



NASA Procedural Requirements

COMPLIANCE IS MANDATORY

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[| TOC](#) | [Preface](#) | [Chapter1](#) | [Chapter2](#) | [Chapter3](#) | [Chapter4](#) | [Chapter5](#) | [Chapter6](#) | [AppendixA](#)
| [AppendixB](#) | [AppendixC](#) | [AppendixD](#) | [AppendixE](#) | [ALL](#) |

Chapter 4. Foreign Nationals

4.1 Overview

4.1.1 This chapter outlines the requirements that NASA personnel shall follow in granting access to foreign nationals to NASA physical and/or IT resources for any purpose other than an appropriately authorized tour of facilities that is, or would normally be, conducted for the general public. The subsections outline additions and variations to existing processes, procedures, and authorizations necessary to successfully obtain required access permissions in a timely manner. Also included are the requirements for the processing of persons who have multiple citizenships, foreign nationals from designated countries, Lawful Permanent Residents (LPR), and U.S. citizens working for a foreign entity.

4.1.2 This chapter defines the identity management requirements specific to foreign nationals at NASA including, but not limited to, visit coordination, access approval, escort procedures, fingerprint checks, and background investigations for permanent, temporary, and visitor access.

4.1.3 The requirements in this chapter apply to all foreign nationals, including but not limited to foreign nationals who are civil servants, contractors, researchers, international partners as defined via International Space Act Agreements (ISAA), HLPV, foreign nationals with the news media, NASA-sponsored J-1 Visas, grantees, and visitors.

4.1.4 Questions regarding the receipt and processing of access requests for foreign nationals and the conduct of approved visits and other access shall be directed to the NASA Center or Component Facility IVC. If the criteria for processing a specific foreign national cannot be accommodated within one of the scenarios documented in this chapter, a waiver request can be submitted to the NASA OPS for review and approval (see section 1.3, Waivers and Exceptions of this document).

4.2 NASA Foreign National Access Policy and Related Requirements

4.2.1 Foreign national access is determined on a case-by-case basis. All visits and other approved access will be reviewed to ensure the request conforms to Agency and Federal policies and regulations, including U.S. national security, export control, nonproliferation, and foreign policies and regulations.

4.2.2 Record keeping related to tracking foreign national access requests and visits will be accomplished via the NASA IdMAX system.

4.2.3 Visits and other access for the purpose of implementing a mutually agreed upon program or project shall comply with the terms of the NASA/foreign partner program or project agreement, particularly the provisions in the agreement dealing with responsibilities of the parties and the transfer of data and goods. Discussion or other release of information by NASA personnel to a foreign national during a visit or other approved access that does not pertain to an agreed program or project will be limited to information releasable to the general public, i.e., unclassified, non-sensitive, and non-export controlled. Scientific and Technical Information (STI) that is proposed for release outside of NASA is required to be reviewed in order to ensure it does not contain sensitive information,

including Sensitive But Unclassified (SBU)/Controlled Unclassified Information (CUI), per NPR 2200.2, Requirements for Documentation, Approval, and Dissemination of NASA Scientific and Technical Information.

4.2.4 Visits, assignments, or IT access requests for foreign nationals from nondesignated countries are coordinated and implemented at the Center level through the IVC. Visits, assignments, or IT access requests for foreign nationals from designated countries are coordinated initially through the Center Export Administrator (CEA) and the Center IVC, then forwarded to NASA Headquarters Office of International and Interagency Relations (OIIR), Export Control Administrator, and program points-of-contact, as necessary, for review and final approval. A foreign national will be provided access to NASA physical and/or IT assets only after final approval. For a current list of designated countries, refer to the OIIR Web page at: <http://oiir.hq.nasa.gov/nasaecp>.

4.2.5 An approved foreign national visit request will allow access to information that is releasable to the general public. Visit requests with the purpose of gathering or sharing information or conducting discussions in areas that NASA considers sensitive (e.g., for proprietary, national security, or export control reasons) shall be disapproved in the absence of a specific NASA programmatic interest.

