Can TRIO Staff Attend a Proposal Writing Workshop on Grant Time?

NOSOTROS Education Center
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A practical guide for TRIO Directors on proposal costs, workshop attendance, vacation leave, salary charges, and time-and-effort documentation.

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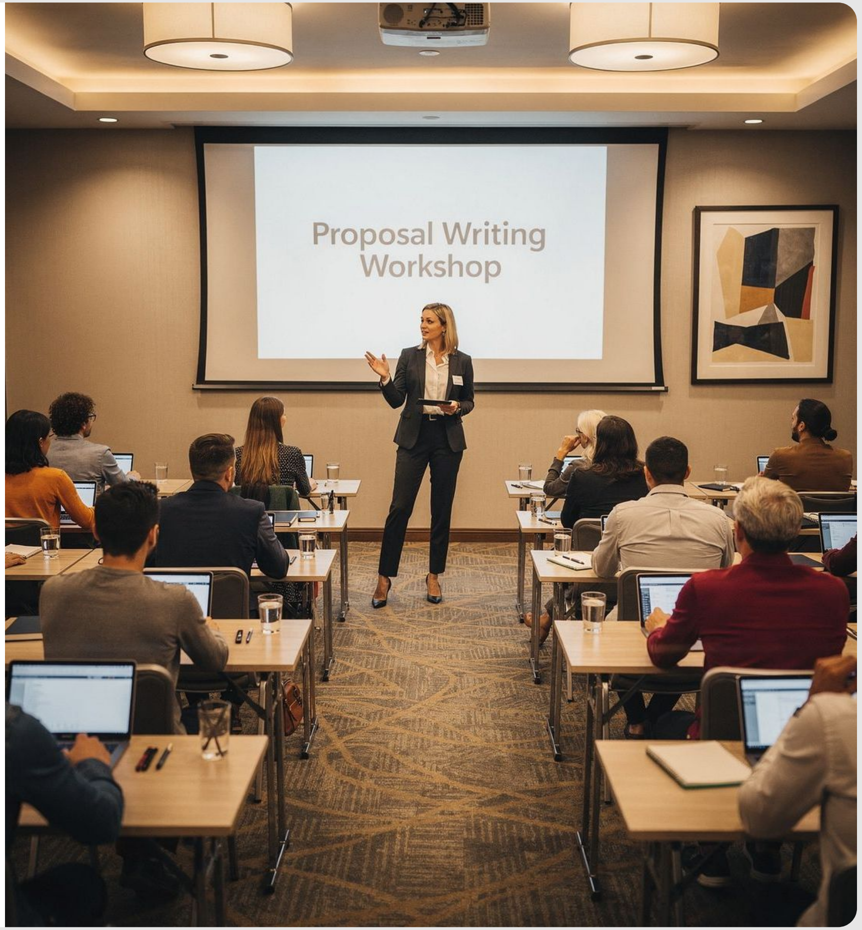
ESTIMATED READING TIME: 7 MINUTES

