Tuesday Tips is a new outreach effort by OGCA. The idea behind *Tuesday Tips* is to convey tips, tricks and other helpful information around the area of research administration. Our goal is to post on (almost every) Tuesdays. If there is something you would like to see covered on *Tuesday Tips*, email: UAF-GCReATE@alaska.edu. For more Tips visit OGCA website.

Participant Support Costs (PSC): Everything you wanted to know but were afraid to ask

Participant Support Costs (PSC) are payments to individuals for training through a workshop, conference, seminar or other short term instructional or information sharing activity funded by a sponsored award.

Purpose	• Distinguish participant support costs from honoraria, human subjects payments, and fellowships support; • Provide guidance on the use of participant support costs; • Describe the responsibilities of the PI/unit

This guidance addresses fundamental concepts related to participant support costs and offers some examples. Participant support costs are allowed by a number of Federal agencies and other sponsors. Participant

support costs are defined by the [Uniform Guidance in §200.75](#) and referenced in [Uniform Guidance §200.456](#).

Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.[1]

Participant support costs are typically incurred for projects that include an education or outreach component. NIH indicates that participant support costs are allowable only if specified in the Funding Opportunity Announcement (FOA). These types of costs are most commonly included:

Participant Support[1]	• Attendee at a workshop, conference, or symposia funded by a sponsored project • Short term educational project/training activity including programs such as, but not limited, to: • NSF Research Experiences for Undergraduates (REU) • NSF Research Experiences for Teachers program (RET) • NSF Research Traineeship (NRT) Program • NIH National Center for Rehabilitative Auditory Research Summer Research Training Program

Funds provided for participant support costs that are not spent <u>cannot</u> be rebudgeted for use in other categories unless prior written approval has been obtained from the sponsor.

Participant support costs are budgeted in a separate category in the application budget and must be accounted for separately. [OGCA](#) sets up a separate fund under the award to isolate participant support costs and to ensure that F&A is not applied against these costs. Please contact [OGCA](#) <u>prior</u> to proposal submission if you have any questions regarding participant support costs.

[1]This does not include [NIH Kirschstein-NRSA programs](#).

1. What are participant support costs?
Participant support costs are costs to support individuals who are receiving a training opportunity as part of a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by a sponsored award. Costs may include stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants (not employees). Also see #3 and #4 below.
A participant does not perform work or service for the project or program. The participant is not required to deliver anything or provide any service to the university in return for these support costs.

2. What types of sponsored projects may include participant support costs?
Projects with an educational or outreach component may include participant support costs. For example, a project may be in support of professional development and continuing education activities for secondary school teachers/educational professionals. Participant support costs for this project may include registration fees for the event, transportation to/from and lodging during the event, as well as a per diem allowance to cover meals and incidental expenses.

3. What costs can be included in participant support costs?
- Stipend: A stipend is a set amount of money to be paid by UAF directly to the participant.

- Travel: Travel includes the costs of transportation and associated travel-related expenses and must follow sponsor guidelines as well as UAF policies and guidelines. The sole purpose of the trip must be to participate in the project activity.

- Subsistence Allowance: The cost of a participant's housing and per diem expenses necessary for the individual to participate in the project are generally allowed, provided these costs are reasonable and limited to the days of attendance. Participants who live in the local area are not entitled to subsistence payments, although they may participate in meals and breaks provided at the meeting or conference.

- Other: Certain other costs in support of the participant's involvement may be allowable, including training materials or laboratory supplies.

See Fees example below. Check the funding solicitation or FOA for guidance and contact OGCA with questions.

- o Fees: The fees paid by or on behalf of a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. Additionally, these fees may include laboratory fees, passport or visa fees for foreign participants, and registration fees.

4. What costs cannot be included as participant support costs?

Participant support costs do NOT include the following types of payments:

- Travel for project PI or staff

- Travel for a consultant providing services to the University, project, or program

- Honoraria paid to a guest speaker or lecturer

- Conference support costs such as facility rental or media equipment rental

- Agreement with a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)

- Travel to bring collaborators together to meet and discuss the project

- Incentive payments to an individual who agrees to participate as a human subject in a research project

5. What are some examples of what might or might not be considered participant support costs?

Some examples that would be considered participant support costs:

- An NSF project has been awarded an REU supplement. The REU supplement will enable 5 undergraduate students from around the country to participate in a summer research project with a UAF PI. The students will be paid a stipend and provided room and board over an 8-week period. The stipends and room/board would be considered participant support costs.