4.2.6 All foreign national access requests, other than for an authorized public tour coordinated through a NASA visitor center, shall undergo an identity vetting and credentialing process in accordance with this chapter.

4.2.7 Foreign national identities and associated access permissions shall be suspended on the day the foreign national's affiliation ends.

4.2.8 Identities and access permissions shall be terminated the day the affiliation ends for foreign nationals from designated countries and 30 calendar days after affiliation ends for foreign nationals from nondesignated countries.

4.2.9 Access shall only be granted to vetted foreign nationals from designated and nondesignated countries consistent with the completed Access Control Plan (ACP), as defined by NPR 2190.1, NASA Export Control Program.

4.2.10 Physical access permissions are granted by the Center Protective Services Office. IT access permissions are granted by IT system owners. The decision to grant physical and/or logical access to foreign nationals to NASA's restricted areas, mission essential infrastructure, sensitive or classified information, and/or export-controlled data may require a higher level of identity vetting due to the heightened risk of exposing these areas and data.

4.2.11 Access requirements established by this NPR shall not preclude each Center Protective Services Office from enacting additional requirements regarding access to the Center, buildings, or other secured areas.

4.2.12 Escort Requirements

4.2.12.1 The IVC shall work with the Center Protective Services Office, CEA, program managers, and sponsor to determine escort requirements while the foreign national is located at the Center.

4.2.12.2 The escort and foreign national shall acknowledge understanding and acceptance of the ACP and the associated escort requirements.

4.2.12.3 The Center Protective Services Office shall be responsible for developing and conducting training for all escorts.

4.2.12.4 Centers shall determine the necessary escort-to-visitor ratio for foreign nationals from nondesignated countries.

4.2.12.5 Foreign nationals from designated countries shall be escorted at all times.

4.2.12.6 One escort shall be assigned to each foreign national from a designated country so that an escort-to-visitor ratio of 1:1 is maintained. For High-Level Protocol Visits (HLPV), Centers may determine a different escort-to-visitor ratio.

4.2.12.7 Escorts of foreign nationals shall maintain continuous physical supervision of their assigned visitor for the entire duration of the visit, beginning with the visitor's initial entry through the Center perimeter and concluding with the visitor's final exit through the Center perimeter.

4.2.12.8 Escorts shall only permit access to areas which the escort and the visitor have been granted access.

4.2.12.9 Per NPR 1660.1, NASA Counterintelligence and Counterterrorism, escorts of foreign nationals from designated countries shall complete an in-person briefing with a Center CISA prior to the visit as well as an in-person debriefing with a Center CISA following the visit.

4.2.12.10 Escorts of foreign nationals shall be given an additional, Agency-standard badge that identifies their certified status as an escort of foreign nationals at that Center/Facility. This badge must be clearly displayed at all times while escorting foreign nationals.

4.2.12.11 Only trained escorts who are U.S. citizens, LPRs, or foreign nationals from nondesignated countries with a

valid NASA PIV credential, or a Department of Defense Common Access Card (CAC) or other Federal agency PIV that has been successfully registered utilizing the NASA credential registration process, shall be allowed to escort foreign nationals.

4.2.12.12 Foreign nationals from designated countries shall not be allowed to perform duties as an escort.

4.2.13 Escorts of all foreign nationals, from both designated and nondesignated countries, shall complete annual training which includes the following information:

4.2.13.1 The requirements to become an escort and maintain escort status, as detailed in this section.

4.2.13.2 The roles and responsibilities of escorting foreign national visitors on a NASA Center/Facility including maintaining continuous physical supervision of the foreign national visitor at all times, Center-specific escort policies, and the duration of escort responsibilities beginning at initial visitor entry through the Center perimeter and concluding at final visitor exit through the Center perimeter.