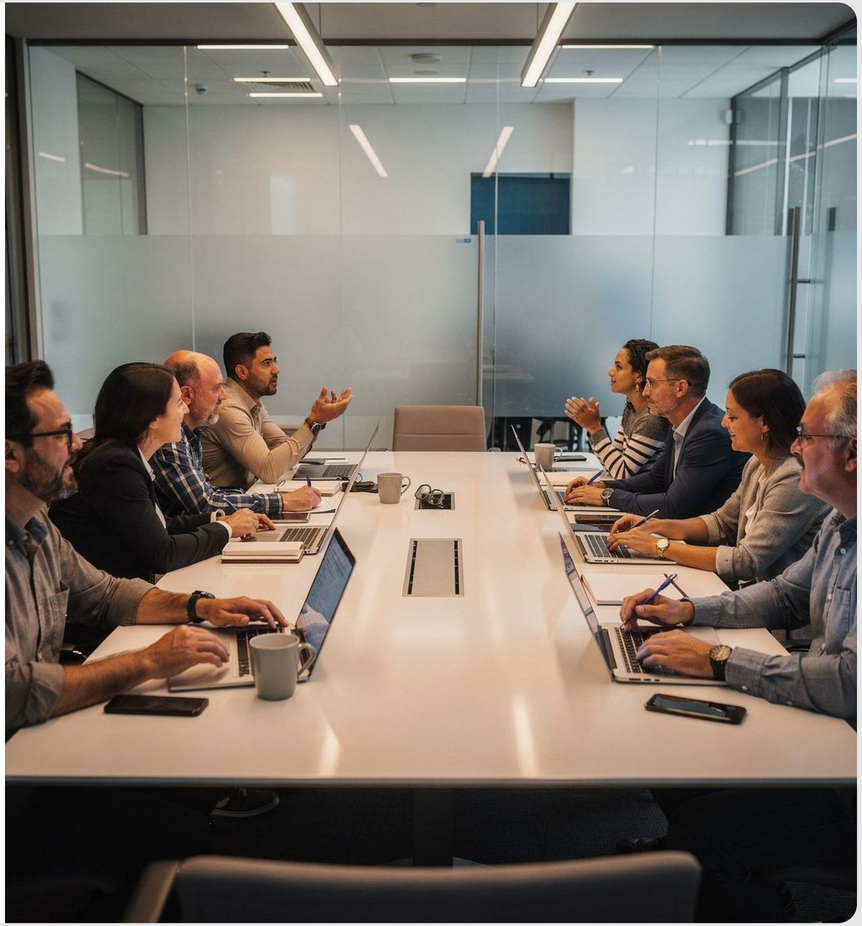


The Quick Answer

TRIO staff may attend a proposal-writing workshop, and in many cases, they should. But if the workshop is focused on preparing a future TRIO application, the time and registration cost generally should **not** be charged directly to the current TRIO grant. **Thus, it is considered an "unallowable" cost and must be charged to indirect funds or other non-grant funds.**

The practical answer is: **Attend, but pay for it correctly.**

A proposal-writing workshop may support the institution's effort to compete for future funding — but that is not the same thing as carrying out the current approved TRIO project.



The Real Compliance Question

A TRIO staff member asks: *"Can I use vacation days to attend the proposal-writing workshop?"* That is a fair question. But the better compliance question is:

> **How should the agency/college account for the staff member's time while attending a workshop focused on preparing the next TRIO application?**

The agency/college should first determine whether the time is proposal development, current grant work, institutional professional development, or some documented combination. Vacation leave may be one option — but it is not necessarily the only option.

✅ Key Issue

Does the workshop time benefit the TRIO grant being operated now, or does it help the agency/institution prepare a future application?

⚠️ Risk Zone

Leaving proposal-development time charged to the TRIO grant being operated now when the primary benefit is preparing a future application.