- The UAF is awarded a grant from a Federal agency to host an educational workshop in Washington, DC. Individuals (the audience is primarily postdoctoral fellows from around the country) will apply for financial support to attend the conference. The financial support will cover the costs to travel to and attend the workshop. Travel costs, as

well as lodging/meals during the event, would be considered participant support costs.

- The UAF receives an award from the NSF that includes an REU component. The REU component allows the PI's lab to support undergraduate student positions during the academic year over the course of the three-year grant. The students will be mentored and will assist with various research projects, e.g., media preparation, plant tissue culture, cloning, and mutant analysis. The student support would be considered participant support costs.

- NSF provides an award to UAF that includes an RET activity. The PI will host a teacher over the course of the summer who will gain research experience, and then use that knowledge to develop educational materials and activities. The teacher will pilot the activities with students and present the materials at regional conferences with fellow teachers. The teacher's summer stipend, supplies for the activities, and travel to regional conferences would be considered participant support costs.

Some examples that would <u>not</u> be considered participant support costs:
- The UAF is part of a scientific collaboration involving PIs from five different institutions. The UAF PI hosts a meeting with her Co-PIs and other scientists to discuss project progress. Collaborators must travel to Fairbanks to attend the meeting. The costs for this meeting of scientific collaborators to discuss the project would <u>not</u> be considered participant support costs.

- As part of a conference grant, a UAF PI invites an expert in the field to talk about her recent discoveries that were featured in a prominent scientific journal. In order to support the expert's attendance, the grant provides an honorarium of $2,000. The honorarium for the speaker would <u>not</u> be considered a participant support cost.

6. What costs may not be budgeted as participant costs?

- Payments to guest speakers, trainers and/or individuals providing peer review or evaluation services
- Expenses for the PI or other project team members to attend the workshop, conference, or symposia supported by an UAF sponsored award. These must be budgeted in the "travel" category

- Food expenses for the PI or other project team members. These must be budgeted in *Other Direct Costs*

7. What costs do NOT qualify as participant support costs?

Honoraria	• Payment to a guest (non-UAF) subject matter expert for speaking at a conference, symposium, or workshop • Payment for participation on an advisory board related to a sponsored project
Human Subjects	• Incentive payments to encourage individuals to participate in research study and provide private data/information through intervention or interaction. This includes participation in surveys and interviews. Additional Resource: Office of Research Integrity
Fellowships	• Support for individual with strong ties to UAF working toward their degree and who may or may not be providing services to UAF, the sponsor, or other third party Examples of fellowships include: • NIH Ruth L. Kirschstein National Research Service Award (NRSA)

CAUTION:
The terms "participant" and "participant support costs" are sometimes used interchangeably when referring to trainees, human subjects, or human subject incentive payments. Financial transactions involving stipends or incentives in research administration context are not interchangeable.

Participant Support Costs vs. Human Subject Payments

	Participant Support Costs	Human Subject Payments
Supports non-employees while participating in sponsored project funded conferences, workshops, and training activities	√	
Provides compensation or incentives to individuals serving as subjects in research studies		√
Requires prior approval from the awarding agency	√	√
Requires an approved IRB protocol		√
Charges will assess F&A in Banner		√
Separate fund will be created in Banner	√	
Employees may participate or receive payment		√

Definitions

Study Subject Payments and/or Participant Incentives are defined as a payment or series of payments made to individuals for participating in research or sponsored activity projects (e.g., clinical trials).

Participant Support Costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. (2 CFR 200.75) Participant support costs paid to the participant as stipends and/or allowances are considered taxable income by the IRS.

Note: Participant support costs, such as actual travel expenses, paid as a reimbursement of allowable costs (i.e., expenses connected to participation in the project that are paid for by the participant, substantiated by receipts that are provided within a reasonable period of time, and reimbursed by Northeastern) are not considered taxable income by the IRS.

