

Guidance for Participant Support Costs and Non-Employee Stipends on Sponsored Awards

I. Purpose:

The purpose of this guidance is to ensure compliance with sponsor regulations regarding **participants** on external grants. This aims to ensure that funds provided for participant support costs are accounted for, according to sponsor and university expectations, and expended for appropriate and intended objectives. **For purposes of this guidance, participant payments and non-employee stipends are functionally the same**; student researchers categorized as hourly employees are not the focus of this document.

II. Scope:

This guidance applies to all sponsored awards managed by Villanova University's Office of Grants and Contracts regardless of the sponsor type or project goal. Participant support costs (PSC) are a restricted budget category proposed on National Science Foundation (NSF) awards. Other sponsors may vary slightly in their definitions and restrictions.

III. Definitions:

A participant is defined as a person who is the recipient, not the provider, of training associated with a workshop, conference, seminar, symposium, or other short-term instructional or information sharing activity. Participants are not required to provide deliverables to the project or to the University, and they are not paid wages. Therefore, are not subject to Villanova human resources policies (e.g., they cannot be terminated for failure to perform).

Participant Support Costs as defined by 2 CFR §200.75, 200.456, 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.

Participants may include students, scholars, and scientists from other institutions, representatives of private sector companies, teachers, and state or local government agency personnel. A person classified as an intern would be paid as an employee and not as a participant, because the intern, while receiving certain training, is also providing services.

IV. Participant (and non-employee stipends) on sponsored awards:

Participant support costs are **not routinely allowed** on research projects. Typically, these expenses are incurred for projects that include an education/training, research experience, and/or outreach component as described in the notice of funding opportunity (NOFO). The NOFO will indicate when these expenses are allowable as direct costs to the project.

When allowed, these types of costs are most commonly included in National Science Foundation (NSF) grants, particularly in the following programs:

- Research Experiences for Undergraduates (REU), REU Sites, and REU supplements
- Research Experiences for Teachers (RET)
- National Research Traineeship (NRT)
- Research Training Groups (RTG) in Mathematical Sciences
- Integrative Graduate Education and Research Traineeship Program (IGERT)

The following groups would **not** be considered participants:

- Employees of the University
- An employee of the sponsor

This guidance was developed to support compliance with the "[Participant Support Costs Self-Assessment Checklist | NSF - National Science Foundation](#)"

- Advisory Board members
- Interns who have paid appointments
- Anyone who has a deliverable or is primarily providing a service to the project
- Individuals receiving incentive payments for participation as a Human Subject

V. Roles and Responsibilities

Principal Investigator (PI)/Co-PI

- Works with pre-award support to communicate the needs of the project and budget. When participant costs are included in the budget, the NOFO will indicate that these are allowable as direct costs to the project.
- Notifies OG&C if a prior approval request/budget revision to sponsor is needed.
- Confirms sponsor approval is in place before making commitments or incurring cost in participant expense categories.
- Monitors under and overspending of participant support costs.
- Works with Department and College staff to recruit and onboard participants in the vendor payment system and related paperwork.
- Holds responsibility for charges incurred on their sponsored award.

Department/College Level Support

- Confirms that the activity falls under participant costs, and not employment, consistent with this guidance and the roles described in the proposal budget and VU institutional guidelines.
- Ensures consistency in budgeting for PSC and/or non-employee stipends across all funding sources, including non-sponsored funds.
- Facilitates onboarding of participants in vendor payment system and submits payments in Concur.
- Retains all related paperwork in accordance with terms of the award and institutional policies.

Office of Grants and Contracts (OG&C)

- Ensures PSCs are appropriately budgeted and allowable.
- If awarded, ensures budget lines are reflected appropriately in Banner.
- Reviews and approves prior approval/budget revision requests before submitting to sponsor.
- Submits prior approval/budget revision requests to sponsor.
- Approves all expenses against sponsor approved budget and/or budget revision.
- Communicates any F&A restrictions to RAO.
- Monitors under/overspending of participant costs.
- Maintains accurate information in the Cayuse post-award record.

Research Accounting Office (RAO)

- Ensures that PSCs are excluded from indirect cost calculations, when applicable.