

Participant Support Cost FAQ's

Office of Sponsored Programs

<https://www.montana.edu/research/osp/>

October 2021

1. What is a Participant?

- A participant is defined as a non-employee who is the recipient, not the provider, of a service or training opportunity as part of a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity funded by a sponsored award. Participants may be, but are not limited to, students, scholars, scientists from other institutions, or teachers.
- **Participants are not paid salaries or wages.**
See FAQ #5 for further information regarding who and what type of costs do not qualify as PSC.

2. 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. Participant support costs are allowable with prior sponsor approval, per the Uniform Guidance. These types of costs are most commonly included in National Science Foundation (NSF) grants, such as the following programs:

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

While NSF has historically allowed participant support costs, NIH only allows participant support costs if they are explicitly identified in the Funding Opportunity Announcement. Other Federal sponsors that may allow participant support include EPA, USDA NIFA or NRCS, NOAA, and others. Non-Federal sponsors may allow participant support costs under some circumstances. Review the funding solicitation for specific instructions and contact Office of Sponsored Programs (OSP) with any questions **prior to proposal submission**.

3. Should participant support costs be identified in the budget/budget justification?

Yes, participant support costs must be explicitly identified in the budget and budget justification. The NSF budget form has a section online F specifically for participant support costs, and they are identified in the categories listed in FAQ #4 below. If the budget form you are using does not have such a section, but you plan to include participant support costs, please explicitly identify any participant support costs in the budget and budget justification. Participant support costs are excluded from the MTDC base when calculating F&A costs. Identifying participant support costs will help ensure prior sponsor approval is requested and, if awarded, these expenses will be managed correctly and with the appropriate F&A.

4. What costs may be included as participant support costs?

Participant support costs for a project may include a set stipend amount, registration fees for an event, transportation to/from event, lodging during an event, and a per diem allowance to cover meals and incidental expenses if appropriate.

- **Stipend:** A Stipend is a set amount of money to be paid by MSU directly to the participant. For more information regarding stipends, please see FAQ #12.
- **Travel:** Travel includes the costs of transportation, lodging and associated travel-related expenses and must follow sponsor specific guidelines as well as MSU policies and guidelines. The sole purpose of the trip must be to participate in the project activity. The cost of a participant's per diem expenses (reduced accordingly if meals are provided at the meeting/conference) necessary for the individual to participate in the project are generally allowed, provided these costs are reasonable and limited to the days of attendance. Participants who live in the local area are not entitled to travel payments, although they may participate in meals and breaks provided at the meeting/conference. Travel allowances can be either lump sum direct payment to the participant or reimbursement of actual expenses incurred, based on MSU guidelines.
- **Provided Business Meals (excluding catering):** The meals paid on behalf of a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. Please see FAQ #6 for more information.
- **Miscellaneous:** Certain other costs in support of the participant's involvement may be allowable, including housing, training materials or laboratory supplies that can be tied to specific participants (this differs from conference supplies, which should be charged to the non-PSC award index). See Fees example below. Check the funding solicitation for guidance and contact OSP with questions.
- **Fees:** The fees paid by or on behalf of a participant in connection with meetings, conferences, symposia, or training projects are generally allowable costs. Additionally, these fees may include lab fees, visa fees for foreign participants and registration fees.

5. What costs cannot be included as participant support costs?

Participant support costs do NOT include the following types of expenses:

- Costs for PI or project staff*, such as salary and wages, fringe, or travel
- Costs for a consultant or trainer providing services to the University project or program, including fees and travel
- Costs for a guest speaker or lecturer, such as honoraria 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 individuals participating in a research project (these are human subjects payments and should be charged to (currently 62868A - working with UBS to identify a new account code to be listed under supplies)

In general, costs listed above may be included in other budget categories outside of the PSC budget category.

*Project staff include those individuals who are listed in the Senior/Key Person or Other Personnel sections of the project budget. These individuals generally have an employment relationship with the University and are engaged in accomplishing the project's scope of work or deliverables.

6. How are catering and business meals defined and are they allowable on PSC?

It depends. Catering is not a permissible PSC expense. Business Meals, however, if expenses are for participants (in place of a meal per diem) are eligible to be considered PSC. It must be a budgeted cost or we must have received prior sponsor approval. We are required to follow institutional definitions provided by University Business Services, to determine what category of expense the food/meals provided fit(s) into. Please contact OSP with questions.