The Regulation to Put on the Table

2 CFR§ 200.460, Proposal Costs

What It Covers

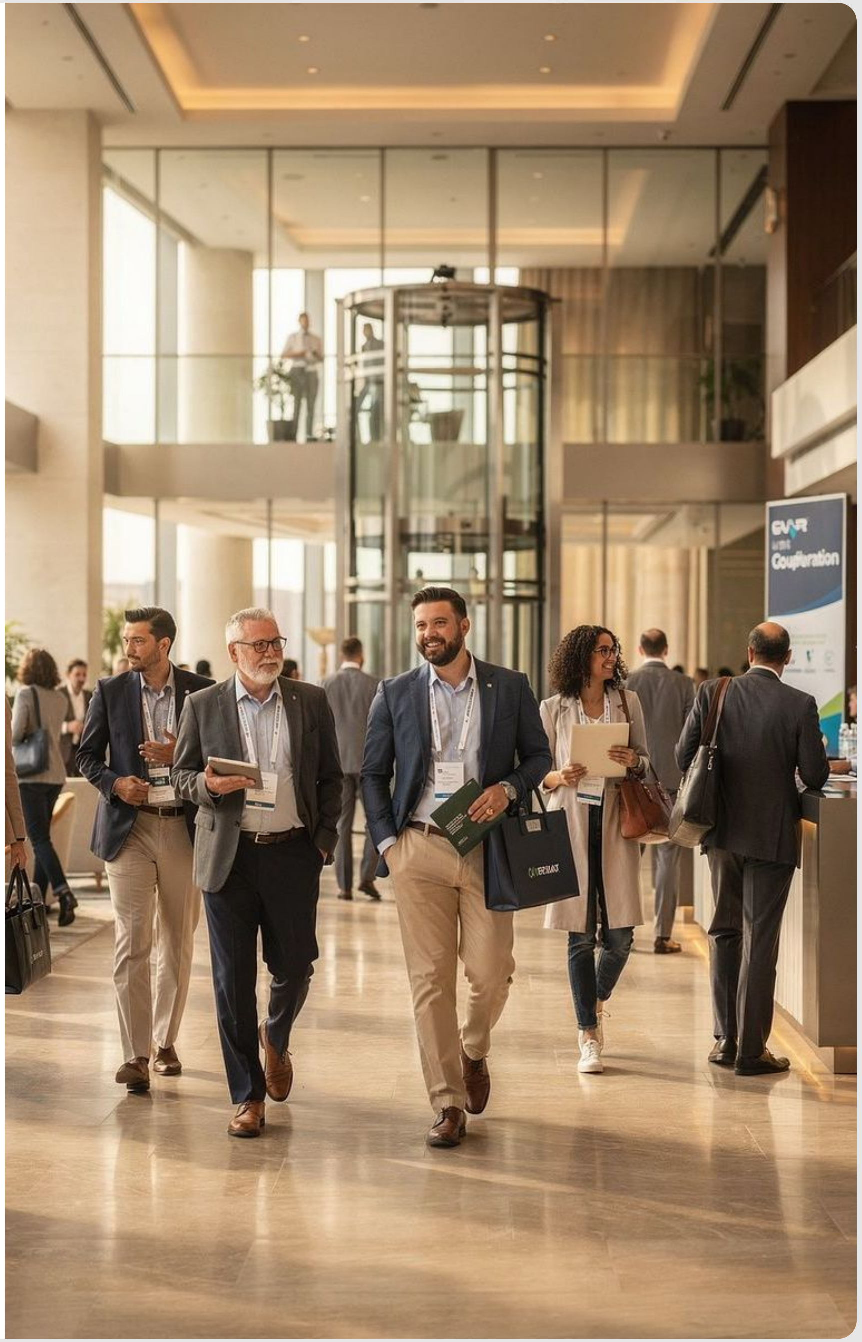
Proposal costs are the costs of preparing bids, proposals, or applications for potential federal and non-federal awards or projects, including the development of data needed to support those proposals.

Key Treatment

Proposal costs for both successful and unsuccessful applications normally should be treated as **indirect costs** and allocated to all current activities of the recipient or subrecipient.

Important Note

Proposal costs must be recorded in the accounting period when they occur. Costs from a prior accounting period cannot be shifted into the current period.



Why This Matters

1

The Current Grant's Purpose

A current TRIO grant is awarded to operate the current approved project — serving participants, meeting approved objectives, providing required and permissible services, maintaining documentation, administering the current award, and reporting on the current project.

2

Preparing the Next Application Is Different

Preparing the next application may be essential, strategic, and beneficial to the institution, but **writing the next grant is separate from operating the current grant.**

3

Uniform Guidance Still Applies

Costs charged to a federal award must be necessary, reasonable, allocable, and adequately documented. Proposal costs have their own specific treatment under Uniform Guidance. **2 CFR § 200.403, 200.405, and 200.460.**

Put plainly: The fact that a workshop is about TRIO does not make it chargeable to the current TRIO grant. **The primary purpose and primary beneficiary determine the cost treatment.**

