a long-term visit. Access to services, such as a guest network that allows personal devices to connect to the public Internet outside the NASA firewall, is permitted during short-term visits without the requirement to be processed for a long-term visit.

Foreign nationals visiting NASA for a short-term visit undergo database checks of restricted party screening authorities, a Federal Bureau of Investigation (FBI) Investigations File (name check), and check of the USCIS Systematic Alien Verification for Entitlements (SAVE). These checks verify that the individual's name is not listed on any law enforcement or restricted party lists and that the individual has been authorized to enter the United States.

Foreign nationals with multiple visits expected to cumulatively exceed 29 days in a 365-day period should be processed for a long-term visit.

▶ **Example**

A researcher participates in a 20-day research project and is issued a visitor badge during his or her time at the Center. A month later, the same researcher comes back for another 20-day research project. The cumulative total of days is now 40, which exceeds 29, and requires the individual to be processed as a long-term visitor during the second visit.



> **DEFINITION**

A short-term visit is any visit enabling physical-only access for a period of up to but not exceeding 29 calendar days in a 365-day period.

> **HELPFUL TIP**

For more information on database checks, refer to *Chapter 6, Database Checks*.

3.5 Long-Term Visits

Long-term visits last for a minimum of 30 days in a 365-day period, or when IT access is required during a short-term visit. Access duration determines the type of credential to be received and the level of identity vetting that will be performed. Visit durations that are cumulative for a 365-day period begin the first day of affiliation (i.e., if access begins June 15, 2015, all visit days that occur between June 15, 2015, and June 14, 2016, count toward the duration).

Foreign nationals are issued non-PIV or PIV credentials based on the duration of the affiliation. Additional information on the requirements to receive a non-PIV or PIV can be found in NPR 1600.4 and in *Chapter 7, Background Investigations*.

Long-term visits require additional scrutiny of an individual's identity to include database checks of restricted party screening authorities, an FBI Investigations File (name check), an FBI fingerprint based NCHC, and a check of SAVE. The most significant differences between identity vetting of short-term and long-term visits are the fingerprint and SAVE checks.

3.6 Meetings and Conferences

This section and its subsections do not seek to define the terms meeting or conference. Policy definitions for these terms can be found in NPR 9700.1, Travel.

For our intent and purpose, a “meeting” or “conference” is any event where one or more NASA personnel meet to discuss NASA business (programs, projects, technologies, etc.). Meetings or conferences are most often short-term visits which can occur on or off the Center and be conducted in-person or via telephone, video conference, or other remote communication capability.

It is the responsibility of NASA employees and contractors to ensure foreign nationals attending a meeting are permitted to receive the information being shared. Personnel must be diligent to ensure that information being presented at meetings and conferences with foreign national attendance is reviewed and foreign national attendees are vetted, as appropriate. NASA has rules for specific countries that require review by Agency-level offices to determine if the activity is approved. Contact your Center Export Control Administrator for more information.



> DEFINITION

A long-term visit is any access by a foreign national for a period of 30 calendar days or more in a 365-day period.

> HELPFUL TIP

Safeguarding NASA personnel, facilities, technology, and data is the responsibility of every NASA employee and contractor.



Award Ceremony at
Langley Research Center

3.6.1 On-Site Meetings and Conferences

Meetings and conferences that are held at a NASA Center are considered on-site meetings or conferences, regardless of the content of that meeting or conference.

All on-site meetings and conferences are required to undergo full identity vetting. A full list of foreign national attendees must be provided to the IVC, through IdMAX, to ensure appropriate vetting occurs prior to the visit and to facilitate entry of the visitor to the meeting or conference. These foreign national attendees must be assigned an ACP and are required to follow all requirements of their ACP.

When foreign nationals are or may be in attendance, presentations and materials should be properly vetted by the appropriate organizations (Scientific and Technical Information (STI) Program, Center ECS) prior to the meeting or conference being held to ensure the information exchange is allowed. Additional guidance for the review of presentations and materials for onsite meetings and conferences can be found in the NASA Export Control Program Operations Manual NAI 2190.1.

3.6.2 Off-Site Meetings

Meetings held outside a NASA Center are considered off-site meetings when there is an exchange of NASA information or if NASA business is being conducted. Off-site meetings include teleconferences, video conferences, Web meetings, and any other remote meetings. When a meeting is held off-site, NASA assets (people, technology, information, etc.) are taken from the Center and shared with the other attendees.

A full list of foreign national attendees should be provided to the IVC, through IdMAX, to ensure the attendees can be vetted prior to the meeting.

When foreign nationals are or may be in attendance, presentations and materials should be properly vetted by the appropriate organizations (STI Program, Center ECS) prior to the meeting being held to ensure the information exchange is allowed. These organizations can also advise which countries this information should not be shared with so that NASA personnel can proactively protect information.



> HELPFUL TIP

Additional guidance for the review of presentations and materials for meetings and conferences can be found in the NASA Export Control Program Operations Manual, NAI 2190.1.



NASA Administrator Charles Bolden discusses Earth Science near the launch site for OCO-2



▶ **Example A**

The Chief Engineer is presenting at an off-site meeting of industry leaders in rocket engineering. It is unknown who will be in attendance but it is likely that foreign nationals will be in attendance. Prior to the meeting, the presentation is reviewed with Center ECS who recommends three slides be removed if foreign nationals from any designated country are in attendance. Before his presentation, the Chief Engineer checks with the meeting organizers and learns two individuals from a designated country will be present. The slides recommended by Center ECS for removal are removed and only approved information is shared.

ALLOWED

▶ **Example B**

A Webinar is hosted by a NASA program to unveil their newest discovery. This discovery contains export-controlled information. No review of the information is conducted and the information is shared with numerous foreign nationals that are not authorized to receive the information.

NOT ALLOWED

The responsibility of NASA employees and contractors to protect NASA assets continues when a visit occurs off the Center. In these situations, it is important to realize that NASA assets (people, technology, information, etc.) are leaving the Center to “visit” other parties. These NASA assets must remain protected in accordance with Federal requirements, including export controls.

Special care should be taken when holding meetings outside of a NASA Center. A meeting in a public space (e.g., coffee shop, restaurant) between two NASA employees is a prime target for eavesdropping. While the employees may not have expressly invited the other patrons of the shop, those patrons could become attendees to the meeting and thereby privy to information that should be controlled and protected. Safeguarding NASA technology and data is the responsibility of every NASA employee and contractor.

> **HELPFUL TIP**

The responsibility of NASA employees and contractors to protect NASA assets continues when a visit occurs off the Center.

3.6.3 NASA-Sponsored Conferences

Refer to NPR 9700.1 for the definition of a NASA-sponsored conference. NASA-sponsored conferences include any conference held on-site at NASA (whether sponsored by NASA or not) and any conference held off site that is sponsored by NASA.

NASA-sponsored conferences held on-site must follow the guidance in *Section 3.6.1, On-Site Meetings and Conferences*. A full list of all foreign national attendees must be provided to the IVC through IdMAX, to ensure appropriate vetting occurs prior to the visit and to facilitate entry of the visitor to the meeting or conference. These foreign national attendees must be assigned an ACP and are required to follow all requirements of their ACP.

NASA-sponsored conferences held off site should provide a full list of foreign national attendees to the IVC through IdMAX, so that these foreign nationals can be appropriately vetted.

When foreign nationals are or may be in attendance, presentations and materials should be properly vetted by the appropriate organizations (STI Program, Center ECS) prior to the meeting being held to ensure the information exchange is allowed. These organizations can also advise which countries this information should not be shared with so that NASA personnel can proactively protect information.

3.6.4 Non-NASA/Third Party Sponsored Conferences

Refer to NPR 9700.1 for the definition of a non-NASA or third party sponsored conference.

Non-NASA or third party sponsored conferences held on-site must follow the guidance in *Section 3.6.1, On-Site Meetings and Conferences*. A full list of all foreign national attendees must be provided to the IVC through IdMAX, to ensure appropriate vetting occurs prior to the visit and to facilitate entry of the visitor to the meeting or conference. These foreign national attendees must be assigned an ACP and are required to follow all requirements of their ACP.

