PART 1

AN INTERIM EVALUATION OF UTAH'S LEGAL REGULATORY SANDBOX

Sandbox Background & Evaluation Design Overview

IAALS INSTITUTE FOR THE ADVANCEMENT OF THE AMERICAN LEGAL SYSTEM

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Part 1

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IAALS, the Institute for the Advancement of the American Legal System, is a national, independent research organization that innovates and advances solutions that make our civil justice system more just.

Founded in 2006 at the University of Denver, IAALS believes that justice for all must be a reality for everyone. When innovation is rooted in finding common ground, questioning the status quo, and centering the people, we begin to craft solutions that transform our civil justice system. IAALS' unique approach depends on purposeful research, deep collaboration, and diversity of perspective, followed by evidence-based recommendations that take hold in courts and legal institutions across the country—jumpstarting the groundbreaking and achievable solutions that will clear a path to justice for everyone. Because justice for all will never be a reality if those seeking justice cannot access the system designed to deliver it.

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Our ability to better the civil justice system soars when it is backed by consistent, ongoing research and evaluation. We must continue to invest in collaborative research agendas that will allow us to fully see the challenges facing the system and what people need from it. Only then can we create evidence-based change.

At IAALS, our unique approach depends on deep collaboration and diversity of perspective, followed by evidence-based recommendations that take hold in courts and legal institutions across the country. Our gratitude to the many people and organizations that were a part of this process and made this interim evaluation possible.

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EXECUTIVE SUMMARY

In the fall of 2020, the Utah Supreme Court launched the nation's first legal regulatory sandbox (the Sandbox), allowing nontraditional legal service providers and business structures—including entities with nonlawyer ownership or nonlawyer legal practitioners—to offer legal services under a novel regulatory approach. The stated objective of this new regulatory framework is "to ensure consumers have access to a well-developed, high-quality, innovative, affordable, and competitive market for legal services." Utah's Sandbox is built largely on the model IAALS developed and published in 2019.[1]

The Sandbox was developed in response to long-standing challenges in the legal profession, specifically the widespread gap in access to affordable legal services and the limitations in traditional legal regulatory structures that permit only lawyer-owned and lawyer-delivered legal solutions. In the Sandbox, entities can test models that would otherwise violate unauthorized practice of law (UPL) or ethics rules. Since the launch of the Sandbox, a few additional states have proposed a legal regulatory sandbox and many others have proposed or launched other regulatory innovation initiatives that involve waiving UPL or ethics rules.

From the outset, the leaders involved in the launch of the Sandbox recognized that rigorous data collection and evaluation would be critical in understanding whether the Sandbox was meeting its stated goals. To that end, IAALS is conducting a robust evaluation throughout the pilot phase of the Sandbox, which is set to end in 2027. This series of reports presents findings from our interim evaluation, conducted over the first five years of Sandbox operations. We will publish updated evaluation findings once the pilot phase has concluded.

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[1] GILLIAN HADFIELD & LUCY RICCA, INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., INDEPENDENT REGULATOR OF LEGAL SERVICES POLICY OUTLINE (2019) [hereinafter POLICY OUTLINE], https://iaals.du.edu/sites/default/files/documents/publications/iaals_independent_regulator_of_legal_services_policy_outline.pdf.

This interim evaluation report series consists of four separate publications:

- **Part 1 — Sandbox Background and Evaluation Design Overview**

  Presents important background and contextual information about the Sandbox along with an overview of the purpose and evaluative approaches used.

- **Part 2 — Process Evaluation**

  Provides a detailed examination of how the Sandbox is designed and implemented, including a fully articulated logic model and a comprehensive review of changes to Sandbox policy to date.

- **Part 3 — Outcomes Evaluation**

  Presents findings related to the outcomes and intended impacts of the Sandbox, including the entity authorizations, types of entities operating in the Sandbox, services provided, the quality of those services, the objectives of Sandbox entities, and additional insights gathered from their experiences.

- **Part 4 — Social Return on Investment (SROI) Analysis**

  Provides empirically driven insights into the value the Sandbox has generated—including social value—in comparison with the amount invested.

