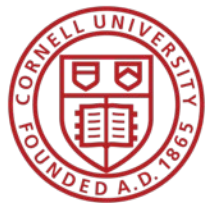




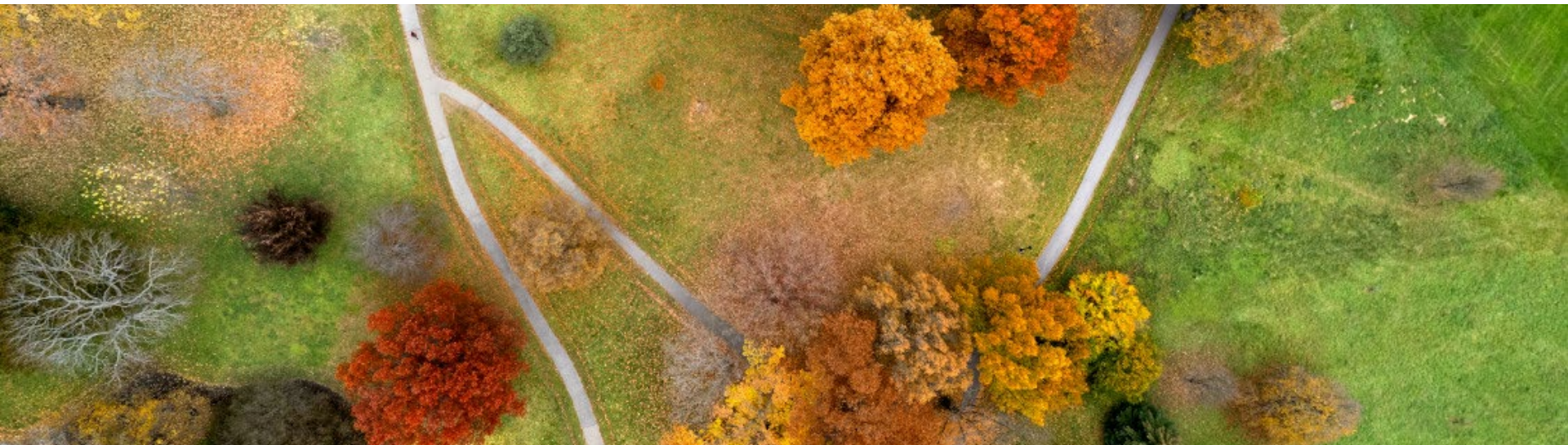
Participant Support Costs

Sponsored Financial Services





General Overview



Participant support costs

- 2 CFR 200.1 “*Participant support costs* means direct costs that support participants (see definition for Participant in §200.1) and their involvement in a Federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.”
- 200.456: Are allowable costs. “The classification of items as participant support costs must be documented in the recipient’s or subrecipient’s written policies and procedures and treated consistently across all Federal awards.”
- Participant support costs (PSC) are excluded from the Modified Total Direct Cost (MTDC) base, also defined in 2 CFR 200.1.
- These are costs that support participation (travel, subsistence, lodging, registration) for the supported activity not the program in which they participate.

2 CFR 200.1 Participant

“*Participant* generally means an individual participating in or attending program activities under a Federal award, such as trainings or conferences, but who is not responsible for implementation of the Federal award. Individuals committing effort to the development or delivery of program activities under a Federal award (such as consultants, project personnel, or staff members for a recipient or subrecipient) are not participants. Examples of participants may include community members participating in a community outreach program, members of the public whose perspectives or input are sought as part of a program, students, or conference attendees.”

Who is a participant?

- A participant is defined as a 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.).
- Individuals committing effort to the development or delivery of program activities are not participants.

Who is a participant?

- A participant may be:
 - Students
 - Scholars
 - Scientists
 - Teachers
 - Private sector representatives

Who is **not** a participant?

