

Policy on Participant Support: 10/9/2024

Background

Some contract and grant sponsors include a budget category called "participant support costs" which are defined 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 meetings, conferences, symposia, or training projects. These costs are allowable with the prior approval of the awarding agency.

Who is a 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 of 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. (See definition for *Participant* in [§ 200.1](#))

A participant is **not** an employee of Wellesley College or a research subject receiving incentive payments.

A participant does not perform work or services for the project or program other than for their own benefit. The participant is not required to deliver anything or provide any service to the College in return for these support costs.

What are Participant Support Costs?

Participant support costs mean direct costs that support participants 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.

Participant support costs are direct costs for items such as participant allowance, supplies, per diem, travel expenses, and/or registration fees paid to or on behalf of a participant in connection with a meeting, workshop, conference, symposium or training project conducted under the award. Amounts must be reasonable, based on type and duration of the activity, and outlined in the program solicitation.

Participant support costs may include the following expenses:

- Event registration fees
- Stipend (predetermined amount regardless of actual costs) for housing and subsistence allowance
- Travel costs when the sole purpose of the trip is to participate in the project activity
- Event support costs for lodging and food expenses paid directly to the event facility, only if the payment is made on behalf of, or reimbursed directly to, the participant
- Meals and incidentals when on travel status
- Training materials

All costs that are reimbursed or paid on behalf of the participant must be incurred within the project period and be 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 re-budgeted for use in other categories except with the prior written approval of the sponsor. In most cases, unspent participant support funds must be returned to the sponsor. As always, read your award document, along with any applicable terms and conditions or agency specific regulations, for guidance on rebudgeting Participant Support funds.

The following expenses, except when specifically allowed by the award, should **not** be processed as participant support costs:

- Travel for project PI or staff
- Multi-purpose travel (i.e., to perform research in addition to attending a project related meeting)
- Travel for a consultant who is providing service to the university
- Event support cost (i.e., facility rentals, media equipment rentals, food/refreshments)
- Entertainment/food for non-participants
- Honoraria paid to a guest speaker or lecturer
- Incentive payment to encourage an individual to participate as a research subject
- Subaward to a provider for multiple training events (i.e., an ongoing contract with specific terms and conditions)
- Payments to a participant's employer for reimburse for the costs related to sending the employee to the project event.
- Expenses related to meetings of an administrative nature

Recommended Documentation

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 re-budget requests).

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
- Support for allocating costs as “other” or “fees”