This is the first report in our four-part series: *An Interim Evaluation of Utah's Legal Regulatory Sandbox: Part 1 — Sandbox Background and Evaluation Design Overview*. Regarding background information included in this report, the section The Context for Regulatory Innovation contains subsections that discuss 1) defining access to justice, 2) the pervasive gap in access to justice, 3) regulatory innovation as a tool for addressing the justice gap, 4) regulatory innovation in Utah, and 5) regulatory innovation across the U.S. The Evaluation Design section provides key information related to 1) the conceptual framework of the evaluation, 2) our evaluation questions, and 3) our methodological approaches to the evaluation as a whole.

Download the other reports in this series:

https://iaals.du.edu/projects/unlocking-legal-regulation/utah-evaluation

- **Part 2 — Process Evaluation**

  Available October 2025
- **Part 3 — Outcomes Evaluation**

  Available November 2025
- **Part 4 — Social Return on Investment Analysis**

  Available January 2026

I. INTRODUCTION

The Utah Supreme Court launched its legal regulatory sandbox (the Sandbox) in August 2020 as an experimental framework to test new models of legal service delivery. The Sandbox allows nontraditional legal service providers and business structures—including entities with nonlawyer ownership or nonlawyer legal practitioners—to offer legal services under a risk-based regulatory approach. By allowing new models of service delivery while monitoring for consumer harm, the Sandbox seeks to balance innovation and public protection in legal service regulation. The Sandbox was developed in response to long-standing challenges facing the legal profession, particularly the widespread gap in access to legal services and the limitations traditional legal regulatory structures have in closing that gap. The pilot period for the Sandbox will expire in 2027, at which point the Court will make determinations about the future of these regulatory innovations in Utah. [2]

By being among the first states in the nation to implement its Sandbox—along with other regulatory reforms[3]—Utah has positioned itself at the forefront of innovative efforts to expand the ways that legal services can be delivered to the people who need them. Utah's experience has already served as a foundation for similar efforts in other jurisdictions, evidencing widespread confidence in such reforms. Still, given the ambitious nature of the Sandbox, Utah's Supreme Court and other stakeholders have been vocal about the need for rigorous empirical study to understand the degree to which the Sandbox is achieving its intended goals.

To meet that need, IAALS is conducting an extensive evaluation of the Sandbox that will provide crucial data to inform the future of these innovations in Utah, as well as similar innovations across the country. Our interim evaluation—findings for which are presented in

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[2] The original term for the Sandbox was two years. In May 2021, the Utah Supreme Court extended the term to seven years to allow for a longer period during which the impact of the regulatory reforms could be realized and assessed.

[3] *See, e.g.*, UTAH ST. B., LICENSED PARALEGAL PRACTITIONER PROGRAM, https://www.utahbar.org/licensed-paralegal-practitioner/ (last visited September 19, 2025).

this series of reports—covers August 2020 through February 2025. We will publish findings for the full pilot period of the Sandbox once it has concluded.

This interim evaluation report series consists of four separate publications, each of which is dedicated to a different component of the evaluation.

Part 1	**Part 2**	**Part 3**	**Part 4**
Sandbox Background and Evaluation Design Overview	Process Evaluation	Outcomes Evaluation	Social Return on Investment

This report—*An Interim Evaluation of Utah's Legal Regulatory Sandbox: Part 1 – Sandbox Background and Evaluation Design Overview*—provides background and contextual information to facilitate a full understanding of the regulatory environment in which the Sandbox is situated, as well as a broad overview of the three components of the evaluation.

This report includes two primary substantive sections. The first covers the context for regulatory innovation, while the second presents an overview of the evaluation rationale and methodological approaches employed.

II. THE CONTEXT FOR REGULATORY INNOVATION

While Utah's Sandbox is currently the only one of its kind, it exists within a much broader universe of regulatory innovations in the U.S. today. This section presents an overview of this context in terms of 1) defining access to justice, 2) the pervasive gap in access to justice, 3) regulatory innovation as a tool for addressing the justice gap, 4) regulatory innovation in Utah, and 5) regulatory innovation across the U.S.