Non-NASA or third party sponsored conferences held off site are not required to undergo any identity vetting.



> HELPFUL TIP

Refer to NPR 9700.1 for the definition of a NASA-sponsored conference.



Langley Research Center



When foreign nationals are or may be in attendance, presentations and materials should be properly vetted by the appropriate organizations (STI Program, Center ECS) prior to the meeting being held to ensure the information exchange is allowed. These organizations can also advise which countries this information should not be shared with so that NASA personnel can proactively protect information.

3.7 Access to Multiple Centers (Center-to-Center Visits)

In the past, identities of foreign nationals were locked to a single home Center unless a Center-to-Center visit request was performed. The Center-to-Center visit request created the foreign national's identity record in the Enterprise Physical Access Control System (EPACS) at the travel Center after approval by the sponsor, IVC, and other relevant approvers. Once the Center-to-Center visit request was complete, the foreign national's access could be assigned and granted.

Now, a new process has been introduced to IdMAX, which allows the foreign national to request access to a travel Center. This new process does not require a Center-to-Center visit request to be completed prior to the self-request, though a Center-to-Center visit request should be completed to confirm the visit is valid. Using the self-request process, the NASA Access Management System (NAMS) will create the foreign national's identity in EPACS when the foreign national submits the access requests.

Before any access will be granted, the access request must be approved by appropriate parties at the travel Center. The foreign national's identity will enter an approval queue that requires the foreign national's sponsor, the travel Center's IVC and Export Control, and the asset owner to approve the request. Once all approvals are complete, access will be entered in the travel Center's EPACS.

> IMPORTANT INFORMATION

A Center-to-Center visit request should still be completed in IdMAX for a foreign national to visit another Center so that the access request can be confirmed to be a valid visit request.



North gate at Goddard Space Flight Center

3.8 High-Level Protocol Visit (HLPV)

NASA hosts high-level protocol visits (HLPV) which are events or meetings attended by individuals representing, or delegations of, foreign heads of state or government, ambassadors, heads of foreign government ministries or space agencies. These high-level protocol visits are organized and coordinated through the Center’s protocol office and must meet the same requirements as all other visits. Visits by U.S. citizens who are VIPs (e.g., prominent politicians, senior Government officials, celebrities, etc.) are not considered high-level protocol visits as defined in NASA’s NPR 1600.4.

▶ **Example A**

The President of the Japan Aerospace Exploration Agency is coming to NASA Headquarters to meet with the NASA Administrator to finalize an agreement for cooperation on a new satellite mission to monitor the Earth’s atmosphere from outer space.



▶ **Example B**

The Chief Executive Officer of a major aerospace development contractor is meeting with the Center Director to discuss opportunities to develop new technology.



Due to the high level of attention and potential impact of an HLPV, these visits should be given priority for processing. The IVC works with the Center protocol office to ensure information necessary to process the access request is provided. Once all information has been provided, the IVC will process the request through IdMAX to the appropriate reviewers including the OIIR international desk officer and the Headquarters ECILD. To ensure the access request process is completed in a timely manner, the IVC should communicate directly with other reviewers in the process, including Center ECS and the Center CISA.



> **DEFINITION**

A high-level protocol visit is an event or meeting attend by individuals representing, or delegations of, foreign heads of state or government, ambassadors, heads of foreign government ministries or space agencies.

> **HELPFUL TIP**

Visits by U.S. citizens who are VIPs **ARE NOT** considered high-level protocol visits as defined in NASA’s NPR 1600.4.



Goddard Institute of Space Studies



4 Access

It is NASA policy to facilitate, authorize, and control all types of access to NASA facilities, technology, and information. All NASA employees and contractors are responsible to comply with all foreign national access management requirements, including export control (NPR 2190.1), physical security (NPR 1600.1), identity, credential, and access management (NPR 1600.4 and NPR 2841.1), and IT security (NPR 2810.1) requirements.

The decision to grant physical and/or logical access depends on the level of confidence (LOC) of the individual, their credential type, and the work-related need to access NASA assets.

- 4.1 Types of Access
- 4.2 Location-Based Processing for Long-Term Foreign National Access
- 4.3 Access Control Plan (ACP)



Kennedy Space Center

ACCESS

4.1 Types of Access

While physical access can only be achieved on site, logical access can be achieved on site or remotely through NASA virtual private network or other means.

4.1.1 Physical Access

Physical access is the ability to touch, or walk into or up to, an asset such as a building, door, flight hardware, paper, IT system, etc. Physical access is controlled through the use of door locks, card readers, gates, fences, officers, walls, etc. The purpose of these controls is to limit access to those persons who have been granted permission to access controlled assets.

NASA uses a security-in-depth methodology to secure physical access by layering access levels. NASA has defined four access levels with increasingly enhanced security controls at each level: unrestricted, controlled, limited, and exclusion. The security controls implemented at a given access level are determined by the associated facility security level (FSL) designation as defined in NPR 1620.3. Access authorization to physical assets is controlled through the NAMS.

- **Unrestricted.** NASA Areas that fall below the guidelines of controlled, limited, and exclusion. These areas can include mustering points, cafeterias, gyms, etc.
- **Controlled (FSL II).** A NASA Controlled Area is a physical area, including buildings or facilities, in which security measures are taken to safeguard and control access to property and hazardous materials, other sensitive material, or to protect operations that are vital to accomplishing the mission assigned to a sensitive material, Center, or Component Facility. The Controlled Area has a clearly defined perimeter, but perimeter physical barriers are not required.
- **Limited (FSL III).** A NASA Limited Area is a physical area in which security measures are taken to safeguard or control access to classified material or unclassified property warranting special protection or property and hazardous materials or to protect operations that are vital to the mission assigned to a Center or Component Facility. The Limited Area has a clearly defined perimeter and utilizes permanent physical barriers and access control devices (walls, doors with locks or access devices) to assist occupants in keeping out unauthorized personnel.



> DEFINITION

Access, with regard to NASA assets, is the explicit granting of permission to enter and/or use NASA facilities, interact with NASA personnel, and/or use NASA information and related information processing services.



Security officer
at Ames Research Center

- **Exclusion (FSL IV).** A NASA Exclusion Area is a permanent facility dedicated solely to safeguarding and use of Classified National Security Information (CNSI). This designation is used when vaults are unsuitable or impractical and/or where entry to the area could provide visible or audible access to classified material.

All facilities designated as NASA Critical Infrastructure (NCI) or key resources are designated as “Limited” areas, at minimum.

4.1.2 Logical (IT) Access

Logical access, commonly referred to as IT access, is the ability to interact with electronic data, applications, or systems. Access authorization to IT resources or logical assets is controlled through the NAMS.

NASA uses both internal and external border controls along with multi-factor authentication mechanisms and role-based access control to secure logical access. These controls limit access to those persons who have been granted permission to access controlled assets.

4.2 Location-Based Processing for Long-Term Foreign National Access

The primary consideration for how long-term access requests for foreign nationals are processed is the physical location from which the foreign national will be accessing NASA assets. Federal requirements, published by the Office of Personnel Management (OPM) in the July 31, 2008 memo entitled “Final Credentialing Standards for Issuing Personal Identity Verification Cards under HSPD-12,” define the location-based requirements for processing an access request.

4.2.1 Long-Term Access Inside the United States

Foreign nationals accessing NASA assets while located inside the United States are required to undergo complete identity proofing to include fingerprint capture and background investigation. A favorable background investigation must be completed commensurate with the level of confidence associated with the assets to which access is requested. Refer to *Chapter 5, Identity Proofing*, and *Chapter 7, Background Investigations*, for additional information on these requirements.



NASA Deputy Administrator Dava Newman speaking at NASA Headquarters

> HELPFUL TIP

Location-based requirements for processing an access request are defined in the July 31, 2008 OPM memo entitled Final Credentialing Standards for Issuing Personal Identity Verification Cards under HSPD-12.

To determine whether the access request will be processed as “inside the United States” we consider the following question: “Will any access be obtained inside the United States?” If the answer to this question is yes, then the individual must be processed in IdMAX as “inside the United States.”

