

SUPPORTING STATEMENT

2013 National Survey of Indigent Defense Systems

B. Collection of Information Employing Statistical Methods

1. Universe and Respondent Selection

It would be beneficial to conduct a census of indigent systems because it allows BJS to report data on the policies and practices for the provision of indigent defense in all 50 states and the District of Columbia. Specifically, a census provides BJS with an opportunity to show how indigent systems vary across and within states. Being able to compare indigent systems is particularly important in light of the variability that exists among these organizations in terms of their administration, governance, funding, and policies. For example, a census allows one to compare indigent defense in states with centralized public defender systems in terms of their staffing, budgets, and caseloads to indigent defense systems in states where criminal defense is administered at the local level through a combination of public defenders, assigned counsel, or contract attorneys. We are unable to utilize a sampling data collection strategy because data are not available regarding the roster from which to draw a sample and the sample design would be very complex given the within-state heterogeneity in states without centralized indigent defense systems. In the future, it may be possible to use the information garnered through the proposed census as a foundation from which to conduct surveys of indigent systems utilizing sampling techniques. Completing the census, for example, will provide BJS with a fuller understanding of how each state and locality administers its indigent defense system, necessary for building the sample frames for the future indigent defense studies proposed in the president's 2015 FY budget to collect information on individual defense lawyers and defense offices. Attempting to generate samples of indigent networks without this crucial information would be more time intensive and costly.

The overarching goal of the 2013 NSIDS is to collect information on the universe of state and county indigent defense systems operating throughout the U.S. For the purpose of this study, an indigent defense system is defined as a system that employs any method or mixture of methods for providing legal representation to indigent clients, including use of public defenders, appointed counsel, and contract attorneys. The organizations that provide the various service delivery methods to indigent defense are defined in more detail below:

Governmental Public Defender Office: Public defender office that provides representation to indigent clients through a publicly operated governmental office where staff are government employees.

Governmental Public Defender Conflict Office: Public defender office that provides alternative representation to indigent clients in cases where legal conflicts exist or for other administrative reasons through a publicly operated governmental office where staff are government employees.

Non-Governmental Public Defender Office: Public defender office that provides representation to indigent clients through written contracts between some governmental entity

and a non-profit corporation, bar association or other such non-profit organization, who receive cases and are paid pursuant to the terms of the contract. These entities often operate as 501(c)(3) non-profit law firms. New York City's Legal Aid Society is an example of a non-governmental public defender office. In this instance, New York City contracts with the city's non-profit Legal Aid Society to provide indigent defense services to criminal defendants.

Contract Attorney: Contract attorney systems provide representation to indigent clients through written contracts between a governmental entity and one or more private attorneys or law firms that operate on a for-profit basis. These attorneys or law firms receive cases and are paid pursuant to the terms of the written contract. The contract may provide compensation through either an hourly rate or on a fixed-fee basis. The difference between contract attorneys and non-government public defenders is that the contract attorneys operate on a for-profit basis, while the non-governmental public defenders are organized as non-profit organizations.

Assigned/Appointed Counsel: Assigned counsel systems provide representation to indigent clients through individual attorneys or private law firms. In these systems, private attorneys are appointed from a list of private bar members who accept cases on a judge-by-judge, court-by-court, or case-by-case basis. These attorneys are generally paid by the case on an hourly basis or a flat rate. Assigned counsel systems are characterized by the absence of any fixed long term contract between the government entity and indigent attorney. Cases are simply assigned to private attorneys on either an ad-hoc or structured basis.

The national landscape of indigent defense systems is multi-faceted and diverse. The term *indigent defense system* is commonly used to define the overall delivery system utilized in a given jurisdiction to provide a continuum of legal services to members of the indigent community facing adult criminal, juvenile delinquency, certain family matters, and any other authorized proceedings.

Although there is no single model of an indigent defense system in our country, these systems are generally categorized as either statewide or county-based. It is within these broad categories that multiple configurations exist. Each jurisdiction applies its own combination of laws and policies in numerous ways including but not limited to: the creation, authority, administration, structure, funding, oversight, jurisdiction, scope, and delivery methods. Therefore, in order to conduct a census of indigent defense systems, the 2013 NSIDS requires a strategy that takes into account the many variations of administration, funding, and service delivery methods used to administer indigent defense.

