

# FCT Evaluation of R&D Units 2017-18

## Guidelines for Complaints Analysis

The following document presents the guidelines for the analysis of complaints submitted by R&D Units after the last systematic assessment exercise of research units in Portugal that was completed in 2019. According to the Portuguese law and regulations, all R&D units that were assessed have the right to submit an official complaint on the decision reached by the evaluation panels. This complaint should be analysed by a new evaluation panel.

### 1. Context

The Portuguese Science and Technology Foundation (FCT) is the Portuguese national Research Funding Organization (RFO) for all areas of knowledge. Among several funding calls, the R&D Units Multiannual Funding Program was initiated in 1993 with the main objective of promoting the institutional organization of the Portuguese research system associated with higher education and not-for-profit institutions in research centres and institutes of the initiative of groups of researchers.

R&D units are regularly evaluated by FCT (approximately every 4-5 years). Evaluation is carried out by independent panels of internationally recognised experts.

This evaluation process consisted on a remote analysis of applications submitted by 348 R&D Units, complemented by a site visit to all the units. This stage encompassed meetings with the units' teams, followed by a final panel meeting. The result of the final panel meeting was a ranked list of the R&D units and their classification by overall quality grading levels, graded in 5 levels, designated Insufficient, Weak, Good, Very Good, Excellent, as described in the [Evaluation Guide](#). Only R&D Units with overall grade Good, Very Good or Excellent are eligible for funding by FCT. The funding comprises two components: base funding is granted based on the grade awarded to each research unit and its size (number of PhD holders), and programmatic funding is granted based on the panel decision given the allocated budget. The regulations and the evaluation guidelines are public and were sent to all panels. The evaluation results and the panels evaluation reports for each R&D Unit are public.

In compliance with the Portuguese Law and as specified in the Regulations of the Evaluation of R&D Units 2017, all units assessed have the right to appeal about the recommended decision stated in the panels' consensus reports (preliminary hearing) before the final results are given, and their appeals are analysed by the respective evaluation panel. After the disclosure of the final results, the R&D units still have the further right to present a formal complaint to FCT.

The analysis of the scientific issues underlying the formal complaint is carried out by a second panel of independent experts, who may uphold or modify the original panel decision.

The grounds to modify the initial decision are limited to the confirmation of factual errors or major shortcomings of a scientific nature that may have been identified by the unit in the initial assessment

and which, furthermore, may not have been appropriately addressed in the preliminary hearings (appeals) analysis.

A complaint is not a second evaluation or an additional opportunity for units to present new information that was not included in the application. Panel members should also be aware that a difference of opinion on a scientific issue should not be considered a factual error.

Should any errors or shortcomings indeed be identified, they would need to be acknowledged by this second panel of independent experts and collegially agreed upon by consensus.

## 2. Methodology

The comments presented by units in their complaints should be duly substantiated and carefully reviewed as follows:

- By FCT, regarding procedural and administrative issues and/or
- By a second panel of independent experts, regarding scientific issues.

The second panel of independent experts will have to (1) analyse the complaints submitted by the R&D units. If any factual errors and shortcomings of a scientific nature, which were not properly addressed in the analysis of the preliminary hearings (appeals), are identified, the panel will have to (2) judge the impact of these errors for the overall assessment of the R&D unit. The second panel of independent experts will have access to all existing reviews of all the applying R&D units and may seek additional expert advice if needed. Panel members are advised to carefully read all documents associated with the evaluation process as these may provide useful background information for assessing the complains.

The outcome of the analysis by the second panel of independent experts may or may not impact on the final overall grade of the unit.

The outcome of the complaint will be one of the following:

1. The R&D unit **maintains** its scores, overall grade and programmatic funding. An explanatory comment from the second panel of independent experts is conveyed to the unit.
2. The R&D unit scores and/or overall grade and/or programmatic funding are **changed**. This will lead to a reclassification by the second panel, which should take into account the classifications that were attributed by the first panel to the other units within the same scientific area, with an explanatory comment to be conveyed to the unit.