Per University Business Services, a Business Meal is a breakfast, lunch or dinner attended by multiple people which has a MSU business purpose. Business Meals do not have a fixed timeline or agenda and may be attended by employees and non-employees. To be considered allowable on PSC, only the participant's portion of the meal is allowable within the MSU's per person event meal limits. This can be prorated, if necessary, between the non-PSC project to include employees working on the grant in attendance, and the PSC project for only the participants in attendance. Itemized, paid receipts are required for all business meals.

Examples of business meals could include purchased food, such as pre-packaged box lunches, sandwiches, cheese trays, pizza, cookies, fruit, etc., purchased from a licensed restaurant and/or catering operation. Prepared food may be delivered by the vendor or picked up at the vendor's site by University staff. An example is a PI buying lunch to be delivered from a local restaurant for a group of NSF REU students so that, over lunch, they can discuss the projects to which the students have been assigned. Business meals provided by the University that are directly charged to a PSC project are in lieu of the participant receiving a per diem reimbursement or stipend. The per diem or subsistence allowance, if any, is to be correspondingly reduced (a hospitality approval form is required if over \$30).

7. Are Costs such as room rental fees, catering, hosted meals, and supplies related to NSF-sponsored conferences considered participant Support costs?

No. The participant support costs should not typically include these costs. These costs should be included in the appropriate budget categories for the project.

8. For participant support funds, the PI only budgeted travel and subsistence. The PI realized after the award was received that they will actually need to pay a registration fee on behalf of each participant to attend the workshop. What budget category would this expense fall under?

Prior approval is needed to charge these registrations fees as PSC to the project. Once approved, the fees would be budgeted to Miscellaneous Participant Support, account code 62686M.

9. What are some examples of what might or might not be considered participant support costs?

Some examples that would be considered participant support costs:

Example: An NSF project has been awarded an REU supplement. The REU supplement will enable 5 undergraduate students from around the country to participate in a summer research project with a MSU PI. The students will be paid a stipend and provided room and board over an 8-week period. The stipends and room/board would be considered participant support costs.

Example: MSU is awarded a grant from a Federal agency to host an educational workshop in Washington, DC. Individuals (the audience is primarily postdoctoral fellows from around the country) will apply for financial support to attend the conference. The financial support will cover the costs to travel to and attend the workshop. Travel reimbursement costs, lodging/per diem during the event, and registration fees would be considered participant support costs. However, costs of hosting the event, such as room rental, AV equipment rental, or catering, would not be allowable as participant support costs and would need to be charged elsewhere in the budget.

Example: MSU receives an award from the NSF that includes an REU component. The REU component allows the PI's lab to support MSU undergraduate students during the academic year over the course of the three-year grant. The students will be mentored and will assist with various research projects, e.g., media preparation, plant tissue culture, cloning, and mutant analysis. The student stipends would be considered participant support costs. Undergraduate student stipend payments require special treatment and should not be paid as student hourly wages. Consult OSP for guidance.

Example: NSF provides an award to MSU that includes a RET activity. The PI will host a teacher over the course of the summer who will gain research experience, and then use that knowledge to develop educational materials and activities. The teacher will pilot the activities with students and present the materials at regional conferences with fellow teachers. The teacher's summer stipend, supplies for the activities, and travel to regional conferences would be considered participant support costs.

Example: A Federal agency provides an award to MSU to train teams of classroom educators and community members from around the state. The teams of educators and community members will then engage local youth in community-based science and service-learning projects. The workshops to train classroom educators and community members take place over the summer. The costs associated with the workshops **that** enable the individuals to attend, including stipends, transportation, and lodging, are participant support costs.

Some examples that would not be considered participant support costs:

Example: MSU is part of a scientific collaboration involving PIs from five different institutions. The MSU PI hosts a meeting with his/her Co-PIs and other scientists to discuss project progress. Collaborators must travel to Billings to attend the meeting. The costs for this meeting of scientific collaborators to discuss the project would not be considered participant support costs. The Co-PI's/other scientists would need to follow their own institutions travel policies.