▶ **Example A**

A foreign national employed by Caltech and working at the Jet Propulsion Laboratory on the Mars Rover program.

YES

▶ **Example B**

A foreign national attending the University of Montana and participating in a research program at Goddard Space Flight Center.

YES

▶ **Example C**

A foreign national living in China and requiring access to a very low risk system operated by NASA to perform work with the International Space Station.

NO

4.2.2 Long-Term Access Outside the United States

Foreign nationals accessing NASA assets while located solely outside the United States are required to provide sufficient information to claim an identity and undergo basic database checks. Refer to *Chapter 5, Identity Proofing*, and *Chapter 7, Background Investigations*, for additional information on these requirements.

The access granted to these foreign nationals is limited to remote-only logical access to very low risk systems unless the foreign national travels to a NASA center for additional vetting or the risk is accepted via a waiver.

To determine whether the access request will be processed as “outside the United States” we consider the following question: “Will access be obtained solely outside the United States”? If the answer to this question is yes, then the individual must be processed in IdMAX as “outside the United States.”



Jet Propulsion Laboratory

> HELPFUL TIP

Foreign nationals working outside the United States who do not undergo a full enrollment are only granted access to very low risk IT systems.

▶ **Example A**

A foreign national living in China and requiring access to a system operated by NASA to perform work with the International Space Station.

YES

▶ **Example B**

A foreign national employed by Caltech and working at the Jet Propulsion Laboratory on the Mars Rover program.

NO

▶ **Example C**

A foreign national attending the University of Montana and participating in an off-site internship at Goddard Space Flight Center.

NO

4.3 Access Control Plan (ACP)

The ACP, formerly referred to as the Security Technology Transfer Control Plan (STTCP) or Technology Transfer Control Plan (TTCP), is a collection of NASA assets (facilities, information, and technology) to which a foreign national may request access. ACPs function on the principle of whitelisting—a list of assets is identified to which a foreign national may request access without further review by the IVC or export control. Access is not granted by the ACP. The foreign national must request access to an asset listed in their ACP, which will then be reviewed by appropriate owners and other persons (e.g., CEA, IVC) prior to access being granted.

The capability to create and assign ACPs within IdMAX is currently being developed and will streamline the access approval process. Until the ACP functionality is made available, ACPs should be uploaded electronically to IdMAX and attached to an individual's identity record.

Policies for the use and creation of ACPs can be found in NPR 2190.1. Additional information regarding the ACP can be found in the Export Control Program Operations Manual, NAI 2190.1.

ACPs are created for each program and project at NASA and assigned to a foreign national's identity record to create an individual ACP. Addendum ACPs may be



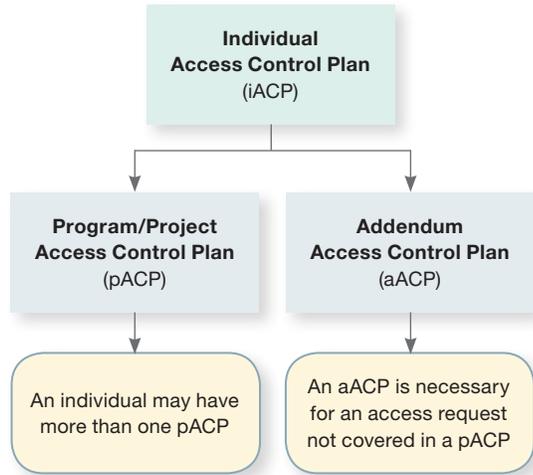
Glenn Research Center

> HELPFUL TIP

ACPs do not grant access. ACPs provide a list of assets to which a foreign national may request access.



added to an individual ACP when a foreign national requests access to assets outside of those included in the individual ACP.



4.3.1 Program/Project ACP (pACP)

An ACP must be created for each program or project and should include any specific assets associated with the program/project such as buildings, rooms, systems, etc. Program/Project ACPs (pACP) capture the information necessary to control access to the facilities, information, and technology relevant to that program or project. A pACP is “attached” to an individual foreign national’s access record in IdMAX to define the requirements of the individual ACP.

4.3.2 Individual ACP (iACP)

An individual ACP (iACP) is comprised of all the pACPs that have been assigned to the foreign national. The iACP determines the potential and actual access to which a foreign national may request access through NAMS.

An iACP ensures Center ECS, program and project managers, security personnel, and others working with the foreign national have a consistent understanding of access allowances that may be granted to the foreign national. An iACP is required for all visits, regardless of duration, where access will be granted to programs or projects with security and export control requirements.

> HELPFUL TIP

Program/Project ACPs also include Center-specific ACPs for common areas, controlled areas, and other Center-specific access groups.

> HELPFUL TIP

Individual ACPs (iACP) are created by assigning program/project ACPs (pACP) and adding addendums to an ACP (aACP) to a foreign national’s individual ACP.

Access in addition to that allowed in the iACP through associated pACP requires an addendum to an ACP to be added to the foreign national's iACP.

4.3.3 Addendums to an Individual ACP

Addendums to an ACP (aACP) are additions to individual ACPs, which grant a foreign national permission to access an asset not already allowed through an existing program or project ACP. Multiple addendums may be added to an iACP. Addendums must be reviewed by the IVC and/or export control, as appropriate, prior to any approval by the asset owner.



Ames Research Center



> HELPFUL TIP

An addendum to an ACP is necessary for an access request not covered in a program/project ACP.





5 Identity Proofing

Prior to being granted access to NASA assets, an identity must be claimed, scrutinized, verified, and established. An identity requestor will submit basic identity data for a claimed identity to an IVC. Once the basic identity data is received, the IVC can begin to verify the identity.

IVCs coordinate the receipt of identity data and NASA-approved identity source documents, as appropriate, in order to perform the necessary identity proofing. When sufficient identity information has been provided, the IVC will review and verify the identity data and identity source documents.

> DEFINITION

Identity proofing is the process whereby an individual's claimed identity is provided, scrutinized, verified, and established.

If sufficient identity information is not provided initially, the IVC should work with the sponsor, host, and/or requestor to obtain the necessary information from the foreign national. The IVC should coordinate submission of the information, but it is not the IVC's responsibility to obtain the information. The responsibility to provide sufficient and necessary information lies solely with the foreign national and the sponsor, host, and/or requestor. If sufficient identity data and identity source documents are not provided in a timely manner (within 10 business days of requesting the necessary information), the IVC may deny the access request with a note stating "sufficient identity data/identity source documents were not provided by the foreign national to allow for identity proofing."

- 5.1 United States Citizens
- 5.2 Lawful Permanent Residents (LPRs)
- 5.3 Foreign Nationals
- 5.4 Foreign Nationals from Designated Countries (Birth and Citizenship)
- 5.5 NASA-Approved Identity Source Documents

IDENTITY PROOFING

Once verified, the identity is established and appropriate background investigations can be performed. Refer to *Chapter 7, Background Investigations*, for additional information on these requirements.

5.1 United States Citizens

Citizens of the United States, whether working for a foreign company or having dual citizenship (to include dual citizenship with a designated country) are treated as U.S. citizens for the purposes of identity vetting. Any access restrictions for U.S. citizens will be determined and agreed to by the CCS/CCPS.

5.2 Lawful Permanent Residents (LPRs)

Foreign nationals who have been granted permission to permanently reside in the United States are called Lawful Permanent Residents (LPRs). LPRs are granted certain rights and responsibilities which include living and working permanently anywhere in the United States as well as attending public schools, colleges, and universities.

A Permanent Resident Card (PRC) or Alien Registration Receipt Card (ARRC) (Form I-551), commonly referred to as a “Green Card,” is issued to LPRs, which indicates their status as an LPR. Green Cards that have expired are not acceptable identity source documents and the individual should be treated as a foreign national. In some situations, an LPR may be entering the United States without having received a Green Card. In this situation, the visa will state “upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year.” The entry stamp given to the visa serves as this endorsement and the foreign national is now considered an LPR. Any affiliation and access should be set to expire at the end of 1 year and it is the responsibility of the LPR to present the official Green Card prior to the 1-year expiration date.