The result of the complaints procedure will not have any impact on the other R&D units and their assessments.

Additionally, and for all submitted complaints, we would ask you to please note the following:

- All comments regarding the financial, organisational or regional impact of the evaluation results or any other similar consequences of the outcome are considered administrative and should not be considered by the panel of independent experts.
- Legal issues should not be answered by the panel of independent experts.

### 3. Recommendations

#### **Recommendation on how to apply the evaluation guidelines for the assessment of complains form Research Units – FCT assessment of Research Units 2017-18**

In order to further assist you in the analysis of the complaints submitted and considering questions and doubts that have been raised, please find below some additional information and more detailed suggestions on how to apply the complaints' analysis guidelines.

FCT does not favour any specific outcome of the assessment of the complaints i.e. any outcome is possible and will be accepted if duly justified by the panel.

In compliance with the Portuguese law and FCT regulations, as well as with the best international practices in R&D evaluation, it is of the utmost importance to ensure consistency and coherence across evaluators and reports. Thus, all panel members are advised to address the complaints submitted by the R&D Units as follows:

1. Begin by reading and carefully assessing the complaint and determine whether there are factual errors or major scientific shortcomings in the evaluation of the application.
2. Before reaching a decision, please keep in mind that:
  - New information, not presented before by the R&D Unit, should not be considered in your analysis.
  - A factual error is based on the confirmation of significant discrepancies between the panel report and the information provided by the unit in the application.
  - A major shortcoming of scientific nature is a factual error that requires scientific expertise to be identified.
  - A difference of opinion on a scientific issue is not considered to be a factual error; thus, complaints are not an opportunity to dispute valid scientific advice.
3. If you did **identify a factual error or major shortcoming**, you will need to assess the impact (if any) that the error or shortcoming has on the scores and/or overall grade and funding of the R&D Unit. Assessment of the impact of a factual error or major shortcoming in the evaluation is likely to involve:
  - Assessing the whole application.
  - Carefully considering the panel report and remote reviewers report (if applicable) and comments to the report (if any) submitted by the R&D Unit during the preliminary hearing, as well as the panel's response to those comments.
  - Reading applications submitted by other R&D Units in the same panel. The classifications awarded by the panel to other R&D Units are likely to provide appropriate points of calibration, should you need to propose a new score or classification for the R&D Unit.
- 3.1. If you did identify a factual error/major shortcoming that does not impact on the overall classification of the R&D Unit:

- An appropriate explanation needs to be provided to the R&D Unit (as detailed as necessary) indicating the nature of the error and the reasons why it did not impact on the R&D Unit's scores and classification.

3.2. If you did identify a factual error/major shortcoming that impacts on the classification of the R&D Unit:

- Assess the impact that a correction of such an error or shortcoming has on the scores or classification of the R&D Unit.
- Ensure that the report clearly explains the panel's decision, substantiating the reasons underlying it.

4. If you **did not identify any factual error or major shortcoming** in the R&D Unit's evaluation:

- You will need to provide an adequate explanation for why the complaint was not upheld. Please avoid dismissive sentences or vague comments and provide the main reasons that justify your decision.
- There is no need either for a new reassessment of the R&D Unit nor for a detailed analysis of the panel report.

Please keep in mind at all stages, that all decisions are collegial and should be reached by consensus at panel meetings to be held remotely. No decisions are made, nor can any decision be inferred before the panel meetings.

#### 4. Panel composition

FCT will constitute a single panel that will analyse the scientific complaints, considering:

- that each complaint must be analysed by 2 panel members who will produce individual reports, with a rapporteur being appointed who will produce the consensus report.
- that the number of complaints to be analysed by each panel member must be limited to 10.
- the scientific areas most representative of the complaints.
- the minimum number of panel elements for each sub-panel (by domain) is 2, regardless of the number of complaints filed in that area.
- A chairman of the process will be appointed by the FCT board who will accompany the preparation of the guidelines, the constitution of the sub-panels and all meetings by videoconference.
- For each of the 6 areas, a co-chair should be appointed from among the invited experts.