Example: As part of a conference grant, a MSU PI invites an expert in the field to talk about recent discoveries that were featured in a prominent scientific journal. In order to support the expert's attendance, the grant provides an honorarium of \$2,000. The honorarium for the speaker would not be considered a participant support cost.

10. Is rebudgeting of participant support costs allowed during the life of the award? How would I go about rebudgeting?

Rebudgeting may be allowed, but in almost all cases requires prior approval from the sponsor. See the [Research Terms and Conditions Prior Approval Matrix](#) (also detailed at end of this slide deck). Rebudgeting requests should be processed during the life of the award. More information is available below.

a. Can I rebudget funds categorized as Participant Support Costs to non-PSC budget categories within the award after an award has been received?

Maybe. Generally, it is not allowable to rebudget from the participant support costs category into other budget categories unless prior written approval has been obtained from the sponsor. If approval is obtained from the sponsor and funds are moved from participant support costs into other budget categories, F&A costs will be applied to the rebudgeted funds as appropriate.

b. Can I rebudget non-PSC funds into a PSC budget category?

If a participant support project were approved as part of the original award, then funds could be rebudgeted from the non-PSC project in accordance with the terms and conditions of the award. If the award did not already include a participant support project, then adding a participant support component to the award would need the sponsor's prior approval- NIH, specifically requires prior approval for this.

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

Maybe. Adding a participant support component to the project will need prior approval from the sponsor. With the sponsor's approval, one option to fund this new component would be to rebudget unused funds into participant support costs. OSP can assist with submitting a prior approval request to rebudget funds for this purpose. The other option would be for the PI to request a supplement for participant support costs. A supplemental proposal would need to be submitted but discuss with your program officer first. If approval were obtained for participant support costs, OSP could set up a new index for the award in order to separately account for these costs and apply a 0% F&A rate as required by the Uniform Guidance.

d. Can I rebudget funds within the different participant support cost categories?

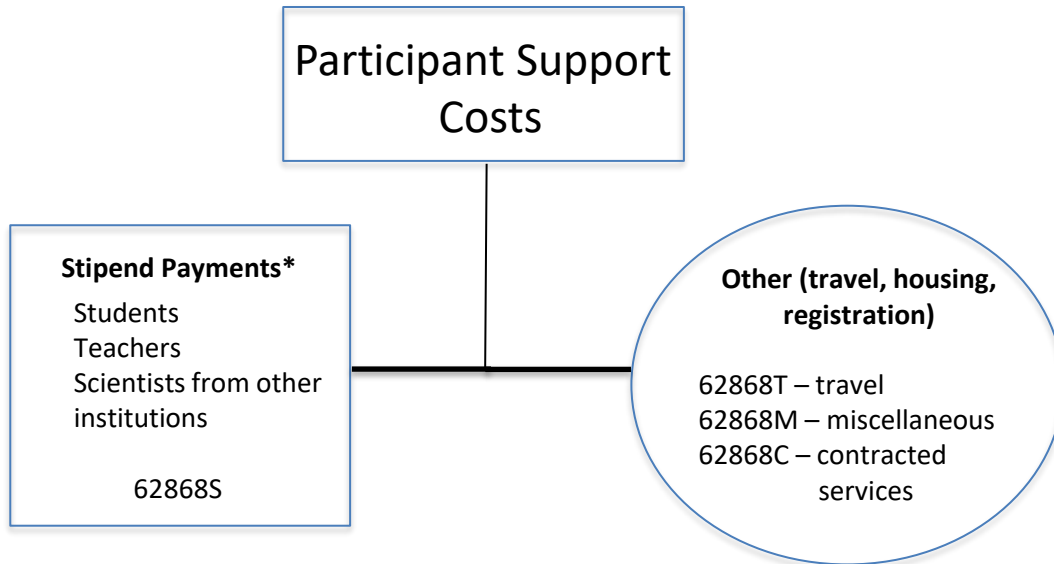
Generally speaking, rebudgeting within different participant support cost categories is allowable. An exception would be for NSF awards. If the intent were to rebudget funds into the "Other" miscellaneous category, that action may need agency prior approval.

e. How would I make a prior approval request?

Please work with your OSP Fiscal Manager to submit a prior approval request to the sponsor. Note that NSF prior approval requests must be initiated by the PI in Research.gov.

