



Policy Directory

Responsible Division: Office of Research and Sponsored Programs
Responsible Office: Office of Grants and Contracts
Issue/Revision Date: May 7, 2019

Policy Title

Policy: Participant Support Costs

Procedures: Uniform Guidance (2 CFR Part 200, et al) – OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the Uniform Guidance), in particular sections §200.68, §200.75, §200.308 (c)(5), and §200.456. The Office of Management and Budget (OMB), within the Executive Office of the President, released the Uniform Guidance to the university community.

I. PURPOSE:

To establish the requirements that apply to participant support costs. This policy sets forth the University's procedures for managing and processing support payments for participants or trainees (excluding ASU employees) funded through sponsored grants and contracts.

II. DEFINITIONS:

Participant – an individual who is receiving a service or training opportunity from a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by a sponsored award. Neither research subject(s) receiving incentive payments nor project staff member(s) and/or students receiving compensation directly or indirectly from the grant are considered participants. Also: (1) University employees cannot be participants. (2) Participants may not work or provide services for the project or program other than for their own benefit. (3) A participant is not involved in providing any deliverable to the University or a third party.

Participant Support Costs (excluding training grants) – "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" ([2 CFR 200.75](#)). *Participant support costs are allowable with the prior approval of the Federal awarding agency* ([2 CFR 200.456](#)).

Principal Investigator (PI) – A member of the University faculty/staff who is responsible for the overall design, conduct, reporting and management of an externally sponsored project.

Sponsored Award – A funding instrument with terms and conditions in which the University agrees to provide a return benefit to, or agrees to provide a defined deliverable(s) for a sponsor in exchange for funds. The funding instrument may be a grant, contract, cooperative agreement, or similar document.

Subsistence Allowance – lodging, meals and incidentals when on travel status, training materials or other out-of-pocket costs associated with attendance at a workshop conference, seminar, symposium or other short-term training or information-sharing activity.

Travel Allowance – an amount paid to or on behalf of a participant for transportation costs incurred while under a travel authorization for the purposes of attending a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by a sponsored award.

III. POLICY:

Funds identified as "participant support costs" are those costs paid to (or on behalf of) participants in meetings, conferences, symposia, seminars and workshops, if allowed in the award budget. Participant support costs are intended to support students and other trainees. Participant support costs may not be paid to individuals providing administrative or logistical support, individuals attending the conference as invited speakers or research subjects participating in a study. (Per the Uniform Guidance)

Participant support costs are excluded from MTDC ([2 CFR 200.68](#)), thus F&A is not assessed on participant support costs (unless the budget is being calculated on a TDC or Total Cost basis.) There is no special object code associated with participant support costs, since such costs can be associated with travel, stipends, registration fees, etc. Thus, it is generally necessary to establish separate accounts, one for the participant support costs (assessed 0% F&A) and one for all other costs.

The federal government also expects participant support costs to be accounted for separately. According to the Uniform Guidance, grantees must request the Federal awarding agency's prior approval before transferring funds budgeted for participant support costs to other categories of expense ([2 CFR 200.308\(c\)\(5\)](#)). As a result, unused participant support costs are generally returned to the sponsor rather than spent on other categories of cost.

Historically, participant support costs have been associated most commonly with the National Science Foundation (especially Research Experience for Undergraduates grants (REUs) and Research Experiences for Teachers grants (RETs)). Please refer to [NSF's Grants Proposal Guide, Chapter II](#), section [C.2.g.\(v\)](#) for NSF specific guidance.

IV. ADMINISTRATION:

In order to be in compliance with the Uniform Guidance the Principal Investigator (PI) and his/her administrative support personnel are required to retain records detailing:

- List of program participants and documentation of their participation in the program.
- (a) Criteria by which participants in the program are selected.
- (b) Copies of applications of selected participants, with documentation as to how they meet the selection criteria.

Additionally, the PI and his/her administrative staff should ensure the following expenses, except when specifically allowed by the award, are not processed as participant support costs:

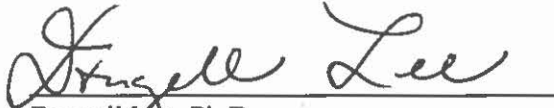
- (a) Travel for PI or project staff,
- (b) Multi-purpose travel (i.e., to perform research in addition to attending a project related meeting),
- (c) Travel for a consultant who is providing service to the university,
- (d) Event support cost (i.e., facility rentals, media equipment rentals, food/refreshments) not made on behalf of or paid to participants,
- (d) Entertainment/food for non-participants,
- (e) Honoraria paid to a guest speaker or lecturer,
- (f) Incentive payment to encourage an individual to participate as a research subject,
- (g) Subaward to a provider for

multiple training events (i.e., an ongoing contract with specific terms and conditions), (h) Payments to a participant's employer to reimburse for the costs related to sending the employee to the project event, (i) Administrative expenses related to meetings

V. EFFECTIVE DATE(S) This Policy is effective May 7, 2019.

VI. SIGNATURE, TITLE AND DATE OF APPROVAL

This policy needs to be signed by the appropriate officer (listed below) before it is considered approved. This document was approved and signed by.



Donzell Lee, Ph.D.
Interim President

5/30/2019
Date