A. Defining Access to Justice

The term "access to justice" is widely used but interpreted differently depending on the audience and context. Some define it narrowly, focusing on access to formal legal representation or the courts, while others take a broader view, considering whether

individuals can effectively resolve legal issues through various means, including self-help tools, community-based services, and alternative dispute resolution. Scholars and policymakers also emphasize different dimensions, such as affordability, availability, quality of legal assistance, and equity in legal outcomes. Utah's Sandbox adopts an expansive definition: "access to justice means the ability of citizens to meaningfully access solutions to their justice problems, which includes access to legal information, advice, and resources, as well as access to the courts."[4] This broad interpretation underpins the rationale for the Utah Sandbox, which seeks to expand service options and improve accessibility for all Utahns while maintaining consumer protections.[5] This broad interpretation includes serving those across the economic spectrum to broadly expand services and access for all.

B. The Pervasive Gap in Access to Justice

Numerous studies have demonstrated that people in the U.S. cannot (or do not) access legal services to help them resolve justiciable issues.[6] While some individuals and

[4] Utah Supreme Court Standing Ord. No. 15 (Aug. 14, 2020, Amended Sept. 21, 2022), at 1 [hereinafter Standing Ord. 15], https://legacy.utcourts.gov/utc/rules-approved/wp-content/uploads/sites/4/2020/08/FINAL-Utah-Supreme-Court-Standing-Order-No.-15.pdf; Rebecca L. Sandefur, *Access to What?*, 148 DAEDALUS 49 (2019) [hereinafter *Access to What?*], https://direct.mit.edu/daed/article/148/1/49/27247/Access-to-What.

[5] Standing Ord. 15, *supra* note 4; *Access to What?*, *supra* note 4.

[6] MARTIN GRAMATIKOV, BRITTANY KAUFFMAN, ET AL., HAGUE INST. FOR INNOVATION OF LAW, INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., JUSTICE NEEDS & SATISFACTION IN THE UNITED STATES OF AMERICA (2021) [hereinafter US JUSTICE NEEDS], https://iaals.du.edu/sites/default/files/documents/publications/justice-needs-and-satisfaction-us.pdf; LEGAL SERVS. CORP., THE JUSTICE GAP: THE UNMET CIVIL LEGAL NEEDS OF LOW-INCOME AMERICANS (2022) [hereinafter LSC JUSTICE GAP REPORT], https://lsc-live.box.com/s/xl2v2uraiotbbzrhuwtjlgi0emp3myz1 ; REBECCA L. SANDEFUR, AM. B. FOUND., ACCESSING JUSTICE IN THE CONTEMPORARY USA: FINDINGS FROM THE COMMUNITY NEEDS & SERVICES STUDY (2014), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2478040.

communities—for example, low-income individuals,[7] women,[8] and people of color[9]—are particularly impacted by these access issues, data shows that no segment of the population has remained unscathed.[10] Notably, according to the World Justice Project's Rule of Law Index, the U.S. ranks remarkably low in terms of *accessibility and affordability of civil justice* and *freedom from discrimination in civil justice*.[11] With regard to *accessibility and affordability of civil justice*, the U.S. ranks 107 out of 142 countries globally, 31 out of 31 countries regionally, and 47 out of 47 countries in the same income category.[12] For the *freedom from discrimination in civil justice* metric, these rankings for the U.S. are 115 out of 142 countries globally, 30 out of 31 countries regionally, and 45 out of 47 countries in the same income category.[13]

C. Regulatory Innovation as a Tool for Addressing the Justice Gap

There are many systemic issues that contribute to the existence of the justice gap and make it difficult to close. Among thought leaders across the legal profession, there is a growing consensus that the existing regulatory framework—which generally restricts the provision of legal services to licensed attorneys and prohibits alternative business models—has been a key factor contributing to this issue.[14] Compounding the issue is that traditional solutions

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[7] LSC JUSTICE GAP REPORT, *supra* note 6.

[8] US JUSTICE NEEDS, *supra* note 6.

[9] *Id.*

[10] *Id.*

[11] WORLD JUST. PROJECT, RULE OF LAW INDEX, https://worldjusticeproject.org/rule-of-law-index/country/2024/United%20States/Civil%20Justice (last visited Sept. 15, 2025).