11. When and how should stipends be paid to participants?

Stipend payments may be paid to participants for certain training grant such as NSF REU's and RET's but not payroll. See diagram below. Consult with your OSP Fiscal Manager, as well.



*Chrome River should not be used for stipends. The Traineeships and Fellowships Form (student stipend) should be used and is available through OSP. Once this form is completed and signed a BPA should be generated. (a sample form is attached at end of this slide deck)

12. What kind of documentation should a department keep on file for participant support costs?

Similar to other award-related expenses, a department must maintain back-up documentation for all participant support costs. This would include a list of program participants and evidence of attendance of participants.

13. Are payments to research subjects considered participant support costs?

No. A payment to an individual who agrees to participate as a human subject in a research project is not a participant support cost and should be budgeted as Other Direct Costs in the project proposal and expensed to account code (currently 62868A- working with UBS to identify a new account code to be listed under supplies).

14. May I include conference speaker fees in the participant support section of the budget?

No. The participant support costs category is for the support of participants or trainees only. Speakers and trainers are not considered participants and should not be included in this section of the budget. Conference speaker fees should be included as a contracted service within the proposal budget, but not a PSC.

15. Are costs to support pre-doc or post-doc trainees in a training grant considered to be participant support costs?

The answer depends on the sponsor. Generally, costs for training grant programs are not considered participant support costs. Training grant programs are not typically short-term experiences and are not consistent with the types of experiences considered to be participant support activities. Trainees are also actively engaged in the scope of work and paid as a fellowship.

16. Our University is a subrecipient and the project contains participant support costs. We are interested in rebudgeting out of participant support costs into another budget category. Should we submit our prior approval request to the pass-through entity that issued the subaward or to the sponsoring agency?

The Pass-through entity. When a university is a subrecipient, their relationship is with the pass-through entity and the pass-through entity is expected to oversee administration of the subaward.

17. Our institution would like to rebudget funds out of participant support costs into another category of expense. Will there be an F&A impact?

Yes. Participant support costs are excluded from F&A per the MTDC definition. When funds are moved from participant support to another budget category F&A must be applied to the new budget category.

Montana State Business Manual – Hospitality Approval

460.10 Introduction

According to Section 205.4 of the Montana University System Policy and Procedures Manual, expenses for official hospitality, community relations, or public relations may be paid by a unit only when such activities are directly related to the unit. Those authorized to approve hospitality must determine that the activity is **directly** related to an objective of the unit and evaluate the importance of the event in terms of cost versus benefits and alternatives that would be equally effective. If the hospitality is to benefit persons from outside the unit, the department may pay for the meal expenses of its guest and **one** official host from the department. OTHER DEPARTMENT MEMBERS ATTENDING **MUST** PAY FOR THEIR OWN MEALS.

460.20 Definitions

An official guest is a person, not employed or compensated by the unit, who is present on the campus to render a service or as a position candidate. Meals do not include alcohol. Light refreshments mean non-alcoholic beverages and/or pastries or fruit.

460.30 Form

A Hospitality Approval Form will be required for all hospitality that exceeds \$30.00 for both on and off campus. The Hospitality Approval Form must be attached to the BPA with the itemized invoice. No payment for services can be made without the Hospitality Approval Form and the itemized invoice(s). See above to download Hospitality Approval Form. (see the following slide).

460.40 Authorization

To be reimbursed for hospitality that exceeds **\$30.00**, the hospitality must be approved **PRIOR** to the event, using the Hospitality Approval Form. Authorization by the head of the department is sufficient for less than \$50.00. If the cumulative invoices for hospitality exceed \$50.00, both the Department Head and that person's supervisor must approve the expenditure. The Dean's or VP's signature is required if more than one MSU employee is attending. The host may not approve his/or her own hospitality. The amount authorized should be adequate to cover the cost of delivery and set up charges. If the amount is exceeded, the authorized approval authority must change and initial the requested amount and if necessary, additional signatures secured.

If you have ANY questions, please contact University Business Services.

