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## Participant Support Policy & Procedures

- I. **POLICY STATEMENT** – Some extramural sponsors of research projects include a category in their budget forms called participant support costs. The purpose of this policy is to define participant support costs and to provide information to principal investigators (PIs) on the processes used at the University of Massachusetts Boston (UMB) for the payment of participant support costs.
- II. **SCOPE** – All UMB personnel must be aware of the complex and detailed rules provided under Federal, State regulations, as well as terms and conditions of individual sponsored activities.
- III. **POLICY** – Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific policies. This is applicable to building proposal budgets, negotiating sponsored projects, setting up sponsored projects, as well as initiating, approving, invoicing and reporting costs.

### **What are participant support costs?**

If a grant supports a conference, meeting, workshop, seminar, symposium, or training program, then the direct costs associated with an individual's participation in these activities may be allowed under the sponsoring agency's program guidelines as participant support costs. A number of grants awarded by Federal Agencies allow budgeting for these costs.

This budget category is not used to request funds to pay for the costs of the project staff to travel to a conference, the costs of bringing collaborators together in one location to work on a project, or the costs of the PI to attend a seminar. These payments are not to be confused with payments made to research subjects as an incentive for recruitment and participation in a research project. Students and project staff members who are participating in a grant-funded training program and who are receiving compensation directly or indirectly from the grant typically cannot also be reimbursed for participant support costs. Moreover, in the case of federal grants, individuals may not be reimbursed for participant support costs if they are receiving compensation from any other federal government source while participating in the project.

### **Who is a participant?**

A participant is defined as a non-UMB 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 to the university and they are not subject to UMB Human Resources policies (e.g., they cannot be terminated for failure to perform). Participants may include students, scholars, and scientists from other institutions, representatives of private sector companies, teachers, and state or local government agency personnel. A person classified as an intern would be paid as an employee and not as a participant, because the intern, while receiving certain training, is also providing services to the university, to the grant sponsor, or to a third party (e.g., counseling students at a local public schools).

### **What costs can be included in participant support costs?**

Participant support costs include the direct costs for items such as the following:

- *Stipend* - A stipend is a set amount of money to be paid directly to the participant. Certain agencies of the federal government specifically restrict participant stipends. The professional staff in the Office of Research and Sponsored Programs (ORSP) will assist the PI to determine if the sponsoring agency for a particular project restricts the stipend to be paid to a participant.
- *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 UMB policies and guidelines. The sole purpose of the trip must be to participate in the project activity. If a training activity involves field trips, the costs of transportation of participants may be allowable.
- *Subsistence allowance* - The cost of a participant's housing and per diem board 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 they may participate in meals and snacks provided at the meeting or conference, participants who live in the local area are not entitled to subsistence payments.
- *Fees* - The fees paid by a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. These fees may include laboratory fees, passport or visa fees for foreign participants, and registration fees. A sponsor may also allow the costs of any UMB tuition and fee charges that are required to be paid for the individual to participate in the training project.
- *Other* - Certain other costs borne by the participant may be allowable, including training materials, laboratory supplies, and insurance.

All costs that are reimbursed to or paid on behalf of participants must be incurred within the project period and specifically allowed by the sponsoring agency. Participant support costs are budgeted in a separate line and must be accounted for separately. Funds provided for participant support costs that are not spent cannot be rebudgeted for use in other categories except with the prior written approval of the sponsor. In most cases, unspent participant support costs must be returned to the sponsor.

Participant support costs do not include the following types of payments:

- Honoraria paid to a guest speaker or lecturer;
- Conference support costs such as facility rentals, media equipment rentals, or conference food;
- Subaward to a provider for multiple training events (i.e. an ongoing contract with specific terms and conditions); and/or
- Agreements with employers (e.g., public school system) to reimburse the employer for

the costs related to sending its employee to a conference or workshop.

It is recommended that the PI inform participants prior to the initiation of the project about any costs associated with their participation in the project that are not covered.

**Are incentive payments to research subjects considered participant support costs?**

An incentive payment to encourage an individual to participate as a human subject in a research study is not a participant cost and must be budgeted differently in the project proposal.

