## Worcester Polytechnic Institute

**Procedure Title:** Participant Support Costs Procedure

### **Purpose**

The purpose of this procedure is to document the University's established practices and to comply with federal regulations in order to ensure that funds provided for participant costs are expended for appropriate and intended objectives.

### **Background**

Participant support is provided by a number of federal, state and private agencies, as well as other sponsors. In general, participants or trainees (but not employees) are the recipients of service or training provided at a workshop, conference, seminar, symposium, or other short-term instructional or information sharing activity. Participant support costs do not include incentive payments made to human subjects. Participants may include students, national scholars and scientists, private sector representatives, agency personnel, teachers, and others, who attend and participate in the conference, workshop or training activity. Participant support costs are excluded from the modified total direct cost base (2 CFR §200.68) therefore F&A is not assessed on participant support costs.

Participant support costs are defined by 2 CFR §200.75 as 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. [Stipends, are defined in this procedure, as a payment made to an individual to provide for the participant's expenses during the period of the training or other activities. A stipend is not considered compensation for services normally expected of an employee.]

#### **Procedure**

The Principal Investigator (PI) must clearly request and justify participant support costs in proposal budgets and be aware of and ensure budgets adhere to sponsor policy. As referenced in the National Institutes of Health (NIH) Grants Policy Statement, participant support costs are only allowable when identified in the specific Funding Opportunity Announcement (FOA). Additionally, as referenced in the National Science Foundation (NSF) Proposal and Award Policies and Procedures Guide any additional categories of participant support costs other than those described in 2 CFR § 200.75 (such as gifts, souvenirs, t-shirts and memorabilia), must be justified in the budget justification, and such costs will be closely scrutinized by NSF.

Per federal regulations, participant support may not be re-budgeted without written approval from the sponsor.

The PI is responsible for documenting participant and non-participant attendance at meetings and other events by maintaining an attendee lists that supports the proper allocation of costs. For meetings or events that span multiple days, a daily record of attendance should be maintained. In the case of an individual who would not normally be considered a participant, PIs should document the justification for

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including the individual as a participant support cost. PIs are encouraged to name and/or report on the number of participants in technical reports.

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