## Justification for Request to Interview Unfunded APRC Applicants

We are seeking OMB approval of our proposal to modify our APRC Evaluation Study protocol (OMB 0925-0573; expiration 10/31/2009) to include interviews of unfunded APRC applicants for the following reasons. Mr. John Kraemer, the OMB Desk Officer who had reviewed our original proposal, had recommended that our evaluation of the APRC Program include interviewing unfunded applicants. His rationale was that this was the best comparison group for analyzing the outcomes of the funded applicants. Upon careful consideration, we believe that his assessment was accurate and that this comparison group would significantly enhance the findings on the effectiveness of our APRC program.

Initially, we had intended to compare the funded and unfunded groups solely utilizing archival data. As the study is progressing, we are encountering challenges of missing data for archival analyses. This was anticipated during our discussion with Mr. Kraemer and constituted another reason for OMB's initial recommendation that we actually interview the unfunded applicants. Our original resistance to OMB's recommendation was because of budgetary constraints against having to increase the number people we had to interview, but this has been resolved now. It appears that the secondary data sources we had proposed in lieu of interviewing the unfunded applicants are simply not adequate.

The new number of total respondents, including funded and unfunded would be 350 and the new total annual hours would be 158. This request for modification would result in additional 33 total annual hours of burden.