

**DRAFT – v.3**  
(December 14, 2007)

**NOTE Concerning Participant Support Costs**

If a grant supports a conference, meeting, workshop, seminar, symposium, or training program, then the direct costs associated with an individual’s participation in these activities may be allowed under the sponsoring agency’s program guidelines as participant support. These costs are allowable *with the prior approval of the awarding agency* (OMB Circular A-122).

To show compliance with the prior approval requirement, participant support costs must be budgeted for and accounted for separately. Some agencies include a category for participant support costs on their budget forms. The category is not used for general travel to conferences nor is it used on a research proposal to bring collaborators together to meet and discuss the project.

Funds proposed in this category and approved by the agency cannot be reallocated for use in other categories without the prior approval of the agency. Nor can funds budgeted for another purpose be reallocated to participant support costs without prior approval of the funding agency. Unspent participant support costs must generally be returned to the sponsor unless official approval is received to redirect them.

***Who is a participant?***

A participant is defined as a non-WHOI employee who is the recipient, not a paid provider, of a service or training associated with the workshop, conference, seminar, symposium or other short-term instructional or information-sharing activity being sponsored.

- The employee classification has to do with how accountable a person is to the institution. In general, WHOI Human Resources classification of employees and non-employee affiliations apply, with a few exceptions:

<b>Employees</b>	<b>Academic (Employees)</b>	<b>Non-Employee Affiliations</b>
Scientific Staff Technical Staff Postdocs Visiting Investigators (paid) Departmental Assistants Administrative Assistants	Postdocs JP Students Student & Teacher Fellows	Emeritus Appointments* Adjunct Appointments* Guest Investigators Guest Students  <i>*unless the person is currently on-site and being paid by WHOI.</i>

***What costs may be classified as participant support costs?***

Participant support costs include the direct costs for items such as:

- **Stipend.** A stipend or allowance is a *set* amount of money to be paid directly to the participant (without receipts). Such payments must be reported to the IRS on a 1099-Misc

form. Certain agencies of the federal government specifically restrict participant stipends, so check agency guidelines. In general, WHOI does not recommend this approach.

- **Travel.** Reimbursement of costs of transportation to and from the meeting, and local transportation during the period of the meeting are allowable (receipts required). Arrangements must follow sponsor guidelines (e.g., US flag carrier, coach class, etc.). If training activity involves field trips, the costs of transportation of participants may be allowable.
- **Subsistence allowance.** The costs of the participant's housing and per diem board expenses are generally allowed provided these costs are reasonable and limited to the days of attendance. Per diem is not paid for meals provided during the conference. Also, although they may participate in meals and snacks provided at the meeting or conference, participants who live in the local area are not entitled to subsistence payments.
- **Fees.** The fees paid by participants in connection with meetings, conferences, symposia, or training are generally allowable costs. These may include registration fees, passport or visa fees for foreign participants, or tuition or lab charges required for the individual to participate in the training.
- **Other.** Other costs may be allowable including training materials, lab supplies and insurance.

#### *What costs may NOT be classified as participant support costs?*

- Conference support costs such as facility rentals, media equipment rentals, or conference food.
- Honoraria and travel costs for speakers.
- Subawards to providers for training events.

#### *Administering participant support costs*

To show compliance with the prior approval requirement, participant support costs must be budgeted and accounted for separately. Specific object codes have been set up for tracking purposes:

5745 Partic. Supp. Stipend  
5746 Partic. Supp. Subsistence Allowance  
5765 Partic. Supp. Other Costs  
5766 Partic. Supp. Travel

If the participant support payments are made as a stipend or allowance (not recommended), WHOI will report participant support payments to the individual on IRS Form 1099-Misc at the end of each year.

If the participant support payments are made as a reimbursement of allowable expenses, the participant should submit an expense voucher that itemizes expenses together with receipts. In such cases, no 1099 reporting is required.

Remember - Unspent participant support costs must generally be returned to the sponsor unless official approval is received to redirect them.