8. When are participant support costs allowed?

Participant support costs are allowable with prior sponsor approval, per the Uniform Guidance. In addition, individual agencies may have specific

policies restricting the use and allowability of participant support costs. NSF has historically allowed participant support costs, for instance, in the REU and RET programs.

NIH only allows participant support costs if they are explicitly identified in the Funding Opportunity Announcement (FOA). Other Federal and non-Federal sponsors may allow participant support costs under some circumstances. Review the funding solicitation for specific instructions and contact OGCA with any questions prior to proposal submission.

9. Should participant support costs be identified in the budget/budget justification?

Yes, participant support costs must be explicitly identified in the budget and budget justification. For instance, the NSF budget form has a section specifically for participant support costs. If the budget form you are using does not have such a section, but you plan to include participant support costs, please explicitly identify any participant support costs in the budget and budget justification.

Participant support costs are excluded from the MTDC base when calculating F&A costs. Identifying participant support costs will help ensure prior sponsor approval is requested and, if awarded, that OGCA sets up a separate fund with appropriate F&A.

10. Can I rebudget participant support costs into another budget category after an award has been received?

Maybe. Generally, it is not allowable to rebudget from the participant support costs category into other budget categories unless prior written approval has been obtained from the sponsor. If approval is obtained from the sponsor and funds are moved from participant support costs into other budget categories, F&A costs will be applied to the rebudgeted funds as appropriate.

11. If participant support costs were not included in the original award, can I add a participant support component to my project?

Maybe. Adding a participant support component to the project will need prior approval from the sponsor.

With the sponsor's approval, one option to fund this new component would be to rebudget unused funds into participant support costs. OGCA can assist with submitting a prior approval request to rebudget funds for this purpose. The other option would be for the PI to request a supplement for participant support costs. A supplemental proposal would need to be submitted.

If approval were obtained for participant support costs, OGCA would set up a new fund under the award in order to separately account for these costs and apply a 0% F&A rate as required by the Uniform Guidance.

12. What kind of documentation should a department/unit keep on file for participant support costs?

Similar to other award-related expenses, a department must maintain back-up documentation for all participant support costs. This would include a list of program participants and evidence of attendance of participants, such as a daily log or similar documentation.

13. Are participant support costs treated differently in the Uniform Guidance than they were in OMB Circular A-21?

Yes. Previously, in A-21, the definition of MTDC did not address participant support costs. In the Uniform Guidance, the definition of Modified Total Direct Costs addresses participant support costs. This means, for awards from any agency that are made under the Uniform Guidance, participant support costs (similar to equipment) should be excluded from the base used to calculate F&A costs.

14. Are payments to research subjects/participants considered participant support costs?

No. A payment to an individual who agrees to participate as a human subject in a research project is not a participant support cost and should be budgeted as Other Direct Costs in the project proposal. Information on payments to research subjects/participants is available at Office of Research Integrity (ORI).

15. Are costs to support pre- or post-doc trainees in a training grant considered to be participant support costs?

The answer depends on the sponsor. Generally, costs for training grant programs are not considered participant support costs. Training grant programs are not typically short-term experiences and are not consistent with the types of experiences considered to be participant support activities. Trainees are also actively engaged in the scope of work, where participants do not perform work or service for the project or program.

16. What if a sponsoring agency representative requests that I move student hourly employee costs to the participant support costs budget section?

It depends. If UAF has determined that student hourly employee is the appropriate role, then a compelling justification should be sent to the sponsoring agency representative about why that determination was made. Guidance from the National Science Foundation is that the institution determines whether a student hourly employee or participant is appropriate for the project.

However, for the NSF REU program, any student involved would be considered a participant. The NSF REU program is intended to provide a practical educational experience for undergraduate students, to develop

their research skills while being mentored. Given the goals of the NSF REU program, it is not possible to have both student hourly employees and participants – all students on an NSF REU project should be considered participants.

17. Special Considerations

Participant support costs should be considered as only those costs that can directly be attributable to an individual participant rather than costs that support all participants collectively.