Why This Gets Confusing

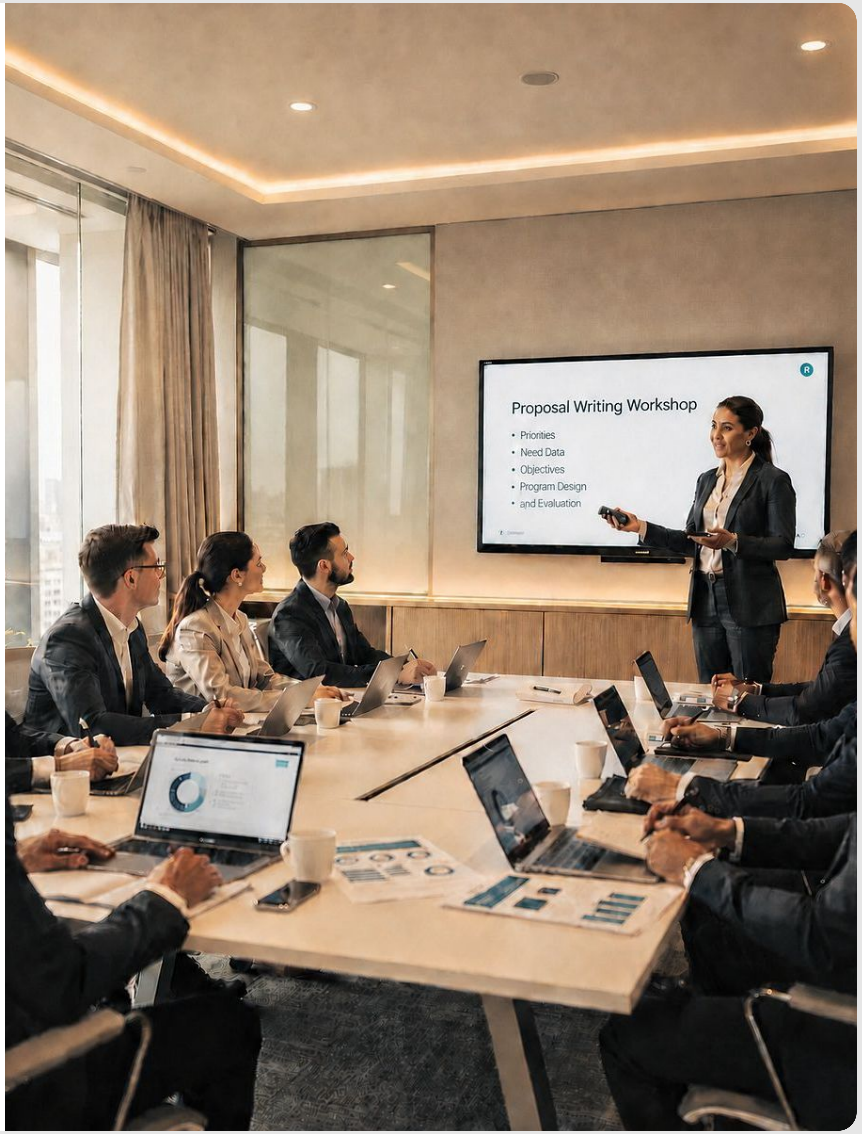
Proposal writing workshops are often described as professional development. That is partly true. Staff may learn useful information about TRIO priorities, need data, objectives, project design, evaluation, and compliance.

The Primary Purpose Matters

If the workshop is designed to help the agency/institution prepare a future application, the main benefit is not the day-to-day operation of the current award. The main benefit is helping the institution compete for future funding.

That Is Why It Is a Proposal Cost Issue

This should be treated under 2 CFR.§ 200.460 — not simply as current grant training or routine professional development chargeable to the award.



Current-Grant Training vs. Proposal Preparation

These examples show how to distinguish allowable current-grant training from proposal-development costs that should not be charged directly to the award.

Activity Type	✅ More Likely Current-Grant Training	⚠️ More Likely Proposal Cost
APR & Reporting	APR training for the current project; current evaluation or reporting training.	Analyzing data or developing objectives for the next competition.
Eligibility & Files	Eligibility documentation training; participant file review; current project compliance training.	Updating the Need section or drafting future project design for the upcoming application.
Services & Design	Training on required services; training that improves current participant services.	Writing the next application; responding to selection criteria; preparing a future budget narrative.

The question is not whether the topic is TRIO. The question is which activity receives the primary benefit.

What About Salary During the Workshop?

For a four half-day workshop, the time issue matters. Four half-days equals approximately **two full workdays.**

1

Automatic Continuation Is Not the Answer

If an employee is normally paid 100 percent from the current TRIO grant, the institution should not automatically leave those workshop hours charged to the current grant if the employee is attending for proposal development.

2

Records Must Reflect the Work Performed

Federal personnel charges must be supported by records that accurately reflect the work performed, and those records must support that charges are accurate, allowable, and properly allocated. **2 CFR § 200.430.**

3

Payroll Must Match Reality

If an employee spends two days on proposal development, the payroll and time-and-effort records should not treat those two days as current-grant work. Records must reflect what the employee actually did.

What About the Registration Fee?

The same principle that applies to salary applies to the workshop registration fee. If the workshop is primarily designed to help prepare a future TRIO application, the registration fee generally **should not** be charged directly to the current TRIO grant.

✅ Appropriate Ways to Cover the Cost

Do not charge a proposal-writing workshop directly to the grant being operated now if the purpose is preparing a future application.

Better options may include institutional funds, departmental professional-development funds, another non-federal account, or the college’s normal proposal-cost process.

❌ The Shortcut to Avoid

Do not charge the registration fee to the current grant simply because the workshop is about TRIO. **Topic alone does not determine allowability. Primary purpose and primary benefit do.**

Is Vacation Leave Required?

