

# Processing Research Participant Costs

## *Support, Patient Care and Compensation*

### **Principle:**

Many research studies rely on participants in various ways to fulfill the desired outcome of the project. Varying definitions apply based on the nature of the expense. Once it is determined which of the following types of expense the award incurs, the appropriate procedure can be applied.

### **Participant Support**

Participant support costs are payments provided to a study participant or to a workshop attendee. These are payments FROM the grant to an individual or to a vendor on behalf of the individual. These costs are expressed as non-salary expenses and carry no facilities and administrative costs on the grant.

NSF and NIH both refer to OMB Circular A-122 for definition of participant support costs:

([http://www.whitehouse.gov/omb/circulars\\_a122\\_2004/#b33](http://www.whitehouse.gov/omb/circulars_a122_2004/#b33))

***Participant support costs.*** 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. These costs are allowable with the prior approval of the awarding agency.

Who is a participant?

A participant is a recipient who is typically not an employee of The University of Delaware, not the provider, of a service or training associated with a workshop, conference, seminar, symposium, or other short-term instructional or information sharing activity. Participants are not required to provide any deliverable to the university and they are not subject to University of Delaware Human Resource policies (e.g., they cannot be terminated for failure to perform). 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 to the university, to the grant sponsor, or to a third party (e.g., counseling students at a local public schools).

What costs may be included in participant support costs?

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

**Stipend.** A stipend is a set amount of money to be paid directly to the participant. Certain agencies of the federal government specifically restrict participant stipends. The professional staff in the Office of Sponsored Programs (OSP) will assist the Principal Investigator (PI) to determine if the sponsoring agency for a particular project restricts the stipend to be paid to a participant.

**Travel.** Travel includes the costs of transportation and associated costs and must follow sponsor guidelines (e.g., U.S. flag carrier, coach class, most direct route) as well as travel rules for the University of Delaware policies and guidelines. The sole purpose of the trip must be to participate in the project activity. If a training activity involves field trips, the costs of transportation for participants may be allowable.

**Subsistence allowance.** The cost of a participant's housing and per diem expenses necessary for the individual to participate in the project are generally allowed, provided these costs are reasonable and limited to the days of attendance. 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 a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. These fees may include laboratory fees, passport or visa fees for foreign participants (based on sponsor guidelines), and registration fees. A sponsor may also allow the costs of any University of Delaware tuition and fee charges that are required to be paid for the individual to participate in the training project.

**Other.** Certain other costs in support of the participant's involvement may be allowable, including training materials, laboratory supplies, and insurance.

What costs **may not** be included as participant support costs?

Participant support costs do not include the following types of payments:

Honoraria paid to a guest speaker or lecturer.

Conference support costs such as facility rentals, media equipment rentals, or conference food.

Subaward to a provider for multiple training events (i.e. an ongoing contract with specific terms and conditions).

Agreements with employers (e.g., public school system) to reimburse the employer for the costs related to sending its employee to a conference or workshop. It is recommended that the PI inform participants prior to the initiation of the project about any costs associated with their participation in the project that are not covered.

## **Participant Support Costs Procedure**

Employees\* are generally not permitted to be compensated as participants under this definition. Therefore processing payments of this kind will be for non-employees as follows:

Non-Employees (when reimbursing someone external to UD for costs they incurred to participate which should be covered by grant)

- Originate a FIN Request for Payment to Individual web form
- Add comment stating that this is a payment for participant support
- Use account 146100 "Part Spprt-Non Employee"
- No F&A will be applied to this expense
- IRS form 1099/1042 will generate as appropriate

Vendors (payments for travel/lodging/meals directly to vendor)

- Originate a FIN Request for Payment to Vendor web form
- Add comment stating that the payment is for participant support costs
- Use account 146190 "Part Spprt-Vendor"
- No F&A will be applied to this expense

Student (not UD employee)

- Originate a FIN Request for Payment to Individual or GNCP web form
- Add comment stating that the payment is for participant support
- Use account 146115 "Part Spprt- student"
- General Accounting/HR may change to 146915 after FICA eligibility is determined
- No F&A will be applied to this expense
- FICA will be applied using account 129800 where applicable

\*Where circumstances require participant support costs for employees, the research office will participate in a solution appropriate to the situation.