Costs for project organizers (such as PI, co-I, etc.), speakers, and program facilitators or coordinators, even where these individuals may also participate as a program participant, are NOT considered participant support costs.

18. What is the difference between a stipend and an incentive?

Stipend: payment to an individual who is attending a conference/workshop/or other short term educational training activity. It may also be applicable to those on a training grant or fellows with no service obligations

Incentive: cash or cash equivalent payments (such as gift cards or course credit) for participation in a research study

19. Can individuals from other entities receive participant support costs?

Assuming they meet the sponsored project criteria for participants, the following groups may receive participant support:
• Students, Scholars and Scientists from other institutions
• Representatives of private sector companies
• Teachers
• State or local government agency personnel

20. If participant support is for training activities or "traineeships", does that mean internship costs are also participant support?

Participant support opportunities may be considered "traineeships" but not all traineeships are related to participant support. Interns are trainees who receive information to advance their knowledge, skills, and experience; however, interns also provide services to UAF, the grant sponsor/program, or a third party. Service providers, such as interns, are not participants.

21. Can individuals receive both a stipend for the training received and a salary for training they provide to others on the same project?

They may not.   If any portion of an individual's activity is classified as salary, then all payment to that individual is salary. Example: The individual will participate in the training but will then train others as part of a sponsored project.   Though the individual is first trained, the training of others is a service and therefore the entire expense is a personnel expense, not a participant support cost.

22. What costs are generally included in the participant support costs category?
Sponsors generally stipulate allowable costs for the participant support category which normally includes:
• Event registration or tuition fees
• Travel (airfare, mileage, lodging, per diem)
• Training materials
• Participant supplies*
• Stipend
Participant support costs may also include, only if permitted by sponsor's guidelines:
• Health Insurance allowance
• Subsistence: meals and catered food*
Read the sponsor's general guidelines, the specific FOA.
*The National Science Foundation's (NSF) Policy office has stated that room rental fees, catering, and supplies should not be budgeted in participant costs in NSF proposals. If essential for project completion, include request in Other Direct Costs category.
23. Do all sponsors allow participant support costs?
No. Below are some general guidelines but to make a definitive determination, the sponsor's guidelines and the FOA must be carefully read.

Federal Sponsors - In General	Federal Programs - FOA Specific	Non-Federal Public & For Profits	Foreign Sponsors
May be allowed if relevant to program and not precluded by FOA	Allowable if relevant to the program and if permitted by FOA.	Not typically allowed unless sponsor's program is intended to support students	Not typically familiar with the concept but may be allowed for specific situations

PI/Department/Unit Responsibilities

1. The PI and RA/unit should be familiar with the specific requirements set forth by the sponsor and also comply with UAF requirements:

• Confirm that sponsor's guidelines and/or FOA allow for participant support costs to be budgeted.

- Determine whether the proposed costs are participant support costs, human subject incentives, or fellowship and budget accordingly

- Budget costs in accord with UAF standard cost practices such as approved per diem rates, competitive airfare, etc.

- Include a proposal budget justification which fully explains all the individual costs (e.g. stipend, travel, supplies, meals and catered food, etc.) and the number of anticipated participants.

- Ensure participant support costs are approved by the sponsor prior to expenditure

- Ensure participant support costs are allowable, allocable, and reasonable

  - UAF PI must monitor subaward invoices which include participant costs to ensure they are being accounted for separately and that they are allowable and allocable

- Determine what, if any, sponsor restrictions exist for example:

  - Does the sponsor require prior approval to rebudget the funds to another direct cost category?
  - Does the sponsor require that unspent participant support costs to be returned to them?

- Take note that:

  - Participant support costs will be placed in a separate account to allow for compliance
  - Participant support cost balances may not be used to offset project overruns

2. Identify and Recruit Participants

4. Disburse payments to participants/monitor expenses

5. The PI/unit should also retain records detailing:

- Criteria by which participants in the program were selected

- Copies of applications of selected participants, with documentation as to how they met the selection criteria

- List of program participants and documentation of their participation in the program (signed check-in lists; email acceptance from participants; etc.)

Additional Information can be found at:
https://www.uaf.edu/ogca/lifecycle/3-develop/budgets/direct-costs/#collapse7d11e391