Dear Roger

Thank you for the opportunity to provide feedback on the proposed changes for the 2018 PBRF round.

1. **In your view, will increasing the proportion of PBRF income allocated based on External Research Income better value user-perspectives of research quality?**

   *Not necessarily so. There are a broad set of ‘user-perspectives’ of research quality, some of which are fully funded, some marginally cost funded and others of a ‘public good’ nature.*

   *Many of our private sector stakeholders would, we assume, base their ‘evaluations’ of research on its direct application to contemporary problems (in practice or policy, the willingness of researchers to engage in transfer/communication of findings rather than input costs).*

   *Our internal data informs us that there is a positive but poor correlation between academics engaged in fully funded research and high QS ratings – with many academics scoring high scores for engagement in only public good or internally funded research.*

2. **Will the proposed change encourage tertiary education organisations to more actively seek out additional research income, and to what extent?**

   *Not necessarily so. Our experience is that all universities are very actively engaged in seeking appropriate research funds wherever they may be found.*

3. **What do you see as the potential benefits and risks associated with increasing the proportion of PBRF funding allocated based on External Research Income, and decreasing the proportion of funding allocated through the Quality Evaluation?**
We agree that external research income is an important component of research productivity (and excellence). Carefully managed, it could place an alternative measure on the ability to deliver research to industry for commercialisation and technology transfer. A broader measure would be required where there are modest benefits delivered over multiple end-users – as is often found, for example, in the agricultural sector. As noted above, much research that confers environmental and social benefits is of a public good nature, undertaken within Universities, without formal external funds.

Our concern lies in developing a suitably reliable (objective and verifiable) set of definitions and measures. On the surface, the measure could include income from subsidiary companies, (non-profit) trusts, and local government. Further, would it be possible to include overseas sourced research/consortia membership funds, in keeping with other government policy directives? We believe that the assessment process might expose itself to contentious definitions of funding source, and the concomitant temptations for channelling funds into higher weighted categories. Thus, the recording and auditing costs would run counter to the goals of reducing compliance burdens for both TEO and the TEC.

Yours sincerely

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