PART 2

AN INTERIM EVALUATION OF UTAH'S LEGAL REGULATORY SANDBOX

Process Evaluation

IAALS INSTITUTE FOR THE ADVANCEMENT OF THE AMERICAN LEGAL SYSTEM

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Part 2

Process Evaluation

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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 second report in our four-part series: *An Interim Evaluation of Utah's Legal Regulatory Sandbox: Part 2 — Process Evaluation*. This report includes three substantive sections. The Process Evaluation Design section defines process evaluation and our evaluation questions, and situates the process component within the broader context of the evaluation. The Methods section details the methodological approaches we employed. The Process Evaluation Findings section provides an in-depth discussion of the findings from this component of the Sandbox evaluation.

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 is the second report in our interim evaluation series, covering process evaluation. Process evaluation is a critical component of program evaluation that provides deep insight into how the program functions, which has implications for understanding the program's outcomes. The sections that follow present a detailed picture of our process evaluation of the Sandbox. The Process Evaluation Design section outlines how the process evaluation fits in with the conceptual framework for the broader interim evaluation, as well as the relevant evaluation questions. The Methods section presents details about the various data sources we utilized, as well as an overview of theories of change and logic modeling. Process Evaluation Findings provides a granular examination of the findings of this process evaluation.

II. PROCESS EVALUATION DESIGN

A process evaluation is designed to examine how a program is implemented, with a focus on the structures, activities, and decision-making processes that shape its operation. Rather than asking *whether* a program has achieved its intended goals, a process evaluation looks at *how* it works: what inputs and activities are involved, how implementation unfolds in practice, and what challenges and adaptations emerge along the way. This approach provides critical insight into whether the program is functioning as intended, helps explain outcome findings, and highlights areas for refinement or improvement. In the context of Utah's regulatory sandbox, the process evaluation offers valuable evidence about the mechanics of implementation and governance, providing lessons that are useful both for

strengthening the Sandbox itself and for informing broader regulatory reform efforts in other jurisdictions. Table 1 defines the three components of this evaluation, highlighting process evaluation.

Figure 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 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.

Clearly articulating and defining a set of evaluation questions is a critical first step in any evaluative process.[4] 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. Figure 2 presents our evaluation questions for the process component alongside questions for other components of the evaluation.

[4] *See, e.g.,* PETER H. ROSSI, MARK W. LIPSEY, & GARY T. HENRY, EVALUATION: A SYSTEMIC APPROACH (8th ed. 2019); E. JANE DAVIDSON, EVALUATION METHODOLOGY BASICS: THE NUTS & BOLTS OF SOUND EVALUATION (2005).

Figure 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?

III. METHODS

This section provides details about our methodological approach to conducting this process evaluation. The first subsection outlines the data sources we utilized, as well as our approaches to analyzing each. The second subsection provides an overview of theories of change and logic modeling—two crucial evaluative elements of process evaluation.

A. Data Sources and Analytic Techniques

This process evaluation draws on numerous data sources, each of which falls into one of two categories: 1) archival and documentary data and 2) structured discussions with Sandbox leadership.

1. Archival and Documentary Data

Archival and documentary data are similar but distinct types of data. Archival data refers to records that were created and maintained as part of the ordinary administration of the Sandbox, such as entity authorization packets. Documentary data includes materials that

provide context for the Sandbox's design and operation, such as guidance manuals and court orders outlining Sandbox policy. These sources were not produced specifically for research purposes but offer valuable insight into the processes, decisions, and structures underlying the Sandbox.

In order to gain a full understanding of the Sandbox's regulatory structures and how it carries out its regulatory functions, we analyzed more than 100 archival and documentary resources including foundational documents, official websites, guidance manuals, and other documentation. Figure 3 provides details about the key resources we relied upon for the process evaluation.

Figure 3: Key Archival Data Resources for the Process Evaluation

Originating Authority	Resource Type	Resource Details	Resource Description
Utah Supreme Court	Court Orders	Standing Order 15 *Issued: August 14, 2020* *Amended: September 21, 2022*	Establishes the Sandbox and defines its regulatory scope and structure.
	Official Communications	Letter to Utah State Bar *March 28, 2023*	Outlines significant structural, operational, and governance changes.
		Letter to Legal Services Innovation Committee *September 5, 2024*	Directs the Innovation Office to resume paused activities and to make recommendations regarding entities that do not meet new Sandbox criteria.
Utah Office of Legal Services Innovation	Reference Documents	Office Manual (2020, 2022, 2024) *February 20, 2024*	Provides guidance targeted at prospective and approved Sandbox entities.
	Official Communications	Open Letter to Utah State Bar *February 23, 2021*	Responds to a series of inquiries from the Utah State Bar about how the Sandbox operates.
	Website	All webpages and documents *Last visited: February 28, 2025*	Provides information about the Sandbox to the public.

