Contract & Grant Accounting Policy 6 Participant Support Costs

The University of North Carolina at Greensboro

Approved by Steve Honeycutt, Interim AVC for Finance, July 1, 2021

Revised July 1, 2021

1. **Purpose**

Sponsored projects may include funding to enable or encourage individuals to attend conferences, training programs or other sponsored activities without undue financial burden. The expenses for these experiences are covered by participant support costs in the sponsored project budget. This policy will offer guidance to comply with federal regulations, ensuring that funds provided for participant costs are separately accounted for, and expended for appropriate and intended objectives.

2. **Scope**

This policy applies to all University faculty, departments, units, and divisions with external sponsored funding.

3. **Definitions and Roles and Responsibilities**

3.1 **Definitions**

**Participant support costs** – “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.” 2

**Participant** – a non-UNCG 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 other than meeting the program requirements and they are not subject to UNCG human resources policies.

Participants may include:

- Students, scholars, and scientists from other institutions
- Representatives of private sector companies
- Teachers
- State or local government agency personnel
Participants 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

3.2 Roles and Responsibilities

The Principal Investigator (PI), PI’s project staff, and the PI’s department are responsible for:

- Reviewing award documents at setup to determine if this issue is applicable to their project. Information concerning Participant Support Costs will be covered during the New Award Meeting and in the Award Activation Letter
- Monitoring expenditures for appropriateness throughout the life of the grant
- Familiarity with the specific requirements set forth by the sponsor and are expected to ensure compliance with those requirements

Documenting and retaining the required records detailing:

- Criteria by which participants in the program are selected
- Copies of applications of selected participants, including documentation as to how they meet the selection criteria
- List of program participants and documentation of their participation in the program

Contract & Grant Accounting is responsible for:

- Establishing a separate fund or loading budget on a separate account line to ensure compliance with re-budgeting requests, financial reporting, and accurate charging of Financial and Administrative (F&A) Costs
- Reviewing any re-budgeting requests for participant support costs and submitting to the sponsor if appropriate
- Review of participant support costs at closeout and work with department to adjust for any discrepancies

4. Policy

Participant support costs (as defined in 2 CFR 200.75) 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. Participant support costs may not be paid to trainees who are receiving
compensation either directly or indirectly from other federal sources while participating in the project.

Participant support costs are allowable with the prior approval of the awarding agency. Participant support costs need to be a part of the funding opportunity or agency rules and be specifically included in the proposal. Conditions or constraints for re-budgeting awarded participant support costs vary and are specific to the awarding agency. Any re-budgeting which changes scope of the award must have agency approval. The addition of a participant program, not previously awarded, is considered a change in scope, and will require agency approval.

Use of a separate fund or account is required for participant support costs to ensure compliance with re-budgeting requests, financial reporting, and accurate charging of F&A costs.

**Participant support costs include expenditures for items such as the following:**

- **A stipend**, a set amount of money to be paid directly to the participant in connection with a short-term training activity. Note that short-term means the appointment period approved by the sponsor.

- **Travel**, which includes the costs of transportation and related associated costs. These travel costs must follow both the sponsor guidelines (e.g., US flag carrier, coach class, most direct route), and UNCG’s travel 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 cost of transportation for these field trips for participants may also be allowable.

- **Subsistence allowance**, or the costs of a participant’s housing and per diem expenses necessary for the individual to participate in the project, provided these expenses 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, costs directly associated with attending** meetings, conferences, symposia, or training projects. These fees may include laboratory fees, passport or visa fees for foreign participants, and registration fees.

- **Other** costs not listed above should be specifically allowable per the funding solicitation and identified in the approved sponsor budget. These costs are paid on behalf of the participant and should be required for their involvement, including training materials, laboratory supplies, and certain types of insurance directly related to attendance.
Participant support costs do not include the following types of expenses:

- **Honoraria** paid to a guest speaker or lecturer
- **Service or independent contractor agreements**
- **Conference support costs** such as facility rentals, media equipment rentals, or conference food
- Expenses for project personnel or collaborators to attend meetings, conferences, or seminars including meetings to discuss a research project’s progress or direction. These type expenses should be budgeted and paid under travel as allowed by sponsor.
- Payments to participants in human subject research studies
- Incentives, memorabilia, or gifts
- Payments to the providers of the training

5. **Compliance and Enforcement**

Contract & Grant Accounting is responsible for ensuring compliance with this policy.

6. **Additional Information**

6.1 **Supporting Documents**

- § 200.75 Participant support costs
- Proposal Guide – G. (v)
- 2 CFR 200.75
- Contract and Grant Accounting Procedure 6P Participant Support Costs

6.2 **Approval Authority**

This policy will be approved by the Interim Associate Vice Chancellor for Finance.

6.3 **Contacts for Additional Information and Reporting**

- Responsible Executive: William Walters, Director, Contract and Grant Accounting, 336-334-5824, wdwalter@uncg.edu