NASA treats all LPRs (including protected individuals) as U.S. persons, which is to say they are treated as near-equals to U.S. citizens for the purposes of identity vetting, granting of access, and escort requirements. The treatment of LPRs does not change if they are citizens of, or were born in, a designated country. Access restrictions for U.S. persons, to include potential escort requirements, are determined and agreed to by the CCS/CCPS.

During identity proofing, LPRs are required to present a valid Green Card (PRC or ARRC) to document their status as an LPR. The LPR’s identity information should be submitted to the USCIS SAVE to validate the immigration status of the LPR. LPRs should also present documentation showing their authorization to work.



> HELPFUL TIP

It is the responsibility of the foreign national to provide complete and accurate information in a timely manner to avoid delays.

> HELPFUL TIP

NASA treats protected persons (status as “refugee,” “displaced person,” or victim of “religious or political” persecution) the same as LPRs.

> HELPFUL TIP

Expired Green Cards are not acceptable identity source documents and the individual should be treated as a foreign national until LPR status can be verified in SAVE or with a renewed, valid Green Card.

Due to the close working environment NASA Centers share with some Department of Defense (DoD) installations, it should be noted that LPRs are treated as foreign nationals by DoD. As such, LPRs entering those NASA Centers with a DoD-controlled or shared perimeter may be required to be processed and escorted as foreign nationals. For example, all LPRs requiring access to Marshall Space Flight Center are required to pass through a DoD gate and are treated as foreign nationals—and therefore need to be escorted while on the Center.

5.3 Foreign Nationals

Any person who is not a U.S. citizen or LPR (including protected individuals) is a foreign national.

In order to visit NASA, a foreign national must obtain approval for the visit, obtain a visa appropriate to the purpose of the visit, ensure a host/sponsor is identified, and begin the visit process with sufficient time for the process to be completed prior to their arrival.

During identity proofing, foreign nationals accessing NASA from inside the United States must present a valid passport with accompanying visa, or ESTA receipt for a visa waiver, and an admission stamp, or paper Form I-94, Arrival/Departure Record, with an Admitted-Until Date or “D/S” (duration of status). Failure to present these documents, or presenting invalid documents, will result in rejection of the access request. Additional information on visas can be found in [Chapter 8, Visas](#).

In order to work in the United States, non-U.S. Citizens must show proof of their ability to work in this country. Often this requires applying for and receiving an Employment Authorization Document (EAD), though other means may be presented to provide evidence that the foreign national is authorized to be employed in the United States for a specific period of time.

As part of identity proofing, all foreign nationals undergo a check through Visual Compliance and SAVE. SAVE validates the entry into the United States and the visa information provided by the foreign national. The Visual Compliance check provides a method to determine if a foreign national has been identified as a person of interest on any list in Visual Compliance. Refer to [Chapter 7, Background Investigations](#), for additional information on these requirements.

All foreign national access requests are reviewed by Center ECS to determine if any export control concerns exist with the visit or the foreign national.



> HELPFUL TIP

LPRs at NASA Centers within or sharing a DoD perimeter may be treated as foreign nationals due to DoD policy.

> HELPFUL TIP

The requirements for a foreign national visiting NASA apply to any foreign national entering the Center, to include tenants leasing space on a NASA Center.



NASA Shared Services Center

5.4 Foreign Nationals from Designated Countries (Birth and Citizenship)

A foreign national from a designated country is any foreign national born in, or a citizen of, a designated country. If the foreign national has dual citizenship and one of those countries is a designated country, the foreign national will be processed as a foreign national from a designated country.

A foreign national from a designated country is not automatically denied access but is subject to additional scrutiny, which may result in the visit request being denied. All foreign nationals from designated countries are required to be escorted at all times.

Foreign nationals from designated countries must complete all the requirements in *Section 5.3, Foreign Nationals*, as well as additional reviews by the CISA and the Agency Desk Officer and the ECILD. Refer to *Sections 2.2.3, Counterintelligence/Counterterrorism (CI/CT) Review* and *2.2.4, Export Control Review* for additional information on these reviews. These examinations are necessary to ensure existing sanctions, embargos, and technology concerns are considered before access is granted.

▶ Example

Israel is a country of Missile Technology Concern. It is NASA's responsibility to ensure that foreign nationals from Israel are not allowed to access restricted missile technologies. This limitation would not, however, apply to an Israeli citizen working with NASA on a climate change mapping project.

In many instances, a visit which might otherwise be denied, may be approved when mitigating actions are implemented (e.g., limiting access to certain approved areas, not allowing logical access, etc.).

5.5 NASA-Approved Identity Source Documents

The list of NASA-approved identity source documents which may be used by a foreign national is limited due to the allowances made for foreign nationals and the requirements for identity source documents they must present. As with all identity proofing, two forms of identification are required—one primary ID (Government-issued photo identification) and one secondary ID (authorization to work).



> HELPFUL TIP

Country of birth is a factor for determining designated country status as required by Department of State ITAR regulations found in 22 CFR Part 124 regarding dual and third country nationals.



The next two sections discuss the identity source documents most commonly used by foreign nationals. If questions arise regarding the use of other identity source documents, contact your CCS/CCPS, who can contact the Agency Identity Management Official (AIMO) for a final decision on any identity source document issues. Examples of the identity source documents discussed below can be found in DHS USCIS M-274, Handbook for Employers (<http://www.uscis.gov/sites/default/files/files/form/m-274.pdf>).

Foreign nationals accessing NASA assets while located solely outside the United States (refer to *Section 4.2.2, Long-Term Access Outside the United States*) are required to provide documentation necessary to ensure the proper level of identity assurance.

5.5.1 Primary ID

In order to establish a foreign national's identity, one of the following forms of Government-issued photo ID must be provided:

- **Passport.** A passport is a required travel document for any foreign national visiting the United States. The passport includes basic identity information as well as a photograph of the foreign national. Expired passports or passports with handwritten extensions are not acceptable documents.
- **Green Card.** Also known as a Permanent Resident Card (PRC) or an Alien Registration Receipt Card (ARRC), Green Cards are issued by the DHS USCIS and establish a foreign national's status as a lawful permanent resident. Refer to the USCIS Web site at <http://www.uscis.gov/greencard> for additional information regarding Green Cards.
- **U.S. Department of State Identification Cards.** The U.S. Department of State may issue diplomatic or consular identification cards to foreign government personnel in certain situations. Additional information can be found on the Department of State Web site (www.state.gov).

Foreign nationals are required to carry, at all times, any certificate of alien registration or alien registration receipt card which they have been issued; examples include a passport with visa and admittance stamps, or a Green Card for LPRs. This is a requirement of the Immigration and Nationality Act, Section 264(e). Foreign nationals and LPRs are required to present these documents to proper authorities upon request. Failure to present these documents when requested is a misdemeanor and can be cause for fine and/or imprisonment, potentially leading to deportation.



Identity Source Documents

PRIMARY ID

- Passport
- Green Card (PRC or AARC)
- U.S. Department of State ID Cards

SECONDARY ID

- Employment Authorization Document (EAD)
- Social Security Card
- Visa or Visa Waiver

> HELPFUL TIP

Expired identity source documents, or handwritten addendums to an identity source document, are not valid.

> HELPFUL TIP

Foreign nationals are required to carry their passport, and LPRs are required to carry their Green Card, at all times while in the United States and must provide these documents upon request by proper authorities.

It should be noted that a driver's license does not meet the requirements of a primary identity source document to establish status as a foreign national or LPR. Additionally, any expired document or handwritten addendum to an identity source document is not valid and cannot be accepted.