Originating Authority	Resource Type	Resource Details	Resource Description
Legal Services Innovation Committee	Official Documentation	Meeting minutes *October 2022–May 2024*	Track discussions at monthly meetings.

Archival data was analyzed using content analysis techniques. Resources were systematically reviewed to identify information relevant to the Sandbox's implementation and governance. A coding framework was developed to capture themes such as regulatory processes, service delivery models, compliance monitoring, and adaptations over time. Codes were applied to the text to organize information and highlight recurring patterns, while attention was also given to unique or outlier cases that provided additional insight. This approach allowed us to synthesize large volumes of documentary material into themes that directly inform the process evaluation questions.

2. Structured Discussions with Sandbox Leadership

The process evaluation also draws on data from structured discussions with Sandbox leadership. Specifically, we spoke with six individuals who have been involved in the development and/or governance of the Sandbox. Questions for these structured discussions centered on:

- Successes related to both implementation and outcomes of the Sandbox
- Ways that information about the Sandbox has been communicated to stakeholders and the public
- Financial supports for the Sandbox
- Key changes to Sandbox policy since initial implementation
- Essential features of a successful regulatory sandbox
- Defining a vision for what it means for consumers to have access to well-developed, high-quality, and affordable legal services

Participants included Sandbox leadership from a variety of stakeholder groups, including the Utah State Bar, the Legal Services Innovation Committee, the Innovation Office, and the Utah Supreme Court.[5] Discussions occurred in September 2023 and October 2024.

Data from the structured discussions with Sandbox leadership were analyzed using thematic analysis. Transcripts and detailed notes were reviewed systematically, with responses first organized according to the topics outlined in the structured protocol. Within each topic area, themes were inductively identified to capture recurring ideas, points of emphasis, and areas of divergence across participants. This thematic analysis provided a nuanced view of how leadership experienced successes, challenges, and adaptations within the regulatory framework.

B. A Brief Primer on Theories of Change and Program Logic Modeling

This section outlines the foundational framework for evaluating the Utah Sandbox, beginning with Defining Theory of Change, which explains the assumptions and mechanisms that drive expected outcomes. Understanding Logic Modeling builds on this by mapping the causal relationships between inputs, activities, and results.

1. Defining Theory of Change

A theory of change is a description of how and why a desired change is expected to happen in a particular context.[6] Well-articulated theories of change concisely outline a clear pathway from the present situation, through the intervention approach, to the envisioned future state—as well as identify any assumptions made. This process helps stakeholders understand the underlying assumptions and mechanisms intended to drive the desired change, facilitating better planning, implementation, and evaluation of the program.[7]

[5] In order to preserve confidentiality, we have omitted additional details about our participants.

[6] ROSSI ET AL., *supra* note 4.

[7] *Id*.

2. Understanding Logic Modeling

Logic modeling builds upon the theory of change by providing a systematic and visual representation of the causal links between what a program does and its direct results. Logic models consist of four broad components:

- **Inputs**
  The resources (e.g., funding, staff, technology) needed to carry out a program or initiative.
- **Activities**
  The actions or processes undertaken to implement the program (e.g., training sessions, policy changes, service delivery).
- **Outputs**
  The direct, measurable products or results of the activities (e.g., number of people trained, policies developed, services provided).
- **Outcomes and Impacts**
  The short- and long-term changes or impacts resulting from the outputs (e.g., increased knowledge, improved access to justice, policy adoption).

This model can serve as a blueprint for both implementation and program evaluation, ensuring that program components are aligned with the desired goals. Moreover, they can prove invaluable in clarifying program objectives, enhancing strategic planning, improving stakeholder communication, and providing a framework for future monitoring and evaluation—the strength in the logic modeling approach is its versatile utility.

For these reasons, this interim evaluation proposes a theory of change and a logic model for the Sandbox regulatory structure based on multiple sources of data, including the broad array of data described in the previous Data Sources and Analytic Techniques section.

Importantly, theories of change and logic models are not static. On the contrary, programs benefit from periodic review and reassessment. It is also true that inclusion of additional stakeholders—like Sandbox entities and consumers—could help to further refine the models. Thus, we view both the theory of change and the logic model outlined next as an evidence-based framework upon which future work can build.

