Participant Support Costs

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Northwestern

Introduction

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Agenda

- Define participant support
- Review sponsoring agency requirements
- Learn who can and cannot be a participant
- Allowable vs. unallowable costs
- Highlight what to include in the budget justification
- Questions and open discussion

Uniform Guidance

§200.75

Participant support costs are 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.

Objective

To allow people *who would otherwise not be able to participate due to lack of funding* to receive a service or training opportunity from a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity that is funded by a sponsored project.
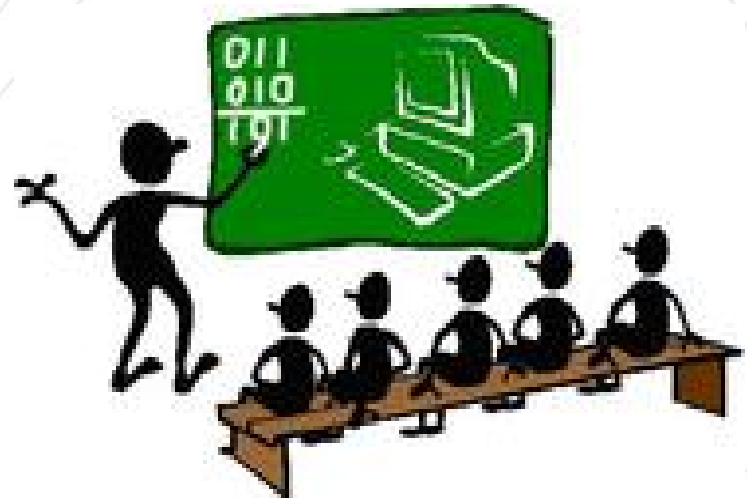
UG Requirements

- **§200.68** – Participant support costs are excluded from F&A
- **§200.308** – Re-budgeting funds out of participant support requires prior approval
  - Unspent funds must be returned to sponsor
- **§200.456** – Prior approval is required from sponsor before spending on participants can occur

NSF Proposal Guidelines

- This budget category refers to costs of transportation, per diem, stipends and other related costs for participants or trainees (but not employees) in connection with **NSF-sponsored** conferences, meetings, symposia, training activities and workshops.

- Generally, indirect costs (F&A) are not allowed on participant support costs.

- The number of participants to be supported must be entered in the parentheses on the proposal budget. These costs also must be justified in the budget justification section of the proposal.

- Some programs, such as Research Experiences for Undergraduates, have special instructions for treatment of participant support.

- http://www.nsf.gov/pubs/gpg/nsf04_23/2.jsp

Who is eligible?

- Northwestern students
- Students from other institutions
- Private sector representatives
- K-12 teachers
- State or local government agency personnel
- U.S. citizens, permanent residents, or foreign nationals

Who is not eligible?

- Employees of Northwestern
- Project staff members, students, or trainees receiving compensation from the grant or other Federal government sources while participating in the project
- Consultants receiving compensation from the grant
- Research subjects cannot be participants as an incentive to get them to enroll in a study
- Federal employees from the granting agency
  - e.g. an NSF award cannot provide participant support to an NSF employee

A participant cannot be required to deliver anything or provide any service to the university in return for these support costs

Allowable Costs

- *Stipend* - A stipend is a set amount of money to be paid directly to the participant in connection with a short-term training activity. Note that short-term means the appointment period approved by the sponsor.
    - E.g. REU & RET grants
- *Travel* - Travel includes the costs of transportation and must follow sponsor guidelines and University travel policy. 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 expenses are reasonable and limited to the days of attendance.
- *Fees* - The fees paid by a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. These fees may include laboratory fees, passport or visa fees for foreign participants, and registration fees.
- *Other* - Certain other costs paid on behalf of or to the participant as required for their involvement may be allowable, including training materials, laboratory supplies, and insurance.

Unallowable Costs

- Travel for project PI or project staff
- Travel for collaborators or consultants for purpose other than the training event or conference
- Multi-purpose travel
  - I.e., to perform research in addition to attending a project related meeting
- Event support cost not made on behalf of or paid to participants
  - Event support costs include rentals, media equipment rentals, food or refreshments
  - Usually, meals and refreshments are covered by the conference registration fees
- Expenses related to meetings of an administrative nature
- Human subject fees
- Honoraria paid to a guest speaker or lecturer
- Subaward to a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)

Detailed Budget Justification

- Clearly state how many speakers, how many faculty participants and how many student participants are expected
- Be sure to say why private sector or government participants are being supported
- If all attendees are covered by PSC, clearly justify food and beverage costs that are included in the proposal budget
- If there is a collaborator on the project that also qualifies for PSC, include the person in the justification
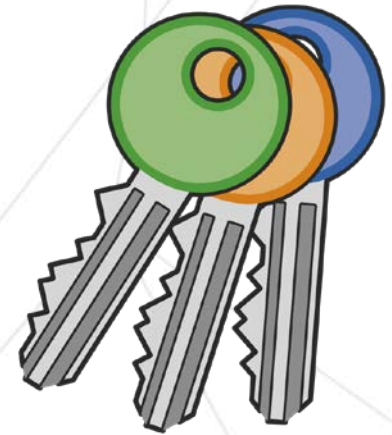
Account Code & Project

- OSR will create a separate project that does not incur F&A. The project must be used to capture only participant support costs.
- Expenses account code is 76760 for participant travel
- Conference registration income is applied to the conference grant as a credit to expense under account code 78767 - Program Income

Key Takeaways

- Prior approval is required
  - Costs must be explicitly listed in proposal budget justification
  - After the award has been made, work with OSR to request sponsor approval
- No double dipping
  - People with other sources of federal funding cannot be considered participants
- Participants cannot be required to provide services in order to participate
- Funds budgeted for participants support cannot be used for any other purpose without prior approval
- Human subject fees are not participant support costs

Appendix – Current Policy Links

- Uniform Guidance – sections §200.68, 200.75, §200.308 and §200.456
  - http://www.northwestern.edu/asrsp/federal-initiatives/uniform-guidance.html
- NSF Grant Proposal Guide, Chapters II.D.9 and II.C.2.g(v)
- NSF Award and Administration Guide Chapter V.A.3.b
  - http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/index.jsp
- NIH Grants Policy Statement, 1.2 Definition of Terms and 7.9 Allowability of Costs/Activities
  - http://grants.nih.gov/grants/policy/nihgps/index.htm

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