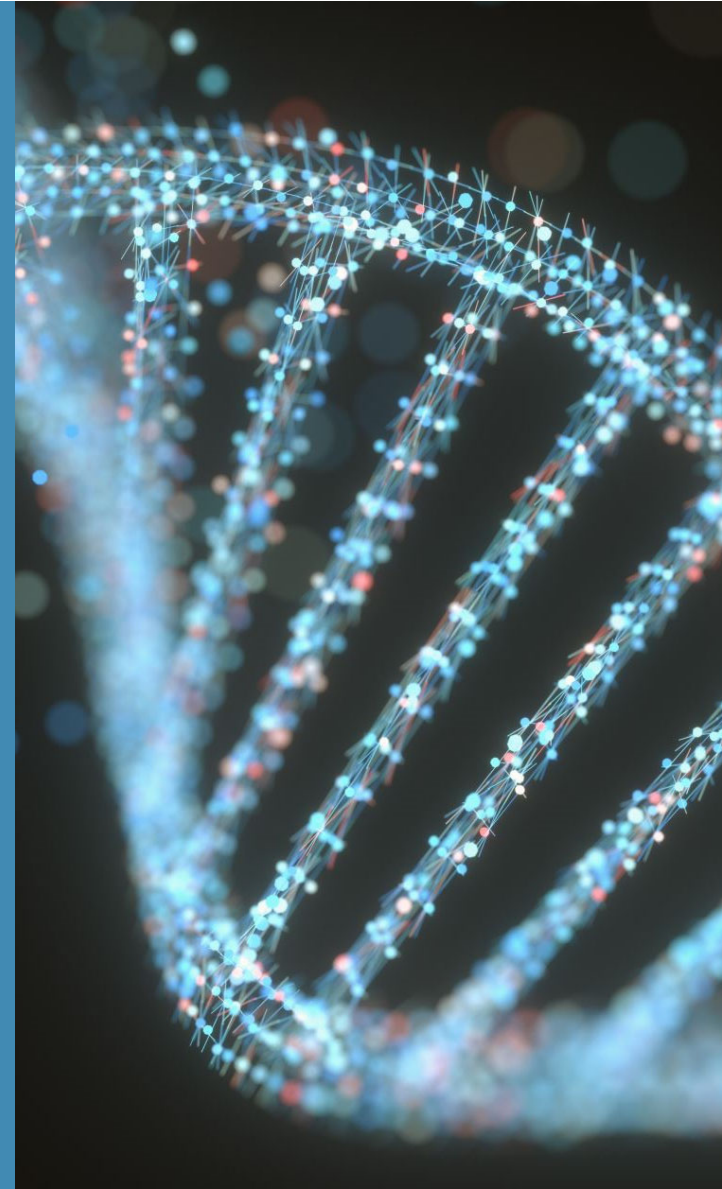




BROWN

Office of the Vice President for Research

Participant Support Costs Overview and National Science Foundation REU/RET Programs



Learning Objectives



BROWN
Office of the Vice President for Research

Who is a Participant?

Participant Support Costs Overview

Roles & Responsibilities

Department/Principal Investigator/OSP

National Science Foundation

REU and RET

Award Lifecycle

NSF Awards with REU/RET Components

Frequently Asked Questions

Who is a Participant?

- A participant is a **non-employee**, who is the ***recipient***, not the provider of a service or training opportunity and are not required to provide any deliverable to the University;
- Participants may be, but are not limited to, students, scholars, scientists from other institutions, or teachers;
- A participant is **not**:
 - An employee of the university
 - Research subject/participant in a clinical trial, receiving incentive payments
 - Anyone who has a deliverable or is primarily providing a service to the research in a project's scope of work
 - An intern, who while receiving training is also providing a service
 - A student or project staff member receiving compensation



Participant Support Costs (PSC)

Defined in Uniform Guidance

2 CFR §200.75

Direct costs for items such as **stipends, subsistence & travel allowances, and registration fees** paid to or on behalf of participants or trainees (**not employees**) in connection with conferences or training projects.