IV. PROCESS EVALUATION FINDINGS

The sections that follow present detailed findings from our process evaluation of Utah's Sandbox. The Guiding Objectives and Principles section outlines the objectives and principles that inform how decision making and operations take place in the Sandbox. Sandbox Theory of Change and Logic Model presents details of the theory of change and logic model we developed for the evaluation. How the Sandbox Operates describes information about the Sandbox structure, funding, and regulatory scope. The How Sandbox Authorization and Compliance Work provides details about how entities enter the Sandbox, requirements for entities to maintain regulatory compliance, and how entities exit the Sandbox. How the Sandbox Mitigates Risks and Harms outlines Sandbox procedures for pre-authorization risk assessment, soliciting consumer feedback, and responding to harms and noncompliance. How the Sandbox Maintains Transparency and Accountability describes the ways that information about the Sandbox is provided to the public.

A. Guiding Objectives and Principles

In Standing Order 15, which established the Sandbox, the Utah Supreme Court outlined the three components of the Sandbox's regulatory approach[8]; these are outlined in Table 4. Notably, Utah's Sandbox is an adaptation of the regulatory approach described in IAALS' policy outline.[9]

[8] 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

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

Figure 4: The Three Components of the Sandbox's Regulatory Approach, Standing Order 15

Entity Regulation	Organizations, rather than individuals, are the subject of regulation
Objectives-Based Regulation	Regulatory objectives are clearly stated to guide development and implementation of the approach
Risk-Based Regulation	Empirical assessments of risk identify areas where regulatory resources should be deployed

In addition, the Order also established the Court's own role as final decision-maker on entry into the Sandbox, established the Office of Legal Services Innovation (Innovation Office), charged the Innovation Office with operating and administering the Sandbox, and created the Legal Services Innovation (LSI) Committee (see section on How the Sandbox Operates for details on the roles of the Innovation Office and the LSI Committee).[10]

The sections that follow outline the core regulatory foundations of the Sandbox including regulatory objective and principles, defining consumer harms, and objectives and principles for decision-making within the Sandbox. Note that, in presenting the first two of these topics, we have included side-by-side comparisons between the model outlined in the 2019 Policy Paper and Utah's Sandbox. We make these comparisons for two primary reasons. First is to understand the various ways in which the model has been tailored specifically to the Utah context—that is, to compare the theoretical with an example of real-world implementation. Second is that understanding the places where the 2019 Policy Paper and Utah's Sandbox overlap and where they diverge is instructive for the future of regulatory innovation writ large.

[10] Standing Ord. 15, *supra* note 8.

1. Regulatory Objective and Principles

The Utah Supreme Court has explicitly defined the overarching regulatory goal of the Sandbox, as well as the regulatory principles that guide Sandbox operations toward intended impacts and improvements in the justice gap.[11] Figure 5 presents Utah's regulatory objective and principles, as well as those articulated in the 2019 Policy Paper.

Distinctions include the following:

- **Affordability**
  The Sandbox introduced an additional qualifier to the list of characteristics
- **Consumer Risk Assessment**
  Utah streamlined the principle regarding assessment of risk to consumers without making substantive changes to the meaning of the principle's counterpart in the Model Regulatory Framework.
- **Relative Assessments of Risk**
  A principle instructing that risk be assessed relative to the current options available in the legal market has been articulated for the Sandbox that was not included in the Model Regulatory Framework.

Figure 5: Regulatory Objective and Regulatory Principles

Utah's Sandbox *Standing Order 15*	**Model Regulatory Framework** *2019 Policy Paper*
Regulatory Objective	
To ensure consumers have access to a well-developed, high-quality,	To ensure consumers access to a well-developed, high-quality, innovative,

[11] *Id.*

Utah's Sandbox *Standing Order 15*	Model Regulatory Framework *2019 Policy Paper*
innovative, **affordable,** and competitive market for legal services.	and competitive market for legal services.
Regulatory Principles	
Regulation should be **based on the evaluation of risk to the consumer**.	Regulation should be **risk-based (proportionate and responsive to actual risks of harm posed to consumers of legal services)**.
Risk to the consumer should be evaluated relative to the current legal services options available.	N/A
Regulation should establish probabilistic thresholds for acceptable levels of harm.	Regulation should establish probabilistic thresholds for acceptable levels of harm.
Regulation should be empirically driven.	Regulation should be empirically driven.
Regulation should be guided by a market-based approach.	Regulation should be guided by a market-based approach.

