

**NATIONAL SCIENCE FOUNDATION**  
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TO: Office of Information and Regulatory Affairs  
Office of Management and Budget  
Docket Library

FROM: Suzanne Plimpton  
Reports Clearance Officer  
National Science Foundation

SUBJECT: Amendment to OMB clearance 3145-0100, "Survey of R&D Expenditures at Universities and Colleges"

Attached for your records is the electronic submission of the amendment to the OMB clearance until 10/31/13 of the following collection:

- 3145-0100, "Survey of R&D Expenditures at Universities and Colleges"

This amendment concerns the FY 2012 Higher Education R&D (HERD) Survey questionnaire. The changes requested are as follows.

The first change requested for the FY 2012 survey is to reduce the number of questions required for institutions who reported between \$150,000 and \$1 million in R&D expenditures on the FY 2011 survey. Due to the identification of over 180 additional institutions with R&D activity during the FY 2010 expanded population review, the FY 2011 survey population included 912 institutions. Many of these newly added institutions had very small amounts of R&D expenditures. In FY 2010 the survey had 155 schools reporting between \$150,000 and \$1 million in total R&D expenditures, in FY 2011 this number increased to 264. Combined, these 264 institutions accounted for \$126 million in R&D expenditures, or 0.2% of the total higher education R&D expenditures reported in FY 2011.

NSF considered raising the survey threshold to \$1 million in order to reduce the survey burden, but ultimately decided to keep all institutions in the survey but only collect minimal information from those reporting under \$1 million. Their data allow NSF to present complete state and national level totals. Many of the institutions desire having their R&D expenditures included in the national totals. Also, completing this survey allows for easy entry into the full survey when these schools do exceed \$1 million in R&D expenditures.

Therefore NSF would like to use an abbreviated form that will collect the core survey information but significantly reduce the burden for 264 of the institutions currently included in the survey (29% of the survey population). The abbreviated version of the questionnaire (officially titled the HERD short form) will contain a subset of 5 questions rather than 18. The burden estimates provided by these institutions when responding to the full survey in FY 2011 averaged 14 hours. The burden is expected to be significantly lower than 14 hours when answering 5 questions, but for the purposes of this clearance amendment we are using 14 hours as the maximum burden for this subset of institutions.

Conversely, the burden reported for those institutions with over \$1 million in R&D expenditures in FY 2011 was 50 hours, which is slightly higher than our current estimate of 48 hours. Since the burden estimate is being reduced for the under \$1 million group, NSF is also updating the estimate for the over \$1 million population.

The second change requested for the FY 2012 HERD survey is the addition of a one-time check-box question and related instructions on institutionally financed research. If approved, the question will be added to both the FY 2012 regular form and short form. The purpose of this question, which would be question 1.1 (a sub-item of question 1), is to determine the types of expenditures that are currently being included within the institutional funds category of the survey. Over the past year, NSF has investigated the issue of internally funded research and how it is coded and tracked across institutions. Our interview and workshop findings have highlighted inconsistencies in how survey respondents are defining and reporting this category of R&D. NSF revised the survey instructions in FY 2011 in an attempt to clarify what should be included, but interpretation issues still remain. NSF expects this question will provide greater transparency regarding what is currently being reported by each institution, and the new instructions should aid respondents' understanding of what can be included on the survey.

Based on discussions with 6 respondents regarding the new item and instructions, we expect no real increase in burden due to these changes. These respondents were shown the new question 1.1 and it was verified by NSF that each of them understood and could easily answer it. It is possible that the new clarifications will result in minor reporting revisions for some institutions. However, given that these instructions apply only to institutional funding, NSF does not expect any revisions to be time-consuming.

NSF would still like to revise the burden estimate to 50 hours to better reflect the reported experiences of those reporting over \$1 million in FY 2011. The previous annual burden estimate for this information collection was 43,014 hours. Combining the increase to 50 hours for the 648 institutions reporting over \$1 million and the reduction to 14 hours for the 264 institutions in the short form population, the new burden is estimated to be 36,336 hours.

We are continuing to collect burden reports from all survey respondents in order to provide OMB with an updated report on the total survey burden as part of the next request for Information Collection clearance.

If you have any questions, please call me at 703-292-7556.

Form 83-C

Attachment 1: FY 2012 Higher Education R&D Survey regular form

Attachment 2: FY 2012 Higher Education R&D Survey short form