2 CFR §200.456

Allowable with **prior approval** from the Federal awarding agency.

The Notice of Award provides prior approval. Otherwise, the PI would need to submit a proposal for a PSC supplement.

2 CFR §200.68

Excluded from the modified total direct costs (MDTC).

Therefore, 0% F&A is charged on participant support costs. Funds are set up in a separate, restricted 'child' account.

2 CFR §200.308

The transfer of funds budgeted for participant support costs to other budget categories requires the approval from the Federal awarding agency.

Additional Info

A **restricted budget category** proposed on National Science Foundation awards. Also provided by other federal agencies & sponsors. Other sponsors may vary slightly in their definition and restrictions for participant support costs.

What types of Sponsored Projects may include Participant Support Costs?

Participant Support Costs (PSC) are typically incurred for projects that include an **education or outreach** component. PSC are commonly included in National Science Foundation (NSF) grants, such as the following programs:

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

NIH only allows PSC if they are in the Funding Opportunity Announcement (FOA). Other federal sponsors that may allow participant support include EPA, NASA, USDA, NIFA or NRCS, NOAA, and others.

Participant Support Cost Budget Categories

- **Stipend:** *Set amount of money* paid to the participant. The payment may be one-time or recurring payments. Individual must be paid as a ***stipendee and not an employee.***
- **Travel:** Transportation and associated costs. Must follow sponsor guidelines (e.g., US flag carrier, coach class, most direct route) & Brown University's travel policies/guidelines. The sole purpose of the trip must be to participate in the project activity.
- **Subsistence Allowance:** The cost of a participant's housing & per diem expenses for the conference or training activity. This includes registration fees. Participants who live in the local area are not entitled to subsistence payments.
- **Fees:** Paid by or on behalf of a participant in connection with meetings, conferences, symposia, or training projects. Fees may also include laboratory fees, and passport or visa fees for foreign participants.
- **Other:** Other costs may be allowable, including training materials, printing costs for presentation materials to be distributed at a conference, laboratory supplies and services that can be **tied to specific participants**. Check the funding announcement for guidance.

What costs
cannot be
included
as
participant
support
costs?

- Costs for a guest speaker or lecturer, such as honoraria or travel
- Costs for a consultant or trainer providing services to the sponsored project, such as fees or travel
- Costs for PI or project staff, such as salary, wages, fringe, or travel
- Conference/workshop support costs such as facility rental, catering, supplies, or media equipment rental
- Costs for collaborators, such as travel
- Human subject payments for participating in a research project. These types of costs should be on the **primary project budget**, not the participant support budget

Roles & Responsibilities

Department/Managing Unit

- Responsible for developing proposals and managing awards in compliance sponsor guidance regarding Participant Support Costs, including coordination with the PI and OSP.
- Assume the primary responsibility for posting relevant Participant Support Costs and retaining related documentation/records in accordance with the terms of the award and Brown University policies.

Principal Investigator (PI)

- Responsible for working with their managing department to communicate the needs of the project and budget.
- Ultimately responsible for the charges on the federal award.

Office of Sponsored Projects (OSP)

- Responsible for ensuring participant support costs are appropriately budgeted and setting up a separate account in the Workday system, which will be excluded from F&A.
- Serve as a resource to the department and PI and submits prior approvals to the sponsor, if necessary.



For additional information on Participant Support Costs

<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/participant-support-costs>

The background is a collage of three images showing students in a laboratory setting. On the left, a close-up of a student with blue eyes and safety glasses. In the center, a student with curly hair and safety glasses working with a pipette. On the right, a student with dark hair in a ponytail and safety glasses looking at a test tube rack. The text is overlaid on a semi-transparent white rectangle with four binder holes.