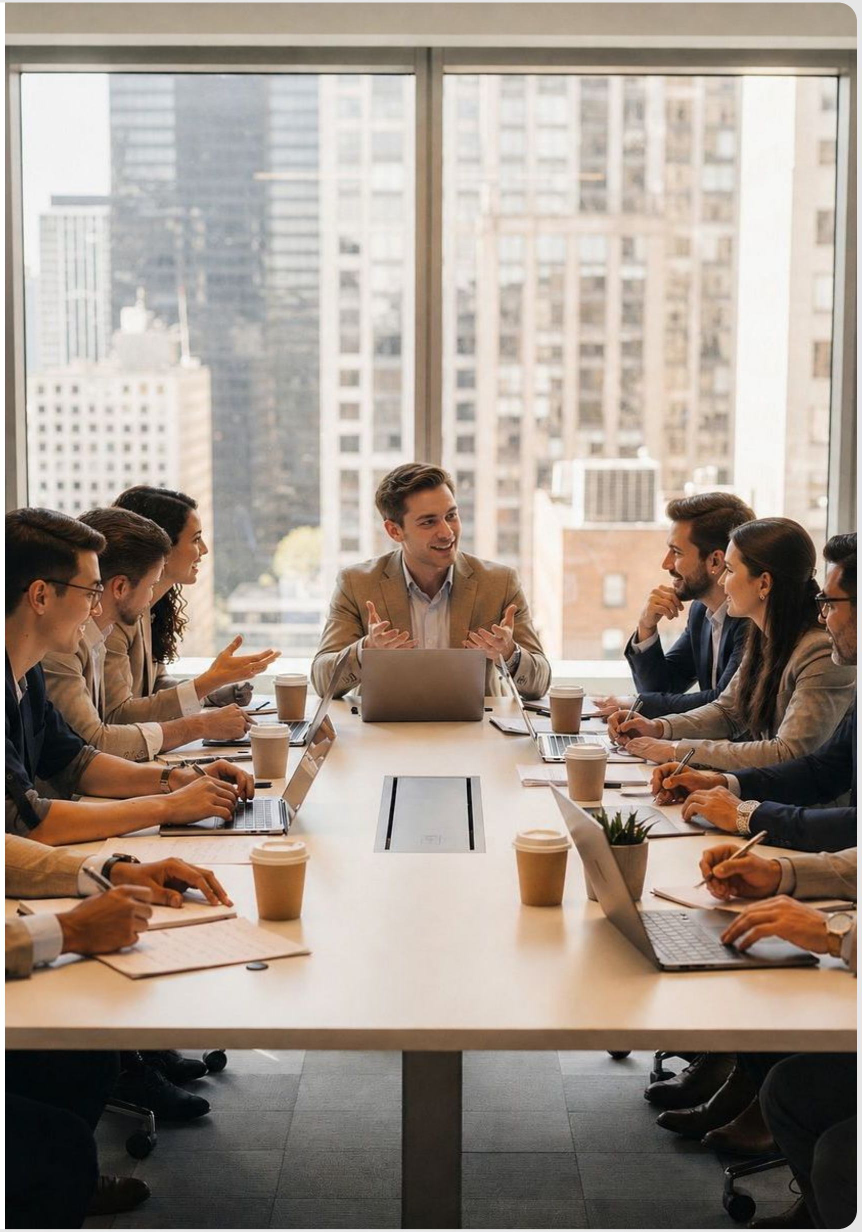
Not necessarily. A staff member may use vacation or personal leave to attend the workshop if the agency/college approves that leave in accordance with its established policies.

Check Before Using Vacation Time

The staff member should check with the grants office or business office before using vacation leave. There may be other appropriate ways for the college to account for the time, and vacation leave should not be treated as the only possible answer.

The Better Answer

Ask the business office how proposal-development time should be handled under agency/institutional policy. The answer may involve adjusted scheduling, institutional funding, or a documented combination of options — not necessarily vacation leave.



Practical Options for the College/Agency to Consider

Because the workshop is proposal-related, the college/agency has several ways to account for the time appropriately. The key is **consistency** — whatever option is selected should match the agency/college's established written policies and payroll practices.

→ Institutional or Indirect-Cost Coverage

Allow the staff member to participate during regular work hours, with salary and related costs covered by the institution or handled through the college's normal indirect-cost process.

