

Madame Isabelle Blain
Vice-President, Research Grants and Scholarships
NSERC

January 31, 2013

Dear Madame Blain,

Thank you for the opportunity to provide feedback on behalf of the CAP-NSERC Liaison Committee (LC) concerning the CCA Report entitled “Informing Research Choices: Indicators and Judgment” and the corresponding NSERC survey. The LC, in the absence of the NSERC staff member, has discussed both the report and the survey, and we would like to offer the following comments.

General Comments on CCA Report:

The LC was very impressed with the thoughtful analysis and guiding principles presented in the CCA Report. The LC strongly endorses the emphasis on the importance of expert opinion and deliberation in funding allocation procedures, which are informed by quantitative measures provided by the bibliometrics. The selection of the proper individuals for the expert opinion component will be crucial to the success of the process. The LC recommends that NSERC consult with the research communities to identify the appropriate individuals for this exercise.

Current Allocation Procedure:

The lack of a Research Quality component to the current allocation procedure is a big concern. The LC recommends that NSERC revise the allocation procedure to incorporate some of the Research Quality metrics advocated in Appendix C of the CCA Report.

The LC is also very interested in learning about the redistribution of funding between EGs in recent years due to the current allocation procedure. It would be very helpful if NSERC made this information available to the research communities in the spirit of the “transparency is critical” guiding principle recommended in the CCA Report.

New Allocation Procedure for Existing and New Funding:

The LC feels strongly that the allocation of funding should be done on the basis of expert judgment informed by bibliometric and other measures of quality, impact and discipline dynamics (the “do no harm” principle presented in the CCA Report). As stated in the CCA Report, bibliometrics that are relative and field-normalized, e.g. average relative citations (ARC), provide the most reliable and

robust metrics for evaluating the scientific impact of a field at the national level. The LC disagrees with some of the CCA Report recommendations for valid indicators. For example, the use of Researcher Population for determining Research Trends is flawed since a large percentage of hiring at universities is directed at increasing undergraduate student numbers, i.e. teaching undergraduates, to increase government revenues to the universities. In addition, decreases in the success rates for other funding agencies such as CIHR could lead to large increases in the number of researchers/research applications for specific fields in the NSE, and this could distort the allocation of funding. For these reasons, we do not think that it is logical to tie research funding to this metric.

The LC is concerned that the magnitude of the changes produced by the new allocation procedure could be too large. We think that it would be prudent to limit the changes to the EG budgets in any given allocation exercise so that no research community is crippled by this exercise. This is particularly true at the beginning of the new allocation procedure until the consequences of the implementation are fully understood.

The LC encourages NSERC to test any proposed new allocation procedure in advance on previous competition data to see if the allocation procedure achieves the desired result without any unforeseen consequences. We feel that this is a very important exercise that will provide both NSERC and the research communities with confidence that the new allocation procedure will achieve NSERC's goals without disadvantaging the research communities.

Feedback on the Survey Itself:

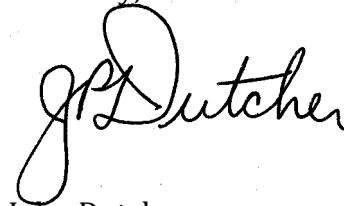
The LC has received many comments that the NSERC survey was difficult to understand and very time consuming to complete. We fear that many respondents may have started the survey and then abandoned it due to frustration, and that this may have limited the participation rate for the survey and the conclusions that can be drawn from it. One of the main concerns was that the survey focused on the "microscopic details" and was lacking a crucial component on the "big picture", i.e. the principles that should guide the allocation procedure. We feel that many researchers have a well-developed idea of how funds should be allocated, and it was not possible for them to express these views except in the box at the end of the survey. It was particularly frustrating that these comments could not be submitted unless all of the survey questions had been answered.

In terms of the big picture, the LC feels that it is most important to determine two quantities for each EG: impact, which should include scientific impact and training impact, and relative funding, i.e. is the EG "well-funded" or "under-funded"

(relative to other EGs)? We think that disciplines that are doing research that has high impact (on an international level) but are relatively under-funded are those that are most deserving of increased funding. To give more to those areas that are already well-funded (and have high impact) or to give more to those areas that have low impact is not a good idea in the climate of limited funding. We are not sure how to determine the level of under- or over-funding when comparing disciplines, since the success rates and funding levels are determined by individual EGs.

In summary, the LC strongly encourages NSERC to adopt the general principles outlined in the CCA Report, to adopt a new allocation procedure that contains a significant component based on Research Quality and is guided by expert opinion and informed by bibliometric indicators, and to test the new allocation procedure on previous competition data to validate the new approach. It is our hope that changes to the allocation of research funding will result in effective and productive research efforts in all disciplines. Thank you again for the opportunity to provide feedback, and I hope that you find our comments useful as NSERC develops the new allocation procedure.

Sincerely,

A handwritten signature in black ink that reads "John Dutcher". The signature is written in a cursive style with a large, looping initial "J".

John Dutcher

Chair, CAP-NSERC Liaison Committee