

## **Participant Support FAQ's**

(updated 01/01/2025)

### **What is participant support?**

In general, participant support funding is provided to enable and encourage individuals to attend conferences or training programs without undue financial burden. Participant support costs (PSC) are those costs paid to (or on behalf of) participants or trainees (not employees) for participation in meetings, conferences, symposia, and workshops or other training activities. They can include fellowships, scholarships, and other forms of student financial aid. These activities are not intended to benefit the university or contribute to any research outcome and should only benefit the participant.

### **What type of sponsored projects may include participant support?**

Participant support costs are typically incurred for projects that include an education or outreach component. Participant support costs are allowable with prior sponsor approval, per the Uniform Guidance. These types of costs are most included in National Science Foundation (NSF) grants, such as the following programs:

- Research Experiences for Undergraduates (REU)
- Research Experiences for Teachers (RET)
- National Research Traineeship (NRT)
- Research Training Groups (RTG) in Mathematical Sciences
- Integrative Graduate Education and Research Traineeship Program (IGERT)

While NSF has historically allowed participant support costs, NIH only allows participant support costs if they are explicitly identified in the Funding Opportunity Announcement. Other Federal sponsors that may allow participant support include EPA, USDA NIFA or NRCS, NOAA, and others. Non-Federal sponsors may allow participant support costs under some circumstances.

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

### **Examples of a participant:**

- A **Student** may be an undergraduate attending a summer REU program at WPI
- **Scholars**
- A **Scientist** attending a WPI hosted conference in a strictly learning capacity
- A **Teacher** be a high school teacher attending a WPI curriculum development training
- **Private sector representatives**

**Examples of what a participant is not:**

- An employee of the university
- WPI Students in the Graduate Workers Union
- Advisory board members
- Interns who have paid appointments
- Anyone who has a deliverable or is primarily providing a service to the project
- Conference speakers or presenters
- Human subject (research participants)

**Should participant support costs be identified in the budget/budget justification?**

Yes, participant support costs must be explicitly identified in the budget and budget justification. The NSF budget form has [Line F](#) specifically for participant support costs, and they are identified in the categories listed in question below. If the budget form you are using does not have such a section, but you plan to include participant support costs, please explicitly identify any participant support costs in the budget and budget justification. Participant support costs are excluded from the MTDC base when calculating F&A costs. Identifying participant support costs will help ensure prior sponsor approval is requested and, if awarded, monitored appropriately.

**What costs may be included in participant support costs?**

- **Grant Participant Stipends:** Stipends are a set amount paid to the participant to be used in connection with training which are paid through Accounts Payable or Payroll, depending on the training program.
- **Grant Participant Travel:** Travel includes the actual costs of transportation, lodging, meals and associated expenses to and from the training location. These costs must follow sponsor guidelines as well as WPI's travel policies and guidelines. The sole purpose of the trip must be to participate in the training.
- **Grant Participant - Subsistence - Housing - ID Cards:** The cost of a participant's housing and per diem expenses (reduced accordingly if meals are provided at the meeting/conference) necessary for the individual to participate in the project are generally allowed, provided these costs are reasonable and limited to the days of attendance. Participants who live in the local area are not entitled to subsistence payments, although they may participate in meals and breaks provided at the meeting or conference. Subsistence allowances can be either a lump sum direct payment to the participant or reimbursement of actual expenses, based on WPI policies and guidelines. When paying a disbursement for subsistence at the same time as stipends, please itemize them accurately in workday for tracking.
- **Grant Participant – Supplies:** training materials or laboratory supplies that can be tied to specific participants. (This differs from conference supplies, which should be charged to the non-participant budget line)
- **Grant Participant - Tuition and Fees:** Tuition and applicable fees may be allowed on certain training programs, see project solicitation for further guidance.

- **Grant Participant - Other (Needs NSF approval - contact SPA):** if other types of expenses are required, please contact OSP/SPA to discuss allowability.

**What kind of documentation should a department keep on file for participant support costs?**

Like other award-related expenses, a department must maintain back-up documentation for all participant support costs. This includes a list of program participants and evidence of attendance of participants, such as a daily log or similar documentation.