## **NSF REU Participant Support Costs**

In February 2013, the National Science Foundation released a revised Research Experiences for Undergraduates (REU) Program Announcement ([NSF 13-542](#)). Effective with this REU Program Announcement, NSF no longer permits the recovery of facilities and administrative costs on Participant Support Costs in REU awards. NSF states:

Recovery of indirect costs (F&A) is prohibited on Participant Support Costs in REU Site proposals and REU Supplemental funding requests. This limitation may entail mandatory

committed cost sharing by the institution. In such cases, it constitutes an exception to NSF's cost sharing policy."

REU awards made under previous NSF solicitations will follow the terms and conditions of the specific award unless otherwise stated.

NSF REU participants must typically be a U.S. Citizen, U.S. National or permanent resident.

All REU costs are entered into section F Participant Support Costs on the NSF budget.

### **NSF REU Participant Support Costs Procedure**

#### **For Budget Purposes**

The F&A and Pricing Set Up for the project budget FA base should be MTDC with a budget rate of zero  
Student Stipend should use budget category REU

For other participant support costs use PTTRAV, OTHER

#### **For Processing Payment to Student**

Originate a FIN Request for Payment to Individual web form (typically payments made in installments) through UD Procurement Office.

Add comment stating that this is a payment for NSF Research Experience for Undergraduates

Use account 148100 "REU SCH SUPT-US CITIZN/PERM RE"

No F&A will be applied to this expense or other participant support costs because a separate project code with an F&A and pricing percent of zero will be established.

### **Patient Care Costs**

NIH grants policy statement addresses actual patient care in the following way:

[http://grants.nih.gov/grants/policy/nihgps\\_2003/NIHGPS\\_Part13.htm#\\_Toc54600300](http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part13.htm#_Toc54600300).

**Research Patient Care Costs.** The costs of routine and ancillary services provided by hospitals to individuals participating in research programs. The costs of these services normally are assigned to specific research projects through the development and application of research patient care rates or amounts (hereafter "rates"). Research patient care costs do not include: (1) the otherwise allowable items of personal expense reimbursement, such as patient travel or subsistence, consulting physician fees, or any other direct payments related to all classes of individuals, including inpatients, outpatients, subjects, volunteers, and donors, (2) costs of ancillary tests performed in facilities outside the hospital on a fee-for-service basis (e.g., in an independent, privately owned laboratory) or in an affiliated medical

school/university based on an organizational fee schedule, or (3) the data management or statistical analysis of clinical research results.

These are not payments to individuals, but rather they are costs incurred by the institution conducting the research.

## **Participant Compensation**

***Participant compensation*** (e.g. \$50 to run on a treadmill) are not considered participant support, but in fact are normally considered other direct costs necessary for the research. Many situations call for compensation to be provided to the study participant in cash or via a store gift card.

### Participant Compensation Procedure

Participants may be external to the University (non-employees) or internal to the University (employees or students). Payments will be processed as follows:

#### Non-Employees (external to UD)

- Originate a FIN Request for Payment to Individual web form
- Add comment stating that the payment is for participant compensation
- Use account 149250 "Participant Incentive"
- F&A will be applied to this expense
- IRS form 1099/ 1042 will generate as appropriate

#### Employees

- Originate an HR S-contract
- Add comment stating that the payment is for participant compensation
- Use account 149250 "Participant Incentive"
- F&A will be applied

#### Students (Grad or undergrad)

- Originate a GNCP if graduate student, S-contract if undergrad in HRsystem, payment to individual if undergrad not in HR system
- Add comment stating that the payment is for participant compensation
- Use account 149250 "Participant Incentive"
- F&A will be applied

Expenses of cash withdraws or gift card purchases should be recorded as follows:

Cash/Gift Card

Originate expense using a T/E or Pro Card  
 Use account 149250 "Participant Compensation"  
 Bank fees for these types of payments may not be charged to a federal award  
 F&A will be applied

If you are withdrawing cash from an ATM for this purpose, you must retain the bank receipt indicating the amount of cash withdrawn from the bank and provide supporting documentation regarding the disbursement of the funds to participants.

**Summary Table Participant Support/Participant Compensation**

<b>Payee</b>	<b>Participant Support</b>	<b>Patient Care Costs</b>	<b>Participant Compensation</b>	<b>NSF Participant Support (REU)</b>
Non employee	146100 if taxable	N/A	149250	NA
Student	146115 (or changed to 146915 (changed at HR) w/129800 for FICA when applicable)	N/A	149250	148100
Employee	N/A	N/A	149250	NA
Vendor (travel/lodging, etc.)	146190 when non taxable reimbursement	146195	149250	146190 when non taxable reimbursement
F&A Charged	NO	NO	YES	NO
IRS form 1099 or 1042	Where applicable	Where applicable	Where applicable	NO