University Business Procedures Manual – Hospitality Approval Form



HOSPITALITY APPROVAL FORM

- Educational/Training Expenses: Training costs including light refreshments or meals served during seminars, workshops, professional meetings, or conferences. Hospitality Form required for food over \$30.00. (Account Code 62809)
- Entertainment: Costs related to university approved entertainment of official guests or visitors. A Hospitality Approval form is required if over \$30.00. Receipt documentation should include a list of attendees. (Account Code 62824)
- Recruiting: Travel meals lodging for position candidates and prospective athletes. Not Advertising (See 62316 & 62317 for advertising.) Hospitality form and participant list required for food over \$30.00. (Account Code 62815)
- OSP Seminar Expenses: Light refreshments or meals provided during OSP seminars. (Account Code 62145)

DATE: _____

PERMISSION IS REQUESTED TO USE _____ FUNDS
(Department Name & Account Number)

FOR _____ DATE: _____
(Refreshments, Breakfast, Lunch, Dinner)

FUNCTION _____

NAME OF GUEST (S) OR GROUP AT FUNCTION _____

NUMBER OF PERSONS FROM _____ AND _____
(Other Units, Etc.) (MSU)

OFFICIAL HOST: _____ AMOUNT REQUESTED _____
((\$30.00 or More)

DEPARTMENT HEAD APPROVAL _____ DATE _____

DEAN/VP APPROVAL _____ DATE _____
(Must be signed if amount exceeds \$50.00 or more than one MSU representative is present.)

OFFICE OF SPONSORED PROGRAMS APPROVAL _____
DATE _____
(Valid for FUNDS 426XXX through 429999 and 4WXXXX, 436XXX through 438XXX)

*****THE HOSPITALITY APPROVAL FORM MUST BE APPROVED PRIOR TO THE DATE OF THE EVENT.

NOTE: ALL EXPENSES MUST MEET THE GUIDELINES IN THE MSU BUSINESS PROCEDURES MANUAL

<https://www.montana.edu/ubs/documents/Hospitality%20approval%20Form.pdf>



University Business Services
Montana State University
Bozeman, Montana 59717

Non OSP APPOINTMENT FORM - TRAINEESHIPS & FELLOWSHIPS

Name: _____ Dept/School: _____
Home Address: _____ Banner ID No. _____

Appointment Details:

Date to Begin: _____ Date to Terminate: _____
Total Gross Amount: _____ Non OSP Index No.: _____
Amount to be Paid per Month: _____ Account Code: _____

This traineeship or fellowship award is made for the training and education of the individual, and is directly related to the technical area of degree sought.

You are advised that amounts granted are taxable income if the total scholarship amount exceeds tuition and fees required for enrollment (not including room and board) and include fees, books, supplies and equipment required for courses of instruction.

No deductions are made for any purposes, such as income tax, or social security. As a result, 1099 Forms will not be sent to you. You must maintain your own income tax records for tax purposes. Contact the IRS for more information.

I have read the above statement and understand I will be responsible for any tax liability resulting from amounts received.

Student's Signature Date

APPROVED BY:

