



SCRIPPS

THE WOMEN'S COLLEGE
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Guidance on Participant Support Costs

Participant Support Costs

What are participant support costs (PSC)?

Participant support costs ([as defined in 2 CFR 200.75](#)) means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees who are not Scripps College employees in connection with conferences or training projects. The Uniform Guidance ([2 CFR 200.456](#)) requires prior approval of the Federal Agency in order to incur PSCs under federally sponsored awards. The PSCs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency. Please direct all Participant Support Costs related questions to Postaward@scrippscollege.edu.

When preparing the proposal budget justification and budget the Principal Investigator/Project Director must clearly request and justify participant support costs. As referenced in the [National Institutes of Health \(NIH\) Grants Policy Statement](#) and [National Science Foundation \(NSF\) Proposal and Award Policies and Procedures Guide](#), Participant Support Costs are only allowable when identified in the specific Funding Opportunity Announcement (FOA) for NIH, and prior NSF approval is required for additional categories of participant support costs other than those described in [2 CFR 200.75](#).

Categories of PSCs must be reasonable and conform to Scripps College policies and sponsor requirements. When proposing PSCs, include the number of participants to be supported in the proposal budget. Participant support costs must be specified, itemized, and justified in the budget justification section of the proposal.

- **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/Project Director.
- **Travel:** Is limited to the days of attendance at the conference/training activity plus the actual travel time required to reach the conference location. All travel expenses must comply with federal regulations included but not limited to the [Fly America Act](#) and Scripps College policy. Training activities that involve travel and costs of transportation of participants are allowable.
- **Subsistence Allowance:** The cost of housing and meal expenses necessary for the individual to participate in the training activity are generally allowed, provided these costs are reasonable and limited to the days of attendance. 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. Where meals or lodgings are furnished without charge or at a nominal cost (e.g., as part of the registration fee), the [per diem](#) or subsistence allowance should be correspondingly reduced.
- **Fees:** Includes registration or conference fees directly associated with the training activity.
- **Other:** May include costs approved by the sponsor to support training materials or laboratory supplies.

What costs are typically considered to be an unallowable PSC?

Examples of costs that are typically unallowable as PSCs are:

- Expenses for the PI/PD, project staff or collaborators to attend
- Speaker/lecturer fees or honoraria
- Conference support costs such as facility and audio/visual equipment rental
- Memorabilia or gifts
- Trainer or facilitator fees
- Meal costs for non-Participants
- Human subject payments

Who qualifies as a participant?

As indicated above, a participant is a non-Scripps College employee. The participant does not perform work or services for the project or program unless it is for their own benefit. A participant may include students, scholars, and scientists from other institutions, representatives from the private sector, teachers, and state or local government agency personnel.

Speakers and trainers generally are not considered participants and should not be included in the participant support section of the budget. However, if the primary purpose of the individual's attendance at the conference is learning and receiving training as a participant, then the costs may be included under participant support. If the primary purpose is to speak or assist with management of the conference, then such costs should be budgeted in appropriate categories other than participant support.

Do human subject participants qualify as a participant?

No, nor would remuneration as a human subject participant be budgeted as a participant support cost.

How does Scripps College manage and monitor the charging of PSCs on sponsored awards?

In order to properly track and segregate PSCs from other direct costs charged to federally funded awards, the award is setup with a separate Workday award line/grant number. This Workday award line/grant number will facilitate the monitoring and reporting of PSCs through the use of a specific PSC naming convention. Specifically, all federal awards providing PSC funding will be set up in Workday with "PSC" in the grant name.

Example: GR300000 SCR Participant Support Costs – Unique name

This award/grant line will ensure that expenses charged will be separately tracked. In addition, the PI, is responsible for charging only those costs which are allowable as a PSC to this unique award/grant line in accordance with the terms and conditions of the sponsor and Scripps College.

National Science Foundation

The following FAQs are specific to proposals submitted to and awards received from the [National Science Foundation](#).

We would like to rebudget our NSF award to move funds out of the participant support category. Do we need NSF approval to do this?

While NSF does provide rebudgeting authority for many categories, you must receive prior approval from the cognizant NSF Program Officer to reallocate funds **out of** the participant support category. You may, however, rebudget funds **into** this category without prior NSF approval

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.

Are costs such as room rental fees, catering, supplies, etc. related to an NSF-sponsored conference considered participant support costs?

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

Do participant support costs apply for all participants, or do they only apply for non-awardee organization participants?

Participants from the submitting institution and other institution(s) could be considered participants.

May human subjects who 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.

We are preparing a Research Experiences for Undergraduate Research (REU) proposal. Is it acceptable to categorize students as both employees and participants if we have made the appropriate determination?

No, the REU program is different in that the goal of the program is to provide a practical educational experience for undergraduate students, rather than simply a job. The role of an REU student differs from the role of a student employee because the REU program is aimed at developing the students’ research skills and providing a high-quality mentoring experience. Based on this role, an REU student is considered a participant in a training activity and funds for their support should be included as a stipend in the participant support cost section of the budget.

Would conference/workshop costs such as breakfast, coffee, training supplies, room rental, and materials be considered participant support costs?

Items such as breakfast, coffee, training supplies, room rental, and materials generally are not covered by participant support costs. These costs should be included in the Other Direct Costs line item of the NSF Budget (see [PAPPG](#) Chapter II.C.2.g.vi(a) for further information).

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