**Is the workshop or seminar agenda also required?**

Like other award-related expenses, a department must maintain back-up documentation for all participant support costs. In addition to a list of participants, evidence of the attendance of these participants, such as an agenda or similar documentation should be kept on file.

**What type of costs cannot be included as participant support costs?**

Participant support costs do NOT include the following types of expenses:

- Costs for PI or project staff\*, such as salary and wages, fringe, or travel
- Costs for a consultant or trainer providing services to the University project or program, such as fees or travel
- Costs for a guest speaker or lecturer, such as honoraria or travel
- Conference/workshop support costs such as facility rental, catering, supplies, or media equipment rental
- Costs for collaborators, such as travel
- Human subject payments for participating in a research project

In general, costs listed above may be allowable on the non-PSC project, not the participant support project. If your area of concern is not addressed in this FAQ, please reach out to your SPA contact by department to discuss further.

\*Project staff include those individuals who are listed in the Senior/Key Person or Other Personnel sections of the project budget. These individuals generally have an employment relationship with the University and are engaged in accomplishing the project's scope of work or deliverables.

**How are catering and meals defined and are they allowable Participant Support Costs?**

It depends. Catering is not a permissible PSC expense. Food, however, if expenses are for participants only, in place of a meal per diem, are eligible to be considered PSC. It must be a budgeted cost or have received prior sponsor approval. To be considered allowable on PSC, only the participant's portion of the meal is allowable within the WPI's per person event meal limits. This can be prorated, if necessary, between the non-PSC project to include employees

working on the grant in attendance, and the PSC project for only the participants in attendance. Itemized, paid receipts are required for all reimbursement of food for Participants.

**Examples** of meals could include purchased food, such as pre-packaged box lunches, sandwiches, cheese trays, pizza, cookies, fruit, etc., purchased from a licensed restaurant and/or catering operation and served by university staff on university property. Prepared food may be delivered by the vendor or picked up at the vendor's site - An example is a PI buying lunch to be delivered from a local restaurant for a group of NSF REU students so that, over lunch, they can discuss the projects to which the students have been assigned. Meals provided by the University that are directly charged to a PSC project are in lieu of the participant receiving a per diem reimbursement or stipend. The per diem or subsistence allowance, if any, is to be correspondingly reduced.

Is Chartwell's considered a cater? Pizzas, box lunches, and small snacks are allowable to be provided by Chartwells. Catering for a function is unallowable.

**Examples** of catering may include a conference the University is hosting, where the vendor prepares, sets out, and serves the food. As noted above, this catering is not an allowable expense on PSC funds.

#### **What are some examples of what might or might not be considered participant support costs?**

Some examples that would be considered participant support costs:

- An NSF project has been awarded an REU supplement. The REU supplement will enable 5 undergraduate students from around the country to participate in a summer research project with a WPI PI. The students will be paid a stipend and provided room and board over an 8-week period. The stipends and room/board (subsistence) would be considered participant support costs.
- WPI is awarded a grant from a Federal agency to host an educational workshop in Washington, DC. Individuals (the audience is primarily postdoctoral fellows from around the country) will apply for financial support to attend the conference. The financial support will cover the costs to travel to and attend the workshop. Travel reimbursement costs, lodging/per diem during the event, and registration fees would be considered participant support costs. However, costs of hosting the event, such as room rental, AV equipment rental, or catering, would not be allowable as participant support costs and would need to be charged to the non-PSC project.
- WPI receives an award from the NSF that includes an REU component. The REU component allows the PI's lab to support WPI undergraduate students during the academic year over the course of the three-year grant. The students will be mentored and will assist with various research projects, e.g., media preparation, plant tissue culture, cloning, and mutant analysis. The student stipends would be considered participant support costs. Undergraduate student stipend payments require special treatment and should not be paid as student hourly wages through Payroll.

- NSF provides an award to WPI that includes a RET activity. The PI will host a teacher over the course of the summer who will gain research experience, and then use that knowledge to develop educational materials and activities. The teacher will pilot the activities with students and present the materials at regional conferences with fellow teachers. The teacher's summer stipend, supplies for the activities, and travel to regional conferences would be considered participant support costs.
- A Federal agency provides an award to WPI to train teams of classroom educators and community members from around the state. The teams of educators and community members will then engage local youth in community-based science and service-learning projects. The workshops to train classroom educators and community members take place over the summer. The costs associated with the workshops that enable the individuals to attend, including stipends, transportation, and lodging, are participant support costs.