→ Alternative Institutional Account

Pay for the time from another appropriate agency/institutional or non-federal account, or use administrative or professional-development time if permitted under agency/college policy.

→ Schedule Adjustment or Combination Approach

Allow the staff member to flex the work schedule during the four workshop days, or use a documented combination of regular work time and vacation or personal leave.

Use This Four-Question Test Before Charging the Grant

1

Is the cost reasonable and necessary?

Would a prudent person buy this workshop for this purpose? Is the cost reasonable for what the workshop provides?

2

Who receives the primary benefit?

Does the current grant benefit directly, or does the institution benefit by preparing for the next competition?

3

Is the cost consistent with institutional policy?

Does the college or agency treat similar costs the same way for non-federal activities? Is there a consistent practice for proposal-related professional development?

4

Is the cost documented correctly?

Do time-and-effort records, payroll, and any allocation memos accurately reflect what the employee did and why the cost was charged as it was?

Three Situations, Three Different Answers

✅ Likely Supportable

A staff member attends training on current eligibility documentation, participant files, and APR reporting. The training directly improves current project operations. The Director can explain the current-grant purpose, expected results, and supporting documentation.

⚠️ Needs Allocation and Documentation

A training event includes one session on current grant compliance and several sessions on proposal writing. The current-grant portion may be separable if the agenda, purpose, and documentation clearly support the allocation. Do not split costs just to make them fit.

❌ Generally Not a Direct Grant Charge

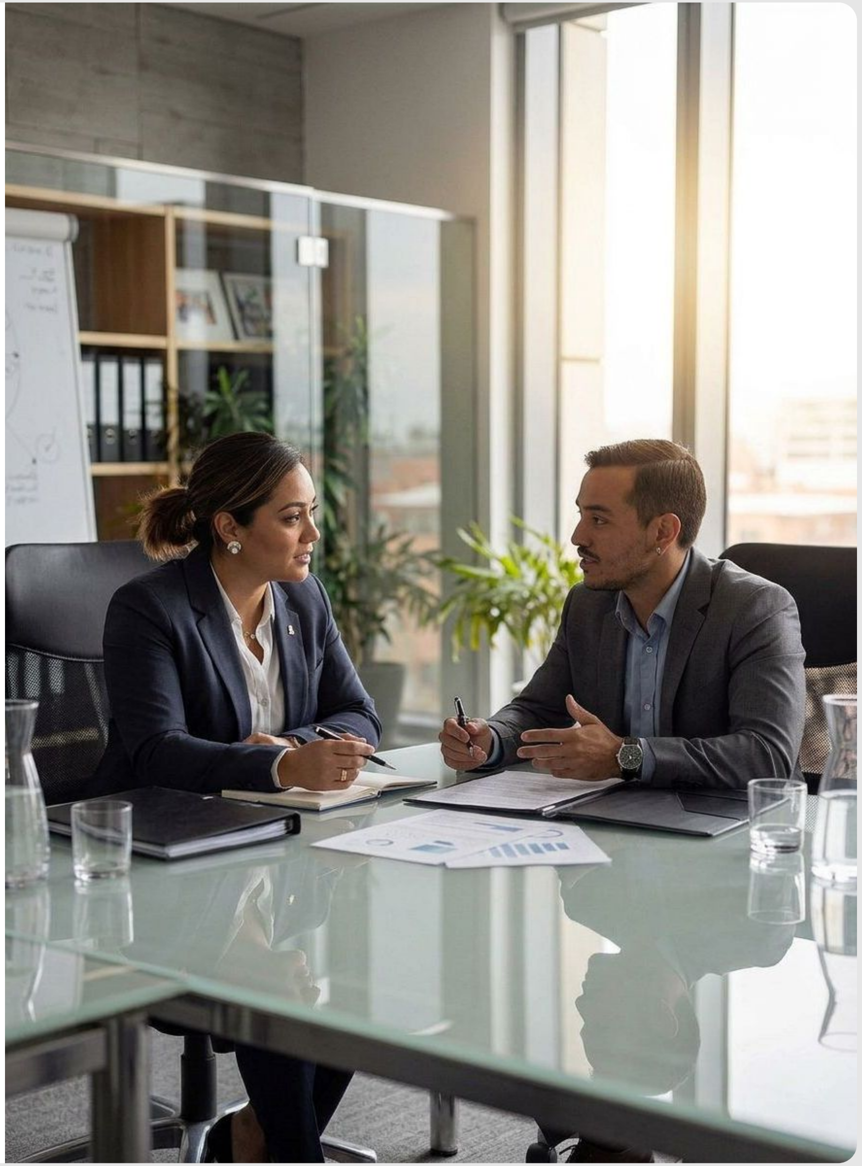
A staff member attends a four half-day proposal-writing workshop focused on the upcoming TRIO application. This should generally not be charged directly to the current grant — for salary, registration fee, or any related costs.