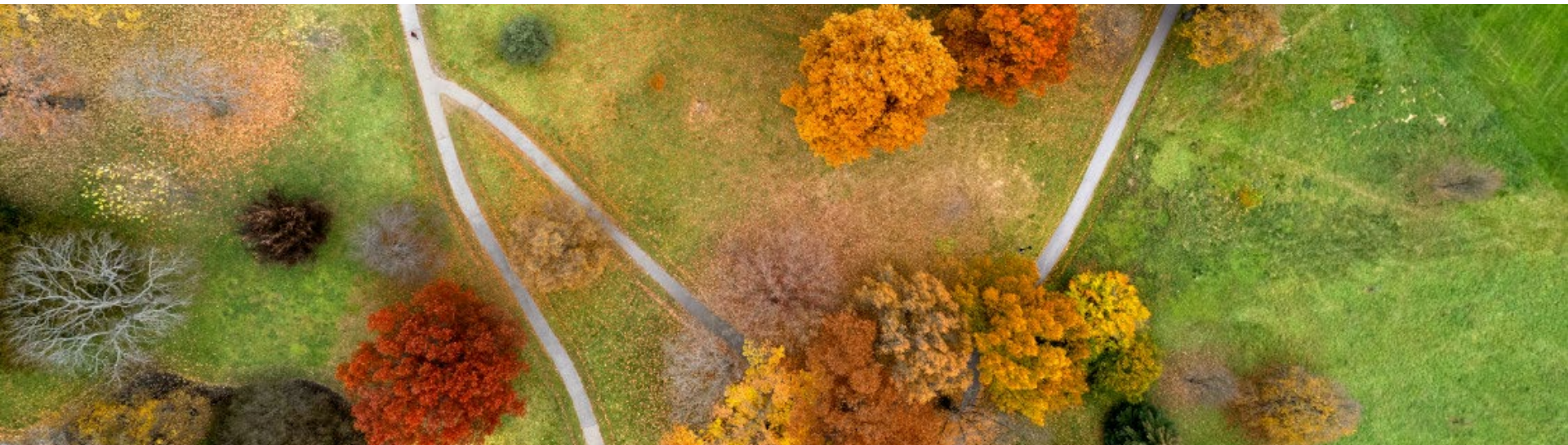
- A participant cannot be:
 - Advisory board members
 - Anyone who has a deliverable or is primarily providing a service to the project
 - Generally, not pre- or post-docs (because these are not “short-term” activities and often require services)
- Human participant (human subject) related to research is an individual participating as a subject in a research activity
 - This is a different use of the word “participant”
 - Incentive payments to encourage individuals to participate in research study and provide private data/information through intervention or interaction. This includes participation in surveys and interviews.

Participant Support Costs (PSC)

- Examples of Federal Agency treatment of participant support costs:
 - National Science Foundation (NSF) Grant General Conditions (GC-1) grants approval only for the categories specifically listed in §200.1
 - National Institutes of Health (NIH) Grants Policy Statement (GPS) states “only allowable when identified in specific FOAs [Funding Opportunity Announcement]”



Participant Support Costs (PSCs)



Participant Support Cost Categories

- Stipend
- Subsistence
- Travel
- Fees
- Other

Stipend

- A set amount of money to be paid directly to the participant. Conditions for receiving a stipend should be in writing and program completion attested to by the project Principal Investigator (PI). Granting agencies may have specific guidelines for participant stipends.
 - Use Kuali Financial System (KFS) object code 9096

Subsistence allowance

- The cost of housing and meal 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 participants who live in the local area are not entitled to subsistence payments or per diem, they may participate in meals and refreshments provided at the meeting or conference.
 - Use KFS object code 9096 (or 9093 if interdepartmental)
 - Research Experiences for Undergraduate (REU) students are entitled to subsistence support even if local.
 - Care should be taken not to duplicate support for individuals covered by other federal sources of funding (e.g. a GRA should not be receiving a stipend for attendance).

Travel

- Travel includes the costs of transportation and associated costs and must follow sponsor rules (e.g., Fly America Act, coach class, most direct route) as well as university policies and guidelines.
- The sole purpose of the trip must be to participate in the training activity.
- If a training activity involves additional field trips, the costs of that transportation of participants may be allowable.
 - Use KFS object code 9097 (or 9093 if interdepartmental)
 - Field trips for recreational purpose are not permitted.

Fees and Other

- Fees: Costs directly associated with attending conferences, symposia, or training projects. Such costs include conference registration, summer campus registration or similar fees.
 - Use KFS object code 9098 (or 9093 if interdepartmental)
- Other: Certain other costs may also be allowable if consistent with university policy and practice and specified in the proposal approved by sponsor upon review. Training supplies required for the participant and training program.
 - **Must be identified in proposal and approved**
 - Use KFS object code 9099 (or 9093 if interdepartmental)

PSCs awarded:

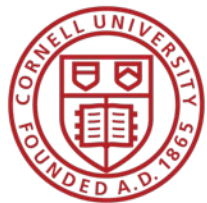
Funds are requested to support two undergraduate student researchers during Year 1, to each work full-time for the 10 weeks of the summer session. The stipend is set equal to that provided for the other Research Experience for Undergraduate (REU) programs on campus.