The first group of statewide public defender systems includes 28 states and the District of Columbia (herein referred to as 29 states). In these states, indigent defense is administered, funded, and organized at the state level which means there is a centralized indigent defense system that serves the entire state. The other 22 states are generally grounded in a county-based indigent defense system. The specific breakout of the nation's states into state and county-based indigent defense systems is provided in the following table.

Table 5. State-Based vs. County-Based Indigent Defense Systems

State-Based Indigent Defense Systems (29 states)		County-Based Indigent Defense Systems (22 states)	
Alabama	Minnesota	Arizona	Nevada
Alaska	Missouri	California	New York
Arkansas	Montana	Florida	Ohio
Colorado	New Hampshire	Georgia	Oklahoma
Connecticut	New Jersey	Idaho	Pennsylvania
Delaware	New Mexico	Illinois	South Dakota
District of Columbia	North Carolina	Indiana	Tennessee
Hawaii	North Dakota	Kansas	Texas
Iowa	Oregon	Michigan	Utah
Kentucky	Rhode Island	Mississippi	Washington
Louisiana	South Carolina	Nebraska	West Virginia
Maine	Vermont		
Maryland	Virginia		
Massachusetts	Wisconsin		
	Wyoming		

Although the state based systems are similar in that they centralize the provision of indigent defense at the state level, there is some diversity in how they are structured in terms of the administration and delivery of indigent defense. Specifically, some of these states utilize a commission comprised of attorneys and laypersons to oversee the administration and delivery of public defense, while others employ a state public defender who is most often appointed by the state’s governor or legislature to manage a state’s entire indigent defense system. Moreover, several states have separate components or sectors within their system to manage their primary caseload while they utilize a different component to administer and manage conflict or other discrete caseloads.

It is important to note that one survey instrument will be completed for each of these 29 states and that the Chief Public Defender in each state would be responsible for completing the survey and/or making a reasonable amount of outreach to coordinate the provision of information for each delivery method employed by their system. We do understand however that there may be instances when follow-up with additional contacts outside of the Chief Public Defender may be necessary to complete the survey for each delivery method and every such effort will be made by the data collection agent to identify these additional contacts and collect the necessary information. It is also important to note that the NSIDS will not attempt to obtain county-level information for these 29 states with centralized systems because their indigent systems are not structured to provide information on funding, staffing, and caseloads at the county level.¹

The remaining 22 states, in general, are grounded in a county-based system. In these states, the indigent defense is administered principally at the local level or through some combination of county and state oversight – and funded principally by the county or through some combination

¹ The 2007 CPDO initially attempted to obtain county-level information for state administered public defender programs and was unable to do so. After several efforts, it was determined that many state systems share staffing, budget, and resources across several counties, precluding a county-level examination of these indigent defense characteristics.

of county and state funds. There are approximately 1,533 county-based indigent defense systems in these 22 states; typically corresponding with the county's geographical boundaries but in some states the boundaries are based upon judicial circuits.

In some counties, the indigent defense system relies on a single governmental public defender office to provide indigent defense. Other county-based systems may elect to contract with a non-governmental public defender office or contract attorney to provide indigent defense. Still others may utilize the services of assigned/appointed counsel to provide indigent defense on a case-by-case or ad-hoc basis.

Despite the potential complexity of indigent defense systems at the county level, in most counties, the data collection would involve a relatively simple process of sending the survey to the chief public defender for those counties with a public defender office delivery method and to the Court administrator (or equivalent position) for those counties with contract attorneys and/or assigned counsel in addition to a public defender office delivery method. For those counties with only contract attorneys and/or assigned counsel, only one survey would be sent to the Court Administrator for completion. The majority of counties have either:

- a single public defender office, backed up by an assigned counsel or contract system;
- a series of contracts with private law firms or attorneys; or
- only an assigned counsel system.²

Lastly, it is important to note that the 2013 NSIDS will not attempt to survey the actual private attorneys participating in assigned/appointed counsel or contract attorney service delivery methods. Previous efforts at collecting information on private attorneys have not been successful; the information sought should be maintained by the indigent defense systems being examined.

2. Procedures for Collection Information

The procedures for collecting data for the 2013 NSIDS involve several major components including identifying the indigent defense systems and contacting the list of respondents, obtaining the data on each indigent defense system, and verifying and validating the submitted data. Each of these components is described below.