[12] *Id.*

[13] *Id.*

[14] Gillian Hadfield, *Legal Markets*, 60 J. OF ECON. LITERATURE 1265 (2022), https://doi.org/10.1257/jel.20201330; Standing Ord. 15, *supra* note 4; DAVID FREEMAN ENGSTROM, LUCY RICCA, ET AL., STAN. LAW SCH. CTR. ON THE LEGAL PROF., LEGAL INNOVATION AFTER

(e.g., increased funding for legal aid, pro bono initiatives) cannot move the needle on the justice gap on their own.[15] As the Utah Supreme Court put it, "what has become clear . . . is that real change in Utahns' access to legal services requires recognition that we will never volunteer ourselves across the access to justice divide, and what is needed is market-based, far-reaching reform based on opening up the legal market to new providers, business models, and service options."[16]

In 2019, just as the earnest movement within the profession to broaden regulatory approaches was starting to gain momentum, IAALS issued a policy paper outlining "a non-profit, independent regulator of legal service providers implementing a risk-based approach to regulation that seeks to advance the regulatory objective . . . to ensure consumers access to a well-developed, high-quality, innovative, and competitive market for legal services."[17] As part of the process of developing the policy outline, IAALS convened a group of leaders and experts in the regulation of legal services to vet and refine the content of the policy. Many key leaders were in attendance and, among them, was Justice Deno Himonas who was serving on Utah's Supreme Court at that time.

D. Regulatory Innovation in Utah

In response to the persistent challenges in bridging the justice gap—and now equipped with a deep understanding of a promising new model for regulation of legal services—the Utah Supreme Court developed its own market-based regulatory approach that could foster innovation while ensuring consumer protection. In August 2020, the Utah Supreme Court

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REFORM: EVIDENCE FROM REGULATORY CHANGE (2022), https://law.stanford.edu/wp-content/uploads/2022/09/SLS-CLP-Regulatory-Reform-REPORTExecSum-9.26.pdf; *Nonlawyer Services: A 'Harbinger of the Future' to Close the Justice Gap?*, A.B.A. (Feb. 01, 2025), https://www.americanbar.org/news/abanews/aba-news-archives/2025/02/non-lawyer-services-close-justice-gap/.

[15] *See, e.g.*, Helen Respass, *Bridging the Access To Justice Gap with Legal Pro Bono*, THOMSON REUTERS (Oct. 19, 2022), https://www.thomsonreuters.com/en-us/posts/our-purpose/bridging-the-access-to-justice-gap-with-legal-pro-bono/,

[16] Standing Ord. 15, *supra* note 4.

[17] POLICY OUTLINE, *supra* note 1.

issued Standing Order 15, which established the Sandbox, set forth its regulatory objective and principles, defined its regulatory scope, outlined the process for authorization to provide services in the Sandbox, and created the Office of Legal Services Innovation (Innovation Office) to administer the Sandbox.

In other fields, sandboxes serve as controlled testing environments that allow for experimentation and risk assessment without jeopardizing broader systems. In technology and cybersecurity, sandboxes are used to safely test new software and evaluate code performance (among other things) in an isolated setting.[18] Similarly, in financial regulation, regulatory sandboxes provide a structured space for fintech companies to trial innovative financial products and services under regulatory supervision, balancing innovation with consumer protection.[19] By adapting this concept to legal services, Utah's Sandbox was designed to be a controlled environment in which new legal service models could be tested, allowing regulators to assess risks and benefits in real time rather than relying solely on preemptive, rule-based restrictions.[20]

In addition to its Sandbox, Utah has also created a Licensed Paralegal Practitioner (LPP) program that authorizes nonlawyers who meet specified educational and licensing requirements to engage in limited forms of legal practice.[21] This program—along with the various other approaches to reform—are critical to a global understanding of regulatory

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[18] *See, e.g.*, NAT'L INST. OF STANDARDS & TECH., GLOSSARY, SANDBOX, https://csrc.nist.gov/glossary/term/sandbox (last visited Sep. 15, 2025); WIKIPEDIA, SANDBOX (SOFTWARE DEVELOPMENT), https://en.wikipedia.org/wiki/Sandbox_%28software_development%29? (last visited Sept. 15, 2025).

[19] *See, e.g.*, Giulio Cornelli, Sebastian Doerr, et el., *Regulatory Sandboxes and Fintech Funding: Evidence from the UK*, 28 REV. OF FIN. 203 (2024), https://academic.oup.com/rof/article-pdf/28/1/203/56151338/rfad017.pdf; MONETARY AUTHORITY OF SINGAPORE, OVERVIEW OF REGULATORY SANDBOX, https://www.mas.gov.sg/development/fintech/regulatory-sandbox (last visited Sept. 15, 2025).

