

This document is intended to provide a basis for consistent practice in compensating or otherwise financially supporting students on sponsored projects across The University of Texas at San Antonio (UTSA).

Introduction

In accordance with standard practice, the terms of an individual award, and then federal sponsor regulations should be reviewed to determine if there are any award- or agency- specific regulations or guidelines regarding any of the topics covered below. If both the award and the sponsor are silent, then federal regulations should be followed. UTSA follows federal regulations ([2 CFR 200, Uniform Guidance](#)) as a general basis for consistently administering projects across all sponsor types ([UTSA HOP 10.12 – Sponsored Programs](#)). The Uniform Guidance – a "government-wide framework for grants management" – is an authoritative set of rules and requirements for Federal awards that synthesizes and supersedes guidance from earlier Office of Management and Budget (OMB) circulars.

Student Roles

UTSA students can receive support or compensation through sponsored projects in one of three ways: (1) as student employees working towards project deliverables (typically, research assistant titles), (2) as participants in a training program, or (3) as human research subjects.

If the role of a student is that of a **Research Assistant**, then:

- Individual is considered an employee.
- Institution personnel policies will apply, i.e., the person is hired on an appointment, earns/contributes toward [minimum federal fringe benefits](#), has a set expected schedule/hours worked in office/a lab each week
- In a proposal budget, the individual must be listed under Personnel/Salaries & Wages.
- The employee cannot also be listed under Participant Support.
- Tuition/Fee support for this person, if being provided through the sponsored project, should be included in the "Other Direct Cost" line and identified as "Tuition and Fees" (line 90 in the UTSA budget template).
- See further information about [graduate student assistantship roles](#), as outlined by the UTSA Graduate School.

If the role of a student is that of a **Participant**, then:

- Individual is considered a Participant.
- Institution participant policies will apply, i.e., the person is paid after completing a participant agreement
- In a proposal budget, costs associated with the individual should be listed within [Participant Support Costs](#) section/line items.
- The person cannot also be an Employee on the same project.

If the role of a student is that of a **Research Subject**, then:

- Individual is considered a Research Subject recruited for a research project.
- Institution policies will apply, including the necessity of an approved IRB protocol on file.
- In a proposal budget, the cost should be listed under [Other Direct Costs](#). Within the UTSA budget template there is a specific line item for "Human Subject Payments," which can be used for budget drafting/estimation.

GUIDANCE ON STUDENT SUPPORT & COMPENSATION ON SPONSORED PROJECTS

Guidance on Roles

	Research Assistant (Salary/Wages)	Participant (Stipends/Other Support)	Research Subject (Incentive)
Is this person directly contributing to the outcome of the project / conducting activities or work that will benefit the project?	Yes	No	No
Is this person responsible for deliverables on the project, working in a lab executing project activities, developing a thesis/dissertation from their work on the project, etc.?	Yes	No	No
Is this person expected to maintain a particular schedule and work a certain number of hours on the project?	Yes	No	No
Is this person an employee?	Yes	No	Could be
Does this person receive Federal fringe benefits?	Yes	No	No
Does or will the person receive performance reviews?	Yes	No	No
Is this person enrolled at UTSA?	Yes	Could be, if participating in a program specifically designated for training or fellowships	Could be
Is this person participating in a research project by taking a survey, taking part in a research study, or similar activity?	No	No	Yes
Is there an IRB protocol on file for the project/study in which that person is a research subject and information/data is collected from or about them?	No	No	Yes
Is this person's sole role on the project to participate as an attendee/trainee (not speaker) in a conference or training workshop/activity?	No	Yes	No
Is this person part of an REU (Research Experience for Undergraduates), Fellowship (F31, GRFP), or other formal internship/traineeship?	No	Yes	No

Participant Support Costs

What are Participant Support Costs?

Participant support costs (as defined in [Uniform Guidance, 2 CFR 200.1](#)) means 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 conferences or training projects. The Uniform Guidance requires prior approval of the Federal Agency in order to incur Participant Support Costs under federally sponsored awards ([Uniform Guidance, 2 CFR 200.456](#)). The Participant Support Costs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency.

Who is a participant?

A participant is defined as the recipient (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 do not perform work or services for the project or program unless it is for their own benefit. Participants may include students, scholars, and scientists from other institutions, representatives from the private sector, teachers, and state or local government agency personnel.

What costs are not considered Participant Support Costs?

Participant Support Costs do not include honoraria for guest speakers; expenses for the PI, project staff or collaborators to attend project meetings, conferences, or seminars; payments to research assistants; or payments made to research subjects as an incentive for recruitment or participation in a research project. Participant Support Costs are not intended to pay the costs of hosting a conference or training program – room rental and supplies are typically not considered Participant Support Costs. UTSA employees are not considered participants therefore costs incurred for UTSA employees do not qualify as Participant Support Costs.

Can I rebudget Participant Support Costs within my award/project?

Any rebudgeting of Participant Support Costs to another budget category on an award requires the approval of the sponsor.

How should student employees be budgeted?

A student cannot be compensated partially as an employee and as a participant on the same project. It is up to the PI and REDKE personnel to determine whether a student should be paid as a student employee or a participant based on the role of the student in the project.

May human subjects that are being paid as survey takers be considered participants?

No, the participant support section of the budget may not be used to provide incentive payments to research subjects. Human subject payments should be included within the "Other Direct Costs" section of the budget, and indirect costs should be calculated on the payments in accordance with UTSA's federally negotiated indirect cost rate.

Tuition and Scholarships

Tuition

Tuition is the charge or fee for instruction, as at a private school or a college or university. Tuition is different from a Scholarship. Per UTSA policy and federal regulations (Uniform Guidance), tuition is allowed on an award when it is:

- (1) Paid as a fringe benefit for an undergraduate or graduate employee, provided such benefits are granted in accordance with established UTSA policies, and are distributed to all UTSA activities on an equitable basis. *Tuition benefits for family members other than the employee are unallowable.* [See [Uniform Guidance, 2 CFR 200.431](#)] **OR**
- (2) The purpose of the award is to provide training to selected participants (e.g., Training Grant or Fellowships) and the sponsor allows tuition charges on the award [See [Uniform Guidance, 2 CFR 200.466](#)].

Scholarship (and Fellowship)

An amount of money that is given by any person or entity to help pay for a student's education. Scholarships can typically be used to pay for any type of cost, not necessarily tuition. The scholarship funds can be given directly to the student or to the educational institution.

Scholarships and Fellowships are typically not allowable costs on Federal research awards as they are considered to be student aid and would offer no benefit to the research project activities. Per Uniform Guidance ([2 CFR 200.466](#)), costs of scholarships, fellowships, and other programs of student aid at institutions of higher education are allowable only when the purpose of the Federal award is to provide training to selected participants and the charge is approved by the Federal awarding agency.

UTSA and PIs should follow the funding design intended by the sponsor for the program and follow sponsor terms and conditions for funded fellowships as they apply to the institution, department, mentor, and fellow.