Budgeted Cost: Total for 2 REU students:

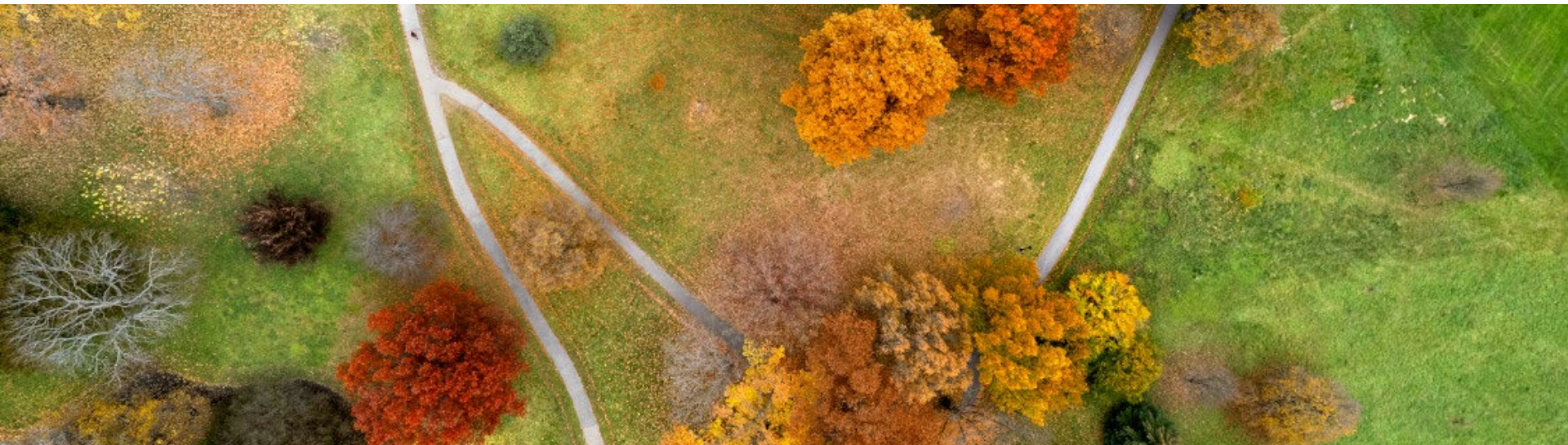
Stipend	\$5,600
Housing	2,402
Subsistence	520
Travel	<u>500</u>
Total per student	<u>\$9,022</u>
Total for 2 students	\$18,044

Travel costs budgeted are to cover travel to/from Cornell University from the students' home institution. Domestic travel costs are based on current average round-trip airfare on domestic air carriers.

F. Participant Support Costs	
Participant Support Costs Stipends	\$11,200
Participant Support Costs Travel	\$1,000
Participant Support Costs Subsistence	\$5,844
Participant Support Costs Other	\$0
Total Number of Participants	2.00
<i>Total Participant Costs (F)</i>	\$18,044



Managing Costs (PSCs)



Managing PSCs

- Federal agencies vary in their requirements for management of PSCs.
- Because participants do not provide services to a project it is not necessarily clear how they benefit the award. Therefore, PSCs need to be part of the funding opportunity or agency rules.
- Conditions or constraints for rebudgeting awarded participant support funds vary and are specific to the awarding agency.
 - Prior approval is generally required to shift budget from participant support.
 - Any rebudgeting which changes the scope of the award must have agency approval, even if rebudgeting authority has been assigned to the grantee.
- Adding a participant training element to a project after execution of the agreement is likely a change in scope requiring prior approval

Accounting of PSCs

- To assist with compliance and reporting, there are specific object codes for PSCs, which are standard modifiers and exempt from indirect costs. Using these codes enables proper management of the costs and allows the exclusion of these expenses from the indirect cost base.
 - 6915 Participant Support Cost Budget
 - 9096 Subsistence/stipend
 - 9097 Travel
 - 9098 Fees
 - 9099 Other
 - 9093 Interdepartmental Expense

Payments Associated with Participant Support

- All expenses must be consistent with university Business Expense Policy
- Direct payments for stipend or subsistence are processed on a Disbursement Voucher.
 - Questions related to processing payments can be directed to your appropriate service center
- Interdepartmental billings may be appropriate and should utilize the appropriate interdepartmental PSC object code.
- A subaward to a collaborating institution may include funding for participant support activity. (e.g., REU funds)
 - It is expected that PSC are segregated and reported on the subaward invoice.

