

May 17, 2019

Suzanne H. Plimpton  
Reports Clearance Officer  
National Science Foundation  
2415 Eisenhower Avenue, Suite W18200  
Alexandria, VA 22314

**Re: Federal Register Notice, Vol. 84, No. 52 / Monday, March 18, 2019  
National Science Foundation. Agency Information Collection Activities: Comment Request;  
Higher Education Research and Development Survey**

Dear Ms. Plimpton:

The University of Washington (UW) appreciates the opportunity to comment on the above-referenced Federal Register Notice regarding the NSF's plans to renew the HERD Survey and information collection. We have responded below to each of the areas where comments were invited.

**(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information shall have practical utility.**

We understand that one of the primary purposes of the collection of information is to assist NSF in tracking trends in R&D as well as provide a means of collecting a consistent set of data from recipients of NSF funding. It is unclear to us what more detailed purpose this could have specifically related to proper performance of NSF functions. Publishing this information is, however, very useful for the research community as a key set of data to utilize in a wide variety of settings and projects.

**(b) The accuracy of the Agency's estimate of the burden of the proposed collection of information.**

Based on our experience at the University of Washington, the estimate of the burden in collection of this information is low. It is uncertain whether the following areas are included in the current burden estimates.

- The ongoing effort throughout the year for institutions to discuss, prepare and develop automated reports to meet the reporting requirements.
- If there are changes issued with the announcement of each years report, this requires additional time for discussion, preparation and potentially updating reports used to provide information in the survey. Depending on the extent of the changes, significant rework can be required in assessing and understanding the question about the data as well as altering the previously developed reports if needed to update the data. This would not just happen once a year when instructions and potential changes are issued, but throughout the year as organizations internal systems are updated/altered.
- The fact that many organizations such as UW submit information for multiple campuses in separate reports. In the case of UW, this triples the burden.
- The fact that time and effort from multiple departments within a particular organization are required in order to put together the information for the survey. These multiple departments often have independent systems requiring work to crosswalk or standardize in order to collect data.
- The time and effort that goes into handling questions from NSF staff after the survey has been submitted and reviewed at NSF.

- The time and effort required to manage a knowledge base and retain key expertise ongoing, which may be considered an intangible overhead, in order to support current survey, changes to survey and question on previous surveys.

**(c) Ways to enhance the quality, utility, and clarity of the information on respondents, including through the use of automated collection techniques or other forms of information technology.**

- Provide and adhere to strict definitions for what can be included in Institutional Research to ensure high level of consistency across organizations and a truly comparable set of data. Criteria to accomplish this was discussed in the lead up to the FY18 survey, but appeared to have been walked back on the survey instructions.
- Provide clear information in instructions about what information is required when data entries are flagged for further questioning. Publicizing this information could provide a means for enhanced review at organizations prior to submission and minimize follow-up questions from NSF analysts.
- Include a review for materiality on specific issues and publicize what that level will be and why enhanced review of the particular sections requires the time and effort to ensure absolute accuracy.
- If the internal funding field/section is to remain, provide Total Funding figures, exclusive of institutional research funding, so that true comparable amounts can be reported and used in rankings. The survey is costly to administer and complete. Lack of consistency leads to possibilities of organizations over inflating their institutional research costs.
- Utilize national standards for categorization of scientific fields, such as the Comprehensive Instruction Program (CIP) developed and maintained by the Department of Education. An alternative would be to develop a standard crosswalk that could be used by all organizations.

**(d) Ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

- Minimize yearly changes to the report structure, contents and instructions. Consider an every 2-3 year cycle on updates to ease the annual burden.
- Coordinate with federal wide data standards being developed and published by OMB.
- Allow for data uploads

We are happy to discuss any of these comments further.

Sincerely,



Lynette Arias

Assistant Vice Provost | Office of Research

[ariasl@uw.edu](mailto:ariasl@uw.edu)