Authorized Signature Date

Authorized Signature Date

One copy to AP One copy to Financial Aid One copy to FSS One copy to Student

Research Terms and Conditions Appendix A

Prior Approval Matrix

November 20, 2020

| | Reference | RTC Overlay | NSF | DOE | NIH | USDA NIFA | DOC | NASA | DHS-GFAD | DHS-FEMA |
|--|---------------|-------------|------------------------|----------|-----------------------|----------------------|----------|--------------------------|----------|----------|
| Prior Written Approval (prior approval)¹ | 200.407 | | | | | | | | | |
| Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts | 200.407(a) | | | | | | | | | |
| Changes in principal investigator (PI), project leader, project partner, or scope of effort. | 200.201(b)(5) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Cost sharing or matching | 200.407(b) | | | | | | | | | |
| Use of unrecovered indirect costs, including indirect costs on cost sharing or matching. | 200.306(c) | Waived | Waived | Waived | Waived | Waived ⁵ | Waived | Waived | Required | Waived |
| Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing or matching. | 200.306(d)(2) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Waived |
| Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land. | 200.306(h)(2) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Program Income | 200.407(c) | | | | | | | | | |
| Use of program income during the period of performance (additive method). | 200.307(e)(2) | Waived | Waived | Waived | Waived ⁶ | Waived | Waived | Waived ²⁰ | Waived | Waived |
| Revision of budget and program plans | 200.407(d) | | | | | | | | | |
| Change in the scope or the objective of the project or program. | 200.308(c)(1) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Change in a key person specified in the application or Federal award. | 200.308(c)(2) | Required | Required ¹⁴ | Required | Required | Required | Required | Required | Required | Required |
| Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved Project Director (PD) or PI. | 200.308(c)(3) | Required | Required ¹⁴ | Required | Required ⁵ | Required | Required | Required ²¹ | Required | Required |
| Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E -- Cost Principles. | 200.308(c)(4) | Required | Waived ¹ | Required | Waived ⁷ | Required | Required | Required | Required | Required |
| Transfer of funds budgeted for participant support costs to other categories of expense. | 200.308(c)(5) | Required | Required ² | Required | Waived ³ | Required | Required | Required | Required | Required |
| Subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services. | 200.308(c)(6) | Required | Required | Required | Waived ⁸ | Waived ¹⁸ | Required | Required | Required | Required |
| Changes in the approved cost-sharing or matching provided by the non-Federal entity. | 200.308(c)(7) | Required | Required | Required | Required | Waived ¹⁷ | Required | Required | Required | Required |
| Need for additional Federal funds to complete the project. | 200.308(c)(8) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award. | 200.308(e)(1) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Required | Waived |
| Incur project costs more than 90 calendar days pre-award. | 200.308(e)(1) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Initiate a one-time extension of the period of performance by up to 12 months. | 200.308(e)(2) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Required | Waived |
| Subsequent no-cost extension or extension of more than 12 months. | 200.308(e)(2) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Carry-forward of unobligated balances to subsequent budget periods. | 200.308(e)(3) | Waived | Waived | Waived | Waived ¹⁶ | Waived | Waived | Waived | Required | Waived |
| Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa. | 200.308(e)(4) | Waived | Waived | Waived | Waived ¹³ | Waived | Waived | Waived | Required | Waived |
| Restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the simplified acquisition threshold and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency. | 200.308(f) | Waived | Waived | Waived | Waived ¹¹ | Waived | Waived | Waived ^{22, 23} | Required | Waived |
| Making any fund or budget transfers between construction and non-construction work. | 200.308(h)(5) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Real Property | 200.407(e) | | | | | | | | | |
| Encumber real property acquired with Federal funds. | 200.311(b) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Transfer of title to the Federal awarding agency or to a third party. | 200.311(c)(3) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Special arrangements and alterations costs incurred specifically for a Federal award. | 200.462(a) | Required | Required ³ | Required | Waived ¹² | Required | Required | Required | Required | Required |

