



May 17, 2019

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314
Sent via email to: splimpto@nsf.gov

Subject: Higher Education Research and Development Survey
Federal Register/Vol. 84, No. 52/Monday, March 18, 2019 (9839-9840)

Dear Ms. Plimpton:

The University of Wisconsin-Madison (UW-Madison) would like to offer the following comments on the NSF Higher Education Research and Development (HERD) Survey.

To respond to the NSF HERD Survey, the University of Wisconsin-Madison runs processes in our systems to gather the requested data. We then complete an Excel spreadsheet manually and submit the spreadsheet on the NSF HERD website. This process can be time-consuming and has the potential to lead to data entry errors. We suggest that NSF consider creating a different means for submitting the data. If we were able to upload a different kind of file (e.g., XML or JSON) that we could automatically generate, that would cut down on the time it would take to prepare and submit information and reduce any potential errors. Ultimately, we believe a different submission method could reduce burden on those responding to this information collection.

We are aware that other institutions have suggested that NSF permit multiple campuses to submit a combined institutional response, if a) the campuses report to a senior executive whose office is solely responsible for administering the research enterprise for all campuses, and b) prime/sub relationships are not established between campuses for research awards. While this proposal does not fit the UW-Madison situation at present, we believe that a reasonable strategy would be to enable institutions to opt to report as separate campuses or to submit a combined response for multiple campuses, in accordance with specifically defined criteria. Should NSF allow the option to submit a combined response for multiple campuses, institutions must be transparent with NSF that the data is for multiple campuses. We also recommend that NSF make clear in the results when the data reflects a combined

response. The public accessing the data should be able to easily understand if multiple campuses are being reported as one.

Thank you for the opportunity to comment on this important topic. The UW-Madison is grateful to the National Science Foundation for engaging in dialogue with the research community. Should you have any questions about these comments, please feel free to contact me at kmoreland@rsp.wisc.edu or (608) 262-3822.

Sincerely,

A handwritten signature in black ink, reading "Kim Moreland". The signature is fluid and cursive, with the first name "Kim" and last name "Moreland" clearly distinguishable.

Kim Moreland, Associate Vice Chancellor and
Director, Research and Sponsored Programs