Split only when the agenda, purpose, and documentation support the allocation. Do not split costs just to make them fit.

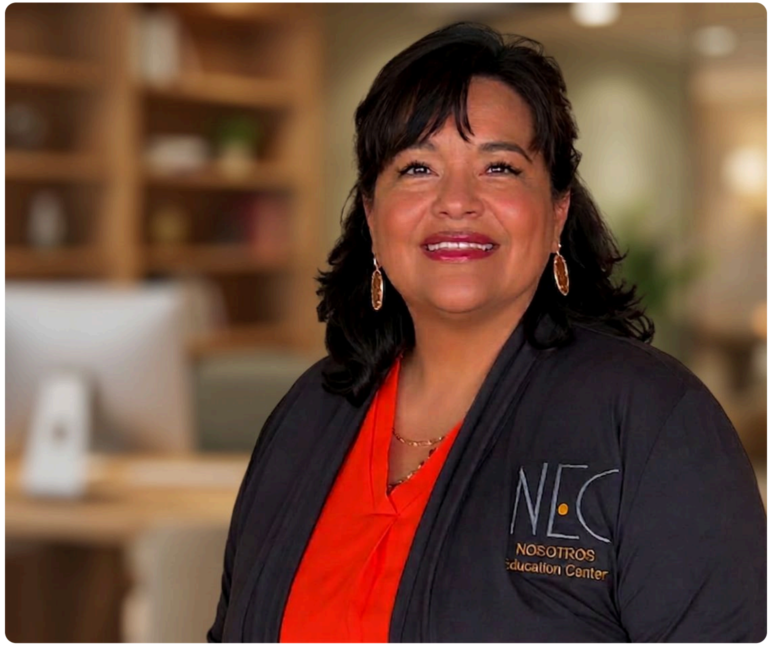
A Practical Response to TRIO Staff

Suggested Language

> *"Yes, you may use vacation days to attend the workshop if the agency/college approves the leave under its normal policies. However, before using vacation time, I recommend checking with the grants or business office because there may be other appropriate ways to account for the time. Since the workshop is focused on preparing the upcoming TRIO application, I would not recommend charging the time directly to the current TRIO grant. Whatever option is selected, payroll and personnel records should accurately reflect the time devoted to proposal-development activities."*



Lisa's Take



TRIO staff should prepare for upcoming competitions. Strong proposals do not appear by magic, although plenty of people act like they do.

But the current grant was awarded to operate the current approved project. It was not awarded to pay the agency's/institution's cost of competing for the next grant cycle.

The best compliance answer is not *"Do not attend."* The best compliance answer is: **"Attend, but pay for it correctly."**

KEY POINTS TO REMEMBER

- Proposal-writing workshop time is generally proposal-development time.
- Proposal costs are addressed in 2 CFR § 200.460.
- The current TRIO grant should generally not pay salary for time spent preparing a future application.
- Vacation leave may be allowed, but it is not the only possible option.
- The business office should determine how to account for the time under institutional policy.
- Payroll and time-and-effort records must match reality.

References

- **2 CFR § 200.403**, Factors affecting allowability of costs.
- **2 CFR § 200.405**, Allocable costs.
- **2 CFR § 200.430**, Compensation, personal services.
- **2 CFR § 200.460**, Proposal costs.

Lisa's Take reflects NEC's practical interpretation of common TRIO compliance questions based on the Higher Education Act, applicable regulations, Uniform Guidance, and decades of experience administering, evaluating, and providing technical assistance to federally funded TRIO projects. These articles are intended as general guidance and should not be construed as legal advice or official policy of the U.S. Department of Education.

Need Help with TRIO Grant Compliance or Proposal Questions?

NOSOTROS Education Center provides proposal development, technical reviews, and practical, customized technical assistance to help TRIO projects evaluate and improve service delivery, documentation, and compliance issues before they become monitoring findings.

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