Research Terms and Conditions Appendix A

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November 20, 2020

| | Reference | RTC Overlay | NSF | DOE | NIH | USDA NIFA | DOC | NASA | DHS-GFAD | DHS-FEMA |
|--|-------------------|-------------|----------|----------|----------------------|----------------------|------------------------|--------------------------|----------|----------|
| Equipment | 200.407(f) | | | | | | | | | |
| Encumber equipment acquired with Federal funds. | 200.313(c)(1) | Required | Required | Required | Required | Required | Required ¹⁹ | Required | Required | Required |
| Fixed amount subawards | 200.407(g) | | | | | | | | | |
| Subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the requirements for fixed amount awards in 200.201. | 200.333 | Required | Required | Required | Required | Required | Required | Required | Required | Waived |
| Direct Costs | 200.407(h) | | | | | | | | | |
| Direct charge the salaries of administrative and clerical staff if all conditions in 200.413 are met, excluding 200.413(c)(3). | 200.413(c) | Waived | Required | Waived | Waived | Waived | Waived | Waived | Waived | Waived |
| Compensation – personal services, paragraph (h) | 200.407(i) | | | | | | | | | |
| Directly charge payments of incidental activities for which supplemental compensation is allowable under written institutional policy (at a rate not to exceed institutional base salary). | 200.430(h)(1)(ii) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Waived |
| Faculty salary in excess of Institutional Base Salary (IBS). | 200.430(h)(2) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Intra-IHE faculty consulting on a Federal award that exceed a faculty member's base salary. | 200.430(h)(3) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Required | Required |
| Compensation – fringe benefits | 200.407(j) | | | | | | | | | |
| Severance payments to foreign nationals employed by the non-Federal entity outside the US that exceed the amounts customary in the US. | 200.431(i)(4) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Severance payments to foreign nationals employed by the non-Federal entity outside the US due to termination of the foreign national as a result of the closing of, or curtailment of activities by, the non-Federal entity in that country. | 200.431(i)(5) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Entertainment costs | 200.407(k) | | | | | | | | | |
| Inclusion of costs of entertainment, including amusement, diversion, and social activities and any associated costs that have a programmatic purpose. | 200.438 | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Equipment and other capital expenditures | 200.407(l) | | | | | | | | | |
| Direct charge capital expenditures for general purpose equipment. | 200.439(b)(1) | Waived | Waived | Waived | Waived ¹¹ | Waived ¹⁸ | Waived | Waived ^{22, 24} | Waived | Waived |
| Direct charge capital expenditures for buildings and land use. | 200.439(b)(1) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Direct charge capital expenditures for special purpose equipment over \$5,000. | 200.439(b)(2) | Waived | Waived | Waived | Waived ¹¹ | Waived | Waived | Waived ^{22, 24} | Waived | Waived |
| Capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life. | 200.439(b)(3) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Exchange rates | 200.407(m) | | | | | | | | | |
| Exchange rate fluctuations that result in the need for additional Federal funding, or a reduction in the scope of the project. | 200.440(a) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Fines, penalties, damages and other settlements | 200.407(n) | | | | | | | | | |
| Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, Federal, state, tribal, local or foreign laws and regulations. | 200.441 | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Fund raising and investment management costs | 200.407(o) | | | | | | | | | |
| Fund raising costs for the purposes of meeting the Federal program objectives. | 200.442(a) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Goods or services for personal use | 200.407(p) | | | | | | | | | |
| Costs of housing (e.g. depreciation, maintenance, utilities, furnishings, rent, housing allowances and personal living expenses). | 200.445(b) | Required | Required | Required | Required | Required | Required | Required | Required | Required |

Research Terms and Conditions Appendix A

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| | Reference | RTC Overlay | NSF | DOE | NIH | USDA NIFA | DOC | NASA | DHS-GFAD | DHS-FEMA |
|---|---------------|-------------|-----------------------|----------|------------------------|-----------|----------|------------------------|----------|----------|
| Insurance and indemnification | 200.407(q) | | | | | | | | | |
| Costs of insurance or of contributions to any reserve covering the risk of loss of, or damage to, Federal Government property. | 200.447(b)(2) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Memberships, subscriptions, and professional activity costs, paragraph (c) | 200.407(r) | | | | | | | | | |
| Costs of membership in any civic or community organization. | 200.454(c) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Organization costs | 200.407(s) | | | | | | | | | |
| Costs such as incorporation fees, brokers' fees, fees to promoters, organizers or management consultants, attorneys, accountants, or investment counselor, whether or not employees of the non-Federal entity in connection with establishment or reorganization. | 200.455 | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Participant support costs | 200.407(t) | | | | | | | | | |
| Transfer of funds into the participant support cost category. | 200.456 | Waived | Waived ⁴ | Waived | Required ¹³ | Waived | Waived | Waived | Required | Waived |
| Transfer of funds budgeted for participant support costs to other categories of expense. | 200.308(c)(5) | Required | Required | Required | Waived ⁵ | Required | Required | Required | Required | Required |
| Pre-award costs | 200.407(u) | | | | | | | | | |
| Inclusion of allowable pre-award costs. | 200.458 | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Required | Waived |
| Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award. | 200.308(e)(1) | Waived | Waived | Waived | Waived | Waived | Waived | Waived | Required | Waived |
| Incur project costs more than 90 calendar days pre-award. | 200.308(e)(1) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Rearrangement and reconversion costs | 200.407(v) | | | | | | | | | |
| Direct charge special arrangements and alterations costs incurred specifically for a Federal award. | 200.452(a) | Required | Required ² | Required | Waived ¹² | Required | Required | Required | Required | Required |
| Selling and marketing costs | 200.407(w) | | | | | | | | | |
| Costs of selling and marketing any products or services of the non-Federal entity (unless allowed under §200.421). | 200.467 | Required | Required | Required | Required | Required | Required | Required ²⁵ | Required | Required |
| Taxes (including Value Added Tax) | 200.407(x) | | | | | | | | | |
| Use of foreign tax reimbursement for approved activities under the Federal award. | 200.470(c) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Travel costs | 200.407(y) | | | | | | | | | |
| Inclusion of travel costs for officials covered by 200.444 General costs of government. | 200.474(a) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| Travel costs for dependents for travel of duration of six months or more. | 200.474(c)(2) | Required | Required | Required | Required | Required | Required | Required | Required | Required |
| * Any of the authorities may be over-riden by a special term or condition of award. | | | | | | | | | | |
| ¹ Except where specified otherwise in this matrix, the terms and conditions of award, or the applicable program solicitation or award notice. | | | | | | | | | | |
| ² This action requires the prior written approval of the cognizant NSF Program Officer. | | | | | | | | | | |
| ³ Rearrangement and reconversion costs under \$25,000 may be approved by grantees. | | | | | | | | | | |
| ⁴ Unless funds are being moved into the "Other" category of participant support. | | | | | | | | | | |
| ⁵ Waived, funds added to the amount available for the project. | | | | | | | | | | |
| ⁶ Required for the PI and any other individuals specifically named in the Notice of Award. | | | | | | | | | | |
| ⁷ Waived, but costs not specifically covered in Subpart F are subject to the NIH Grants Policy Statement (NIHGPS). | | | | | | | | | | |
| ⁸ Waived, unless change in scope. For the purposes of Kirschstein-National Research Service Award (NRSA) programs, this term does not apply. NIH will continue to use the terms trainees, trainee-related expenses, and trainee travel in accordance with NRSA Regulations. Participant support costs are only allowable when identified in specific Funding Opportunity Announcements (FOAs). | | | | | | | | | | |

