

I. Purpose:

To provide guidance on how to identify participant costs within a proposal budget and to ensure the University is in compliance with sponsor regulations as they relate to participant costs expended over the life of the award according to the approved budget justification and intended purpose.

II. What are Participant Costs?

Participant support costs (as defined in 2 CFR 200.75) are direct costs including 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. The Uniform Guidance (2 CFR 200) requires prior approval of the Federal Agency in order to incur Participant Support Costs under federally sponsored awards. The Participant Support Costs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency. The National Science foundation (NSF) defines participant support costs 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 meetings, conferences, symposia or training projects. For some educational projects conducted at local school districts, however, the participants being trained are employees. In such cases, the costs must be classified as participant support if payment is made through a stipend or training allowance method. The school district must have an accounting mechanism in place (i.e. sub-account code) to differentiate between regular salary and stipend payments.” (www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_5.jsp)

III. Who is a participant?

A participant is defined as a non-URI employee who is the recipient, not the provider, of a service or training associated with a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity. Participants do not perform work or services for the project or program unless it is for their own benefit. Participants may include students, scholars, and scientists from other institutions, representatives from the private sector, teachers, and state or local government agency personnel. In general, participants are the recipients of service or training provided at a workshop, conference, seminar, symposia, or other short-term instructional or information sharing activity. The participants are not required to provide any deliverable to the university or third party, nor would they be disciplined or terminated for their failure to perform.

IV. Participant Support Costs Budget

Participant Support Costs are listed as a separate category within the proposal budget. Once the award is received the OSP Post Award staff reviews the award budget and any special terms and conditions. The Participant Support Costs budget category will initiate communication between

OSP and PI to gain a better understanding of what type of Participant Support Costs will be involved to ensure proper setup has been completed.

V. Participant Support Costs and F&A

Participant Support Costs are exempt from F&A in federally sponsored projects as stated by the Uniform Guidance. For Non-Federal awards, specific guidelines within each award should be utilized to determine if F&A is allowable on the Participant Support Costs. If there is no award-specific guidance, then the full F&A rate for the award should be charged.

VI. Rebudgeting Participant Support Costs

All rebudgeting of Participant Support Costs to another budget category requires the approval of the Federal agency. For non-Federal sponsors, award specific guidelines should be consulted before any rebudgeting of Participant Support Costs (Refer to OSP Budget Revision Policy and Form, [Post Award Budget Revision Policy \(02-2018\)](#), [Post Award Budget Revision Request Form \(02-2018\)](#)).

According to NSF, www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_5.jsp, Chapter V, Section 8a-b:

“Funds provided for participant support may not be used by grantees for other categories of expense without the specific prior approval of the cognizant NSF Program Officer. Therefore, awardee organizations must account for participant support costs separately.

VII. Subawards for Participant Support Costs

If a subaward is issued where participant support has been budgeted, the PI must monitor subawardee invoices to ensure that the Participant Support Costs are being accounted for separately, and that these costs are allowable and allocable. Before a subaward is initiated prior approval is required if it was not included in the original proposal budget.

