

Participant Support Costs Guidance

1. Definition of participant support costs

Participant Support Costs (PSC) is defined in Uniform Guidance §200.75:

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.

Participant support costs typically have no expectation or requirement that the participants provide any deliverables or services that are for the benefit of the sponsored award or for the institution. PSC's are typically associated with some form of educational outreach or training component of the sponsored award. There are some instances (typically NSF awards) where PSC's fund undergraduate and graduate students and the students research learning experience is participating in the research work of another research project the University has been awarded.

**Compensation (e.g. cash, store gift cards, etc.) paid to a human research participant for providing a deliverable or service (e.g. running on a treadmill, completing a survey, providing a saliva sample, etc.) in exchange for compensation is not 'participant support costs', it is 'participant compensation' and should be paid with the same title.

Participant support costs are often included as a budget item on Federal awards that are associated with an educational or outreach component of the award (almost always for NSF and very rarely for NIH).

- Short-term PSC funding awarded by various Federal agencies often include training opportunities for individuals who attend a workshop, conference, or seminar that is funded by a sponsored award.
- Longer-term PSC funding awarded by National Science Foundation (NSF) grants include Research Experiences for Teachers (RET) program, Research Experience for Undergraduates (REU), Graduate Research Fellowship Program (GRFP), and Postdoctoral Fellowships.
- NIH states that participant support costs are allowable only if specified in the Funding Opportunity Announcement. For the purposes of Kirschstein-NRSA programs, PSC does not apply. NIH will continue to use the terms trainees, trainee-related expenses, and trainee travel in accordance with NRSA Regulations.

2. Allowable and Unallowable Participant Support Costs Expenses.

Allowable PSC expenses:

- Stipend: a set amount of money to be paid, for an educational purpose, directly to a participant. Stipends can be paid to non-employees and any university personnel who does not work directly on the award. The stipend cannot be paid as salary/wages to the participant.

- Travel: transportation, lodging, per diem, registration fees, etc. for participants while in travel status. The sole purpose of the trip must be to participate in the project activity.
- Subsistence allowance: a participant's housing and meal costs necessary for the individual to participate in the project, provided these costs are reasonable and limited to the days of attendance.
- Other expenses: Other costs not identified in the above three categories; expenses might include participant tuition, health insurance, materials and supplies for participant's use, and other expenses or fees specifically incurred for participants of the project.

Unallowable PSC expenses:

- Stipend payments to a University employee who is ALSO paid salary/wages on the same award.
- Salaries or wages (and associated taxes and benefits) of university personnel who are paid directly by the sponsored award/project; charge these expenses to the main project.
- Travel costs incurred by university personnel who are paid directly by the sponsored award/project; *charge these expenses to the main project.*
- Consultants, lecturers, or guest speakers who help carry out the execution of the conference, event, etc.; charge these expenses *Consultants/Independent Contractors or: Guest Lecturers/Performers.*
- Travel costs incurred by consultants, lecturers, or guest speakers; *charge these expenses to: Travel – Non University on the main project.*
- Conference or event support costs (e.g. facility rental; media equipment; meals, snacks, and refreshments; etc.); *charge these expenses to their appropriate account code on the main project.* Note: meals provided at a conference or event to a participant, which are covered by their registration fee (an allowable expense), must be reduced in the participants travel per diem or meal allowance.
- Honorarium awards; *charge these expenses as Awards/Honorariums.*
- Compensation or incentive payments to human research subjects; *charge these expenses to Participant Compensation.*

3. Accounting for Participant Support Costs.

PSC account codes should only be used on Participant Support Companion projects where these costs have specifically been awarded. PSC's should never show up on the main project (where a companion PSC project was set up) or any project where PSC's were not specifically awarded. PSC expenses should be charged to the following account codes:

- Participant Support Costs – Stipends
- Participant Support Costs – Travel
- Participant Support Costs – Subsistence
- Participant Support Costs – Other

**Any fellowships or other traineeships that are not specifically awarded as PSC's (often NIH awards) should charge account to Scholarships/Fellowships, Travel; and other designated account codes appropriate for the expense type.

When PSC funding is awarded on a sponsored award, a companion project to the main project will be set up by Grants & Contracts Accounting to specifically track and monitor PSC expenses. Only the PSC account codes for stipends, travel, subsistence, and other should be charged to a PSC project. All other expense types (account codes) are unallowable costs as related to the PSC project and should be charged to the main project.

Participant support costs, to be paid directly to a participant.

When a Postdoctoral Fellow is to be paid from PSC funding (typically on NSF awards):

- DO NOT set them up to be paid salary/wages with the PSC funding.
- The postdoc fellow must be paid a stipend using the Participant Support Costs / Traineeship Payment Form (Direct Payment Voucher).
- If a postdoc fellow qualifies for health insurance based upon an anticipated time to be spent participating (not working) on the award (at least .5 FTE equivalent):
 - The postdoc fellow should be set up in the payroll system at the appropriate FTE equivalent;
 - Their pay rate should be set to zero;
 - The department will need to work with HR/Benefits to make the payment for insurance and any other available benefits;
 - If a postdoc fellow is also doing other work, for compensation, for the University, this effort should be set up as a separate record number and paid at the agreed upon pay rate through payroll.