Identifying the indigent defense systems and contacting the list of respondents

As discussed previously, the indigent defense systems will be divided into two primary groups. The first will involve the centralized (or state-based) indigent defense systems operating in 28 states and the District of Columbia. For these states, the chief public defender will be identified for this study. One of our data collection partners, NLADA will identify the chief public defender for each state. The NLADA is an expert in indigent defense systems and provides critical access to both state- and county-based indigent defense programs. As part of its professional activities, the NLADA maintains up-to-date information for all state-based indigent defense systems and the names of the chief public defenders responsible for managing these

² This information was obtained from discussions with the NLADA, who maintains that the majority of jurisdictions in county-based systems should utilize relatively few methods for providing indigent defense. Multiple forms of indigent defense will be more common only in the more populated jurisdictions.

systems. NLADA will be able to utilize this information to identify and determine the appropriate respondent for this survey.

Among the 22 states with county-based systems, NORC will work cooperatively with the NLADA and NACo to identify each county-based indigent defense system and whether it has just a public defender office delivery method or a combination of public defender office and contract and/or assigned counsel. This will be done by utilizing various sources of information including but not limited to public databases, internet searches, and personal outreach (i.e., e-mails and phone calls).

NACo will then identify the chief public defender and/or court administrator (or equivalent) for each county-based indigent defense system. NACo is uniquely positioned to identify and reach out to county government or courts to complete this survey because it is the only national organization that represents county governments in the U.S. Similar to NLADA, NACo has current lists of key county government officials with responsibility for administering a county's indigent defense system. NACo will provide critical access and contacts to the county-based systems for the NSIDS.

Obtaining data on indigent defense systems

Data collection for the 2013 NSIDS will involve a series of mailings and non-response follow-up activities, emphasizing questionnaire completion via a secure web-based reporting system. At first, all respondents will be mailed a pre-notification letter announcing the start of the 2013 NSIDS data collection and requesting that the agency begin gathering the necessary data to respond. This letter will provide the link to the web survey, the respondent's unique login information, and a notification that the web survey is available for use and early reporting. A brochure will also be included with the pre-notification letter. The brochure lists the types of questions that are asked in the web survey to help respondents prepare for its completion. As was done in the 1999 and 2007 surveys, this mailing will contain a letter from the Director of BJS and a letter of support from the NLADA, American Council of Chief Defenders (ACCD), the ABA-SCLAID, and the National Association of Criminal Defense Lawyers (NACD). The NACo will also be included on the letter of support for the 2013 NSIDS.³

Approximately one week after the pre-notification letter mailing, NORC will mail a survey invitation letter to all respondents who did not complete the web survey in response to the pre-notification letter. This letter will convey the importance of the agency's participation in the 2013 NSIDS and their timely submission. The letter will also include instructions for accessing the web questionnaire and the agency's unique PIN and password. Unlike in previous rounds, the 2013 NSIDS invitation letter will provide the URL to complete the web survey but will not include a hardcopy instrument. This will be done to increase the proportion of respondents using the on-line reporting system. Respondents will however be able to receive a hardcopy questionnaire if they prefer by contacting the project 1-800 number or e-mail address.

Approximately one month after the survey invitation mailing, a thank-you/reminder postcard will be mailed to all respondents. This postcard will thank those respondents who completed the survey and encourage non-responders to complete the web or mail questionnaire. It will also

³ The BJS letter and other letters of support are included in attached appendices.

contain the toll-free number and e-mail address for the project so that respondents may contact the data collection agent with questions or for assistance.

Approximately two months after the survey invitation mailing, NORC will mail a questionnaire packet via first-class U.S. mail. The questionnaire packet will contain an introductory cover letter from NORC, a personalized hardcopy questionnaire, and a pre-paid business-reply envelope. The cover letter will inform the data provider of the importance of the study and their timely submission as well as the various options for completing the survey which will include submission through the web, mail, or fax. It will also contain a toll-free number and e-mail address so that respondents may contact the project with questions or for assistance.

NORC's data collection specialists will then begin telephoning non-respondents approximately one week after the questionnaire packet is mailed. This will serve to verify receipt of materials, answer questions, determine and attempt to resolve potential problems with timely submission, and prompt for questionnaire completion. Data collection specialists may also offer respondents the option to complete the survey over the phone if the information requested is readily available and the respondent refuses to complete the online or paper questionnaire. Surveys completed over the phone will be recorded by data collection specialists using the preprogrammed web survey.