Payments Associated with Participant Support

- Buying Manual:
 - Prohibits certain transactions from payment on PCARD or T&M Card
- Procurement Card (PCARD)
 - <https://finance.cornell.edu/procurement/buyers/credit-cards/procurement-card>
- Travel and Meal Card: (T&M Card)
 - **Business travel expenses for other university travelers** other than employees, including students, authorized incoming guests.
 - <https://finance.cornell.edu/travel/paying-expenses/travel-meal-card>

Substantiation of PSCs

- Proposal development
 - Document all categories, rates
 - Enumerate meals and/or breaks
 - Ensure that only allowable and defined participant costs are included in this category
- Program initiation
 - Selection criteria and attendee information
 - Program limitation (e.g. citizenship, educational status)

Substantiation of PSCs

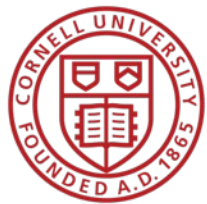
- Stipend/Subsistence:
 - Written agreement prior to program specifically stating the stipend amount.
 - Stipend rates must be documented, reasonable, consistently applied, and pro-rated where appropriate
 - Subsistence allowances to support housing/meals must be documented, reasonable, consistently applied, and pro-rated where appropriate
 - Do not request receipts when individuals are paid a per-diem
- Travel:
 - Reimbursements require the submission of receipts
 - Per Diem [GSA.gov rates]

Documentation

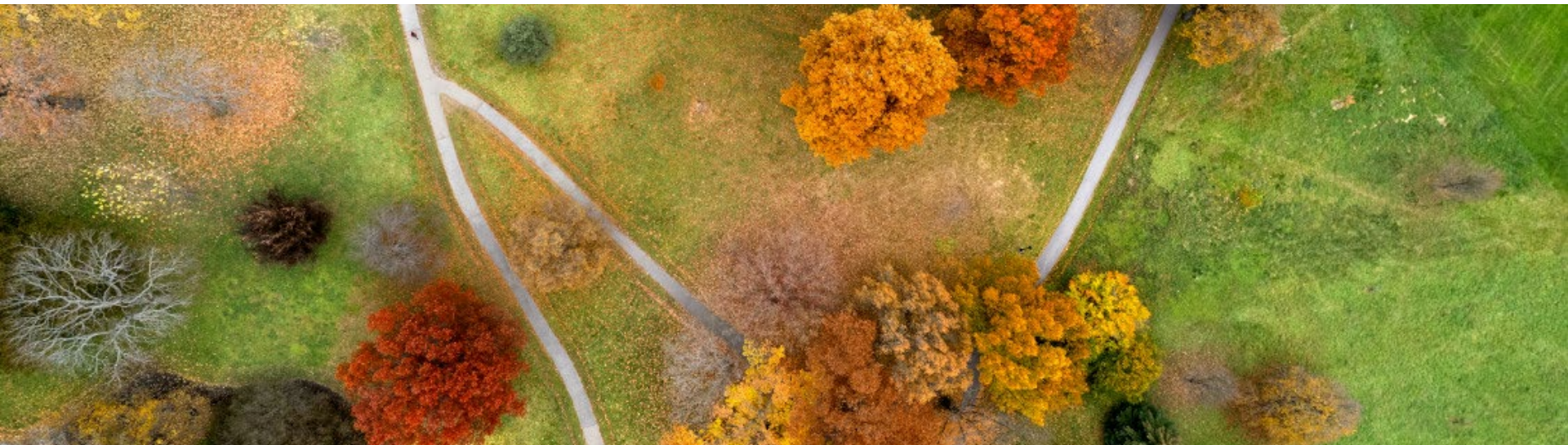
- Participants receiving support should receive a letter outlining the program, requirements for attendance, support provided
- Program completion
 - Documentation is required indicating successful program completion.
 - Classes or workshops require records indicating program attendance.