National Science Foundation

Research Experiences for Undergraduates (REU)
Research Experiences for Teachers (RET)

Research Experiences for Undergraduates (REU)



- Program supports active research participation by undergraduate students in any of the areas of research funded by the NSF. Designed to attract students to science and engineering and prepare them for careers in these fields
- **REU Sites:** independent proposals to initiate and conduct projects that engage a number of students in research.
- **REU Supplements:** Funding for 1-2 REUs and may be included as a component of proposals for new/renewal NSF grants or cooperative agreements or may be requested for ongoing NSF-funded research projects
- **REU Participants** must be U.S. Citizens, U.S. nationals, or permanent residents of the United States. An undergraduate is a student who is enrolled in a degree program (part-time or full-time) leading to a baccalaureate or associate degree

Research Experiences for Teachers (RET)



- Summer research for K-14 educators. Collaborations between universities, community colleges, school districts and industry partners. K-14 educators enhance their scientific disciplinary knowledge and translate the experience into classroom activities and curricula to broaden students' awareness of and participation in computing and engineering pathways
- **RET Sites:** Independent proposals that engage 10 or more K-14 educators for 6-7 weeks during the summer; well-designed research focus and high-quality mentoring strategies; also include academic year activities and dissemination of classroom modules to other K-14 educators/ broader audience
- **RET Supplements:** Funding for 1-2 K-14 STEM educators; a component of proposals for new or renewal NSF grants/cooperative agreements or requested for ongoing NSF research projects
- **RET Participants** must be K-12 teachers and/or community college faculty, as well as U.S. Citizens, U.S. nationals, or permanent residents of the United States



Award Lifecycle: ***Proposal Stage/Planning***

National Science Foundation Proposal
with REU or RET Component

Proposals for REU/RET Sites and Supplements

- Review the most recent **NSF program solicitation** and **NSF Proposal And Award Policies and Procedures Guide (PAPPG)** for guidance
- Address the project components in the solicitation, such as student/teacher program activities, the mentoring plan, recruitment and selection process, Responsible Conduct of Research training, the project evaluation, reporting, and the budget.
- REU/RET Sites will also need a webpage with detail of the program and information on the application process. See NSF's links to **REU** sites for examples.
- ***Supplement requests and Site proposals*** are both submitted through Research.gov as an application to the specific program solicitation.

REU Site Participant Support

Budget Justification Example

- We've provided a sample NSF budget and Budget Justification for the Participant Support Costs (PSCs) for an REU Site. Note that the focus of REU Sites is the student experience, and the budget must reflect this principle. Additionally, PSCs are excluded from the MTDC base, so there's no F&A calculated on these expenses. Project costs must be predominantly for student support, which usually includes such items as:
 - Participant Stipends
 - Housing
 - Meals
 - Travel
 - Laboratory Use

REU Sites/Leadership Alliance

- For REU Sites, consider partnering with Brown's [Leadership Alliance](#). Their flagship program, the Summer Research Early Identification Program (SR-EIP) has been a part of Brown's diversity and inclusion efforts since 1993.
- The SR-EIP runs for 9 weeks over the summer and provides undergraduates with training and mentoring in the principles underlying the conduct of research and prepares them to pursue competitive applications to PhD or MD-PhD programs. This program is for **Non-Brown students only**.
- The Leadership Alliance hosts **networking and professional development events** for all Brown SR-EIP students throughout the summer. REU students would also participate in the **Leadership Alliance National Symposium**.
- The Leadership Alliance Program Coordinator provides a valuable service with the application process and onboarding for REU students, which includes: REU application to use on the REU Site website, summer housing arrangements, travel arrangements to/from Providence, Environmental Health & Safety Training, Responsible Conduct of Research Training, Brown IDs and network/Library Access and managing stipend payments.

