

# COGR

an organization of research universities

## COUNCIL ON GOVERNMENTAL RELATIONS

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May 25, 2010

Ms. Suzanne H. Plimpton  
Reports Clearance Officer  
National Science Foundation  
4201 Wilson Boulevard  
Suite 295  
Arlington, VA 22230

Subject: Higher Education R&D Survey – Notice of Intent to Seek  
Approval to Extend and Revise a Current Information Collection  
Federal Register, March 26, 2010 (Volume 75, FR14633)

Email to: [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Dear Ms. Plimpton,

The Council on Governmental Relations (COGR) is an association of 182 research universities and their affiliated academic medical centers and research institutes, which together account for over 90 percent of the Federally-funded basic research conducted by colleges and universities. COGR concerns itself with the influence of federal regulations, policies and practices on the performance of research and other sponsored activities carried out at its member institutions.

We are writing in response to the National Science Foundation's request for public comments regarding proposed changes to the Higher Education R&D Survey (formerly, the Survey of Research and Development Expenditures at Universities and Colleges).

First, we would like to take this opportunity to thank the National Science Foundation, Division of Science Resources Statistics (NSF, SRS) for its efforts to offer forums and workshops for stakeholders over the past several years, as well as its initiative to work with forty institutions on a 2009 pilot version of the survey. The annual results of the Higher Education R&D Survey provide important information to the research community, and COGR is committed to be a resource to SRS in those situations where our contributions can enhance the quality of the survey.

On the next page, we have highlighted two points that we would like the SRS to consider as it unveils the revised Higher Education R&D Survey for 2010.

**1. Administrative Burden and Other Challenges Should be Regularly Monitored, and a Mechanism to Make Additional Changes to the New Format is Necessary**

While working with forty institutions on the 2009 pilot version of the survey was a beneficial initiative for both the higher education community and the SRS, there will be significant new challenges to many institutions when working with the new format. Challenges will be in the form of technology capabilities, data availability, staff resources, and other potential areas of additional work and administrative burden.

The Federal Register announcement states: "After obtaining and considering public comment, NSF will prepare the submission requesting that OMB approve clearance of this collection for three years." A three year clearance may be administratively appropriate for SRS. However, we believe it is critical for the SRS to be open to ongoing feedback from the higher education community and that SRS be willing to make additional changes to the survey format in selected situations where there is widespread concern and/or confusion on the data elements being surveyed.

**2. "Confidential" Label on Institutional Funding Sources Data Should be Reviewed**

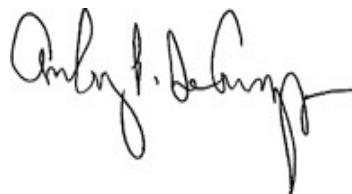
Question 1 of the survey asks the institution to show R&D expenditures by source of funding. The fifth category (item e., Institutional Funds) is to be broken down by: 1. Institutionally financed organized research, 2. Cost sharing, and 3. Unrecovered indirect costs. While the grand total for Institutional Funds from these three sources is shown in the annual survey report, the three sub-categories are listed as "Confidential" on the survey form and the results are not made public.

COGR is interested in learning the official basis for keeping the data from the three sub-categories as confidential, and would like to explore the possibility of making this data publically available.

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Again, we appreciate the thoughtful approach that SRS has taken toward the new survey format. The two points COGR has presented are important to the COGR membership, and we appreciate your consideration and look forward to your responses.

Sincerely,



Anthony P. DeCrappeo  
President, COGR