Participant Support

POLICY AND PROCEDURE

PURPOSE:
The purpose of this policy is to ensure compliance with the standards set forth in the Federal Office of Management and Budget 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), Federal and State regulations, and sponsor-specific requirements. This policy provides guidance which will assist University of Georgia (UGA) personnel proposing, performing and managing sponsored activities. Direct costs on sponsored projects must be allowable, allocable, and reasonable.

Failure to comply with UGA policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities.

SCOPE:
All UGA personnel must be aware of the complex and detailed rules provided under Federal, State regulations, as well as terms and conditions of individual sponsored activities.

POLICY:
Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific policies. This is applicable to building proposal budgets, negotiating sponsored projects, setting up sponsored projects, as well as initiating, approving, invoicing and reporting costs.

Participant support is for the support of students or trainees (non-employees) receiving training or attending a conference or workshop. Allowable expenses include: stipends; subsistence allowance; travel allowance; and registration fees. 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. For some rare educational projects conducted at local school districts, the sponsor may approve participants who are employees being trained. In these rare cases, the costs must be classified as participant support if payment is made through a stipend or training allowance.

Participant support will be separately accounted for and easily identifiable. Funds provided under this category may not be internally re-budgeted from participant support to other budget/expense categories without the prior written approval of the sponsor’s grant official.

Employees of the awardee or employees of partner institutions or organizations are not eligible for participant support stipends, subsistence, travel and other participant support benefits. Employees who are attending program events should do so at their salaried rate for services rendered. The budget would reflect the salary (not participant support).
DEFINITIONS:
Participant Support is for the support of students or trainees (non-employees) receiving training or attending a conference or workshop.

Sponsored Projects are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, State regulation, and UGA policy. Sponsored Activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service and other activities.

Sponsor-specific Requirements include requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

PROCEDURE:
When preparing a proposal, negotiating and setting up a sponsored project, incurring and approving expenses, and invoicing and reporting, UGA personnel must be aware of and conform to the complex and detailed rules surrounding Participant Support.

1. PIs/units are strongly encouraged to review the funding opportunity and sponsor requirements.
2. PIs/units should review this policy and identify which Participant Support expenses are appropriate, estimate the dollar amount needed, and clearly identify Participant Support in the Budget and Budget Justification. Participant Support is usually contained in a unique budget line item of the budget and justification.
3. PIs/units alert Sponsored Projects Administration (SPA) of the inclusion of Participant Support to ensure SPA’s review/approval.
4. SPA will review and update you if any changes are needed.
5. If/when the award is received, Participant Support will be segregated at the budget/expense level to ensure funds are used appropriately.
6. Any re-budgeting will require prior sponsor written approval.

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