5.5.2 Secondary Identification

In order to establish a foreign national's authorization to work in the United States, one of the following forms of secondary ID must be provided:

- **Employment Authorization Document (EAD).** An EAD is issued to foreign nationals to acknowledge their eligibility for employment in the United States. EADs are discussed in detail at the DHS U.S. Citizenship and Immigration Services Web site: <http://www.uscis.gov/green-card/green-card-processes-and-procedures/employment-authorization-document>.
- **Social Security Card.** Foreign nationals authorized to work in the United States are issued Social Security numbers and corresponding Social Security cards. Additional information regarding Social Security cards for foreign nationals can be found on the Social Security Administration Web page at <https://www.ssa.gov/people/immigrants/>.
- **Visa or Visa Waiver.** For specific working relationships with NASA (students, researchers, etc.), a visa or visa waiver may be provided, which authorizes the foreign national to participate in a particular type of visit for a specific duration. Additional information regarding visas and visa waivers and the activities in which a foreign national may participate on specific visas can be found in [Chapter 8, Visas](#), or on the Department of State Tourism and Visit Web site at <http://travel.state.gov/content/visas/en/visit.html>.

Work authorization, established by the secondary ID, is verified by the SAVE check.

5.5.3 Fraudulent Documents

Fraudulent or suspected fraudulent documents should be reported to the CCS/CCPS, who will report the situation as a security incident. Additional information on reporting security incidents regarding foreign nationals can be found in [Chapter 9, Incident Reporting, Accountability, and Duplicate Identities](#).



> HELPFUL TIP

Any identity source document that is expired, or handwritten addendums to an identity source document, is not valid and cannot be accepted.



Goddard Space Flight Center

> HELPFUL TIP

Fraudulent or suspected fraudulent documents should be reported to the CCS/CCPS.



6 Database Checks

NASA conducts various database checks on foreign nationals in order to obtain the necessary data to make an informed decision regarding granting access to NASA assets.

This chapter will describe the various database checks a foreign national may be subject to in order to obtain access.

6.1 National Crime Information Center (NCIC)

The National Crime Information Center (NCIC) database is a clearinghouse of data operated by the FBI Criminal Justice Information Services (CJIS) Division. A check in NCIC will return any records that match the provided name.

6.2 FBI Investigations File (Name Check Search)

The FBI Investigations File name search is a database check performed by the CISA on foreign nationals from designated countries and/or countries of interest. This database checks additional record sources to determine if the foreign national warrants further scrutiny.

- 6.1 National Crime Information Center (NCIC)
- 6.2 FBI Investigations File (Name Check Search)
- 6.3 National Criminal History Check (NCHC) (Fingerprint Check)
- 6.4 Systematic Alien Verification for Entitlements (SAVE)
- 6.5 Visual Compliance

DATABASE CHECKS

6.3 National Criminal History Check (NCHC) (Fingerprint Check)

The NCHC is a search of information taken from fingerprint submissions that is retained by the FBI CJIS Division. This information includes the date of the arrest, the arrest charge, and the disposition of the arrest (if known). In order to perform this check, fingerprints are submitted to the FBI and matched against existing records.

The favorable adjudication of an NCHC is required prior to the issuance of a NASA PIV.

6.4 Systematic Alien Verification for Entitlements (SAVE)

All foreign nationals and LPRs residing and/or working in the United States, regardless of duration, are required to undergo a check through the DHS USCIS SAVE. SAVE validates the entry into the United States and the visa information provided by the foreign national. When performing a SAVE check, you must provide the passport number of the foreign national.

It is recommended to follow the below tips when working with SAVE:

1. If no results are returned from the first search, rerun the check the next day. A record will only be found after the foreign national has entered the country, and SAVE only stores approved entries.
2. For certain countries (e.g., Japan), run the check using the number at the bottom of the passport if the number at the top does not match. Some passports contain two different numbers but SAVE records only one of these numbers.
3. Certain visas require additional information be submitted in SAVE; for example, the Student and Exchange Visitor Information System (SEVIS) number off the DS-2019 for J-1 visas and I-20 form for F-1 visas.

When a record cannot be found, SAVE offers the choice to perform a more thorough search that will take a number of days to complete.



> HELPFUL TIP

All foreign nationals and LPRs residing in the United States (both short and long term) are required to undergo a SAVE check

6.5 Visual Compliance

All foreign nationals, whether working inside or outside the United States, are required to undergo a check through Visual Compliance. The Visual Compliance check provides a method to determine if a foreign national has been identified as a person of interest on any list maintained by a restricted party screening authority. Checks in Visual Compliance are performed by the IVC but may be performed by Center Export Control staff as necessary. The following list of categories is checked:

- Export-Related Restricted, Denied, and Blocked Persons Lists
- Sanction Programs-Related Blocked Persons Lists
- General Services Administration
- Law Enforcement-Related Wanted Persons Lists
- International Terrorist, Blocked Person, Wanted, and Entity Lists
- Export Risk Country Alerts

NASA utilizes a dynamic search service provided by Visual Compliance, which conducts a daily check of all identities that NASA has submitted to Visual Compliance. Any results obtained during this dynamic search are provided to the person who performed the Visual Compliance check, the AIMO, and the OPS Security Management Division Director.

Access requests are denied if the Visual Compliance search results in a “positive hit” for the specific individual who is being vetted. A positive hit is any result showing the specific individual on any available list in Visual Compliance. NASA policy requires that positive hits be reported to the CCS/CPS and the NASA Headquarters Export Control Administrator. Exceptions to this denial of access may be granted in cases where the “positive hit” is found to not belong to the specific individual through an alternate proofing process or further investigation, or where the “positive hit” can be effectively mitigated by access restrictions and controls approved by the NASA Headquarters Export Control Administrator, or through the waiver process.



> HELPFUL TIP

All foreign nationals are required to undergo a check through Visual Compliance.



Michoud Assembly Facility



7 Background Investigations

Once a foreign national's identity has been established and appropriate database checks have been performed, a background investigation must be performed. In order to select the proper background investigation, the access requirements of the foreign national need to be known. These access levels identify an associated risk level, which relates to a level of confidence.

7.1 Levels of Confidence

A level of confidence is the assurance given to NASA that a person is who they say they are, combined with the level of background investigation adjudicated by NASA; essentially, NASA wants to know if the foreign national is a "good" person or has any issues in their past which could pose a risk to the Agency. Each level of confidence directly relates to an identity proofing and/or background investigation.



- 7.1 Levels of Confidence
- 7.2 OPM Background Investigation Tiers

BACKGROUND
INVESTIGATIONS

7 Background Investigations



Refer to the below table for the list of confidence levels and the identity proofing and background investigation required for that level. Basically, the higher the level of confidence, the greater the potential for access to NASA facilities/resources; hence, the more stringent the check that must be performed.

TABLE 5. Levels of Confidence

Level of Confidence	Identity Proofing/Background Investigation
0	None
10	None
20	NCIC (Name Check) without Identity Proofing
30	NCHC (Fingerprint) with Identity Proofing
40	OPM Tier 1
50	OPM Tier 2
55	OPM Tier 3
60	OPM Tier 4
70	OPM Tier 5

Status as a foreign national does not limit the confidence level you may receive, though a foreign national will generally not be subject to any background investigation that would grant a confidence of 40 or more.

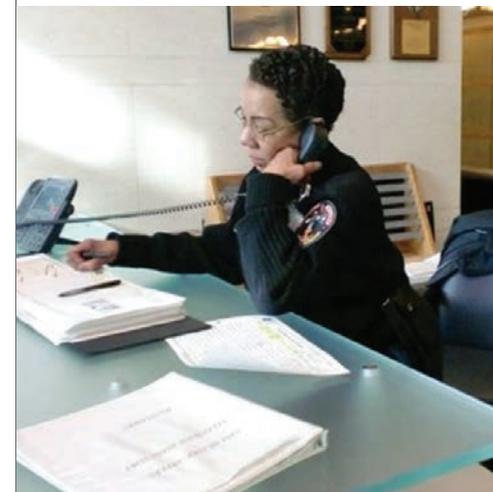
7.2 OPM Background Investigation Tiers

The Office of Personnel Management and the Director of National Intelligence have established investigative standards to determine eligibility for logical and physical access, suitability for Government employment, eligibility for access to classified information, eligibility to hold a sensitive position, and fitness to perform work for or on behalf of the Government as a contractor employee. The investigative standards consist of five tiers with successively higher levels of investigation building on the tier level(s) below. The required level of investigation depends on the designation of a position's assessed risk and national security sensitivity. Each level of background investigation directly relates to a level of confidence in the person requesting access.