**Can participant support costs be included in a subcontract with another institution?**

If a PI will collaborate with colleagues at another institution to have UMB serve as a subcontractor to provide training services to participants, then participant support costs can be included in the subcontract with the collaborating institution. A subcontract proposal must be prepared and routed with appropriate approvals to ORSP for submission to the prime contractor. In all cases, the guidelines concerning participant support costs from the original funding agency (i.e., the sponsor of the project, not the collaborating institution) must be followed.

**Can participant support costs be included as direct costs for the calculation of F&A cost recovery?**

The Uniform Guidance states that participant support costs are exempt from F&A on federally sponsored projects. For Non-Federal awards, sponsor-specific and/or award-specific guidelines should be reviewed at the time of proposal to determine if F&A is allowable.

**How are participant support costs paid and accounted for at UMB?**

When the proposal is developed for a sponsored program that includes the payment of participant support costs, the ORSP staff will segregate those costs in a separate budget line and as a separate project. A grant award that includes participant support costs will be established by the ORSP staff and the determination of F&A cost recovery on these costs will be made at that time. All expenditures made against this budget category will be identified as participant support costs in the financial reports provided to the sponsor.

**What documentation should be retained for participant support costs?**

Documentation must be retained when managing participant support costs and may vary based on scope of work or revisions to the award (prior approval or rebudget requests). Programmatic documentation should be retained in the local unit.

At a minimum, programmatic documentation should include:

- Sign-in sheets for participant attendance at workshops;
- Documentation on supplies that are ordered or distributed to participants and how they support the participant in the project activity;
- List of participants the materials are for; and
- Support for allocating costs as “other” or “fees”.

Please note that some sponsors, such as NSF, will explicitly list participant support costs in the notice of award budget. Other sponsors may not be as explicit. Therefore, it is crucial to maintain all communication and other documentation that would support the inclusion of

participant support costs on the award. Procuring these documents and providing context in cases of audit or review is largely the responsibility of the PI/department. Maintaining such documentation at the department level is important to compensate for portfolio changes and employee turnover.

## IV. RELATED DOCUMENTS

## V. ACRONYMS AND DEFINITIONS:

**Participant Support** is for the support of students or trainees (non-employees) receiving training or attending a conference or workshop.

**Sponsored Projects** are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, State regulation, and UMB policy. Sponsored activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service and other activities.

**Sponsor-specific Requirements** include requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

**VI. STANDARD OPERATING PROCEDURE** – When preparing a proposal, negotiating and setting up a sponsored project, incurring and approving expenses, and invoicing and reporting, UMB personnel must be aware of and conform to the complex and detailed rules surrounding participant support.

1. PIs/Units are strongly encouraged to review the funding opportunity and sponsor requirements to determine whether participant support costs can be included in the project budget as direct costs and whether F&A costs can be recovered. Uniform Guidance states that participant support costs are exempt from F&A on federally sponsored projects. For Non-Federal awards, sponsor-specific and/or award-specific guidelines should be reviewed at the time of proposal to determine if F&A is allowable.
2. PIs/Units should review this policy and identify which Participant Support expenses are appropriate, estimate the dollar amount needed, and clearly identify Participant Support in the Budget and Budget Justification. Participant Support is usually contained in a unique budget line item of the budget and justification.
3. PIs/Units alert ORSP of the inclusion of Participant Support to ensure ORSP's review/approval.
4. ORSP will review and update the PI/Unit if any changes are needed.
5. If/when the award is received, Participant Support will be segregated at the budget/expense level to ensure funds are used appropriately.
6. Participant support costs are restricted to that purpose. Funds not spent on participant support cannot be rebudgeted for use in other categories except with the prior written



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approval of the sponsor. The sponsor may require the return of unspent participant support costs.

7. To make participant support payments to an individual, the PI should prepare and submit disbursement vouchers to ORSP for review and approval. Checks will be made payable to the participant and mailed directly to the participant's mailing address (P.O. boxes are not acceptable).
8. Each UMB PI and/or authorized unit designee is responsible to monitor expenditure appropriateness throughout the life cycle of the grant.

## VII. COMPLIANCE –

- [Uniform Guidance 2 CFR 200.75](#)
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- [National Science Foundation \(NSF\) PAPPG](#)
- [National Institutes of Health \(NIH\)](#) – 7.9 Allowability of Costs/Activities; 7.9.1 Selected Items of Cost
- [National Aeronautics and Space Agency \(NASA\)](#) Guidebook for Proposers
- [Office of Naval Research \(ONR\)](#) Research Grant Terms and Conditions