

Administrative Procedure Chapter 12, Research
Administrative Procedure AP 12.XXX Participant Support Costs
Effective Date: Provisional pending union consultation
Responsible Office: Office of the Vice President for Research and Innovation
Governing Board and/or Executive Policy: Chapter 12, Executive Policy 12.102,
Authority to Sign and Execute Extramural Research and Training Contracts/Grants,
Agreements and Contract Assignments and Releases
Review Date: Three Year Review Cycle

I. Purpose

To define participant support (as frequently proposed on National Science Foundation awards) including the classification of items as participant support costs in order to ensure the consistent treatment across all extramural awards.

II. Definitions

- A. Participant – an individual participating in or attending program activities under an extramural award, such as trainings, conferences, but who is not responsible for implementation of the extramural award. Individuals committing effort to the development or delivery of program activities under an extramural 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.
- B. Participant support costs (PSC) – direct costs that support participants and their involvement in an extramural award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care and per diem paid directly to or on behalf of participants.
- C. Modified Total Direct Cost (MTDC) – all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 (to be increased to \$50,000 when included in the federally negotiated indirect cost rate agreement) of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$25,000 (or \$50,000 as described above). Other items may only be excluded when necessary to avoid a serious inequity in the

distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

III. Administrative Procedure

a. Guidelines

1. The intent of participant support is to provide financial assistance for individuals to participate or attend training or educational activities such as workshops, conferences, seminars or other short-term instructional or information sharing activities funded by an extramural project that has an education or outreach component. Such payments shall be made directly to or on behalf of an individual.
2. Project personnel, staff members, subrecipient personnel, consultants, interns or other individuals supported by the extramural project conducting such program activity are not participants for purposes of receiving participant support. However, students and postdocs employed by the University in jobs unrelated to and uncompensated by the extramural award supporting such program activity are eligible to be a participant.
3. Types of costs that are generally allowed as PSC include:
 - a. Stipends – a set amount paid to participants involved in a specific program activity. The period of such activity shall be approved by the sponsor. Stipends should not be provided as compensation for work performed on a project, but rather as a means to help offset some of the financial burden borne by participants who have chosen to attend training or educational activities instead of pursuing paid employment hours.
 - b. Travel – costs incurred for transportation and associated costs in accordance with sponsor requirements and UH policies and procedures. The purpose of the travel shall only be for participating in the approved program activity.
 - c. Subsistence Allowance – costs incurred for lodging and per diem while an individual participates in an approved program activity.
 - d. Fees – fees paid to participate in the program activity, including laboratory and supply fees to cover items that are specifically required for

participation. Includes VISA fees for foreign participants if allowed by the sponsor.

- e. Other – other costs incurred that can be specifically tied to participation in the program activity (i.e. training materials, printing costs, laboratory supplies, services)

4. Types of costs that are generally unallowed as PSC include:

- a. Incentives/prizes, memorabilia, or gifts, unless the cost is specific to the project, sufficiently justified at the proposal stage, and approved by the sponsor,
- b. Payment for services (e.g. honoraria to guest speakers, casual or intermittent employee salaries, consulting, etc.),
- c. Payments (i.e. gift cards) for time and effort in participating as research subjects,
- d. Advertising and promotional costs for the program activity,
- e. Costs related to hosting a program activity such as facility rental, building services, video recording, audio transcription, program printing, catering, supplies, media equipment rental or insurance,
- f. Expenses for personnel described in III.A.2. and other collaborators such as subrecipients to prepare for or participate in the program activity.

- 5. As noted in the definition of MTDC, PSC shall be excluded from the calculation of indirect cost. While this generally applies to all Federal sponsors, other non-Federal sponsors may have different rules. Indirect Cost on PSC shall be calculated in accordance with the sponsor's requirements.

b. Roles and Responsibilities

1. Principal Investigator (PI) / Fiscal Administrator (FA)

- a. Carefully review the Notice of Funding Opportunity in order to appropriately budget for PSC, in accordance with sponsor's requirements.

- b. Obtain prior approvals as required. (Effective 10/1/2024, awarding agency's prior approval for PSC is no longer required per 2 CFR 200.456.) Prior approval may be required to rebudget to or from PSC to other categories, in accordance with award terms and conditions.
 - c. Upon receipt of an award with PSC, the FA shall determine whether a separate PSC account is required and notify the Extramural Funds Accountant to create such account.
 - d. FA shall review supporting documentation (i.e. evidence of participant eligibility, attendance records, detailed receipts, expense reports) and approve PSC expenditures for allowability, allocability and reasonableness prior to recording the transactions.
2. Office of Research Services
- a. Contracts and Grants Specialist shall review PSC budget for allowability and reasonableness and for sponsor's prior approval if required.
 - b. Extramural Funds Accountant shall create the corresponding PSC account based on the awarded budget or as notified by the FA. Since extramural sponsors may have varying definitions of PSC a separate account allows for specific costs to be excluded from MTDC. The account title should begin with "PSUPP".
 - c. ORS Compliance shall provide guidance related to allowability, allocability and reasonableness.

IV. Delegation of Authority

There is no administrative-procedure-specific delegation of authority.

V. Contact Information

Office of the Vice President for Research and Innovation, telephone number: (808)956-5006; and email uhovpri@hawaii.edu may be contacted for information relating to this Administrative Procedure.

VI. References

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards

- §200.1 Definitions – Modified Total Direct Cost, Participant, Participant support costs
- §200.308 Revision of budget and program plans
- §200.456 Participant support costs

VII. Exhibits and Appendixes

None