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Dear Dr Hendrickson

DRAFT 2018 HERDC SPECIFICATIONS

Thank you for the opportunity to comment on the Draft 2018 HERDC Specifications. We have considered carefully the consultation document and differentiated between the proposed changes which will impact on the manner in which we collect data and the proposed changes on which we wish to make comment more specifically. I would note that given the introduction of new sub-categories of funding we do anticipate changing how we collect data throughout the year given the emphasis on sub-categorisation according to IP arrangements in particular.

We note on page 7 of the document, reference to '*annual reporting of R&D expenditure data*' and wish to query this on the grounds that HEPs already report expenditure against RSP in annual financial statements which are audited in January/February each year. We suggest that this be taken into consideration when designing any new reporting requirements.

In Section 3, '*management of staff who are either directly engaged in the conduct of research or are providing professional, technical, administrative or clerical support or assistance to those staff*' and '*income used to manage staff directly engaged in the conduct of research or providing professional, technical or clerical support or assistance to those staff*' has been removed when compared to the current specifications. While we interpret this to mean that HEPs cannot offset costs such as HR, Finance and IT for example, it potentially creates uncertainty around roles of specific research leadership, for example Research Centre Director salaries or research administration costs within the University and Centres including Research Office, which could be considered management costs. It would be perhaps useful to provide more clarity under the statement that is provided (page 8) that '*Activities that meet the above definition of R&D can include: a) Professional, technical, administrative or clerical support staff directly engaged in activities essential to the conduct of R&D*'.

Within sub-categories 2.1.1 and 2.2.1 it states that '*This sub-category can include cash contributions to competitive grants*'. We would suggest that greater guidance is needed here as to the exact intent: for example, does this include Commonwealth and State government contributions to Australian Research Council (ARC) Linkage Projects excluding the ARC funding component?

I trust these brief comments will be helpful to you and your team in finalising the 2018 HERDC Specifications, and we look forward to the opportunity to comment on further consultations as suggested within the paper.

Yours sincerely



Professor Mary T Kelly
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