Documentation: Payment

- The documentation may also be used to support the payment to the individual
 - Disbursement Voucher Payment Reason
 - Stipend/Subsistence
 - Travel payment
- A request to process the payment should indicate the type of payment and indicate whether it is an allowance or reimbursement



Considerations (Other)



Does the Project Include Participant Support (Hints)

- What is the funding opportunity type? What type of project is supported?
 - Participant costs are generally not included on research awards, and more common on conference and training awards
 - The solicitation will have additional guidance.
- Look for consistency within the project.
 - An individual will not be a Graduate Research Assistant and a participant on the same award.

Proper Coding

- Proper coding of the transaction is important:
 - Tax implications: reimbursement of expense vs stipend/allowance
 - Payment Type: Stipend vs Reimbursement
 - Indirect Cost Assessment:
 - Excluded from Modified Total Indirect Costs (MTDC)
 - Not excluded from projects assessed as Total Direct Costs (TDC)
 - University costing analyses related to indirect costs assessed
 - Proper allocation of costs and research base exclusions

What is not a Participant Support Cost

- Conference support costs such as facility and audio/visual equipment rental
- Catering costs
- Some agencies, especially, National Science Foundation (NSF) do not consider payments to caterers, even at conferences, a participant support costs. These costs, where reasonable, necessary, and allowable should be budgeted as a service and clearly identified in the proposal
 - Alcohol is not allowable on a federal award

What is not a Participant Support Cost

- Not all ‘stipend’ support is related to a participant training expense
- Generally: costs that cannot be specifically identified to a participant are not participant costs
- Guest speaker or lecturer fees
- Incentives (prizes), memorabilia or gifts for participants [Promotional items]
- In-house meals or coffee breaks
- Employee compensation and expenses (Note: Exception for employee meals- they are allowable where provided to all attendees of a sponsored conference.)

What is not a Participant Support Cost

- Stipend for advisory committee members
- Payment for services/supplies
 - Providing compensation for supplies that will be used in a program/study
- Support for farm trials
- Payment to an entity/independent contractor specifically for:
 - Collaboration and services rendered
 - Payment for services
- Competition prizes
- Human Participant (Subject) Fees
 - Institutional Review Board (IRB)
 - IRB protocol exemption is still human subject fee

What is not a Participant Support Cost

- Payments not associated with the project's proposed/defined training program. These expenses may require approval from the sponsor.
 - **9092** Subsistence, Intern: Non-compensatory payments to support subsistence expenses to enable an individual's participation in a Cornell internship program. Individual for whom payments are made under this code should be appointed as an unpaid Intern in Workday.
 - **9095** Subsistence, Academic Visit: Non-compensatory payments to support subsistence exp for academic visitors. Normally visitors will hold an unpaid HR appointment in an academic title (e.g. Visiting Fellow, Visiting Scientist). Not to be used for employees or where delivery of service is required (Example for use: Allowances for visiting scientists)

Complications of Participant Support Activity

- Can a person be both a speaker and a participant?
 - Yes, if consistent with treatment of other participants
- What about workshops where everyone is a participant – including faculty members – and no one is a speaker?
 - Likely to be participants (but watch for employees)
- Can a research award also have a conference or training component with participants?
 - Yes, but should be discretely identified in scope of work. It is not simply attending a conference, nor a student working in a lab. PSCs are normally directly associated with a training / participation goal.
- Generally, if there are questions on treatment of participant support costs, feel free to reach out to Sponsored Financial Services – sfs-help@cornell.edu

National Science Foundation FAQ:

May I include conference speaker fees in the participant support costs section of the budget?

- No, the participant support category is for the support of participants or trainees only. Speakers and trainers are not considered participants and should not be included in this section of the budget.

National Science Foundation FAQ:

Are costs such as room rental fees, catering, supplies, etc. considered participant support costs?

- No, the participant support cost line in the NSF budget should not be used for such costs.

National Science Foundation FAQ:

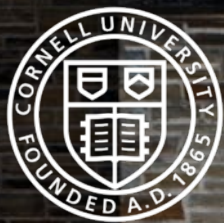
May human subjects that are being paid as survey takers be considered participants?

- No, the participant support section of the budget may not be used to provide incentive payments to research subjects.
- Human subject payments should be included on line G6 of the NSF budget under “Other Direct Costs,” and indirect costs should be calculated on the payments in accordance with the organization’s federally negotiated indirect cost rate.

Questions

- There are many resources available if there are questions.
 - Refer to Agreement Terms & Conditions
 - University Policy 3.14 – Business Expense
 - Buying Manual

- Contact:
 - Sponsored Financial Services (Post-award financial)
sfs-help@cornell.edu



Thank You!