As a Tier 1 (T1) is the minimum background investigation for a PIV credential, this section focuses on the T1 background investigation.

> HELPFUL TIP

A foreign national will typically not be subject to any background investigation which would grant a confidence of 40 or more.



Security personnel at NASA Headquarters



7.2.1 Tier 1

A Tier 1 (T1) background investigation is required for positions designated as low risk, non-sensitive, and for physical and/or logical access. This is the minimum background investigation required for issuance of a PIV credential in accordance with HSPD-12. In order to process this background investigation, a foreign national is required to complete, sign, and submit OPM Standard Form (SF) 85 (or its successor form). Fingerprints for the T1 investigation are captured in and submitted to OPM through IdMAX to ensure a chain of trust.

A T1 background investigation includes checks of claimed identity information (date and place of birth, citizenship/status, and social security number), criminal history (law enforcement agencies), military service (conduct and discharge), educational history, employment history, Federal debt, terrorism, and conduct as well as a request for additional investigation for any information necessary to resolve issues in order to render an adjudicative determination.

For credentialing purposes, this background investigation is valid for 10 years, at which point a reinvestigation must occur.

7.2.2 Tier 2

A Tier 2 (T2) background investigation is required for non-sensitive positions designated as moderate risk public trust.

7.2.3 Tier 3

A Tier 3 (T3) background investigation is required for positions designated as non-critical sensitive and/or requiring eligibility for access to Confidential or Secret information. This is the lowest level of investigation acceptable for access to classified information.

7.2.4 Tier 4

A Tier 4 (T4) background investigation is required for non-sensitive positions designated as high-risk public trust.

7.2.5 Tier 5

A Tier 5 (T5) background investigation is required for positions designated as critical sensitive, special sensitive, or requiring access to Top Secret or Sensitive Compartmented Information (SCI).

> HELPFUL TIP

A Tier 1 background investigation is the minimum investigation, as required by HSPD-12, for issuance of a Personal Identity Verification (PIV) credential.

> HELPFUL TIP

A special request must be submitted before a foreign national can obtain a background investigation of Tier 2 or higher.



8 Visas

All foreign nationals seeking to enter the United States must apply for and receive a visitor visa, qualify for the visa waiver program, or be from a country (e.g., Canada, Mexico, etc.) and visiting for a purpose for which the United States does not require a visa. Visas are issued by the United States Department of State and placed in the foreign national's passport. A visa establishes a foreign national's ability to request entry to the United States for a specific travel purpose and to conduct approved activities while in the United States. While the visa is not a valid document for identity proofing, it may be used as a secondary ID to validate the ability of a foreign national to work in the United States.

When entering the United States, a foreign national will receive an admission stamp from the DHS U.S. Customs and Border Protection (CBP) agent that is annotated with the date of admission, class of admission (visa type), and the admitted-until date. DHS CBP now only creates an electronic version of Form I-94, Arrival/Departure Record, (available at <http://www.cbp.gov/I94>) and no longer issues a paper form I-94 to foreign nationals arriving in the United States.

The following sections provide information related to types of visas, visa waivers, and expiration dates of visas. For additional information regarding visas, please refer to the Department of State visa page at <http://travel.state.gov/content/visas/english.html>.

> HELPFUL TIP

The paper form I-94 has been phased out in favor of an electronically available version. Foreign nationals will still receive an admission stamp in their passport.

- 8.1 Types of Visas
- 8.2 Visa Waivers
- 8.3 Visa Expiration Date and Duration of Status
- 8.4 Exceptions to the Visa Requirement

VISAS



8.1 Types of Visas

There are two main categories of visas: nonimmigrant (travel to the United States on a temporary basis) and immigrant (for travel to live permanently in the United States). Within these two primary categories are many additional categories and types of visas that specify the type of activities in which the foreign national may participate while in the United States. Table 6 details a list of visas that are most commonly issued to foreign nationals visiting NASA and the types of activities

TABLE 6. Types of Visas Most Commonly Used when Visiting NASA

Category	Type	Types of Activities or Persons Allowed	Typical Visit Duration
A	Diplomat or foreign government official	<ul style="list-style-type: none"> Head of State or Government Government minister Government official representing a foreign government 	Short-term
B-1	Business visitor (not valid for employment, research, or education)	<ul style="list-style-type: none"> Consult with business associates Attend a scientific, educational, professional, or business conference Negotiate a contract 	Short-term
B-2	Tourism or visit	<ul style="list-style-type: none"> Tourism Vacation Visit with friends or relatives Enrollment in a short recreational course of study, not for credit toward a degree 	Short-term
F-1	Student	<ul style="list-style-type: none"> Attend university or college Attend high school Attend academic institution 	Long-term
H-1B	Temporary worker in specialty occupation	<ul style="list-style-type: none"> Specialty occupations in fields requiring highly specialized knowledge Government-to-government research and development 	Long-term
I	Media, journalist	<ul style="list-style-type: none"> Employee of foreign information media Foreign journalist reporting on U.S. events for a foreign audience Member of the media engaged in production or distribution of news or education material 	Short-term
J	Exchange visitor	<ul style="list-style-type: none"> Short-term scholar Student, college/university Professor and research scholar Intern 	Long-term
O	Extraordinary ability or achievement	<ul style="list-style-type: none"> Persons with extraordinary ability in the sciences, arts, education, or business Persons providing essential services in support of the above individual 	Short-term

> HELPFUL TIP

When the purpose of the visit and the visa type do not match, the visit must be denied.

> HELPFUL TIP

Table 6 lists the most commonly used visas when visiting NASA. The table does not include all visa types.

> HELPFUL TIP

Typical visit duration is not a limit imposed on the duration of the visit, but the most common length of time a foreign national on that type of visa visits NASA.

permitted on those visas. The typical visit duration identifies the most common length of time a foreign national on that type of visa will visit NASA and is not meant as a limit imposed on the duration of the visit.

For a detailed list of all visa categories with additional examples of activities allowed under those visas, refer to the Department of State Directory of Visa Categories Web site at <http://travel.state.gov/content/visas/en/general/all-visa-categories.html>.

8.2 Visa Waivers

The Visa Waiver Program allows foreign nationals from participating countries to travel to the United States without a visa. The foreign national is still required to have a passport. Travel on a visa waiver must meet specific requirements outlined in the Department of State Visa Waiver Program.

Visits permitted under a visa waiver are limited to stays of 90 days or less. No extensions of stay are permitted on a visa waiver.

All activities conducted while in the United States on a visa waiver must be activities that are permitted on a business (B-1) or tourism and visit (B-2) visa. A valid ESTA approval is required prior to travel on a visa waiver.

TABLE 7. Visa Waiver Activities

Permitted Activities	Activities Not Permitted
Consult with business associates	Employment
Attend scientific or educational conventions or conferences	Work as foreign media
Negotiate a contract	Perform research
Attend a non-credit course of study	Attend a course of study for credit

For additional information regarding visa waivers, including a list of countries participating in the Visa Waiver Program, refer to the Department of State Visa Waiver Web site at <http://travel.state.gov/content/visas/en/visit/visa-waiver-program.html>.



> HELPFUL TIP

Visits permitted under a visa waiver are limited to stays of 90 days or less.

> HELPFUL TIP

All activities conducted on a visa waiver must be activities permitted on a business (B-1) or tourism and visit (B-2) visa.

8.3 Visa Expiration Date and Duration of Status

The duration of a foreign national's affiliation with NASA, for activities inside the United States, is dependent on a number of expiration dates including agreement end date, assignment end date, expiration assigned to their admission stamp, or expiration of a visa waiver.

When looking at a visa, it is important to distinguish between the visa expiration date and the date on the admission stamp in the passport. The visa expiration date identifies the last day the visa may be used to enter the United States.

▶ Example

If a visa expiration date is December 31, 2015, the foreign national can request entry to the United States until that date. If the foreign national attempts to enter the United States on January 1, 2016, the entry request will be denied.

The admitted-until date on the admission stamp identifies the duration a foreign national may stay in the United States. This date may be used to determine the NASA affiliation end date. The admitted-until date is not limited by the visa expiration date and the foreign national may choose to leave prior to the date on the admission stamp.

