

Western Michigan University Participant Support Costs Policy

Purpose:

The purpose of this policy is to set guidelines for participant support costs on externally funded sponsored projects.

Definition:

Participant Support Costs 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 meetings, conferences, symposia or training projects.

Guidelines:

Participant support costs are generally granted for specific projects awarded by the National Science Foundation ("NSF") and the Department of Education ("ED"), and are often subject to special sponsor regulations. For example, NSF and ED regulations indicate they:

1. Do not allow the University to apply Facilities & Administrative ("F&A") costs to participant support costs.
2. Do not allow re-budgeting from the participant support cost category into other categories without written prior approval.
3. Require the university to return any unexpended participant support costs to them.
4. Are often associated with special programs such as Research Experience for Under Graduates ("REU") and Research Experiences for Teachers ("RET") on National Science Foundation grants. When a sponsored project includes participant support costs, the principal investigator and his/her administrative support personnel are required to be familiar with the specific requirements as set forth by the sponsor, and to insure compliance with those requirements. **Evidence of attendance by participants, in the form of a daily log or similar documentation, must be maintained within the project's records. (see [sample participant support log](#))**

Participant support costs cannot be used for employees. Employees are compensated through the University's payroll and reimbursed for travel expenses following the University's travel guidelines

Funds provided for participant support may not be used by grantees for other categories of expense without the specific prior written approval of the granting agency. Therefore, participant support costs are tracked by being coded separately in the University's financial system.

Participant support allowances may not be paid to trainees who are receiving compensation, either directly or indirectly, from other Federal government sources while participating in the project. A non-federal employee may receive participant support allowances from grant funds provided there is no duplication of funding of parent agency and federal grant funds

To help defray costs while participating in a conference or training activity, participants may be reimbursed actual expenses for lodging and meals with provided itemized receipts or per diem with departure and arrival times provided. Other reimbursable expenses include airfare with an itinerary provided, registration fees, and mileage using the university allowed rates. Such allowances must be in conformance with WMU's travel guidelines available <http://www.wmich.edu/travel/> and limited to the days of attendance at the conference plus the actual travel time required to reach the conference location by the most direct route available. In training activities that involve field trips, costs of transportation of participants are allowable.

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If a participant is receiving college credit for a workshop, and the registration fees are being paid by the grant, those fees will be coded as a scholarship and reported to WMU's Financial Aid Office.

Participants may not be paid stipends just to attend a training event. Participant support costs are not included as part of the indirect cost calculation.

Responsibilities:

The University is responsible for maintaining proper documentation and tracking participant support costs. The responsibility is shared by numerous University personnel, and is specifically delegated as follows:

1. Principal Investigator is responsible for reviewing expenditures for accuracy, obtaining participant selection documentation, obtaining participant completion documentation, obtaining participant travel documentation, and requesting prior approve for re-budgeting between costs categories. **All participants are required to sign an attendance sheet at meeting, conferences, etc. This list is to be used to support the actual invoice payment. The final list of attendees must be submitted with the request for payment.**
2. The Grants and Contracts Office is responsible for setting up a grant account, maintaining payment documents with completed documentation, and submitting invoice to granting agency for reimbursement of costs.