Some examples that would not be considered participant support costs:

- WPI is part of a scientific collaboration involving PIs from five different institutions. The WPI PI hosts a meeting with their Co-PIs and other scientists to discuss project progress. Collaborators must travel to WPI to attend the meeting. The costs for this meeting of scientific collaborators to discuss the project would not be considered participant support costs.
- As part of a conference grant, a WPI PI invites an expert in the field to talk about recent discoveries that were featured in a prominent scientific journal. To support the expert's attendance, the grant provides an honorarium of \$2,000. The honorarium for the speaker would not be considered a participant support cost.
- Students are participating in a focus group testing a new product, an example could be an iPad or Iphone. The student is providing their feedback. This is NOT a participant support, it would be a human subjects payment for providing benefit to WPI.

**Is rebudgeting of participant support costs allowed during the life of the award? How do you go about rebudgeting?**

Rebudgeting may be allowed, but in almost all cases requires prior approval from the sponsor. Rebudgeting requests should be processed during the life of the award by submitting a [Post-Award Action Form](#) to WPI Office of Sponsored Projects. More information is available below.

- a. Can I rebudget funds from a PSC project to a non-PSC project within the award after an award has been received?  
Maybe. Generally, it is not allowable to rebudget from the participant support costs category into other budget categories unless prior written approval has been obtained from the sponsor. If approval is obtained from the sponsor and funds are moved from participant support costs into other budget categories, F&A costs will be applied to the rebudgeted funds as appropriate.
- b. Can I rebudget funds from the non-PSC project into a PSC project?  
If a participant support project were approved as part of the original award, then funds

could be rebudgeted from the non-PSC project in accordance with the terms and conditions of the award. If the award did not already include a participant support project, then adding a participant support component to the award would need the sponsor's prior approval.

- c. If participant support costs were not included in the original award, can I add a participant support component to my project?

Maybe. Adding a participant support component to the project will need prior approval from the sponsor. With the sponsor's approval, one option to fund this new component would be to rebudget unused funds into participant support costs. WPI OSP can assist with submitting a prior approval request to rebudget funds for this purpose. The other option would be for the PI to request a supplement for participant support costs. A supplemental proposal would need to be submitted, but discuss with your program officer first. If approval were obtained for participant support costs, WPI would set up a new project under the award in order to separately account for these costs and apply a 0% F&A rate as required by the Uniform Guidance.

- d. Can I rebudget funds within the different participant support cost categories?

Generally speaking, rebudgeting within different participant support cost categories is allowable. An exception would be for NSF awards. If the intent were to rebudget funds into the "Other" category, that action may need agency prior approval. Given that NSF closely scrutinizes costs in the "Other" category, please contact your SPA contact with questions.

- e. How would I make a prior approval request?

Please work with your OSP contact to submit a prior approval request to the sponsor; you may need to submit a rebudgeting request according to sponsor requirements. Note that NSF prior approval requests must be initiated by the PI in Research.gov.

**Are payments to research human subjects/participants considered participant support costs?**

No. A payment to an individual who agrees to participate as a human subject in a research project is not a participant support cost and should be budgeted as Other Direct Costs in the project proposal. If a person who receives PSC (e.g. a conference participant) is ALSO participating in human subjects' research, any incentive payments must be budgeted separately. EXAMPLE: As part of an REU program, the PI wants to conduct a program evaluation, the results of which may be published. Fellows may be entitled to receive an additional payment as compensation for being interviewed, in addition to their stipend and housing allowance. This payment for providing information that benefits WPI cannot be PSC because it is a payment for participating in research.

Participant Support Costs vs. Human Subject Payments

	<b>Participant Support Costs</b>	<b>Human Subject Payments</b>
Supports non-employees while participating in sponsored project funded conferences, workshop, and training activities	X	
Provides compensation or incentives (such as cash or gift card) to individuals serving as subjects in research studies		X
Requires prior approval from awarding agency	X	X
Requires an approved IRB Protocol		X
Expenditures will incur Indirect Costs		X
Separate ledger account will be used in Workday	X	
Employees may participate or receive payment		X