REU Sites/Leadership Alliance Budget

- Budgeting for a partnership with the Leadership Alliance should include 2.5% of the Leadership Alliance's Program Coordinator salary/benefits per year, in the award's main budget (not participant support costs). *Coordinate with Leadership Alliance when working on budget
- Leadership Alliance provides an annual cost sheet for budgeting which can be found on the Brown faculty [collaborator's site](#). **Summer 2023** includes the following budget lines:
 - Student Stipend (base on NSF Solicitation for weekly rate) – 2023 rate is \$600/week
 - Housing - \$2,895/per student
 - Travel - \$750/per student
 - Poster Printing - \$75/per student
 - Leadership Alliance National Symposium Registration Fee - \$350/per student
 - Networking and Community Engagement - \$100/per student
 - Participant Support Costs for 9 -week summer program in 2023: \$9,570



Award Lifecycle: *Award Set-up*

National Science Foundation Award
with REU or RET Component

Set-up of New RET/REU Sites or Supplements

- The new Award or Supplement routes to your department's OSP Post-Award Accountant for set-up in Coeus and Workday
- A **restricted child account** is created with REU or RET in the Project Title and will be set up with 0% F&A for the participant support (***no indirect costs allowable***)
- The budget entered into Workday will align with your Coeus budget/Notice of Award
- Department grant administrators and the Principal Investigator will receive a New Award or Supplement email from their post-award accountant with the NOA or modification attached, which identifies the award # and any child account(s)



Award Lifecycle: *Managing the Award*

National Science Foundation Award
with REU or RET Component

Managing REU/RET Supplements

- **Budget** is for 1-2 local teachers (RET) or Brown undergraduates (REU)
- Determine how REUs/RETs will be matched with Faculty as mentors
- **Offer Letter:** Suggest sending out an offer letter to outline the research experience expectations (duration, research components and the stipend payment structure).
- Teachers may require additional onboarding with Brown Sponsored IDs and Network Access, as well as Environmental Health & Safety Training, depending on research.
- Set-up **Stipend Payments:** Detail on slide #25. Note that for the RETs, the offer letter can be attached to the supplier invoice, as supporting documentation.
- Evaluation for Teacher/Students at the end of the program
- REU/RET Reporting in Annual Research Performance Progress Report (RPPR)

Managing the REU/RET Sites

- REU/RET Site Website Creation (includes application & submission portal/instructions)
- Develop Matrix for Selection Process
- Determine how REUs/RETs will be matched with Faculty
- Send out Offer Letters
- Onboarding, which may include:
 - Confirm Eligibility with Student/Teacher Federal documents
 - Student Housing (Non-Brown REUs)
 - Brown Sponsored IDs, Network Access, Building & Library Access
 - Environmental Health & Safety Training (Contact EHS regarding necessary training, depending on research)
 - Schedule Responsible Conduct of Research Training
- Program Activities: Seminars, Team Building, Lab Meetings, Mini Conference or Symposium to allow participants to present their research
- Program Evaluation
- REU/RET Reporting in Annual RPPR

****some steps above may be coordinated by Leadership Alliance for REU Sites, if a partnership is in place***

Responsible Conduct of Research (RCR) Training

- NSF requires that **all students** and postdoctoral researchers **who receive NSF funds** (salary or stipend) **must obtain RCR Training**.
- For Non-Brown students participating in a summer program, the only time to meet this requirement is during the summer program. For Brown students, please ensure that your Undergraduate Coordinators are aware of this requirement and ensuring compliance for all undergraduates supported on NSF funds.
- There are several options for meeting the RCR Training requirements:
 - **Leadership Alliance** provides RCR Training for all REU Sites/Non-Brown students who are part of their summer program.
 - The online **CITI RCR module** also meets this minimum requirements for NSF trainees, at an additional expense per trainee.
 - Departments with a summer REU program, not managed by Leadership Alliance, can collaborate and reach out to **torrey_truskowski@brown.edu** at the **Office of Research Integrity** about developing a hands-on RCR training program for their summer students. Communicate with Torrey early!

