Lehigh University Policy

PARTICIPANT SUPPORT COSTS

PURPOSE
Federal and non-federal agencies provide support for a variety of sponsored projects, including research, training and public service. When an agency funds a project whose aim is to sponsor outreach programs to bring experts together to discuss research or education findings or to expose other researchers or students to new research and education techniques. To cover the associated costs, the sponsor may include a category of expenses generally referred to as participant support costs. Specifically, participant support costs as defined in the Uniform Guidance (2 CFR200.75) 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.” This policy sets forth the particular requirements that apply to participant support costs.

APPLICABILITY
This policy applies to all sponsored programs (federal, state, industry and private) and all principal investigators, co-principal investigators, senior personnel, faculty and administrators who are seeking to obtain external funding for participant support costs.

DEFINITIONS
Participant Support Costs are those costs paid to, or on behalf of, participants or trainees (but not employees) in meetings, conferences, symposia, and workshops, when there is a category for Participant Support Costs in the award budget. Participant Support Costs may include registration fees, travel allowances, manuals and supplies, tuition, stipends and other costs associated with supporting the cost of attendance at these events. Participant Support Costs pertain only to those projects that are funded specifically for the purpose of supporting the meetings themselves; costs associated with general travel and similar costs incurred on other grants, even when related to attendance at conferences or meetings that bring people together for professional exchange, are classified as travel costs on those individual awards, and are not Participant Support Costs.

POLICY
In order to include Participant Support Costs on sponsored projects, applicants and awardees must receive prior approval from the sponsor. Participant Support Costs are generally granted for specific projects and agencies may restrict their use to specific programs. Indirect costs (F&A) are not provided on participant support costs, and must be excluded when calculating the Modified Total Direct Cost (MTDC) base on a federal sponsored project.

If a federal sponsor awards such participant support costs, the following apply:
- The sponsor will not allow rebudgeting from the participant support cost category into other expense categories without prior approval.
- Any additional categories of Participant Support Costs other than those described in the Uniform Guidance 2 CFR Part 200.75 must be justified in the budget justification, and such costs will be closely examined for adherence to sponsor requirements.
- The University must return any unexpended participant support costs to the sponsor.

When a sponsored project includes Participant Support Costs, the principal investigator and administrative support personnel are required to be familiar with the specific requirements as set forth by the sponsor, and to ensure compliance with those requirements. Evidence of attendance of participants in the form of daily logs or similar documentation must be maintained within the project's records.

**DOCUMENTS**
For further information on participant support costs, and NSF proposals for conferences, symposia and workshops that support participant support costs, please refer to [www.nsf.gov/pubs/policydocs/pappguide/nsf16001/gpg_2.jsp](http://www.nsf.gov/pubs/policydocs/pappguide/nsf16001/gpg_2.jsp).

**CROSS REFERENCE:**
This policy is created in order to comply with OMB Uniform Guidance 2 CFR Parts 200.68, 200.75, 200.308 (c)(5), and 200.456.