4. FAQ's about Participant Support Costs.

FREQUENTLY ASKED QUESTIONS REGARDING PARTICIPANT SUPPORT Participant support costs do NOT include the following types of payments:

1. Travel for project PI or staff
2. Travel for a consultant providing services to the University, project, or program
3. Honoraria paid to a guest speaker or lecturer
4. Conference support costs such as facility rental or media equipment rental
5. Agreement with a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)
6. Travel to bring collaborators together to meet and discuss the project
7. Incentive payments to an individual who agrees to participate as a human subject in a research project

Participant support costs allowed Participant support costs are allowable with prior sponsor approval, per the Uniform Guidance 2 CFR 200.456. 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 Research Experiences for Undergraduates (REU) and Research Experiences for Teachers (RET) in Engineering and Computer Science programs. NIH only allows participant support costs if they are explicitly identified in the Funding Opportunity Announcement. Other Federal and non-Federal sponsors may allow participant support costs under some circumstances. Review the funding solicitation for specific instructions and contact OGRA with any questions prior to proposal submission. Are you allowed to re-budget participant support costs into another budget category after an award has been received? Maybe. Generally, it is not allowable to re-budget 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 re-budgeted funds as appropriate.

What are the examples of **NSF restrictions regarding Participant Support**?

- Participant support costs must be accounted for separately and indirect costs are not allowed to be charged;
- NSF prior written approval is required for any additional categories of participant support costs, such as incentives, gifts, souvenirs, t-shirts and/or memorabilia; and,
- Funds provided for participant support may not be used by grantees for other categories of expense without specific NSF prior written approval.

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 OGRA sets up a separate project with appropriate F&A.

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 re-budget unused funds into participant support costs. OGRA can assist with submitting a prior approval request to re-budget 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, OGRA would set up a new project under the award in order to separately account for these costs and apply a 0% F&A rate as required by the Uniform Guidance.

What kind of documentation should a department 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 eligibility requirements, a list of program participants and evidence of attendance of participants, such as a daily log or similar documentation.

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

Depending 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.

Can a sponsoring agency representative requests that the (CSU) recipient move student hourly employee costs to the participant support costs budget section?

It depends. If CSU 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.

Do I charge the cash or gift card incentive payments given to a human research participant on a clinical trial or other research project to participant support costs?

No. This type of expense is 'participant compensation' and should be charged to account code Participant Compensation. Participant support costs are educational in nature and should not require a person to provide any type of deliverable or service in exchange for the money received.

I have a postdoc fellow with a fulltime appointment to our department who is budgeted to be paid out of Participant Support Costs on my grant at 50%. Should I set her up in payroll to pay her the PSC on my grant?

No. Participant support costs cannot be paid as salary and wages and can/will be disallowed as an expense by the sponsor. PSC for a postdoc fellow MUST be paid as a stipend using the Educational/Research Traineeship Grant Form.

I have a student who is also a University employee working on my grant. We have a three-day conference which is sponsored by my grant coming up where we will pay a \$250 stipend to 40 students who attend. Can I pay my student employee the \$250 stipend for his attendance?

No. A student employee or any University employee cannot be compensated partially as an employee and as a participant on the SAME grant. The student employee can only be paid his regular employee wage, charged to the main project, if he attends the conference.

I have a student that I am paying a stipend to who is participating in some training on my sponsored award. How do I adjust the stipend each month based upon the number of hours he participates?

A student receiving a training stipend does not get paid for each hour spent participating in the training. The stipend payment should be a fixed amount for participating in the total training experience. If the training is over several months, then payments can either be paid as a lump sum or as fixed, specific amounts over the training period, depending upon the length of the training.

I have a faculty member from another University coming to present at my conference, should I charge his travel costs and payment for speaking to participant support costs?

No. A speaker or trainer at a conference is not considered a participant or trainee of the conference and his expenses must be charged to the main project.

Should I charge the room rental and catered food for our conference to Participant Support Costs – Other?

No. These are not participant support costs and must be charged to the main project. If a meal is provided during the conference, and any participants are receiving per diem as part of their PSC payment, then that meal must be deducted from the per diem payment for that day.

We are taking a four-day trip to a remote location as part of the learning experience for our participants, how do I charge these expenses to the project?

All travel costs should be charged to account code: Participant Support Costs – Travel using the proper travel expense forms. Any supplies or materials purchased and used for the trip should be charged to account code: Participant Support Costs – Other.

I have a graduate student coming from another university and staying at our University to participate as a trainee on my grant for the summer (about 2 months). How do I charge his housing and meals for the two months?

Housing and meals should be charged to account code: Participant Support Costs – Subsistence.

I have an undergraduate student who is receiving PSC for an REU. Can I charge his student health insurance as a PSC?

If health insurance for participants was included in the proposal as a PSC budget item and awarded by the sponsor, then the health insurance can be paid for by the award. The same goes for graduate students.

I have a graduate student who has a research fellowship paid by PSC. Can this graduate student qualify for the Tuition Benefits Program?

As long as a graduate student meets the requirements of the Tuition Benefits Program, he can participate in the program. There may be limitations as to how much the student can receive. As every situation will be different, contact the Graduate School for specific details of what each grad student may qualify for.

References for Participant Support Costs.

Uniform Guidance:

- [Electronic Code of Federal Regulations – Subpart A](#)
- [Electronic Code of Federal Regulations – Subpart E](#)

NSF:

- [NSF: Chapter V – Allowability of Costs](#)
- [NSF Pilots a New Collaborator and Other Affiliations Template](#)

NIH:

- [NIH: 7.9 Allowability of Costs/Activities](#)
- [NIH: 11.3.8 Allowable and Unallowable Costs](#)

- [Useful Links](#)
 - [Uniform Guidance](#)