

## Participant Support Policy and Procedures

### I. Policy Statement

Agencies may fund a project whose objective is to sponsor outreach programs which bring together experts to discuss research, educational findings or to expose researchers and students to new teaching and research techniques. To cover the associated costs, the sponsor may include a category of expenses generally referred to as participant support costs.

This policy provides information and guidance on the management of Participant Support funds that are charged to sponsored projects. Regulations issued by the National Science Foundation (NSF), and the 2 CFR 200 establish standards that must be followed for consistency in accounting and costing practices.

### II. PSC Definitions and Examples

Participant support costs (PSC), as defined in 2 CFR 200.75 include 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. Per 2 CFR 200.68 participant support costs are excluded from the Modified Total Direct Cost (MTDC) base.

Per 2 CFR 200.456, these PSCs are allowable with the prior approval of the Federal awarding agency. Examples of Agency treatment of costs:

- National Science Foundation (NSF), GC-1: grants approval only for the categories listed in 2 CFR 200.75.
- National Institutes of Health (NIH), Grants Policy Statement (GPS): “only allowable when identified in specific FOAs”

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 are not required to provide any deliverable, other than meeting the program requirements (e.g. attendance, testing, etc.).

A participant can be:

- Student
- Scholar
- Scientist
- Teacher
- Private sector representative

A participant cannot be:

- An employee of the grantee institution
- Advisory board members
- Interns who have paid appointments
- Anyone who has a deliverable or is primarily providing a service to the project.

Participant support costs may include, but are not limited to:

1. Fees. Costs directly associated with attending conferences, symposia, or training projects. Such costs include registration, conference and similar fees.
2. Travel. Travel includes the costs of transportation and associated costs and must follow sponsor guidelines (e.g., U.S. flag carrier, coach class, most direct route) as well as NMC policies and guidelines. The sole purpose of the trip must be to participate in the project activity. If a training activity involves additional field trips, the costs of transportation of participants may be allowable. Field trips for recreational purpose are not allowed.
3. Subsistence The cost of housing and meal 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. Although participants who live in the local area are not entitled to subsistence payments or per diem, they may participate in meals and refreshments provided at the meeting or conference. Care should be taken not to duplicate support for individuals covered by other federal sources of funding.
  - Note: While employees are not normally considered participants, they may receive conference meals under this provision.
4. Manuals and supplies
5. Tuition
6. Stipends. Stipend is a set amount of money to be paid directly to the participant. Conditions for receiving a stipend should be in writing and program completion attested to by the project PI. Granting agencies may have specific guidelines for participant stipends.
7. Other. Certain other costs may also be allowable if consistent with NMC policy and practice, and specified in the proposal approved by sponsor upon review. Example: training materials or laboratory supplies where approved by the sponsor.

Participant support costs do not include:

1. Guest speaker or lecturer fees
2. Conference support costs such as facility and audio/visual equipment rental
3. Service or independent contractor agreements
4. Employee compensation and expenses

### III. PSC Management Procedures

All Participant Support charges are incurred, tracked, monitored and reimbursed in accordance with all applicable sponsor regulations and award Terms and Conditions, and NMC policies, guidelines and accounting principles. When a sponsored project includes participant support costs, the principal investigator (PI) and administrative support personnel are required to be familiar with the specific requirements as set forth by the sponsor, and to insure compliance with those requirements. The NMC Research Administrator is responsible for reviewing the sponsor's requirements and communicating them along with other terms and conditions of the grant to the PI.

Proposals. Federal agencies vary in their requirements for management of PSCs. Because participants do not provide services to a project it is not necessarily clear how they benefit the award. Therefore PSCs need to be part of the funding opportunity or agency rules and specifically included in the proposal. For conference proposals, each meal associated with a conference must be specifically listed in the proposal, and only beverages (i.e. not food) for session breaks are allowed. Number of participants should also be indicated in the proposal.

Re-budgeting. Conditions or constraints for re-budgeting awarded participant support funds vary and are specific to the awarding agency.

- Any re-budgeting which changes the scope of the award must have agency approval, even if re-budgeting authority has been assigned to the grantee.
- The addition of a participant program, where not previously awarded, is generally considered a change in scope requiring an agency's prior approval.
- Re-budgeting between the defined participant support cost categories is permitted.
- Budget awarded for participant support cannot be transferred to other categories of expense unless approved in writing by the Program Officer.
- Budget can be moved into participant support costs.

Overhead. Overhead cost is not applied to participant support costs.

Accounting. PSCs are accounted for separately in QuickBooks. The costs are assigned to the "Participant Support" account.

Unexpended PSCs. Any unexpended participant support costs should be returned to the sponsor unless otherwise is instructed by the sponsor in writing.

Additional PSCs Categories. Any additional categories of participant support costs, other than those described in 2 CFR 200.75 (such as incentives, gifts, souvenirs, t-shirts and memorabilia), must be justified in the budget justification, and such costs will be closely scrutinized by the agency.

#### **IV. Documentation**

All payments are made in accordance with NMC approval and accounting policies and procedures.

Notes:

- Stipends: written acknowledgement of the stipend receipt is required.
- Reimbursements require the submission of receipts.
- Travel expenses are paid in accordance with NMC Travel Guidelines.
- Classes or workshops require records indicating program attendance.

#### **V. Resources**

2 Cfr Part 200—Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards: [https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=037e83e9cbaf4272d01bdb59e52de15c&mc=true&n=pt2.1.200&r=PART&ty=HTML#\\_top](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=037e83e9cbaf4272d01bdb59e52de15c&mc=true&n=pt2.1.200&r=PART&ty=HTML#_top)

NSF Proposal and Award Policies and Procedures Guide:  
[https://www.nsf.gov/pubs/policydocs/pappg17\\_1/nsf17\\_1.pdf](https://www.nsf.gov/pubs/policydocs/pappg17_1/nsf17_1.pdf)

NMC Travel Guidelines:  
<http://newmexicoconsortium.org/images/pdf/TravelGuidelinesRev121517.pdf>

NMC Research Administration Manual  
NMC Accounting Manual Manual