

Policy on Participant Support Management

The Office of Management and Budget's (OMB) [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#), commonly called "Uniform Guidance", is a government-wide framework for grant administration and provides grantees with necessary definitions and guidelines for the management of federal grants.

The following definitions, policy, and procedures derived from the Uniform Guidance serve as the foundation for Participant Support Management for relevant federal awards at Illinois Wesleyan University.

POLICY STATEMENT:

Participant Support is used to pay for subsistence allowances, travel allowances, and registration fees, attendance at a workshop conference, seminar, symposium or other training or information-sharing activity and other allowable direct costs associated with program participation either to or on behalf of participants. This policy ensures participant support costs are accounted for properly, expended for the appropriate and intended purpose, and are incurred, tracked, monitored and reimbursed in accordance with all applicable Federal and/or Sponsor regulations.

PROCEDURES:

Participant Management

To comply with the Uniform Guidance, the Principal Investigator and/or their administrative support personnel are required to retain the following Participant records:

- Criteria by which participants in the program are selected.
- Participant applications documenting the participant meets the criteria.
- Agendas or other relevant documentation of program activities
- List of program participants and documentation of their participation in the program and program activities (i.e., sign in sheet).

Copies of all Participant Management documentation, including expense documentation, must be kept in a centralized location accessible to grant management personnel.

Participant Support Cost Management

To comply with the Uniform Guidance, the Principal Investigator and/or their administrative support personnel are required to adhere to the following Participant Support Cost management requirements.

- Participant Support Costs must be explicitly identified in all pre-award budgets and budget justifications and must be excluded from the MTDC base when calculating F&A costs.

- The Participant Support Costs must be specifically allowed by the sponsoring agency and be incurred within the period of performance of the project.
- All post-award Participant Support Costs must be tracked separately from other sponsored direct costs. This includes, but is not limited to, assigning Participant Support Costs separate accounting codes.
- Participant Support expenses must be approved by authorized personnel and must reference the unique accounting codes representing the appropriate grant and Participant Support budget categories to be charged and should explicitly indicate the relevant Participant Support activity and/or specific Participants for which expenses are incurred, as relevant.
- Prior approval from the sponsored agency must be obtained should there be a need to reallocate funding from Participant Support.
- Participant Support Costs do not include costs for PI or project staff (e.g., salary and wages, fringe, travel); costs for consultants, trainers, collaborators or guest speakers providing services to the project or program (e.g., fees, travel, honoraria); conference/workshop support costs (e.g., facility or equipment rentals, catering, supplies); and human subject payments. It is the responsibility of the PI and their administrative support personnel to ensure these expenses are tracked separately from Participant Support Costs.
- Participant Support documentation

DEFINITIONS:

A **Participant** is defined as:

the recipient of a service or training opportunity that takes place as part of a workshop, conference, symposium or other instructional or information sharing activity that is funded by a federally sponsored award. Participants may be, but are not limited to, students, scientists from other institutions, or teachers, and do not perform work or service as part of their participation but are expected to complete programmatic activities. Participants may not be employees of the awarded institution.

Participant Support Costs are those direct costs paid to or on behalf of individual participants in connection with workshops, conferences, training projects, or other instructional activities funded by a federally sponsored award. Examples of allowable Participant Support Costs include student scholarships, stipends or subsistence allowances, travel allowances, registration fees, and required research supplies. Sponsors may have solicitation-specific participant eligibility and participant support cost requirements.