



On November 8, 2017, the Council for Opportunity in Education and NASPA’s Center for First-generation Student Success launched the inaugural First-Generation College Celebration. Since then, hundreds of colleges across the nation have continued to mark this date – the anniversary of the signing of the Higher Education Act of 1965 – as a day to celebrate first-generation students on their campuses. Celebrations have taken many forms: campus rallies and panel discussions featuring notable first-generation alumni, faculty, and staff; commemorative ceremonies recognizing the achievements of first-generation students on campus; as well as day- and even weeklong conferences.

In making these efforts to celebrate their students, Federal TRIO Programs, which the U.S. Department of Education issues, must ensure compliance with applicable regulations concerning grant funds. Each TRIO project’s regulations (listed below) describe three areas where supplies are allowable: for project recordkeeping, project administration, and for participant development or service delivery. In contrast, providing forms of direct financial support for participants is unallowable. Projects should ensure that any costs associated with First-Generation Celebrations are associated with a mandatory or permissible service and that adequate documentation is in place. Care should be taken that items considered “direct financial support, promotional items, or gifts” (§200.421) are not purchased.

Projects should also consider OMB Uniform Guidance’s principles for cost allowability. The cost should be reasonable, allocable, and consistently treated across all grantee departments. Therefore, costs for providing services to participants should fit these cost principles. (Student Support Services project regulations also support the coordination of activities among programs that work with a similar student population, stipulating that costs for providing services to a particular project’s participants be allocated to each project. Therefore, costs associated with First-Generation Celebrations should be allocated according to the benefits received by each project if more than one project or entity is involved; TRIO project funds should only be used to provide services to that TRIO project’s participants (§646.32).)

### **Educational Opportunity Centers**

§644.30: Allowable costs include the following if they are reasonably related to the objectives of the project:

- (f) Purchase, lease, or rental of computer hardware, software, and other equipment, service agreements for such equipment, and supplies for participant development, project administration, or project recordkeeping.

§644.31: Costs that are unallowable under the Educational Opportunity Centers program include, but are not limited to, the following:

- (a) Tuition, fees, stipends, and other forms of direct financial support for participants.

### **Talent Search**

§643.30: Allowable costs include the following if they are reasonably related to the objectives of the project:  
(f) Purchase, lease, or rental of computer hardware, software, and other equipment, service agreements for such equipment, and supplies that support the delivery of services to participants, including technology used by participants in a rigorous secondary school program of study.

§643.31: Costs that are unallowable under the Talent Search program include, but are not limited to, the following:  
(a) Stipends and other forms of direct financial support for participants.

### **Student Support Services**

§646.30: Allowable costs include the following if they are reasonably related to the objectives of the project:  
(f) Purchase, lease, or rental of computer hardware, software, and other equipment, service agreements for such equipment, and supplies for participant development, project administration, or project recordkeeping.

§646.31: Costs that may not be charged against a grant under the Student Support Services Program include, but are not limited to, the following:  
(b) Tuition, fees, stipends, and other forms of direct financial support, except for Grant aid under §646.30(i) for staff or participants.

§646.32: (e)(3) Costs for special classes and events that would benefit Student Support Services students and participants in other programs for disadvantaged students must be proportionately divided among the benefiting projects.

### **Upward Bound**

§645.40: Allowable costs include the following if they are reasonably related to the objectives of the project:  
(n) Purchase, lease, or rental of computer hardware, software, and other equipment, service agreements for such equipment, and supplies that support the delivery of services to participants, including technology used by participants in a rigorous secondary school program of study.

### **McNair Postbaccalaureate Achievement**

§647.30: Allowable project costs, not explicitly covered by 34 CFR part 74, may include the following costs reasonably related to carrying out a McNair project:  
(d) Purchase, lease, or rent computer hardware, software, and other equipment, service agreements for such equipment, and supplies for participant development, project administration, or project recordkeeping.

§647.31: Costs that may not be charged against a grant under this program include the following:  
(a) Payment of tuition, stipends, test preparation and fees or any other form of student financial support to staff or participants not expressly allowed under §647.30.

### **OMB Uniform Guidance**

§200.403 Factors affecting allowability of costs.

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.

§200.421 Advertising and public relations.

- (a) The term advertising costs means the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, etc.
- (b) The only allowable advertising costs are those which are solely for:
- (1) The recruitment of personnel required by the non-Federal entity for the performance of a Federal award (See also §200.463 Recruiting costs).
  - (2) Procuring goods and services to perform a federal award.
  - (3) The disposal of scrap or surplus materials acquired in the performance of a federal award except when non-Federal entities are reimbursed for disposal costs at a predetermined amount; or
  - (4) Program outreach and other specific purposes necessary to meet the Federal award requirements.
- (c) The term “public relations” includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.
- (d) The only allowable public relations costs are:
- (1) Costs specifically required by the Federal award.
  - (2) Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from the performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award); or
  - (3) Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.
- (e) *Unallowable advertising and public relations costs include the following:*
- (1) All advertising and public relations costs other than as specified in paragraphs (b) and (d) of this section.
  - (2) Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also §200.432 Conferences), including:
    - (i) Costs of displays, demonstrations, and exhibits.
    - (ii) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and
    - (iii) Salaries and wages of employees who set up and display exhibits, make demonstrations and provide briefings.
  - (3) *promotional items and memorabilia costs, including models, gifts, and souvenirs.*
  - (4) Costs of advertising and public relations designed solely to promote the non-Federal entity.

(Emphasis added)