4.2.13.3 Explanation of an ACP, its requirements, and mandated adherence.

4.2.13.4 Limitations/restrictions associated with where escorts can take foreign national visitors (i.e., only to areas where both escort and visitor have been granted access).

4.2.13.5 The requirement to report to CCS/CCPS any violations or suspected violations of the ACP or visitor policies.

4.2.13.6 Ratios for escort-to-foreign national visitors from designated and nondesignated countries.

4.2.13.7 The requirement to participate in in-person briefings and debriefings with the Center CISA prior to and following escort of foreign nationals from designated countries.

4.2.13.8 Signed acknowledgement, in SATERN, of escort roles and responsibilities at the completion of escort training.

4.2.14 Escorts of foreign nationals from designated countries shall complete in-person briefings with the Center CISA prior to each visit, per NPR 1660.1, which includes the following information:

4.2.14.1 Explanations and examples of information gathering techniques.

4.2.14.2 Information specific to the designated country, such as the types of technology or information that the designated country is interested in obtaining.

4.2.14.3 Project-specific information that must be protected.

4.2.14.4 The requirement to report to CCS/CCPS and the Center CISA any violations or suspected violations of the ACP or visitor policies.

4.2.14.5 The requirement for the escort to attend an in-person debriefing with the Center CISA following each visit.

4.2.14.6 Written acknowledgment of the receipt of the briefing and debriefing for escorts of foreign nationals from designated countries.

4.2.15 Requests to Visit Another Center.

4.2.15.1 Foreign nationals with PIV credentials shall be granted access to their primary Center only.

4.2.15.2 Access to Centers other than the primary Center shall not be allowed until a Visiting Center Request has been completed in IdMAX and the request has been reviewed. Requests for access will only be granted to physical and logical assets listed in the ACP and the NASA Access Management System (NAMS). Physical access is at the discretion of the CCS/CCPS.

4.2.16 Centers and/or programs may specify restrictions regarding physical and/or logical access privileges or escort requirements that are more restrictive than those documented in this NPR.

4.2.17 Any violation or suspected violation of the ACP or visitor policies shall be reported to the CCS/CCPS and the CEA.

4.3 On-Site Enrollment and Issuance Procedures for Foreign Nationals

4.3.1 Foreign nationals shall complete the following steps prior to initiation of any on-site enrollment and issuance procedures:

- a. Obtain visit approval for the visit or assignment.
- b. Obtain a visa sufficient for the purpose of the visit or assignment.

c. Be responsible for ensuring that sponsorship is determined. If a foreign national is not under a contract where a COR has been officially designated, the foreign national will provide information directly to their visit/assignment host, and the host will fulfill the duties of the sponsor as required herein.

d. The foreign national visitor must begin the process long enough before the visit so that pre-visit identity vetting can be conducted and completed by the IVC, as described in this chapter.

4.3.2 Step 1: Credential Request.

4.3.2.1 The requester for a foreign national shall be a current PIV holder. The requester submits the following information to the sponsor via the IdMAX system:

- a. Full legal name.
- b. Date of birth.
- c. Place of birth.
- d. Residence (including country).
- e. Citizenship(s).
- f. Passport and visa information (including appropriate visa waiver as found in section 4.6, Requirements for Visas).
- g. SSN (if one is available).
- h. Foreign national ID (if no SSN is available).
- i. Contact information.
- j. Company of employment.
- k. Sponsor name.
- l. Physical access requirements.
- m. IT access requirements (on-site and/or remote).
- n. Data access requirements (including export control license or authorization requirements).
- o. NASA affiliation (civil servant, contractor, partner, etc.).
- p. Visit duration.
- q. Work description (includes purpose, program, authority, or other information that allows approvers to make an informed decision). The more information provided, the quicker the request can be processed.

