



03/06/2013

Ronda Britt
National Science Foundation
Research and Development Statistics Program
4201 Wilson Boulevard, Suite 965 S
Arlington, VA 22230

Re: Federal Register, Vol. 78, No. 5, January 8, 2013, page 1266, National Science Foundation, "Ways to enhance the quality, utility and clarity of the information on respondents"

Dear Ronda,

One of our goals at the University of Rochester in using the NSF HERD data is to gain a better understanding of how our R&D activity and faculty productivity compares to our peers. We request that NSF consider a modification to the next HERD survey instrument, making it possible to compare R&D expenditures at the R&D discipline level, normalized by the number of principal investigators or faculty in each discipline.

Presently, and beginning with FY2010, the survey asks in question 16: How many principal investigators and other personnel (headcount) were paid from the R&D salaries, wages, and fringe benefits you reported in question 13, row a? (The referenced question 13a asks for compensation for all R&D personnel.)

While HERD question 16 makes it possible to normalize R&D expenditures by principal investigator on an *institutional* level, such a broad measure has limited utility without greater specificity. Since the relative level of R&D activity varies immensely across research universities, it is nearly impossible to use the existing measure for meaningful peer comparison. We propose that the HERD survey ask a similar question or questions at the specific R&D discipline level to provide users with a much more detailed understanding and method of comparison for R&D expenditures normalized by: 1) principal investigators, and 2) disciplinary faculty.

We acknowledge that there are complexities in comparisons of research productivity at as a fine a granularity as the department level. We would suggest that these complexities could be overcome with carefully chosen instructions that encourage uniformity of reporting. One of the challenges is identifying which researchers to count in a given department as the definition of faculty varies from institution to institution. We suggest that a consistent criterion be adopted in which researcher counts include all personnel whose university considers them eligible to submit a research grant. Furthermore, since investigators may work on multiple projects across multiple

fields, for simplicity, we suggest assigning researchers to disciplines based solely on the department in which they hold their primary appointment.

If this proposal were implemented, it would impose a relatively incremental burden on HERD respondents well worth the enhanced quality and utility of the resulting data. Based on conversations we've had with colleagues at other institutions, we believe that there is a widespread interest in this enhanced data.

Thank you for considering our request. Please do not hesitate to contact me or John Podvin, Director of Institutional Research for Arts Sciences & Engineering, if you have questions or need further clarification.

Best wishes,

A handwritten signature in black ink, appearing to read 'D. Williams', with a stylized, flowing script.

David R. Williams
Dean for Research
William G. Allyn Professor of Medical Optics
Director of the Center for Visual Science