2. Defining Consumer Harms

As stated in the 2019 Policy Paper, "The regulator's primary approach to achieving the core regulatory objective is through the identification and reduction of the major risks to

consumers in the legal services market."[12] In addition to defining a regulatory objective and delineating regulatory principles, definitions of consumer harm have been developed both for the Sandbox and the Model Regulatory Framework. *Figure 6* presents definitions of harm articulated in the Innovation Office Manual in conjunction with those found in the 2019 Policy Paper, with the differences in bold. Differences relate to:

- **Failure to Exercise Rights**
  The two frameworks describe harm associated with a consumer's failure to exercise their legal rights; however, the Sandbox uses language that attributes these harms to ignorance *or* bad advice, while the Model Regulatory Framework attributes harms to ignorance only.
- **Bad Legal Results**
  The Sandbox broadly defines a consumer harm related to inaccurate or inappropriate legal outcome, whereas the Model Regulatory Framework employs a more comparative approach, specifying that harm occurs when a consumer receives a worse outcome than they would have with the next best alternative.
- **Overpayment for Services**
  The Model Regulatory Framework includes harm related to consumer overpayment. No corollary exists for the Sandbox.
- **Purchase of Wrong Services**
  Both frameworks agree that harm occurs when a consumer pays for a service that is not needed or is inappropriate for their legal issue, with only minor wording differences.
- **Failure to Engage with the Legal Services Market**
  A harm to consumers who do not engage with the legal services market, despite the existence of a justiciable issue, appears in the Model Regulatory Framework but does not apply within the Sandbox.

[12] POLICY OUTLINE, *supra* note 1, at 1.

Figure 6: Consumer Harms Within Regulatory Oversight

Utah's Sandbox *Innovation Office Manual*	**Model Regulatory Framework** *2019 Policy Paper*
Consumer fails to exercise legal rights **through ignorance or bad advice**.	Consumer fails to exercise their legal rights **because they did not know they possessed that right**.
Consumer achieves **an inaccurate or inappropriate legal result**.	Consumer achieves **a worse legal result than they would have had they used the next best alternative**.
N/A	Consumer overpays for a legal service.
Consumer purchases **an unnecessary or inappropriate legal service**.	Consumer purchases **a legal service not needed or not appropriate to their legal issue**.
N/A	Consumer does not engage with the legal services market at all.

3. Innovation Office Objective and Principles for Decision-Making

To promote and facilitate fairness, consistency, and accountability in decision-making processes—particularly those related to authorization status of Sandbox entities—the

Innovation Office Manual outlines the broad objective and principles underlying decision-making processes within the Innovation Office.[13] Each of these is presented in Figure 7.

Figure 7: Innovation Office Decision-Making Objectives and Principles, Innovation Office Manual

Objective for Decision-Making Processes	
Ensuring that all Office decisions are unbiased and based on a proper, objective consideration of all facts, the Regulatory Objective, and the Regulatory Principles.	
Principles for Decision-Making Processes	
Equal Access	All parties have the same opportunity to access decision makers.
Coherent	Decisions and reasons are reasonably and clearly explained.
Transparent	All parties know what information and arguments the Innovation Office is considering in reaching its decision.
Efficient	Decisions will be made in a timely manner.

[13] OFFICE OF LEGAL SERVICES INNOVATION, INNOVATION OFFICE MANUAL (2024) [hereinafter INNOVATION OFFICE MANUAL], https://utahinnovationoffice.org/wp-content/uploads/2024/02/Innovation-Office-Manual.pdf.

Standard for Sufficiency of Data	The data considered alongside all associated information must be of sufficient quality to inspire confidence in the relevant regulatory action.
Operational Decision Criteria	Decisions are based on empirical evidence whenever possible.

B. Sandbox Theory of Change and Logic Model

The Utah Supreme Court has clearly laid out the overarching goal of the Sandbox: the Court envisions achieving a market for legal services in Utah that is "well-developed, high-quality, innovative, affordable, and competitive" through this novel approach to legal regulation.[14] In establishing the Sandbox, the Court also articulated a complex set of approaches and processes through which this vision would be realized.

1. Assumptions

As with any solution to any problem, the anticipated success of the Sandbox rests on a set of assumptions about the context in which it exists. The assumptions built into the Sandbox approach can be summarized as follows:

- It is possible for innovative legal service models to enhance access to justice.
- Regulatory flexibility can lead to innovative service delivery without compromising consumer protection.
- There is an entrepreneurial appetite to develop and implement innovative service delivery models within the legal marketplace.
- Consumers are willing to receive legal services via innovative, nontraditional service delivery models.