Stipend Payments

- An REU or RET is a participant, who is a **non-employee**, participating in a hands-on training program and educational experience. They are not required to provide any deliverables, other than meeting program requirements for the REU/RET.
- **Stipend is the set amount of money to be paid directly to the participant.** Refer to the proposal budget for the REU/RET stipend amounts. The proposal would have been developed using the most recent National Science Foundation REU/RET solicitation notice and expected weekly stipend levels.
- Stipends can be paid weekly or in lump sums, such as $\frac{1}{2}$ the total stipend at the beginning of the research experience and $\frac{1}{2}$ towards the end of the program, which is allowable, as the stipend is not payroll based on hours 'worked'. ***This payment structure is especially beneficial to the undergraduates.*
- **Academic-year REU programs:** When it's an academic-year vs. summer research experience, the stipend should be comparable on a pro rata basis. Ex: In the summer program, participant may be expected to spend approx. 40 hours/week between lab work, activities and collaborations, receiving \$600/weekly. In the academic year, the allotted time for the research experience would likely be $\frac{1}{4}$ of that, so the stipend may be \$150/week, but for a longer duration.

Stipend Payments (continued)

- **For Brown REUs:** Payments are made via **activity pay** as an undergraduate fellowship payment through **UFunds**. Please contact Financial Operations within the Office of Financial Strategy and Planning (OFSP) by emailing Sarah Peri at: Sarah_Peri@brown.edu. Sarah and her team will assist in setting up the appropriate UFunds application for the department.
 - Stipends will post as payroll transaction using **LA 65050: Other Undergraduate Aid / Undergraduate Fellowship (5360) spend category**
 - These payments are **not typical payroll**, related to a Position/Job. Therefore, if a cost transfer is needed, it cannot be processed with a PAA. Instead, it needs to be processed as a **cost transfer journal**.
- **For Non-Brown REUs and Teachers/Faculty RETs:** Process via Supplier Invoice, attaching the Visiting Researcher/Scholar Form; Stipends will post to **LA 80000: Other Expenses / Visiting Researcher/Scholar (9665) spend category**

Participant Support Costs

- All budget categories that may have been approved as participant support costs in your proposal, such as housing, travel, facility usage fees, etc., should be charged to the appropriate spend categories. The budget for these will be included in the restricted child account and will be exempt from F&A.
 - *Example: Travel for Non-Brown REU to/from Providence. Charged as 3940 spend category for visitor travel*
 - *Example: RET participant doing research in the Electron Microscopy Facility. Charged as 6630 spend category for Miscellaneous Facility*



Award Lifecycle: *Award Closeout*

National Science Foundation Award
with REU or RET Component

Award Closeout



OSP will review all stipend payments. Any hourly payroll expenses on REU/RET restricted accounts with budget dates after 7/1/22 will be require a cost transfer to the parent account, if appropriate or should be removed from the award. Guidance on the stipend payment process was shared by the Controller's office prior to FY 23



Any balances remaining on REU/RET child accounts cannot be used to offset overages on the parent account or other child accounts on the same award

Frequently Asked Questions

Can I rebudget funds from my restricted participant support costs child account to a non-PSC grant account within the same award?

If participant support costs were not included in the original award, can I add a participant support component to my project?

How do I make a prior approval request?

It is not allowable to move funds from the PSC child account to a non-PSC grant account, unless prior approval has been obtained from the sponsor.

Adding a PSC component requires sponsor's prior approval. With approval, may be able to fund the component by rebudgeting unused funds in into PSCs. May also request a supplement for PSCs.

Work with your OSP pre- and post-award contacts to determine sponsor requirements for submitting a prior approval request to the sponsor. NSF prior approval requests must be initiated by the PI in Research.gov.

Important Takeaways

1

Participant support costs are governed by specific regulations, program solicitations, and terms and conditions; guidance may vary by agency

2

Participant support costs must *be proposed, budgeted, and accounted for separately*, in accordance with sponsor guidance

3

To ensure that participant support costs are administered appropriately, *communication* between the department, PI and OSP staff is critical



Questions?

For any questions you may have at a later date, please reach out to your department's pre-award and/or post-award OSP contact.

Thank you for joining us today!