

Participant Support Costs

Purpose:

California State University, East Bay and California State University, East Bay Foundation, Inc. complies with all federal, state, CSU, and auxiliary policies governing the administration of participant support costs provided by externally sponsored programs.

Statement:

Participant Support Costs may be included in proposals for sponsored funding when they align with the scope and objective of the award and are allowed and approved by the sponsor. California State University, East Bay complies with federal, state, and local regulations, including 2-CFR-200. 2-CFR-200.1 defines participant support costs, while 2-CFR-456 provides for the allowability of participant support costs with the prior approval of the federal awarding agency.

Scope:

While requirements differ between federally sponsored awards and non-federal awards the definitions, processes, and requirements outlined below are required for funds from all external sponsors unless indicated otherwise below.

Definitions:

Participant Support Costs, as defined by 2-CFR-200.1, are “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.” For federally-sponsored awards, such participant support costs are allowable with the prior approval of the Federal awarding agency.

Participant is the recipient of a service or training associated with a workshop, conference, seminar, symposium, or other short-term instructional or information-sharing activity. Participants may include students, scholars, and scientists from other

institutions, individuals from the private sector, teachers and state or local government personnel.

Note: CSUEB employees are normally *not* eligible to receive participant support from federally-sponsored programs. In some instances, however, CSUEB students employed on campus or in an auxiliary unrelated to the sponsored grant activity are allowed to receive federally-funded participant support costs for training when applicable.

When educational projects are conducted at local school districts (through a subaward to the school district for example), the participants being trained may be employees of the school district. In such cases, the school district must classify the costs 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.

Budget Requirements:

Participant support costs funded by federal awards are exempt from indirect costs. They are excluded from the Modified Total Direct Cost (MTDC) calculation, i.e., "All direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

Non-federal sponsor-specific and award-specific guidelines must be reviewed at the time of proposal to determine whether indirect costs on participant costs or total direct costs is allowable.

Unallowable Costs

Participant support costs does not include honoraria for guest speakers, incentive payments made to research subjects, costs for hosting a conference or training, or other expenses of the PI, project staff, or collaborators.

Budget Revisions – Rebudgeting

For non-construction federal awards, the university must request prior approvals from the federal awarding agency for the transfer of funds budgeted for participant support costs to other

categories of expense. Requests for sponsor prior approvals are made by contacting ORSP, who will review the request and contact the sponsor on behalf of the program team.

Accounting for Participant Support Costs:

Segregation of funds and categories by fund and subaccount is a standard accounting process at CSUEB. The Office of Research and Sponsored Programs (ORSP) requests a separate fund chartfield for each award.

ORSP provides the budget, with participant support costs separated by line item, to the grant analyst for account set up.

The segregation of Participant Support funds is achieved through subaccount 620002 for federal funds and other sponsored programs that do not allow Indirect Costs (F&A).

Sponsored funding for which IDC is allowed on total direct costs or on Participant Support Costs are segregated into line 620001.

Principal Investigator / Department Responsibilities

1. Review sponsored program guidelines prior to submitting a proposal for external funding to confirm Participant Support Cost requirements and allowances.
2. Adhere to award requirements and related regulations, policies, and procedures.
3. Monitor expenditures for allowability, allocability, and reasonableness throughout the grant period.
4. All participant support cost payment requests must include detailed adequate documentation to support the allowability, allocability and reasonableness of the costs charged, for example, a stipend agreement and acknowledgement form outlining the program and deliverables signed by the participant along with the program tracking mechanism documenting participation, a copy of the meeting or conference agenda, an attendance sign in sheet showing participant signatures, attendance tracking sheet, or other evidence demonstrating participation.
5. Request ORSP assistance with rebudgeting sponsored project budgets. Unless specifically stated otherwise in sponsor guidelines, written sponsor approval must be obtained for any rebudgeting of funds out of the participant support cost line. The PI or authorized designee must contact ORSP for all budget revision requests.

Authority

[2-CFR-200](#)

[Allowable Costs](#)

Sample Agency Requirements

- [National Science Foundation Proposal & Award Policies and Procedures Guide \(PAPPG, see PAPPG Chapter II.D.2.f\(v\). Chapter II.D.2.f\(v\)\).](#)
 - The NSF PAPPG, for example, explains that the budget category Participant Support, refers to “*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 NSF-sponsored conferences or training projects.*”
 - *Any additional categories of participant support costs other than those described in 2 CFR §200.1 (such as incentives, gifts, souvenirs, t-shirts, and memorabilia), must be justified in the budget justification, and such costs will be closely scrutinized by NSF. (See also PAPPG Chapter II.F.7.)*
 - *Speakers and trainers generally are not considered participant. [...]. However, if the primary purpose of the individual’s attendance at the conference is learning and receiving training as a participant, then the costs may be included under participant support. If the primary purpose is to speak or assist with management of the conference, then such costs should be budgeted in appropriate categories other than participant support.”*
- [National Institutes of Health Grants Policy Statement](#)
 - *For the purposes of Kirschstein-NRSA programs and Education Grants (e.g., R25), this term does not apply. NIH will continue to use the terms trainees, trainee-related expenses, and travel for those programs.*