While telephone prompting continues, NORC will send fax and e-mail reminders to all remaining non-responders. The fax and e-mail reminders will provide a different form of contact to gain the respondent's attention, stress the importance of the study, and prompt for return of the questionnaire. The customized e-mail will contain the web survey URL and respondent's PIN and password.

About two months before the end of data collection, a reminder and replacement questionnaire will be sent to all non-responders via priority mail. This mailing will contain a personalized cover letter that urges the respondent to complete the survey and the link and login information to the web survey. A replacement questionnaire and pre-paid return envelope will also be included for those respondents who prefer to complete the survey by mail. Sending a reminder and replacement questionnaire will communicate that the respondent's completed information has not been received and will urge them to respond.

During the final weeks of data collection, the data collection agent will mail a "last chance" postcard alerting respondents of the scheduled data collection end date. A last chance contact has been implemented on previous studies, and it serves to motivate non-responders who had failed to complete and return the survey. This contact will be tailored to urge completion of the web survey for any respondents that completed a portion of on-line instrument and then broke off. At the end of the data collection period, we anticipate obtaining a 90% unit response rate or greater for the state and county-based systems surveyed in the NSIDS. Moreover, we will aim to keep missing/inconsistent item rates to: 1% for questions on function, overall personnel and overall workload; 5% for questions on detailed personnel and workload; and 10% on all other questionnaire items.

Verifying and validating the submitted data

Upon receipt, each questionnaire will be reviewed and edited, and, if needed, the data provider will be contacted to clarify responses or provide missing information. Prior to contacting the respondent jurisdiction, the data collection agent will attempt to address data inconsistencies. The data collection agent will also ensure that responses fall within the proper coding schemes specified by BJS. The following is a summary of the data quality assurance steps that will be implemented during the data collection and processing period:

Data editing: As the surveys are received, the data collection agent will aim to reconcile missing or erroneous data by employing a variety of logical and other verification checks determined collaboratively with BJS. For example, the survey instrument requests several pieces of information about the indigent defense systems including staffing levels and caseload volume. One logic check would involve examining the ratio of cases to staff to ensure that a given jurisdiction was not under or over-estimating their caseload or staffing numbers. Another check would involve an examination of missing or item non-response for each state to ensure that certain states did not have high levels of missing or incomplete data for specific items on the survey instrument. Other checks would involve comparisons of the 2007 public defender data with the current indigent defense census at the state and local level to scrutinize instances where the data submitted changed significantly from 2007. For example, if the staffing, caseload volume, or budgets for a particular public defender office increased substantially, additional checks and follow up would be employed to verify whether the change actually occurred and was not an artifact of an error committed while submitting the data.

Data Retrieval: When it is determined that additional data are needed because of errors, inconsistencies, or missing data, the data collection specialist assigned to the respondent jurisdiction will contact the data provider. Throughout the process, the data collection agent will document the questions needing retrieval, (e.g., missing or inconsistent data elements), request clarification on the provided information, obtain values for missing data elements, and examine any other issues related to the respondent's submission.

Data entry: Respondents completing the survey via the web survey will enter their systems' responses directly into the online instrument. For those respondents returning the survey via hardcopy, (mail or fax), data will be entered as responses are received. Completed hardcopy surveys will be edited; respondents will be contacted for missing or inconsistent critical items and then data entered. As the data are entered into the database, they will be made available to BJS via an SFTP site so that BJS can monitor the progress of the data collection. To confirm that editing rules are being followed, the data collection agent will review frequencies for the entered data after the first 10 percent of cases are received and processed. All issues will be investigated and resolved. Throughout the remainder of the data collection period, the data collection agent will conduct regular data frequency reviews and logic checks to evaluate the quality and completeness of data received.

Imputing for non-response

Despite the best efforts made during data collection, some data will not be collected. There are two major types of nonresponse: "unit," when no data are collected for an indigent defense

system, and “item,” when some questions are answered but others are left unanswered. We will use imputation and weighting adjustments to address concerns of non-response bias in the estimates.