▶ Example

Using the previous visa expiration date of December 31, 2015, the foreign national arrives in the United States on December 1, 2015 and is granted an admitted-until date of June 1, 2016 by CBP at the port of entry.

The admission stamp will most often contain an admitted-until date, but, in some circumstances, it may contain a "D/S" (duration of status). Duration of status allows entry for an appropriate period of time in order to complete the activity for which admittance was granted (e.g., exchange program, course of studies, etc.). Once the activity has been completed, the foreign national is expected to leave the United States. The NASA affiliation end date for duration of status may not exceed 3 years or other affiliation-based end date. The following examples show valid and invalid uses of duration of status with regard to NASA.



> HELPFUL TIP

The visa expiration date is not used to determine the NASA affiliation end date.

> HELPFUL TIP

The NASA affiliation end date cannot exceed the admitted-until date or, for duration of status, 3 years or other affiliation-based end date.

> HELPFUL TIP

Duration of status (D/S) allows a foreign national to stay so long as they continue the activity for which they were granted entry.

▶ **Example A**

A foreign national is granted a duration of status to attend the California Institute of Technology (Caltech) to pursue a degree in robotics. The foreign national completes the degree in the research program and, when the program ends, leaves the United States.

VALID

▶ **Example B**

A foreign national is granted a duration of status to attend the California Institute of Technology (Caltech) to pursue a degree in robotics. After completing the degree, the foreign national applies for a position working at JPL on the Mars Rover Program.

INVALID

Certain visas are issued with additional forms or information which may provide expiration dates; such as the expiration dates on the DS-2019 for J-1 visas and I-20 form for F-1 visas. In the above examples, an expiration date from the relevant forms may be used for the affiliation end date, as appropriate.

A valid passport and visa are required for entry into the United States. It is important to note that a visa is valid until its expiration date. A valid visa that is in an expired passport is still considered a valid visa. In order to gain access to NASA, the foreign national must present an unexpired passport in addition to the valid visa contained in the expired passport.

For additional information regarding Department of State visa expiration dates, refer to <http://travel.state.gov/content/visas/en/general/visa-expiration-date.html>.



Armstrong Flight Research Center



> **HELPFUL TIP**

A valid visa in an expired passport is still considered a valid visa.

8.4 Exceptions to the Visa Requirement

The United States has designated travelers from certain countries as potentially having the permission to travel to the United States without a visa. Specific allowances and restrictions apply to foreign nationals from these countries.

For example, Canadian citizens travelling to the United States to conduct business activities normally allowed on a B-1 visa do not need to acquire a visa. However, a Canadian citizen travelling to the United States as a foreign government official (A visa) or as an official or employee of international organizations (G visa) is required to obtain a visa for that purpose.

For additional information on these exceptions to the visa requirement, refer to the Department of State visa Web site at <http://travel.state.gov/content/visas/en.html> and the country-specific sites listed below.

<http://travel.state.gov/content/visas/en/visit/canada-bermuda.html>

<http://travel.state.gov/content/visas/en/employment/nafta.html>



NASA Langley's twin-engine turboprop, Beechcraft King Air B200 aircraft

> HELPFUL TIP

The Department of State allows travelers from specific countries to travel to the United States without a visa.

9

Incident Reporting, Accountability, and Duplicate Identities

9.1 Reporting Security Incidents

Protecting NASA's personnel, facilities, technology, and data is the responsibility of all NASA employees and contractors. Following the processes and guidelines detailed in this manual assists in executing this responsibility.

NASA employees and contractors are required to report suspicious activities and violations of national security policies, NASA policy requirements, or other Center requirements to the CCS/CCPS. This includes reporting any suspected violations of these policies and requirements. NASA employees and contractors should maintain vigilance and take note of their surroundings. The CCS/CCPS ensures that reported security incidents are reviewed and investigated, as necessary, and a report with any relevant information is created. These security incident reports are provided to the Assistant Administrator for Protective Services for Agency-level awareness and action, as necessary.

> HELPFUL TIP

NASA employees and contractors are required to report all actual and suspected violations of security and related policies.

Examples of activities and violations that should be reported include compromise of classified information, unauthorized entry, theft, or submission of fraudulent identity source documents.

- 9.1 Reporting Security Incidents
- 9.2 Consequences for Violating Policy
- 9.3 Delete Duplicate User/Identity Tool

9.1.1 Fraudulent Documents

Actual or suspected fraudulent identity source documents provided by foreign nationals should be reported as a security incident to the CCS/CCPS and the Center CISA. A copy of the actual or suspected fraudulent identity source document should be captured and included in the security incident report. Unless otherwise directed by your CCS/CCPS through Center security policies, do not confiscate the document. Please consult your CCS/CCPS for additional procedures and requirements related to reporting of fraudulent documents.

9.1.2 IT Security Incidents

The NASA Security Operations Center (SOC) provides a coordinated approach to ensuring confidentiality, integrity, and availability for data and information across NASA. Any incidents involving logical access or information technology assets should be reported to the NASA SOC by phone (877-627-2732) or e-mail (soc@nasa.gov).

9.2 Consequences for Violating Policy

Anyone who willfully violates, attempts to violate, or conspires to violate any regulation or order involving NASA security requirements is subject to disciplinary action up to and including termination of employment and/or possible prosecution under 18 U.S.C. § 799, which stipulates fines or imprisonment for not more than 1 year, or both.

The CCS/CCPS, Center Directors, and the Headquarters Operations Director or their designees shall order the temporary removal and/or denial of access to all NASA facilities of any person who violates NASA security requirements and whose continued presence on NASA property constitutes an imminent security threat or safety risk to persons or property.

Disciplinary action will be dependent upon the severity of the incident/violation. The CCS/CCPS will work with Human Resources and/or the transgressor's supervisor as appropriate to provide information relevant to determining the disciplinary action.



> HELPFUL TIP

18 U.S.C. § 799 imposes fines and/or imprisonment for willful violations, attempts to violate, or conspiring to violate NASA security requirements.

> HELPFUL TIP

For more information on violations of security policy and denial of access, refer to NPR 1600.1.

9.3 Delete Duplicate User/Identity Tool

In situations where a duplicate identity exists in IdMAX, please use the Delete Duplicate User/Identity Tool in IdMAX. This tool will allow you to delete duplicate users from IdMAX. For additional information, refer to the IdMAX Handbook on the ICAM Portal (<https://icam.nasa.gov>).

In situations where the Duplicate User/Identity Tool is not sufficient to address the issue or you do not have access to the tool, submit a ticket to the NASA Enterprise Applications Competency Center (NEACC) through the Enterprise Service Desk (ESD) or the NASA Integrated Service Management (NISM). Scenario-specific information should be provided in the ticket to assist in resolution of the duplicate identity issue.

> HELPFUL TIP

The Delete Duplicate User/Identity Tool in IdMAX can assist in removing duplicate identity records from IdMAX.



Aero Academy at Glenn Research Center





10 Waivers

Foreign national access is determined on a case-by-case basis. Rarely, a situation might arise where a Center has difficulty meeting specific policy requirements of foreign national access management established in NPR 1600.4. In these situations, the Center may request an exception to or a waiver of the specific requirements.

> HELPFUL TIP

A waiver is generally valid for 1 year and must be resubmitted and approved if it is to remain valid.

Exceptions are requests for one-time deviations or exemptions from policy requirements, typically for a single event, expiring at the end of that event. Waivers are generally issued for a period of 1 year. Once an exception or a waiver expires, it is no longer valid. If an extension is needed, a new exception or waiver request must be submitted and approved. Waivers must be submitted in accordance with NPR 1600.1.

> HELPFUL TIP

An exception may be requested in situations where a one-time exemption from policy requirements is needed.

10.1 Waiver Process

WAIVERS



10.1 Waiver Process

The waiver request process begins when a situation arises which necessitates a deviation from the existing foreign national access management policy requirement. The CCPS/CCS or staff will write a justification for the waiver from policy, which includes the following:

- Security risk analysis;
- Effect of potential loss of capability to the Center;
- Loss of one-of-a-kind capability;
- Inability of the Center to perform its missions and goals; and
- Additional information for the specific situation, as necessary.

