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We respectfully request that the National Science Foundation consider issuing more detailed instructions for completing the (HERD) Survey and determining eligible expenditures. Our University's HERD submission undergoes review by our internal audit office, as state performance-based funding is directly linked to our HERD reported research expenditures. As part of this process, each project is individually reviewed for HERD eligibility based on the NSF's definitions, regardless of the indirect cost rate type applied to the award. In discussions with several peer institutions, we have learned that others may adopt a broader interpretation—specifically, that if a federal agency has approved a research indirect cost rate on a grant, then all associated expenditures are automatically included in the HERD Survey. Our institution is not including about 7% of its research expenditures that have a research classification for indirect cost purposes. This absence of a uniform interpretation of what constitutes a HERD expenditure results in inconsistencies across institutions and hampers the comparability of data. To promote fairness and accuracy in national benchmarking, we urge NSF to consider providing more specific criteria and examples to help standardize HERD reporting practices across all institutions. We also suggest the creation of a uniform HERD audit plan by NSF for all institutions to follow.