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When Staff Travel with Students: How Should TRIO Projects Split the Costs?

A practical guide to splitting TRIO travel costs correctly for Modified Total Direct Costs (MTDC) and budget classification purposes.

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The Quick Answer

Do not classify the entire trip by the event name. A "student trip" may include both participant travel costs and staff supervision travel costs. The participant costs may be treated as Participant Support Costs when properly classified and documented. The staff costs may be necessary and allowable, but staff are not participants. Their travel should generally be budgeted separately from participant travel.

> The practical rule is: **Split the trip costs by who the cost is for, not just by what the trip is called.**

The Real Compliance Question

A TRIO staff member asks: *"Where do the regulations say what counts as student travel versus staff travel?"* That sounds like a simple question, but the answer is not found in one neat regulation. The better question is: **Who is the cost for, and why is that cost necessary?**

> **On one approved campus visit, the project may pay for:** student bus transportation, student meals, student lodging, staff mileage, staff hotel, staff meals, admission fees, parking, and conference or event registration.

✅ Same Activity

One trip — but the costs do not all belong in the same budget or indirect-cost category.

⚠️ Classification Risk

Lumping all costs together creates MTDC and compliance exposure for the project.

Why This Matters for MTDC?

Modified Total Direct Costs (MTDC) include many direct costs, including travel, but **exclude participant support costs**. The Uniform Guidance definition of participant support costs includes direct costs that support participants and their involvement in a federal award — such as travel allowances, registration fees, per diem, stipends, subsistence allowances, and similar costs paid directly to or on behalf of participants.

If Staff Costs are Incorrectly Folded into Participant Travel

The institution may exclude too much from MTDC — understating the indirect cost base.

If Participant Costs are Left in Regular Travel

The institution may calculate indirect costs on costs that should have been excluded — overstating the base.

The purpose of separating these costs is not to create a more favorable indirect cost calculation. The purpose is to ensure participant costs and staff costs are classified accurately and consistently.

The Key Uniform Guidance Point

Under the Uniform Guidance, participant support costs are **for participants**. Project staff are not participants because they are responsible for implementing the award. So the clean distinction is:

Participant Travel

Costs paid to or on behalf of TRIO participants so they can participate in an approved project activity. **May be excluded from MTDC when properly classified.**

Staff Supervision Travel

Costs for staff who must accompany, supervise, or support participants during an approved project activity. **Generally remains in MTDC.**

Staff Professional Development Travel

Costs for staff to attend training, conferences, or similar activities for their own professional development or project administration. **Generally included in MTDC.**

Put plainly: All three may be allowable in the right situation. But they are not the same thing.

The Budget Rule

A student trip may include **both** participant travel and staff supervision travel. **The fact that both costs support the same activity does not mean they belong in the same budget category.**

Travel

Staff Professional Development or Training Travel

Staff conferences, Department of Education (ED) training, project administration travel.

Staff Supervision Travel for Approved Participant Activities

Staff costs when accompanying and supervising participants during approved activities.

Participant Support Costs

Participant Travel for Approved Project Activities

Transportation, meals, lodging when allowable, admission fees, registration fees.

Other Participant Support Costs (When Allowable)

Stipends, participant allowances, participant registration fees, other approved participant costs.

The clean rule: Do not include staff travel inside participant support costs just because the staff are traveling with students.

Sample Budget Breakdown

Budget Section	Line Item	Examples	MTDC Treatment
Travel	Staff Professional Development / Training Travel	Staff conferences, ED training, project administration travel	Generally included in MTDC
Travel	Staff Supervision Travel for Approved Participant Activities	Staff airfare, mileage, lodging, meals, per diem, parking while accompanying participants	Generally included in MTDC
Participant Support Costs	Participant Travel for Approved Project Activities	Participant transportation, meals, lodging when allowable, admission fees, registration fees	Excluded from MTDC if properly classified
Participant Support Costs	Other Participant Support	Stipends, participant allowances, participant registration fees, other approved participant costs	Excluded from MTDC if properly classified

Lisa's Take: *Do not place all trip costs in one category just because the trip serves students. Participant costs and staff costs should be separated so the budget and MTDC calculation are accurate.*

SSS Only: Separate Staff Supervision Travel from the 4% Professional-Development Travel Cap

SSS has a specific staff professional development travel rule. Under **34 C.F.R. § 646.30(g)**, staff travel for professional development is limited to **4% of total project salaries,** unless the Secretary approves a higher percentage.

The 4% Cap Applies To

Staff professional development travel — conferences, training, and similar activities for staff member's own professional development or project administration.

Separately Allowable Under § 646.30(e)

Transportation and, with prior approval, meals and lodging for participants *and* staff during approved educational and cultural activities sponsored by the project.

> **Lisa's Take:** *When SSS staff travel with students to supervise an approved educational or cultural activity, they are helping carry out the participant activity. That is different from staff professional-development travel. These costs should be budgeted and described separately, and should not automatically be counted toward the SSS 4% professional-development travel cap.*

SSS Budget Language

Use separate budget lines to make the distinction clear and protect the SSS project from inadvertently consuming the 4% cap with supervision costs.

Participant Travel for Approved Educational and Cultural Activities

Costs paid to or on behalf of SSS participants for approved educational and cultural activities, including transportation, meals, lodging when approved, admission fees, and related participant costs.

Staff Supervision Travel for Approved Educational and Cultural Activities

Costs for SSS staff to accompany, supervise, and support participants during approved educational and cultural activities pursuant to **34 C.F.R. § 646.30(e)**. These costs are distinct from staff professional development travel under **34 C.F.R. § 646.30(g)** and should not automatically be counted toward the SSS 4% professional development travel cap.