4.3.3 Step 2: Sponsorship.

4.3.3.1 The sponsor will be a NASA civil servant or a JPL California Institute of Technology (Caltech) employee who is a U.S. citizen. The sponsor validates the receipt of the request from the requester, reviews the data in the request, and updates the data as necessary. The sponsor will perform a risk-based determination based on the status of the foreign national and the assets that the foreign national is to access. This information is necessary to define the ACP and determine the level of investigation and escort requirements.

4.3.3.2 A foreign national must be assigned a primary Center. If a foreign national will be accessing multiple Centers, access must be granted through a Visiting Center Request in IdMAX (as detailed in section 4.2.15, Requests to Visit Another Center).

4.3.4 Step 3: Foreign National Approval.

4.3.4.1 The IVC shall directly receive and review all access requests for foreign nationals. The IVC validates receipt of the request and confirms sponsorship of the request. The IVC performs or ensures completion of the following reviews and activities, in any order, prior to final approval and authorization, as appropriate.

4.3.4.2 Access Request Review — The IVC reviews the access request with the project office (requesting organization) and the sponsor to confirm access requirements, work description, dates of visit, assignment or length of access request, visa type and its appropriateness to the assignment and visit duration, sponsor's risk determination, and the ACP. The request shall be approved or rejected, as appropriate.

4.3.4.3 Identity Vetting — The IVC performs checks against appropriate databases, in accordance with the identity vetting requirements in section 4.5, Identity Vetting Requirements.

4.3.4.4 Security Review — The IVC reviews the access request within the Center Protective Services Office for broader security issues relevant to the Center, determines escort requirements, reviews the ACP, and approves or

denies the request, as appropriate. If approved, a level of investigation appropriate to physical and/or IT access requirements, visit type, and length of residence in the U.S. is determined and initiated.

4.3.4.5 Counterintelligence/Counterterrorism Review — Center and HQ CISAs perform name checks for foreign nationals of interest to determine intelligence service and/or terrorism affiliations.

4.3.4.6 Export Control Review — Export control issues are reviewed by the CEA to ensure information being exchanged does not violate export control laws. Further review is conducted by Headquarters Export Control if the foreign national is from a designated country, an intern, or part of the NASA Exchange Visitor Program. A risk-based determination on access protocols is made, the ACP is reviewed, and the request is approved or denied, as appropriate.

4.3.5 Step 4: Authorization.

4.3.5.1 The IVC shall confirm receipt of all approvals and reviews and provide final authorization of the access request.

4.3.5.2 The IVC shall report the terms and conditions of the visit, as contained in the ACP, to the sponsor.

4.3.5.3 If a foreign national is denied access (all or in part), the IVC shall inform the sponsor who may request a further review with the CCS/CCPS.

4.3.6 Step 5: Enrollment Process.

4.3.6.1 The enrollment official validates receipt of the request from the authorizer and follows the enrollment procedures in section 3.5.4, Step 4: Enrollment Process, with the following variation:

4.3.6.2 Visit Authorization Documents — The enrollment official obtains legible scanned copies of the following original documents:

- a. Visa or Electronic System for Travel Authorization (ESTA) receipt for visa waivers.
- b. Admission stamp or paper Form I-94, Arrival/Departure Record, with Admitted-Until Date or "D/S" (duration of status).

4.3.7 Step 6: Adjudication.

4.3.7.1 Adjudication follows the adjudication procedures in section 3.5.5, Step 5: Adjudication Process, of this NPR, in accordance with the identity vetting requirements in section 4.5, Identity Vetting Requirements.

4.3.8 Step 7: Credential Production and Issuance.

4.3.8.1 Credential production and issuance follow the procedures described in sections 3.5.6, Step 6: Badge Production Process, and 3.5.7, Step 7: Issuance Process, of this NPR.

4.3.9 Step 8: NAMS Access Request.

4.3.9.1 If accessing NASA IT resources, access requests will be reviewed by the system owner/approver who shall approve the request in NAMS, as appropriate.

