

December 19, 2012

Ms. Isabelle Blain Vice-President, Research Grants and Scholarships Directorate NSERC 350 Albert Street, 16th Floor Ottawa, ON K1A 1H5 Email: connect@nserc-crsnq.qc.ca

Dear Ms. Blain,

I am writing in my capacity as Chair of the Scientific Affairs Committee (SAC) of the Canadian Psychological Association (CPA). CPA is the national organization representing almost 7,000 Canadian psychologists, students and affiliates. Many among our scientist members conduct basic research in psychology, supported by NSERC so we welcome the opportunity to respond to the NSERC request for feedback on the plan to establish a reliable methodology for allocating budgets among Evaluation Groups covered under the Discovery Grants Program.

SAC and CPA were glad to review the 2012 report of the Council of Canadian Academies (CCA). It is an impressive document and we were especially pleased to note psychology is among the 6 research fields in which Canada excels. The report is wide-ranging and scholarly and it provides a very balanced and thoughtful view of the issues attendant on assessing research performance. The costs and benefits of each assessment strategy are well-described and the document makes clear recommendations, noting the possible pitfalls of each approach.

As outlined in the report, there are many useful, and often field-specific, indicators and assessment approaches to determining national research capacity. However, the indicators and approaches must also be sensitive to the context of research and funding environments as well as to the objectives of science more broadly and the exigencies across research fields. The report repeatedly states throughout that expert judgment and interpretation of quantitative indicators are critical to the sound assessment of research.

While we agree that: "context matters", and that "the judgment of scientific experts remains invaluable" (p. 103), we encourage continued use of evidence in funding decision allocations. While CCA reasonably concluded that "Mapping funding allocation decisions directly to indicators is far too simplistic, and is not a realistic strategy (p. xii)", there is a considerable risk of bias if decisions to disregard the evidence are made without a commanding rationale to do so. Among the principles that the CCA recommends to guide assessment are "transparency is critical" and "do no harm". These principles are critical to the support of high quality research that is likely going to translate quickly into population benefits while at the same time allowing for programmatic basic research where benefits may not be immediately obvious.

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141, ave Laurier Ave West Suite 702 Ottawa, (Ontario) K1P 5J3 (613) 237-2144 1-888-472-0657 Fax: (613) 237-1674

> E-mail/Courriel: cpa@cpa.ca

www.cpa.ca

We recommend that the recommendations outlined in the CCA report be adopted by NSERC in its reallocation exercise. Further, we encourage you to develop a reliable methodology for allocating budgets among Evaluation Groups covered under the Discovery Grants Program that is faithful to the evidence and to the principles recommended by the CCA.

We thank you for the opportunity to provide feedback on the CCA report and to assist NSERC in its evaluation of methodologies of research performance. Please do not hesitate to call upon us at any time. You can do so by contacting us at <a href="mailto:executiveoffice@cpa.ca">executiveoffice@cpa.ca</a>.

Yours sincerely,

Aimée Surprenant Ph.D.

Chair, Scientific Affairs Committee Canadian Psychological Association