[14] Standing Ord. 15, *supra* note 8.

2. Sandbox Theory of Change

Given these assumptions, as well as the context in which the Sandbox is situated, its theory of change—the logical progression from the existence of a justice gap to the intended impacts of the Sandbox—can be stated as follows.

Figure 8: Sandbox Theory of Change

Problem Statement	Intervention to Address the Problem	Intended Outcomes
There is a persistent, pervasive, and well-documented access to justice gap across Utah, as well as the rest of the U.S. More traditional approaches to addressing this problem—such as increasing the number of lawyers admitted to practice or implementing pro bono requirements—cannot solve the problem. Traditional regulatory frameworks constrain innovation, limiting legal service providers' ability to explore new ways of delivering legal services to clients.	To tackle these problems, the Sandbox offers a controlled environment for testing innovative legal service models. Implementing the Sandbox involves: • Developing and applying clear criteria for participation • Risk-assessment procedures • Decision-making processes • Data collection and reporting approaches • Quality assurance strategies • Resources for those navigating the new regulatory framework	A well-developed, high-quality, innovative, affordable, and competitive market for legal services. A robust regulatory structure that efficiently and effectively safeguards the public from harm. A set of model policies and processes to guide other jurisdictions considering or implementing new approaches to legal regulation.

3. Sandbox Logic Model

The Sandbox theory of change outlined previously lays the foundation for the development of a logic model that delineates the *presumed* causal chain from the Sandbox's inputs and

activities to its outputs, outcomes, and impacts. Inputs, activities, and outputs are typically the subject of process evaluation; outcomes and impact evaluations, conversely, aim to understand the degree to which the evaluated program meets its goals, both in terms of direct impacts to people served (e.g., better legal outcomes on a given issue) and broader impacts in the community (e.g., increased access to justice). Accordingly, this is the approach we have employed in this study. A final note on the logic model: the process evaluation components are described as they are in reality (i.e., as implemented), while the outcomes and impacts evaluation components are described in terms of the ultimate goals the program aims to achieve over time (i.e., aspirational).

The Sandbox logic model in Figure 9 presents a summarized view of the model elements; the subsections that follow provide a more detailed look at each of these elements.

Figure 9: Full Sandbox Logic Model, Summarized

Process Evaluation *(as implemented)*			**Outcomes and Impacts Evaluation** *(aspirational goals/objectives)*		
Inputs	**Activities**	**Outputs**	**Short Term** *(0–2 yrs)*	**Intermediate Term** *(3–5 yrs)*	**Long Term** *(6+ yrs)*
Financial, human, intellectual, and structural resources Stakeholders within the general public, the profession, and the judiciary Documents and directives that comprise the	Application processing and review Outreach, marketing, and public relations Implementation, monitoring, and enforcement Data collection and reporting	Entities authorized to provide services in the Sandbox Services delivered within the Sandbox Resources and information provided to the public and to prospective/authorized entities	Sandbox services are targeted to meet the regulatory objective Consumer harms are effectively identified/ addressed Sandbox attracts a variety of new kinds	Sandbox sustains itself financially and operates in a cost-efficient manner Sandbox has refined its approaches to carrying out its regulatory function The public is aware of and trusts	Regulatory objective is fully realized Sandbox model can be scaled and replicated Measurable changes in access to justice in Utah emerge

Process Evaluation *(as implemented)*			Outcomes and Impacts Evaluation *(aspirational goals/objectives)*		
Inputs	**Activities**	**Outputs**	**Short Term** *(0–2 yrs)*	**Intermediate Term** *(3–5 yrs)*	**Long Term** *(6+ yrs)*
Sandbox regulatory framework	Financial and operational sustainability Administrative functions		of services and service providers Processes for risk assessment are accurate Sandbox internal mechanisms are feasible	service options in the Sandbox Regulatory innovations in other states are informed by Utah's experience	

a. Inputs into the Sandbox

The Sandbox benefits from a broad variety of inputs—the human, monetary, physical, technological, and conceptual assets that go into running the Sandbox. The Sandbox logic model groups these into three categories: resources, stakeholders, and regulatory framework. Resources are the tangible inputs that go into the Sandbox, such as funding and infrastructure. Stakeholders are the myriad individuals and groups who stand to be affected in some way by the Sandbox. The regulatory framework inputs describe the concepts and processes that collectively make the Sandbox run.