4.4 Implementation

4.4.1 The sponsor and/or host shall ensure the foreign national understands and accepts the terms and conditions of the visit, as contained in the ACP.

4.4.2 The sponsor, supported by the host and escort, shall ensure the foreign national adheres to the access requirements documented in the ACP throughout the duration of the foreign national's affiliation.

4.4.3 If a foreign national application has been outstanding for longer than 15 working days from the initial request, the IVC shall follow up with Center or Headquarters personnel to determine the cause(s) for the delay. Applications outstanding for longer than 20 working days from the initial request will be escalated to the AIMO for resolution.

4.5 Identity Vetting Requirements

4.5.1 Centers shall accept as valid the identity vetting of their peer Centers as a baseline requirement, consistent with this NPR. Additional identity vetting may be required should access requirements change (e.g., if the foreign national needs privileged access).

4.5.2 For foreign national visits of 29 calendar days or less (short-term) which require no IT access, the following shall be required:

- a. A visual compliance database check that reveals no violations or derogatory information;

- b. FBI Investigations File (name check search).
 - c. A database check of the U.S. Customs and Immigration Service (USCIS) Systematic Alien Verification for Entitlements (SAVE) to confirm reciprocity of vetting performed by Customs and Border Patrol at the port of entry.
- 4.5.3 For foreign national visits of 30 calendar days or greater (long-term) or when IT access is required, the foreign national shall be subject to the following database checks prior to the issuance of any credential:
- a. FBI fingerprint-based national criminal history check (NCHC).
 - b. FBI Investigations File (name check search).
 - c. USCIS SAVE.
 - d. Visual Compliance, which includes a check against the Visual Compliance Unverified List, Entities List, Denied Persons List, Debarred Parties List, Specially Designated Nationals, and the Terrorist Screening database.
- 4.5.4 Access requests for foreign nationals shall be denied if the NCHC or Visual Compliance check produces any positive hit result showing the specific individual on any available list in Visual Compliance. Positive hit results are to be reported to the CCS/CCPS and the NASA Headquarters Export Control Administrator. Exceptions to this denial of access are granted in cases where the positive result can be effectively mitigated by an applicable ACP proviso approved by the NASA Headquarters Export Control Administrator.
- 4.5.5 Access requests for foreign nationals shall be denied if the SAVE check verification process reports an invalid immigration status.
- 4.5.6 Foreign nationals requiring a PIV shall be subject to investigation based on their time of residence in the United States.
- 4.5.6.1 For foreign nationals who have resided in the U.S. or a U.S. territory for three years or more, a background investigation (i.e., Tier I background investigation or higher) will be initiated after employment authorization is appropriately verified. Foreign nationals are eligible for issuance of a NASA PIV credential upon favorable adjudication of a Tier I investigation or higher. In the event a foreign national chooses not to complete the appropriate forms for a background investigation required for full identity vetting, the Center Protective Services Office will require completion and a minimum annual revalidation of the NCHC, FBI Investigations File, Visual Compliance, and SAVE checks prior to issuance of an alternate Agency credential.
- 4.5.6.2 For foreign nationals who have resided in the U.S. or a U.S. territory for less than three years, the background investigation shall be delayed until the three-year requirement is met. In such cases, an alternate Agency credential may be issued as appropriate based on a risk determination. Before an alternate Agency credential may be issued, the Center Protective Services Office will require completion and a minimum annual revalidation of the NCHC, FBI Investigations File, Visual Compliance, and SAVE checks prior to issuance of an alternate Agency credential.
- 4.5.6.3 Three years residing in the U.S. is defined as any presence in the U.S. or a U.S. territory for three continuous years or more during which any absences can be regarded as temporary and do not destroy the degree of continuity necessary to establish and maintain residence. Decisions about whether a person maintains residency are based on the circumstances of the particular case and at the discretion of the CCS/CCPS.
- 4.5.7 The results of the check against SAVE and the Visual Compliance check shall be attached to the identity record of the foreign national in IdMAX.