While high item response is anticipated, respondents may leave items blank due to lack of access to the information or the fact that the data are not being recorded by the indigent defense system. We will utilize imputation for the purpose of reducing bias due to item non-response, ensuring consistent estimates, and simplifying data analysis. In this effort, regression imputation is particularly appealing because it allows us to leverage information such as population served that might be correlated with other key characteristics including defense expenditures, caseload size, and other important information. Regression models will be built to estimate missing information by taking advantage of certain variables that should be available for the majority of indigent defense system units. Once all missing values have been imputed, the dataset can then be analyzed using standard techniques for complete data.

Although we prefer the imputation approach to take advantage of the existence of historical data, traditional non-response weighting adjustments may also be used to compensate for unit non-response. The first step under the weighting approach involves computing the sampling weight or base weight, defined as the inverse of the selection probability. Since we are conducting a census of indigent defense systems, the base weight will be one for all jurisdictions. The second step adjusts the base weight for non-response through a weighting class or response propensity-based adjustment to compensate for the non-respondents. For example, we will group similar jurisdictions (in terms of size, region, service delivery structure, etc.) together to form weighting classes and adjust the weights of respondents so that they represent the non-respondents within the same weighting class. Alternatively, we could construct a multivariate model to predict the response propensity and use the predicted propensity score to adjust the base weights. The final weighting procedures will be determined empirically based on a nonresponse bias analysis to identify variables that influence nonresponse.

3. Methods to Maximize Response Rates

The response rate expected is 90 percent or more. In the 1999 NSIDS, the county survey yielded a response rate of 94 percent and the state survey a response rate of 95 percent. In the 2007 CPDO, all state public defender offices responded for a response rate of 100 percent and 94 percent of the county-based public defender offices completed the survey. NORC also anticipates that 100% of state-based IDS will respond to the 2013 NSIDS.

As described in the data collection section, BJS will utilize a variety of techniques to encourage high response rates. In particular, we will provide multiple response options to indigent defense systems, including a web-based questionnaire and the option to return the survey form via mail, fax or to complete it with a telephone interviewer. The follow-up plan utilizes best practices and is comprised of letters, e-mails, faxes, and telephone prompts. The web-based questionnaire will be programmed in an intuitive manner to facilitate ease of completion, including clearly formatted questions and displays, automatic machine checks and skip patterns, drop down menus with pre-programmed responses, and available help-screens to assist respondents if questions arise.

In addition to the contacting done by the primary data collection agent (i.e., NORC), we will utilize subcontractors for this data collection (i.e., NLADA and NACo) to assist in maximizing response rates. Both the NLADA and NACo are major stakeholders in the indigent defense, county government, and state trial court communities. These associations are well positioned to encourage participation by the public defender offices, county executive officials, and chief trial court judges who will be targeted by this survey. Specifically, the NLADA and NACo staff will perform follow-up with individuals as necessary to assist, encourage, and instruct respondents how to complete the survey. Each agency will also inform its membership about the upcoming 2013 NSIDS and present the goals of the study – and the importance of participation – at group forums, including the NLADA and NACo Annual Conferences. This outreach by the national stakeholders was critical to obtaining the high rate of participation for the 2007 CPDO.

Although we are confident the abovementioned steps will result in participation from the majority of respondents, there will always be a small percentage of jurisdictions that refuse to complete the survey for various reasons. For these respondents, we will compile an instrument that seeks to capture data for only critical items. Although not ideal, reducing the number of items and respondent burden will allow for collection of the most important data items from those respondents who previously could not complete the entire survey because of time and/or reporting constraints. The telephone survey option will be employed to address only the critical items component of this project. Phone responses become an option for the critical item survey because they allow for respondents to be quickly contacted and entail a version of the survey that can be completed through a shorter phone conversation. Critical items that will be collected in the telephone survey are listed below.

- Type of indigent defense delivery method utilized
- Total office expenditures in the provision indigent defense
- Total number of paid staff working for indigent defense system
- Total number of cases handled by indigent defense system
- Establishment of formal workload or caseload limits
- Ability to refuse appointments due to case overload
- Formal or written criteria used in the indigence determination process
- Fees and recoupment costs assessed against indigent criminal defendants

4. Testing of Procedures

Under the generic clearance agreement OMB Number 1121-0339, the survey instrument was pretested in 24 selected jurisdictions (i.e., states and counties) representative of the various types of indigent defense systems. Upon receipt and review of the questionnaires, we conducted a short telephone debriefing with the respondents to discuss their experience with and recommendations for the questionnaire. The pilot test served multiple purposes. First, it gauged the ease with which respondents were able to mechanically complete the survey. Second, it demonstrated the level of effort that was required by respondents to obtain the answers to the various questions. Third, it provided a full review of the instrument, including an evaluation of each question for content and clarity as well as the response categories for completeness and accuracy.