Once written, the waiver request must be submitted to the Center Director for concurrence. It is up to the Center Director to decide whether the request can be submitted to the Associate Administrator for Mission Support.

The Associate Administrator for Mission Support will review the request and forward it to the Assistant Administrator for Protective Services requesting concurrence and/or comment.

The Assistant Administrator for Protective Services will review the waiver request with the appropriate offices (i.e., OIIR, OCIO) and subject program managers (e.g., FNAM Program Manager, AIMO, etc.). Once reviewed, the Assistant Administrator for Protective Services will return the waiver request to the Associate Administrator for Mission Support with a recommendation for approval, further study, or denial.

The Associate Administrator for Mission Support will review the waiver request and return it to the Center Director with an approval or disapproval.



Entry gate at Johnson Space Center

> HELPFUL TIP

All waiver requests must be justified and include a security risk analysis, an explanation of how the requirement renders the Center incapable of performing its missions and goals, and an explanation of any mitigating security measures.

> HELPFUL TIP

Until a waiver is approved, the policy for which the waiver is requested must be followed.

APPENDIX A: Acronyms

aACP	Addendum to an Access Control Plan	NAMS	NASA Access Management System
ARRC	Alien Registration Receipt Card	NASA	National Aeronautics and Space Administration
ACP	Access Control Plan	NCHC	National Criminal History Check
AIMO	Agency Identity Management Official	NCI	NASA Critical Infrastructure
CBP	Customs and Border Patrol	NCIC	National Crime Information Center
CCPS	Center Chief of Protective Services	NEACC	NASA Enterprise Applications Competency Center
CCS	Center Chief of Security	NISM	NASA Integrated Service Management
CEA	Center Export Administrator	NODIS	NASA Online Directive Information System
CI/CT	Counterintelligences/Counterterrorism	NPD	NASA Procedural Directive
CISA	Counterintelligence Special Agent	NPR	NASA Procedural Requirements
CJIS	Criminal Justice Information Services	OCIO	Office of the Chief Information Officer
CNSI	Classified National Security Information	OIIR	Office of International and Interagency Relations
D/S	Duration of Status	OPM	Office of Personnel Management
DHS	Department of Homeland Security	OPS	Office of Protective Services
DoD	Department of Defense	pACP	Program/Project Access Control Plan
EAD	Employment Authorization Document	PIV	Personal Identity Verification
ECILD	Export Control and Interagency Liaison Division	PRC	Permanent Resident Card
ECS	Export Control Staff	SAVE	Systematic Alien Verification for Entitlements
EPACS	Enterprise Physical Access Control System	SCI	Sensitive Compartmented Information (SCI)
ESD	Enterprise Service Desk	SEVIS	Student and Exchange Visitor Information System
ESTA	Electronic System for Travel Authorization	SF	Standard Form
FBI	Federal Bureau of Investigation	SOC	Security Operations Center
FNAM	Foreign National Access Management	STI	Scientific and Technical Information
FSL	Facility Security Level	STTCP	Security Technology Transfer Control Plan
HEA	Headquarters Export Administrator	T1	Tier 1
HLPV	High-Level Protocol Visit	T2	Tier 2
iACP	Individual Access Control Plan	T3	Tier 3
ICAM	Identity, Credential, and Access Management	T4	Tier 4
ID	Identification	T5	Tier 5
IdMAX	Identity Management and Account Exchange	TTCP	Technology Transfer Control Plan
IT	Information Technology	U.S.	United States
IVC	International Visit Coordinator	USCIS	United States Citizenship and Immigration Services
LOC	Level of Confidence		
LPR	Lawful Permanent Resident		
NAII	NASA Advisory Implementing Instruction		

APPENDIX B: Checklists

PRE-VISIT CHECKLIST*

Information Requested	Information Provider	Received/ Provided? (Y/N)	Comment
Full Legal Name	Foreign National		
Date of Birth	Foreign National		
Place of Birth	Foreign National		
Residence (including country)	Foreign National		
Citizenship(s)	Foreign National		
Copy of Passport	Foreign National		
Copy of Visa (or waiver)	Foreign National		
Social Security Number (if available)	Foreign National		
Foreign National ID (if no Social Security Number (SSN) is available)	Foreign National		
Contact Information	Foreign National		
Company of Employment	Foreign National		
Sponsor Name	Requestor, Sponsor		
Physical Access Requirements	Host, Requestor, Sponsor		
IT Access Requirements (on-site and/or remote)	Host, Requestor, Sponsor		
Data Access Requirements (including export control license or authorization requirements)	Host, Requestor, Sponsor		
NASA Affiliation (civil servant, contractor, partner, etc.)	Host, Requestor, Sponsor		
Visit Duration	Host, Requestor, Sponsor		
Work Description	Host, Requestor, Sponsor		

* Please note that this form is provided as a tool to guide you through the pre-visit process. This form is not to be used for the collection of information.

IVC REVIEW CHECKLIST

Review	Status (Not Started, In Progress, Complete)	Comments
Initial Review		
Identity Proofing and Verification		
SAVE		
Visual Compliance		
FBI Investigations File (name check)		
National Criminal History Check (fingerprint check) (if required)		
Other		
Counterintelligence/ Counterterrorism Review		
Export Control Review		
Center Export Administrator		
Agency Desk Officer Review		
Export Control and Interagency Liaison Division (ECILD) Review		
Other Reviews (as necessary)		
Final Approval		

APPENDIX C: Resources

Web Site	Web Address
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA)	
Identity Management and Account Exchange (IdMAX)	https://idmax.nasa.gov
Identity, Credential, and Access Management (ICAM) Portal	https://icam.nasa.gov
NASA Access Management System	https://nams.nasa.gov
NASA Online Directives Information System (NODIS)	http://nodis3.gsfc.nasa.gov
Office of the Chief Information Officer (OCIO)	http://www.nasa.gov/offices/ocio/home
Office of International and Interagency Relations (OIIR)	http://oiir.hq.nasa.gov
OIIR Export Control Program	http://oiir.hq.nasa.gov/nasaecp
OIIR Export Control Web Site	https://inside.nasa.gov/web/insidenasa/information_resources/export-control-interagency-and-liaison-division
Office of Protective Services (OPS)	http://www.hq.nasa.gov/office/ops/nasaonly/index.html
OPS Counterintelligence/ Counterterrorism (CI/CT)	http://www.hq.nasa.gov/office/ops/nasaonly/internal/ci/index.htm
OPS Foreign National Access Management (FNAM)	http://www.hq.nasa.gov/office/ops/nasaonly/internal/FNAM
System for Administration, Training, and Educational Resources for NASA (SATERN)	https://satern.nasa.gov
DEPARTMENT OF HOMELAND SECURITY (DHS)	
DHS CBP I-94	http://www.cbp.gov/I94
U.S. Citizenship and Immigration Services (USCIS)	http://www.uscis.gov
USCIS Green Cards	http://www.uscis.gov/greencard
USCIS M-274, Handbook for Employers	http://www.uscis.gov/sites/default/files/files/form/m-274.pdf
USCIS Employment Eligibility	http://www.uscis.gov/green-card/green-card-processes-and-procedures/employment-authorization-document
USCIS Systematic Alien Verification for Entitlements	http://www.uscis.gov/save
DEPARTMENT OF STATE	
Department of State	http://www.state.gov
Visa Program	http://travel.state.gov/content/visas/en/visit.html
Directory of Visa Categories	http://travel.state.gov/content/visas/en/general/all-visa-categories.html
Visa Waiver Program	http://travel.state.gov/content/visas/en/visit/visa-waiver-program.html
Visa Expirations	http://travel.state.gov/content/visas/en/general/visa-expiration-date.html
OTHER RESOURCES	
18 U.S.C. § 799	http://www.gpo.gov/fdsys/pkg/USCODE-2011-title18/html/USCODE-2011-title18-part1-chap37-sec799.htm
Social Security Administration	https://www.ssa.gov/people/immigrants





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