Research Terms and Conditions Appendix A

Prior Approval Matrix

November 20, 2020

| | Reference | RTC Overlay | NSF | DOE | NIH | USDA NIFA | DOC | NASA | DHS-GFAD | DHS-FEMA |
|---|-----------|-------------|-----|-----|-----|--------------|-----|------|----------|----------|
| ⁹ Waived unless change in scope and except when subrecipient is foreign. | | | | | | | | | | |
| ¹⁰ Waived except when Notice of Award indicates prior approval is required. | | | | | | | | | | |
| ¹¹ Waived unless change in scope. | | | | | | | | | | |
| ¹² Waived for alterations and renovations costing up to \$500,000, unless change in scope or rebudgeting into A&R exceeds 25% of budget period total. See Rearrangement and Reconversion Costs within NIH Grants Policy Statement Chapter 7.9.1. | | | | | | | | | | |
| ¹³ Required, participant support costs are only allowable when identified in specific Funding Opportunity Announcements (FOAs). | | | | | | | | | | |
| ¹⁴ This also is required for any co-PI/co-PD on the project. | | | | | | | | | | |
| ¹⁵ Only if the total amount of indirect costs charged to the project does not exceed the maximum allowed indirect costs or the institution's negotiated indirect cost rate, whichever is less. | | | | | | | | | | |
| ¹⁶ Waived except when: 1) subaward(s) would be more than 50% of the total dollars of the award or 2) subaward is to a federal agency. In these situations, prior approval is required. | | | | | | | | | | |
| ¹⁷ Except when the change is a reduction in the amount of approved cost-sharing/match in which case prior approval is required. | | | | | | | | | | |
| ¹⁸ If the cost of the equipment is appropriately prorated among the activities to be benefitted. | | | | | | | | | | |
| ¹⁹ Department of Commerce (DOC) permits non-Federal entities to own equipment upon acquisition without conditions or without obligation to the sponsor at termination of project, unless otherwise specified in a specific award condition. DOC permits trade in equipment to buy replacement equipment. | | | | | | | | | | |
| ²⁰ With prior approval, may use to meet cost share requirement. | | | | | | | | | | |
| ²¹ Applies to PIs and co-PIs. | | | | | | | | | | |
| ²² Waived unless results in a change of scope. | | | | | | | | | | |
| ²³ Waived unless total cost share amount is reduced from what was approved in budget. | | | | | | | | | | |
| ²⁴ Waived if the cost of equipment is appropriately prorated among the activities to be benefitted. | | | | | | | | | | |
| ²⁵ Pertains only to items produced under this award in which the Federal share was used for all or part of the development. | | | | | | | | | | |