[20] Utah Stan. Order 15, *supra* note 4.

[21] Utah R. Jud. Admin. 14-802; Utah R. Jud. Admin. 5-703; UTAH ST. B., *supra* note 3.

innovation but are outside the scope of this evaluation. This will be a key direction for future research.

E. Regulatory Innovation across the U.S.

While this report focuses exclusively on Utah's Sandbox, it is critical to contextualize the Sandbox in the broader landscape of regulatory innovation in the U.S. Many states are experimenting with making changes to the ways legal services can be delivered and by whom, and these regulatory innovations look different from state to state. Generally speaking, there are four broad categories into which regulatory reform efforts can be grouped:

Regulatory Sandboxes

A regulatory sandbox is a policy tool through which new models or services can be offered and tested to assess marketability and impact and inform future policymaking while maintaining consumer protection. It is risk-based regulation involving one or more regulatory models (e.g., alternative business structures, community-based models, etc.).

Alternative Business Structures

An alternative business structure (ABS) is a business entity that includes people who are not lawyers who have an economic interest or decision-making authority in a firm and provides legal services in accordance with local supreme court and ethics rules.

Allied Legal Professionals

"Allied legal professionals" is the term IAALS uses to describe a tier of providers who are trained and certified to offer legal advice and services for certain case types. This is a market-based model that targets middle- and low-income individuals.

Community-Based Justice Workers

Community-based justice worker models involve training and certifying individuals working at community-based organizations to offer legal advice and services in certain case types. These models target low-income individuals.

Figure 1 next presents a snapshot of different types of regulatory reforms and jurisdictions implementing or considering them (as of August 2025).[22] Not included in the figure, but important to note, is that authorized representatives are permitted to offer legal advice and services in many federal administrative proceedings (e.g., immigration).

Figure 1: Regulatory Innovation in the U.S. (as of August 2025)

Regulatory Sandboxes	ABSs	Allied Legal Professionals	Community-Based Justice Workers
Active	**Active**	**Active**	**Active**
Utah	Utah	Utah	Utah
Under development	Arizona	Arizona	Alaska
Indiana	Washington, D.C.[23]	Colorado	Arizona
Minnesota	**Under development**	Indiana	Delaware
Washington	Puerto Rico[24]	Minnesota	Hawaii
		New Hampshire	New York[26]

[22] INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., UNLOCKING LEGAL REGULATION KNOWLEDGE CENTER, https://iaals.du.edu/projects/unlocking-legal-regulation (last visited Sept. 16, 2025); INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., ALLIED LEGAL PROFESSIONALS KNOWLEDGE CENTER, https://iaals.du.edu/projects/allied-legal-professionals/knowledge-center (last visited Sept. 16, 2025).

[23] Washington, D.C., permits multi-disciplinary practices which is a subset of alternative business structures. D.C. B., RULES OF PROFESSIONAL CONDUCT, RULE 5.4: PROFESSIONAL INDEPENDENCE OF A LAWYER, https://www.dcbar.org/for-lawyers/legal-ethics/rules-of-professional-conduct/law-firms-and-associations/professional-independence-of-a-lawyer (last visited Sept. 19, 2025).

[24] On June 17, 2025, the Supreme Court of Puerto Rico entered an order revising Rule of Professional Conduct 5.4 to allow non-lawyers to have ownership interests in law firms starting January 1, 2026. *See,* Debra C. Weiss, *Nonlawyers Can Partly Own Law Firms in Puerto Rico Under Revised Ethics Rules*, A.B.A. J., abajournal.com/news/article/nonlawyers-can-partly-own-law-firms-in-puerto-rico-under-revised-ethics-rules

[26] The program in New York is currently being challenged in court. See Brief for Law Professors as Amici Curiae Supporting Plaintiffs-Appellees, Upsolve v. James, No. 22-2345 (U.S. App. 2025).

