



External Award Funded Participant Support Costs Guidance

What are Participant Support Costs?

Participant support costs (*as defined in 2 CFR 200.75*) 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. The Participant Support Costs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency.

Additional Federal regulations:

- Participant support costs are allowable with prior approval from the Federal awarding agency. (2 CFR 200.456)
- Participant support costs are excluded from modified total direct costs. (2 CFR 200.68)
- The transfer of funds budgeted for participant support costs to other budget categories requires the approval from the Federal awarding agency. (2 CFR 200.308)

Who is a participant?

A participant is defined as a non-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.

A participant is not:

- An employee of the University
- A student or project staff member receiving compensation directly or indirectly from the sponsored project
- A research subject receiving incentive payments
- A recipient of any compensation from any other federal government source while participating in the project (note: applies only to federal grants)

What are allowable participant support costs?

Participant supports costs are costs paid to participants or trainees for their participation in meetings, conferences, symposia, workshops or other training activities.

Allowable costs:

- Training materials and supplies
- Event registration and tuition fees
- Travel (includes airfare, mileage, allowance for lodging, meals, incidental expenses) when the sole purpose of the trip is to participate in the project activity
- Housing and subsistence allowance, all costs reimbursed or paid on behalf of the participant must be incurred within the project period and be specifically allowed by the sponsor.
- Honoraria and travel for speakers and receptions are not considered participant support costs.

Prohibited costs:

- Honoraria for guest speakers
- Expenses for the PI, project staff or collaborators to attend project meetings, conferences, or seminars
- Payments to graduate assistants
- Payments made to research subjects as an incentive for recruitment or participation in a research project

Budgets and Accounting for Participant Support Cost

Participant Support Costs are listed as a separate category on the budget at the proposal stage and award stage. It is important to ensure that participant support costs are accounted for separately from non-participant costs. New awards providing Participant Support Costs are issued two separate cost centers, one for all non-participant costs and a second specifically for all Participant Support Costs. Budget provided for Participant Support Costs may not be reallocated to another budget category without specific written approval of the sponsoring Federal agency.

Subawards including Participant Support Costs

If a subaward is issued where participant support has been budgeted, the Principal Investigator must monitor subawardee invoices to ensure that the Participant Support Costs are being accounted for separately, and that these costs are allowable and allocable.

Revised 11/7/2018