Figure 10: Overview of Sandbox Inputs

Input Type	Input Subtype
Resources	Financial resources
	Human resources
	Intellectual resources
	Structural resources
Stakeholders	Sandbox participants
	Utah Judiciary
	Utah legal community
	Broader legal community
Regulatory Framework	Standing Order 15
	Innovation Office Manual
	March 2023 Letter from the Court to the Bar
	September 2024 Letter from the Court to the LSI Committee

i. Resources

The Utah Sandbox relies on a diverse set of resources to support its operations, oversight, and continuous improvement. These resources can be grouped into four broad categories: financial (funding and fees), human (employees and volunteers), intellectual (expertise and research), and structural (physical, data, and technological infrastructure). Figure 11 details the Sandbox resources in each of these categories.

Figure 11: Overview of Resources (Sandbox Inputs)

Resource Type	Resources
Financial Resources	Funding from public and private sources Entity fees
Human Resources	Staff, justices, and other personnel who work in support of Sandbox operations Volunteer support from LSI Committee members
Intellectual Resources	Legal thought leadership, scholarship, and research Expertise in the regulation of legal services Research and evaluation expertise Technological expertise
Structural Resources	Physical infrastructure Data infrastructure Technological infrastructure

ii. Stakeholders

The Utah Sandbox operates within a broad network of stakeholders, each contributing distinct resources that support its development, sustainability, and long-term impact—and each standing to be impacted by the Sandbox. Stakeholder groups include 1) participants in the Sandbox, 2) the Utah Judiciary, 3) members of the Utah legal community, and 4) members of the broader legal community. Figure 12 details these stakeholder groups, including the specific stakeholders within each.

Figure 12: Sandbox Inputs – Stakeholders

Stakeholder Type	Stakeholders
Sandbox Participants	Consumers of legal services Entities and entrepreneurs Investors
Utah Judiciary	Utah Supreme Court Legal Services Innovation Committee Utah Administrative Office of the Courts
Utah Legal Community	Utah State Bar Lawyers, paralegals, and other traditional legal professionals in Utah Non-traditional legal service providers (alternative legal providers, alternative business structures) in Utah
Broader Legal Community *U.S. and International*	U.S. and international jurisdictions considering or implementing regulatory reforms Lawyers, paralegals, and other traditional legal professionals outside Utah Non-traditional legal service providers (alternative legal providers, alternative business structures) outside Utah

iii. Regulatory Framework

The Utah Sandbox operates within a structured regulatory framework that provides the foundation for its governance, oversight, and decision-making processes. This framework outlines the mandate, objectives, and guiding principles that shape the Sandbox's operations. Additionally, it includes standards, policies, and procedural guidelines that define participation requirements, risk assessment measures, and consumer protection protocols. Together, the collection of documents that sets forth the Sandbox's regulatory framework—and, thus, constitutes the list of regulatory framework inputs—ensures that the

Sandbox remains aligned with its regulatory objectives while fostering innovation and accountability in legal service delivery. Figure 13 presents an overview of the regulatory inputs that support the Sandbox's function.

Figure 13: Sandbox Inputs — Regulatory Framework

Framework Guidance Type	Framework Guidance
Standing Order 15[15] *Issued August 14, 2020, by the Utah Supreme Court* *Amended June 3, 2021, and September 21, 2022*	Establishes the Sandbox Mandates a risk-based regulatory approach Articulates the regulatory objective and principles Authorizes nontraditional legal service providers Creates the Innovation Office and the LSI Committee Outlines consumer protection safeguards Implements data reporting mechanisms Defines compliance and enforcement procedures
Innovation Office Manual[16] *Regularly updated as the Sandbox continues to evolve* *Content developed and maintained by the Innovation Office*	Describes the purpose and scope of the Innovation Office Reiterates key elements of the regulatory framework established in Standing Order 15 Defines decision-making objectives and principles for the Innovation Office Enumerates eligibility criteria for entity authorization Outlines the application process for entities Describes the Innovation Office's procedures for making authorization decisions Details issues related to regulatory compliance and enforcement

[15] Standing Ord. 15, *supra* note 8.

[16] INNOVATION OFFICE MANUAL, *supra* note 13.