Regulatory Sandboxes	ABSs	Allied Legal Professionals	Community-Based Justice Workers
Under consideration	**Under consideration**	Oregon	Tribal Communities[27]
N/A	Texas	Washington[25]	**Under development**
		Under development	South Carolina
		N/A	**Under consideration**
		Under consideration	California
		Connecticut	Illinois
		Iowa	Michigan
		Michigan	Texas
		New Mexico	Washington, D.C.
		New York	
		North Carolina	
		Texas	
		Vermont	

[25] In 2020, the Washington Supreme Court announced that no new LLLTs would be admitted after July 31, 2021. This date was later extended to July 31, 2023. LLLTs who were already authorized were permitted to continue to operate. *See,* JASON SOLOMON & NOELLE SMITH, STAN. CTR. ON THE LEGAL PROF., THE SURPRISING SUCCESS OF WASHINGTON STATE'S LIMITED LICENSE LEGAL TECHNICIAN PROGRAM (2021), https://law.stanford.edu/wp-content/uploads/2021/04/LLLT-White-Paper-Final-5-4-21.pdf.

[27] Tribal communities operate under different rules that allow them to train and certify tribal community members to offer legal advice and services in certain areas without needing a UPL waiver. *See, Harvard Law Sch. Ctr. on the Legal Prof., Tribal Lay Advocates Expand Access to Justice*, THE PRACTICE (2025), https://clp.law.harvard.edu/knowledge-hub/magazine/issues/legal-deserts/tribal-lay-advocates-expand-access-to-justice/.

III. EVALUATION DESIGN

The information in this section describes our evaluative and methodological approaches to conducting this study. The Conceptual Framework section provides an overview of the types of evaluation employed. The Evaluation Questions section briefly outlines the questions that guided data collection and analysis. Finally, the Methods Summary includes an overview of the various approaches used in the evaluation; each of the other reports in this series provides in-depth information about the methods relevant to that component of the evaluation.

A. Conceptual Framework

Our evaluation relies on a robust conceptual framework designed to assess both the processes involved in implementing the Sandbox and the outcomes resulting from its operation. This framework provides a structured approach to understanding how the Sandbox functions and the impact it has had to date. Specifically, this study employs three evaluative techniques to answer questions about implementation and efficacy of Utah's legal regulatory sandbox[28]: 1) process evaluation, 2) outcomes evaluation, and 3) calculation of a social return on investment (SROI). Table 1 provides details about each of these components of the interim evaluation. This integrated approach presents an opportunity for developing a rich understanding of the efficacy of the Sandbox, including how the Sandbox operates, how well it has achieved its goals so far, and the overall value it has created in the broader societal context.

[28] *See, e.g.*, PETER H. ROSSI, MARK W. LIPSEY, & GARY T. HENRY, EVALUATION: A SYSTEMIC APPROACH (8th ed. 2019); MICHAEL Q. PATTON & CHARMAGNE E. CAMPBELL-PATTON, UTILIZATION-FOCUSED EVALUATION (5th ed. 2021).

Table 1: Definitions for Components of the Sandbox Interim Evaluation

Process Evaluation	Outcomes Evaluation	Social Return on Investment (SROI)
Process evaluation focuses on the program processes and implementation. It examines the degree to which the activities and operations of a program are being conducted as planned, and it aims to understand the mechanisms, procedures, and contextual factors that influence the Sandbox's operation.	Outcomes evaluation examines the results and impacts of programs on various stakeholders and systems. It aims to measure the effectiveness of programs in achieving their intended objectives.	SROI is an evaluation framework for estimating the social and economic value created by a program, relative to the investments made. Its goal is to provide a comprehensive, evidence-based estimate of impact that supports better decision-making, resource allocation, and accountability.

B. Evaluation Questions

Evaluation questions are the set of questions that "articulate what an evaluation will answer and are essential for defining the purpose, guiding data collection, and shaping conclusions."[29] Clearly articulating and defining a set of evaluation questions is a critical first step in any evaluative process.[30] These questions serve as guideposts for designing an evaluation that is fine-tuned to target the relevant data and information. For this study, we identified three questions for each of the three components of our evaluative framework, for a total of nine evaluation questions.

[29] CTRS. FOR DISEASE CONTROL, CDC APPROACH TO PROGRAM EVALUATION (Aug. 28, 2024), https://www.cdc.gov/evaluation/php/about/?CDC_AAref_Val=https://www.cdc.gov/evaluation/.

