

MEMORANDUM

DATE: April 14, 2017
FROM: Richard Mocarski, Director Office of Sponsored Programs & Research Development
RE: Participant Support Guidance (2CFR 200.75 and 200.456)

This memo outlines the interim policy and guidance for participant support costs on federal grants in compliance with 2CFR 200.75 and 200.456. A full policy in compliance with UNK's uniform policy guidance will be drafted and posted by the end of fiscal year 2017.

Participant Support Costs Guidance

2CFR 200.75 and 200.456 Participant support costs

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 (Sections 200.75 and 200.456)

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 are allowed on projects with an educational component, if included in the proposal budget or with subsequent sponsor approval.
- Sponsor approval is also required to rebudget funds from participant support costs into another category
- Participant support costs are excluded from the F&A base

Who is a participant?

A participant is defined as a non-UNK employee who is the recipient, not the provider, of a training associated with a workshop, conference, seminar, symposium, or other short-term instructional or information sharing activity. Participants are not required to provide any deliverable to the university and they are not subject to UNK human resources policies (e.g., they cannot be terminated for failure to perform). Participants may include students, scholars, and scientists from other institutions, representatives of private sector companies, teachers, and state or local government agency personnel. A person classified as an intern would be paid as an employee and not as a participant, because the intern, while receiving certain training, is also providing services.

Allowable Participant Support 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.
- Travel. Travel includes the costs of transportation and associated costs and must follow sponsor guidelines (e.g., US flag carrier, coach class, most direct route) as well as UNK's travel policies and guidelines. The sole purpose of the trip must be to participate in the project activity. If a training activity involves field trips, the cost of transportation for participants may be allowable.
- 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. Although they may participate in meals and snacks provided at the meeting or conference, participants who live in the local area are not entitled to subsistence payments.
- 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 Participant Support Costs

Participant support costs do not include the following types of payments:

- Honoraria paid to a guest speaker or lecturer
- Conference support costs such as facility rentals, media equipment rentals, or conference food
- Subaward to a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)
- Agreements with employers (e.g., public school system) to reimburse the employer for the costs related to sending its employee to a conference or workshop. It is recommended that the PI inform participants prior to the initiation of the project about any costs associated with their participation in the project that are not covered.
- Expenses for collaborators to meet at a single destination and discuss a research project's progress and direction. Such expenses should be budgeted under travel or other expenses as allowed by the sponsor.
- An incentive payment to encourage an individual to participate as a human subject in a research study is not a participant support cost and should be budgeted as an "other direct costs" bearing full overhead.

Facilities and Administration and Participant Support Costs

In addition, participant support costs will have to be segregated in a separate sub-project grant with a 0% indirect cost rate when they are included as part of an award that is recovering indirect costs.

*Adapted from Manchester University