Framework Guidance Type	Framework Guidance
	Implements data reporting requirements for authorized entities
March 2023 Letter[17] *Sent March 28, 2023, from the Utah Supreme Court to the Utah State Bar*	Remarks on the early successes of the Sandbox Reaffirms its commitment to the Sandbox as an evolving regulatory experiment Responds to concerns raised by some stakeholder groups Outlines significant structural, operational, and governance changes designed to ensure the Sandbox's long-term viability while addressing stakeholder concerns
September 2024 Letter[18] *Sent September 5, 2024, from the Utah Supreme Court to the LSI Committee*	Directs the Innovation Office to resume processing of entity applications, which had been temporarily paused Ends a temporary pause in service quality audits for moderate- and high-innovation entities Implements a revised approach to badging on entity websites Adopts a policy to exclude for-profit entities that provide immigration-related legal services Directs the Innovation Office to make a list of current Sandbox entities that do not meet the Utah innovation requirement, and for each entity, recommend whether its authorization should be terminated with or without accommodation or whether the entity's authorization should be changed to provisional status

[17]Letter from the Supreme Court of Utah to the Utah State Bar (March 28, 2023) [hereinafter March 2023 Letter], https://utahinnovationoffice.org/wp-content/uploads/2024/01/3.-Letter-to-Utah-State-Bar-3.28.23.pdf.

[18] Letter from the Supreme Court of the State of Utah to the Legal Services Innovation Committee (Sept. 5, 2024) [hereinafter September 2024 Letter], https://utahinnovationoffice.org/wp-content/uploads/2024/10/Letter-to-the-Legal-Services-Innovation-Committee-9.5.24.pdf.

4. Activities Undertaken within the Sandbox

There is a broad range of activities that are essential to the operation, oversight, and sustainability of the Sandbox. These activities are categorized into six key areas: 1) application processing and review (the multi-step process for entity authorization); 2) outreach, marketing, and public relations (stakeholder engagement strategies); 3) implementation, monitoring, and enforcement (steps taken in support of regulatory compliance); 4) data collection and reporting (mandated data procedures for ongoing assessment); 5) financial and operational sustainability (efforts to secure funding and other resources); and 6) administrative functions (various processes that support Sandbox infrastructure). Figure 14 presents additional details for each of these types of Sandbox activities.

Figure 14: Overview of Sandbox Activities

Activity Type	Activity Subtype
Application Processing and Review	Innovation Office review
	LSI Committee recommendation
	Court authorization decision
	Coordination with entities
Outreach, Marketing, and Public Relations	Engagement with the public
	Engagement with prospective and authorized entities
	Engagement with the legal profession
	Engagement in thought leadership and scholarly discourse
Implementation, Monitoring, and Enforcement	Support for authorized Sandbox entities
	Compliance monitoring
	Investigation of consumer complaints
	Enforcement of regulatory policies

Activity Type	Activity Subtype
Data Collection and Reporting	Data privacy and security protocols
	Collection of Sandbox data on key metrics
	Provision of support to assist with entities with data reporting requirements
	Monitoring of data reporting by entities
	Regular reporting to stakeholders and the public
Financial and Operational Sustainability	Administer fee policies
	Seek and secure funding
	Coordination with LSI Committee members
	Facilitation of processes for continuous improvement
Administrative Functions	Planning and project management
	Budgeting
	Record maintenance
	Human resources

5. Outputs from Sandbox Activities

Sandbox inputs and activities result in an array of direct results or outputs, which fall into three broad categories: 1) entity authorizations, 2) services delivered in the Sandbox, and 3) resources provided by the Sandbox to entities and others. Figure 15 presents the specific outputs that the Sandbox has produced.

Figure 15: Overview of Sandbox Outputs

Output Type	Output Subtypes
Authorizations	Number of low, moderate, and high innovation entities authorized to provide legal services in the Sandbox

Output Type	Output Subtypes
	Number and variety of innovative service models developed
	Model application and authorization processes for adoption in other jurisdictions
Services Delivered	Number of people who received services from a Sandbox entity
	Number of Sandbox services utilized per person
	Number of services provided by low, moderate, and high innovation entities
	Number of services delivered to individuals in underserved communities
Resources Provided	Monthly reports providing data on service utilization, consumer feedback, and operational metrics
	Guidance for interested and authorized Sandbox entities
	Information and materials to support public education and understanding of their options for consuming legal services in Utah
	Publicly available database of information about authorized entities, including authorization packets

6. Expected Outcomes and Impacts of the Sandbox Over Time

The outcomes and impacts expected to result from the implementation of the Sandbox are expressed in the logic model in three broad categories:[19] 1) those that are expected to

[19] Note that the terms "outcomes" and "impacts"—while used interchangeably in everyday conversation—mean different things in the context of program evaluation, where "outcomes" are the intended benefits for program participants (and generally are considered shorter term) and "impacts" refer to broader improvements intended to occur in the community or in society as a

occur early in its implementation (0–2 years); 2) those that are expected in the intermediate term (3–5 years); 3) and those that are expected once the Sandbox (in theory) reaches a point of greater maturity (6+ years).[20]