4.6 Requirements for Visas

- 4.6.1 For the purposes of granting access to NASA, the purpose specified by the visa shall match the purpose of the visit to NASA.
- 4.6.2 Any visit purpose outside that specified by the visa shall be denied.
- 4.6.3 Visa waivers shall only be accepted in compliance with Department of State guidelines for use of a visa waiver; specifically:
- a. The duration of the visit must be 90 days or less.
 - b. The purpose of the visit must be an activity permitted on a Visitor (B) Visa.
- 4.6.3.1 When a foreign national with a visa waiver needs to stay in the U.S. beyond the 90 days authorized by the visa waiver, the foreign national is required to provide the final visa information to the Center IVC who will verify the final visa information in SAVE.

4.7 Requirements Based on Type of Onsite Affiliation

4.7.1 If a foreign national is supporting NASA under an International Space Act Agreement (ISAA) and requires periodic access to NASA facilities, the foreign national shall be processed in accordance with procedures in section 4.3, On-Site Enrollment and Issuance Procedures for Foreign Nationals. An ISAA, or other agreement (e.g., contract, grant, etc.), is generally required for any short-term visit or assignment (up to 29 calendar days in a 365-day period).

4.7.2 If a foreign national is visiting NASA periodically as an accredited news media representative, the IVC shall coordinate with the Center public affairs office to obtain requisite information. Once the IVC has determined that agreement has been reached on requirements, the IVC will coordinate with the CCS/CCPS as to the level of investigation required. The foreign national will be given a physical access credential commensurate with the level of investigation performed and access requirements. Only non-PIV credentials will be issued. Investigation status information will be updated annually. Access to IT resources will be administered with a non-PIV credential.

4.7.3 If a foreign national is visiting NASA for a HLPV, the IVC shall coordinate with the Center protocol office to obtain requisite information.

4.7.4 J-1 Exchange Visitor Visa.

4.7.4.1 Under the provisions of 22 CFR Part 62, and as approved by the Department of State, NASA is authorized to conduct an exchange visitor program and can authorize foreign nationals to be assigned to NASA installations on J-1 exchange visitor visas. NASA has authority to sponsor two exchange visitor categories: Research Scholars and Government Visitors. The regulations regarding these categories and the exchange visitor program in general can be found at 22 CFR 62.1 through 62.90.

4.7.4.2 If a foreign national is visiting NASA as part of the NASA Exchange Visitor Program (J-1 Visa), the IVC shall coordinate with the sponsor to obtain requisite information and to ensure that the foreign national is part of an existing ISAA partnership.

4.7.4.3 For a foreign national to be considered for the NASA Exchange Visitor Program, the host Center or Component Facility must document its request (with appropriate justification) in a memo to the cognizant Mission Directorate or Mission Support Office at NASA Headquarters with a copy to the Export Control Office and Interagency Liaison Division, OIIR, and, in parallel, contact the IVC to enter the request for review. If the Headquarters Office endorses the request, OIIR will review for final approval. If approved in principle, OIIR will prepare an ISAA between NASA Headquarters and the foreign sponsoring entity (e.g., foreign space agency or foreign university) and, once executed, if all requirements associated with authorizing a J-1 Visa have been satisfied, the authorization will be issued, covering the period of the approved assignment.

4.7.4.4 No NASA funding is provided to the foreign national under the NASA Exchange Visitor Program. All funding must come from the foreign sponsor or from personal funds, and NASA must assess if the funds available are sufficient to sustain the individual for the period of the assignment. NASA provides office space and supplies and, if necessary and approved pursuant to NASA policies, computer and network access. The period of assignment for approved foreign national participants is generally from six months to three years. Foreign nationals from designated countries and all foreign national undergraduate students are ineligible for participation in the NASA Exchange Visitor Program.

