

Guidance for Participant Support Costs on Federally Funded Awards

This guidance has been created to inform Caltech personnel on the appropriate way to propose, budget, and incur Participant Support Costs on federally funded awards and federally funded pass-through subawards.

This Guidance does not apply to non-federal awards that may use the term “Participant Support”. Rather, Caltech personnel should be guided by the terms of the non-federal award, and questions about expenditure types for Participant Support under non-federal awards should be directed to Post Award Administration.

Definition: Participant Support Costs are defined in the Uniform Guidance (2 CFR 200.75) 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 conferences, or training projects.” The key points to take away from this definition are: 1) Caltech employees do not qualify as “participants”; and 2) Participant Support Costs have to be associated with a training or conference activity.

Prior Approval: Sponsor prior approval is required in order to use federal award funds for Participant Support Costs (2 CFR 200.456); prior approval can be obtained either by inclusion of Participant Support Costs in the sponsor-approved budget, or by requesting approval from the sponsor after issuance of the award. Once funds are approved for use as Participant Support Costs, they may not be re-budgeted for other uses without prior sponsor approval (2 CFR 200.308(c)(1)(v)).

Use: Participant Support Costs at Caltech may be used to support individuals, such as students (Caltech enrolled or otherwise) participating in and benefitting from a training activity funded under a federal award. Participant Support Costs may also be used to support individuals participating in conference activities sponsored by an award. Caltech employees participating in such activities and for whom the federal award will provide support, must be budgeted other than as Participant Support Costs.

Participation in a research project is not sufficient to qualify an individual as a “participant” (e.g., visiting faculty, researchers or students). Rather, the individual must be participating in a training or conference activity which has been approved by the sponsor as Participant Support Costs.

Allowable as Participant Support Costs: registration costs; travel costs (lodging, per diem, mileage, taxi, parking, tolls, baggage costs et cetera); and stipends.

Unallowable as Participant Support Costs: costs for Caltech employees; meeting space (e.g., hotel or conference contracts), rental of equipment, audio visual services/rentals, materials and supplies related to the conference, catering costs or entertainment. Research subject payments are not eligible as Participant Support Costs.

Speakers and trainers are not considered participants and should not be included as Participant Support Costs, unless the primary purpose of the individual’s participation in the activity is learning and receiving training as a participant. If the primary purpose is to speak or assist with management of the activity, then such costs should be budgeted other than as participant support.

Assessment of Overhead: In general, Participant Support Costs are exempt from overhead.

Proposal Preparation: When preparing proposals that include Participant Support Costs, the specific training and/or conference activity should be clearly described in the project description, and the budget and budget justification should detail out the specific costs that will be allocated as Participant Support Costs.

PTA Set Up: When establishing a PTA that will include Participant Support Costs, a separate Project should be established to which such costs should be charged (burden schedule = “Benefits Only NTR”). This will better enable Caltech to track and report on these restricted funds

Expenditure Types: when charging participant support-related conference and training costs, the expenditures types Mtgs – Participant Support; Travel – Participant Support; and Stipend - Participant Support may be used to permit clear identification of such costs.

Re-budgeting into Participant Support Costs: Federal regulations restrict the re-budgeting of funds for Participant Support Costs. If the PI wishes to do so, prior sponsor approval must be obtained. In this case the PI should draft a request, include the information described above under Proposal Preparation and forward the request to OSR for submission to the sponsor.

Re-budgeting out of Participant Support Costs: Federal regulations restrict the rebudgeting of funds out of Participant Support Costs. If the PI wishes to do so, prior sponsor approval must be obtained. In this case the PI should draft a request explaining the reason for the rebudgeting and forward the request to OSR for submission to the sponsor. Please note that funds re-budgeted out of Participant Support Costs will take on the default overhead rate applicable to type of cost for which the funds are ultimately expended.

For pre-award questions on budgeting or re-budgeting Participant Support Costs, please contact the [Office of Sponsored Research](#) for assistance.

For post-award questions on the use of participant support expenditure types, please contact [Post Award Administration](#) for assistance.