Budget label clarity is the first line of defense. If the line item says "Staff Supervision Travel — 34 C.F.R. § 646.30(e)," the auditor and business office both know what it is.

TS, EOC, and VUB

Talent Search

Regulations allow transportation, meals, and, if necessary, lodging for participants and project staff for postsecondary institution visits, College Day activities, career-related field trips, and certain instructional travel.

Budget treatment: Separate participant travel from staff supervision travel.

Educational Opportunity Centers

Regulations allow transportation, meals, and, with specific prior approval of the Secretary, lodging for participants and project staff for postsecondary institution visits, College Day activities, and career-related field trips.

Budget treatment: Separate participant costs from staff costs, and ensure any lodging costs meet the specific prior approval* requirement.

**Project must receive approval from the U.S. Department of Education before charging that cost to the grant.*

Veterans Upward Bound

VUB operates under the Upward Bound regulations in Part 645 but has its own room-and-board restriction for participants. Staff accompaniment costs may be allowable when required, but VUB projects should not copy a regular UB participant lodging structure without checking the VUB restriction.

Budget treatment: Separate participant transportation and allowable participant costs from staff supervision travel.

UB and UBMS: The Regulation Separates the Pieces

Upward Bound regulations are especially helpful because they separately address participant activity costs and staff accompaniment costs.

Participant Field Trips and Educational Activities

May include admission fees, transportation, and other costs necessary to participate in approved activities.

Staff Accompaniment Costs

The same regulation also allows transportation, meals, and overnight accommodations for staff members when they are required to accompany participants in project activities, such as field trips.

Lisa's Take: UB makes the point clear. Participant activity costs and staff accompaniment costs may both be allowable, but they should not be collapsed into one participant support number for MTDC purposes. Participant trip costs go under Participant Support Costs. Staff accompaniment costs go under Travel as staff supervision travel.

McNair: Heavy Participant Travel, No SSS 4% Cap

McNair projects often spend significant funds on travel because academic and scholarly activities are central to preparing participants for doctoral study.

Allowable McNair Participant Travel

Includes academic or scholarly activities such as trips to institutions offering doctoral programs, special lectures, symposia, and professional conferences when the purpose is encouraging and preparing participants for doctoral studies. Also includes necessary tuition, room and board, and transportation for students engaged in summer research internships.

No SSS 4% Cap — But Still Separate Costs

Unlike SSS, McNair does not have the SSS 4% staff professional development travel cap. **However, staff costs should still be separated from participant travel because staff are not participants.**

Lisa's Take: McNair may have a lot of allowable participant travel, but the budget should still separate participant costs from staff costs. The rule is the same regardless of how much travel the program involves.

Three Examples, Three Answers

✅ Example 1: Student Campus Visit

Students travel by bus to visit a four-year institution. Staff accompany them for supervision.

- **Participant costs:** student transportation, meals, lodging, admissions, participant materials → ***Participant Support Costs.***
- **Staff costs:** staff mileage, lodging, meals, per diem, parking → ***Staff Supervision Travel.***

📋 Example 2: Staff TRIO Conference

A Project Director attends a professional conference for training.

- **Treatment:** Staff professional development or training travel.
- **For SSS,** watch the 4% cap. This is the type of travel the cap is designed to limit.

🎓 Example 3: McNair Research Conference

McNair participants present research at a scholarly conference. Staff attend to supervise, coordinate, and support the approved activity.

- **Participant costs:** conference travel (airfare, lodging, meals, related costs), registration fees→ ***Participant Travel.***
- **Staff costs:** airfare, lodging, meals, related costs → ***Staff Supervision Travel.***

A Practical Response to the Institution's dBusiness Office

Suggested Language

> *"The trip supports an approved participant activity, but the costs should still be separated by who they are for. Participant travel costs paid to or on behalf of students may be treated as participant support costs when properly classified and documented. Staff costs for accompanying and supervising students should be budgeted separately as staff supervision travel. For SSS, these staff supervision costs are distinct from staff professional development travel subject to the 4% cap."*

That response protects the project, helps the business office classify the costs correctly, and avoids accidentally excluding staff costs from MTDC or inadvertently consuming the SSS 4% cap.

Lisa's Take

Do not classify travel by the trip name. Classify travel by the nature of each cost: who the cost is for, why it is necessary, whether it supports a participant or staff member, whether it belongs in participant support costs, and how it affects MTDC.

The best practical rule is: A student trip may include both participant travel and staff supervision travel. Split the costs correctly.

Key Points to Remember

- Participant travel and staff supervision travel can occur on the same trip and both may be allowable.
- Participant travel may be excluded from MTDC if properly classified as participant support costs.
- Staff supervision travel generally remains in MTDC because staff are not participants.
- SSS has a 4% cap on staff professional development travel, not on staff supervision travel for approved participant activities under 34 C.F.R. § 646.30(e).
- TRIO may all have staff travel connected to participant activities, but the budget should still separate participant costs from staff costs.
- Do not lump all trip costs into participant travel just because the trip serves students.
- The best compliance response is often not "no." It is: "Here is how we classify this correctly."

References

2 C.F.R. § 200.1, Definitions, including Modified Total Direct Cost and Participant support costs.

2 C.F.R. § 200.405, Allocable costs.

2 C.F.R. § 200.456, Participant support costs.

34 C.F.R. § 643.30, Talent Search allowable costs.

34 C.F.R. § 644.30, Educational Opportunity Centers allowable costs.

34 C.F.R. § 645.40, Upward Bound allowable costs.

34 C.F.R. § 646.30, Student Support Services allowable costs.

34 C.F.R. § 647.30, McNair allowable costs.