4.8 Requirements Based on Visitor Attributes

4.8.1 Dual Citizenship.

4.8.1.1 If the foreign national has dual citizenship with the U.S. and a foreign country (including designated countries), identity vetting shall follow the processes for a U.S. citizen. Any physical access restrictions will be determined and agreed to by the CCS/CCPS and the sponsor/host.

4.8.1.2 If the foreign national has dual citizenship for two foreign countries and one or both of those countries is a designated country, the identity shall be vetted as a foreign national from a designated country.

4.8.2 Foreign nationals born in a designated country shall be identity vetted and credentialed as a foreign national from a designated country. Foreign nationals from countries designated by the Secretary of State as sponsors of terrorism are generally not eligible for access to NASA facilities pending review by OIIR and in accordance with the requirements of section 4.2.4.

4.8.3 U.S. citizens employed by a foreign entity shall be treated as U.S. citizens for the purpose of identity vetting.

4.8.4 U.S. persons, Lawful Permanent Residents (LPR) and protected individuals shall be treated as U.S. citizens for the purposes of identity vetting, granting of access, and escort requirements with the following exceptions:

4.8.4.1 During identity vetting, LPRs shall be required to present a valid Permanent Resident Card (PRC) or Alien Registration Receipt Card (ARRC) (Form I-551), commonly known as a Green Card, to verify and establish LPR status. The Green Card shall be verified through a SAVE check or other electronic verification.

4.8.4.2 LPRs shall be issued badges that identify them as an LPR. LPR credentials will not be issued in excess of the earlier expiration date of the PRC, ARRC, or employment authorization document.

4.9 Requirements Based on Credential Type

4.9.1 The expiration date of credentials issued to foreign nationals shall be set for a period not to exceed the earlier of three years from the Card Production Request (CPR) generation date, agreement end date, assignment end date, visa admitted-until date, or date of I-94/W expiration.

4.10 Requirements for Remote-Only Access

4.10.1 Foreign nationals residing in the U.S. and requesting remote-only access shall be processed in accordance with the requirements in section 4.3, On-Site Enrollment and Issuance Procedures for Foreign Nationals.

4.10.2 Foreign nationals performing work for NASA while residing outside the U.S. and requesting remote-only access to very low-risk systems which do not require identity proofing shall undergo a check through Visual Compliance. Fingerprints are not required of these foreign nationals. A Visual Compliance check, by itself, is not sufficient to be granted access to low-risk, moderate-risk, or high-risk systems.

4.10.3 Foreign nationals performing work for NASA while residing outside the U.S. and requesting remote-only access to low-risk, moderate-risk, or high-risk systems shall be processed in accordance with section 4.3, On-Site Enrollment and Issuance Procedures for Foreign Nationals. Fingerprints are required of these foreign nationals.

4.10.4 Foreign nationals with remote-only access shall be given access credentials commensurate with the level of investigation performed and the access requirements.

4.10.5 Foreign national "limited privileged" access to IT systems shall be allowed only if the foreign national is involved in a program under an ISAA and the foreign national's ACP includes that access. The sponsor will verify that an ISAA and ACP are in place and has accountability for ensuring the security of IT system data being accessed by the foreign national.

4.10.6 Any foreign national having access to NASA data shall provide a written certification that they fully understand and will adhere to NASA rules and regulations regarding the integrity and confidentiality of NASA data being accessed. This certification may be a completed NASA IT Security Training or a signed document signaling understanding of IT access requirements as outlined in NPR 2810.1. Either of these activities will satisfy the completion of the NASA IT Security Training requirement prior to the activation of IT access. Recertification will be performed annually as outlined in NPR 2810.1.

| [TOC](#) | [Preface](#) | [Chapter1](#) | [Chapter2](#) | [Chapter3](#) | [Chapter4](#) | [Chapter5](#) | [Chapter6](#) |
[AppendixA](#) | [AppendixB](#) | [AppendixC](#) | [AppendixD](#) | [AppendixE](#) | [ALL](#) |

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