This information was summarized and provided to BJS in a report with recommendations for revisions to the instrument and data collection procedures prior to the main data collection.

In summary, NORC was able to determine the best strategies for the main study based on two distinct phases of the pilot test.

The first phase of the pilot test surveyed 42 individual respondents, consisting of 19 county-based and 4 state-based IDS's. The state based systems consisted of 1 respondent while the county based systems had anywhere from 1-3 respondents based on their structure and number of delivery methods. Below are the results from this initial pilot test.

	County (N=37)	State (N=5)	TOTAL
Completed via Web	18	4	22
Started on the Web	10	0	10
Out of Scope	1	0	1
Unable to Complete for Pretest	1	1	2
Not started on the web	8	0	8
Overall Response Rate	49%	80%	52%

Because the response rate among county based systems was lower than expected, NORC recommended a strategy in which the survey would be sent to the county administrator of each indigent defense system as a single point of contact for completion. The assumption was that the county administrator would be able to provide the requested information as a single point of contact and avoid having to send the survey to multiple respondents for each county-based indigent defense system. Our assumption was confirmed by a panel of county administrators who reviewed the survey and indicated that they would be able to provide all of the requested information. Based on their input, we sent the survey to the county administrators of the county-based indigent defense system that were initially selected for the pilot test. The production from this additional pilot test is summarized below:

	County (N=19)
Completed via Web	3
Started on the Web	1
Refusal	3
Indicated that original pilot answers would suffice	1
Not started on the web	12
Overall Response Rate	16%

Although several county administrators were able to provide the requested information, there were a significant number who did not want to complete the survey for various reasons despite a series of follow-up attempts. Based on these results and the results of the original pilot test where we analyzed the response rates by type of respondent (chief public defender, court administrator, and county administrator), we concluded that the best strategy would be to send the survey to the chief public defender and the court administrator for county-based indigent defense systems where there is a combination of an institutionalized (i.e., public defender office)

delivery method that provides primary defense services and a non-institutionalized delivery method (i.e., contract and assigned counsel) that provides conflict defense services. For those county-based indigent defense systems that have only a non-institutionalized system for the provision of both primary and conflict defense services, only one survey would be sent to the court administrator.

Within the pilot questionnaire, respondents were asked eight questions to examine their thoughts regarding the survey and their ability to provide the information needed within the web questionnaire. Combined with the information provided by debriefing interviews, a few changes to the questionnaire and data collection procedures are recommended.

Based on the feedback from the debriefing interviews, it was clear that respondents appreciated prior knowledge of the survey questions as the web-survey did not allow them to know what was exactly needed in order to complete the survey. After the first few respondents mentioned this issue, NORC was able to provide the remaining respondents a brochure with the general questions detailed as well as a list of topics that would be covered within the survey. We recommend that during the main data collection, all respondents receive materials specifying the information they will need to complete the questionnaire.

Another issue noted in the pilot questions and debriefing interviews was the inability to answer questions with a “Not Applicable” or “Don’t Know” option. While the respondents had the ability to skip questions, an answer option of the above two choices would have allowed respondents to answer the question more comfortably.

Looking at the self reported timing for the pilot survey, respondents stated that the survey took between 1 and 4 hours with the largest number reporting between 2 and 3 hours to complete the survey in its entirety. Respondents also reported that the time required to consult with others for the requested information contributed to the overall time to complete the survey.

5. Contacts for Statistical Aspects and Data Collection

The Bureau of Justice Statistics, U. S. Department of Justice is the lead agency for this submission. The persons to contact for information on methodology, conducting the survey, and data analysis:

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Appendices

1. Title 42 Authorization
2. Certification Statement
3. NSIDS Questionnaire- Web Version (Screen Shots)
4. Pre-notification letter
5. NSIDS brochure
6. Letters of Support
7. Survey invitation letter
8. Postcard text
9. Replacement letter
10. Telephone Scripts for NORC