

This guidance addresses fundamental concepts related to participant support costs and offers some examples. Please contact OSP with questions. 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:

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 projects¹.

Participant support costs are typically incurred for projects that include an education or outreach component. These types of costs are most commonly included in National Science Foundation (NSF) grants, such as the Research Experience for Undergraduates (REU) or Research Experiences for Teachers (RET) program. NIH indicates that participant support costs are allowable only if specified in the Funding Opportunity Announcement.

Funds provided for participant support costs that are not spent cannot 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. Participant support costs are excluded from the MTDC base when calculating F&A costs. OSP sets up a separate project under the award to isolate participant support costs and to ensure that F&A is not applied against these costs.

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.

¹This does not include NIH Kirschstein-NRSA programs.

3. What costs can be included in participant support costs?

- **Stipend:** A stipend is a set amount of money to be paid by UW-Milwaukee directly to the participant.
- **Travel:** Travel includes the costs of transportation and associated travel-related expenses and must follow sponsor guidelines as well as UW-Milwaukee 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 for guidance and contact OSP with questions.
 - **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 UW-Milwaukee 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 UW-Milwaukee 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 UW-Milwaukee 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 UW-Milwaukee 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 not be considered participant support costs:

- The UW-Milwaukee is part of a scientific collaboration involving PIs from five different institutions. The UW-Milwaukee PI hosts a meeting with her Co-PIs and other scientists to discuss project progress. Collaborators must travel to Milwaukee to attend the meeting. The costs for this meeting of scientific collaborators to discuss the project would not be considered participant support costs.
- As part of a conference grant, a UW-Milwaukee 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 not be considered a participant support cost.

6. 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. Other Federal and non-Federal sponsors may allow participant support costs under some circumstances. Review the funding solicitation for specific instructions and contact OSP with any questions prior to proposal submission.

7. 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 OSP sets up a separate project with appropriate F&A.

8. 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.

9. 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. OSP 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, OSP 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.

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

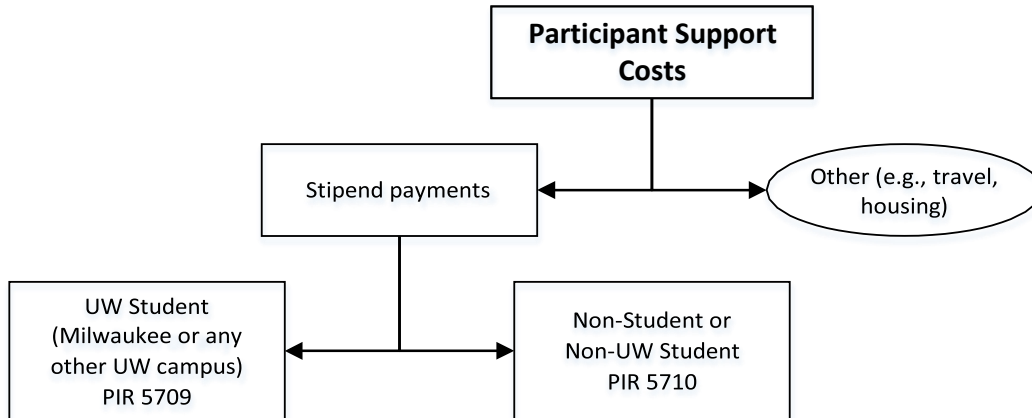
Similar to other award-related expenses, a department must maintain back-up documentation for all participant support costs. This would include a list of program participants and evidence of attendance of participants, such as a daily log or similar documentation.

11. 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.

12. How should stipends be paid to participants?

Stipend payments to participants should be made on a [Payment to Individual Report \(PIR\)](#). The account code used will be either [5709](#) or [5710](#), depending on whether or not the individual is a non-student or student and, if a student, whether or not s/he is attending a UW System institution. See diagram below.



13. 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 this site:

<https://uwm.edu/officeofresearch/osp/compliance/>

See Human Subjects Protection

14. 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.

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

It depends. If UW-Milwaukee 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.