[30] ROSSI ET AL., *supra* note 28.

Table 2: Evaluation Questions for the Sandbox Interim Evaluation

Process Evaluation	Outcomes Evaluation	Social Return on Investment (SROI)
What are the inputs, activities, outputs, and intended outcomes associated with operating the Sandbox? What successes and challenges has the Sandbox encountered so far with respect to its implementation and operations? What insights have been gained for the future of the Sandbox and other regulatory reform efforts?	To what degree have Sandbox activities resulted in the intended outcomes? What goals do Sandbox entities have when entering the Sandbox and to what degree do they view those as having been achieved? To what degree do entity goals align with the intended outcomes of the Sandbox?	What has been the total estimated investment in the Sandbox, including monetary and non-monetary investments? What is the total estimated value that the Sandbox has created, including both social and economic value? What does comparison of these estimates tell us about the value the Sandbox has created relative to investments made into it?

C. Methods Summary

This evaluation employs a mixed-methods approach in addressing the questions described previously, drawing on a variety of qualitative and quantitative strategies; each of the other reports in this series provides in-depth information about the methods relevant to that component of the evaluation. We conducted structured discussions with key sandbox leadership to inform the process evaluation. Monthly activity reports provided quantitative insights into service trends, Sandbox participation, and regulatory oversight. Archival documentation, including court orders, official communications, and public-facing materials, contextualized policy shifts and operational decisions. A survey of Sandbox entities captured direct feedback from participating organizations regarding their experiences and impact, as well as information about investments made in the entity. Lastly,

prior research and publicly available data provide the empirical basis for estimates of social and economic value. The variety of data sources and types provides a holistic view of the Sandbox's effectiveness and its implications for the future of regulatory reform.

Table 3: Overview of Interim Evaluation Data Sources

Data Source	Description
Monthly Sandbox Activity Reports	Monthly reports from the Sandbox providing key data points about its activity and operations (October 2020 to January 2024).
Archival and Documentary Data	A robust library of more than 100 documents related to the formation, establishment, and implementation of the Sandbox.
Survey of Sandbox Entities	Collected information from entities related to investments, goals, and other aspects of Sandbox participation.
Structured Discussions with Sandbox Leadership	Gathered insights from six individuals involved in the Sandbox's development and implementation to inform the process evaluation and contextualize findings.
Existing Research and Publicly Available Data	Findings from previous research and publicly available data provide the empirical basis for estimates of investment in and value generated by the Sandbox.

Each of the data sources utilized plays a key role in the evaluation design and each contributes to multiple components of the interim evaluation. Table 4 outlines how these data sources are incorporated into each evaluation component.

Table 4: Data Sources by Interim Evaluation Component

Evaluation Component	Data Sources Analyzed
Process Evaluation	Archival and documentary data Structured discussions with Sandbox leadership
Outcomes Evaluation	Archival and documentary data Survey of Sandbox entities Structured discussions with Sandbox leadership
SROI	Archival and documentary data Survey of Sandbox entities Existing research and publicly available data

IV. CONCLUSION

Utah's Regulatory Sandbox is a significant disruption to the norms, traditions, and rules that have governed the delivery of legal services in the U.S. for generations and have contributed to a substantial gap in access to justice in the U.S. The Sandbox was designed "to ensure consumers have access to a well-developed, high-quality, innovative, affordable, and competitive market for legal services."[31] It is only through rigorous study that we can gain an understanding of how the Sandbox has been implemented, the goals it has achieved, and the broad value it has generated in Utah.

This report—the first in a four-part series—provides critical information relating to the context in which the Sandbox is situated, as well as an overview of the design and methods

[31] Standing Ord. 15, *supra* note 4.

for our interim evaluation. The remaining reports each detail findings from a distinct component of the evaluation and, when considered together, provide an intricate view of the Sandbox that will support and inform decision making about the future of the regulation of legal services within Utah and across the country.

Download the other reports in this series:

https://iaals.du.edu/projects/unlocking-legal-regulation/utah-evaluation

- **Part 2 — Process Evaluation**
  Available October 2025
- **Part 3 — Outcomes Evaluation**
  Available November 2025
- **Part 4 — Social Return on Investment Analysis**
  Available January 2026