To emphasize a critical point, the outcomes and impacts articulated through the logic model are aspirational—they are the goals that the Sandbox aims to achieve, but may or may not be realized in practice. It is the role of *outcomes evaluation* (as opposed to *process evaluation*, where logic modeling fits in) to understand the degree to which the goals articulated in the logic model have been achieved.

a. Expected Short-Term Outcomes (0–2 years)

For the Sandbox, outcomes expected to occur in the short term can be divided into four key areas: 1) service provision (services are tailored to achieve regulatory objective), 2) consumer protection (harms are addressed and feedback is collected), 3) entity engagement (entities encompass a variety of service models and service types), and 4) process and function outcomes (operations are adjusted when needed for effectiveness and feasibility). Figure 16 defines the short-term outcomes within each of these areas.

Figure 16: Expected Outcomes from the Sandbox – Short Term (0–2 years)

Short Term (0–2 years)	
Outcome Type	**Outcome Subtypes**
Service Provision	Sandbox services are targeted to address the access to justice gap
	Sandbox services are targeted at underserved populations

direct result of the program (and are generally considered longer term). Because this distinction has not been present in the discourse on legal regulatory reform, we do not do so in this report. *See, e.g.*, ROSSI ET AL., *supra* note 4; Davidson, *supra* note 4.

[20] Note that delineation of outcomes along short-, intermediate-, and long-term lines is standard practice in program evaluation, though the specific timeframes entailed by each category can vary slightly from study to study. *See* ROSSI ET AL., *supra* note 4.

Short Term (0–2 years)	
Outcome Type	**Outcome Subtypes**
	Sandbox services are both high-quality and affordable
Consumer Protections	Consumer harms are identified and addressed effectively and efficiently Consumer feedback indicates consistent satisfaction with Sandbox services
Entity Engagement	Engagement with and participation from a variety of non-traditional legal service providers and service delivery models, representing a variety of innovation levels Engagement with and participation from entities providing services in a variety of service areas
Processes and Functions	Risk-assessment process accurately evaluates innovation level for Sandbox applicants Regulatory processes, structure, and oversight mechanisms are feasible for operation of the Sandbox

b. Expected Intermediate-Term Outcomes (3–5 years)

The expected intermediate-term outcomes of the Sandbox reflect its progression toward long-term sustainability, efficiency, and broader impact. These outcomes fall into four groupings: 1) financial sustainability, 2) operational sustainability, 3) community outcomes, and 4) legal profession impacts. Figure 17 provides an overview of Sandbox outcomes expected in the intermediate term.

Figure 17: Expected Outcomes from the Sandbox – Intermediate Term (3–5 years)

Intermediate Term (3–5 years)	
Outcome Type	**Outcome Subtypes**
Financial Sustainability	Operations are financially self-sustaining Operations are administered in a cost-effective manner Reliance on volunteer time is minimized or eliminated
Operational Sustainability	Advancements are made in efficiency of regulatory processes, structure, and oversight mechanisms Sandbox processes and policies are refined to increase efficiency and effectiveness
Community Outcomes	Utahns with legal needs are informed about Sandbox options Sandbox services are trusted in the Utah community
Legal Profession Impacts	Regulatory innovations explored and/or implemented in other jurisdictions are informed by Utah's experience

c. Expected Long-Term Outcomes (6+ years)

The expected long-term (6+ years) outcomes of the Utah Legal Regulatory Sandbox focus on regulatory impacts, model scalability, and social and economic effects. Over time, the Sandbox is expected to contribute to a well-developed, competitive legal services market in Utah where innovative service models are fully integrated and modernization efforts continue to evolve. As the regulatory framework matures, the Sandbox model will be refined to the point that it can be scaled and replicated in other jurisdictions. In terms of social and economic impact, the long-term vision includes a substantial narrowing of the access to justice gap, ensuring more individuals can obtain legal assistance. As a result of a more dynamic and accessible regulatory environment, positive economic outcomes are anticipated. Figure 18 provides a detailed look at the long-term outcomes expected to be achieved through the Sandbox.

Figure 18: Overview of Expected Outcomes from the Sandbox – Long Term (6+ years)

Long Term (6+ years)	
Outcome Type	**Outcomes**
Regulatory Impacts	Market for legal services in Utah is well-developed and competitive Sandbox services are integrated into Utah's legal marketplace Innovation in and modernization of the legal services market is sustained over time
Model Scalability	Sandbox model has been refined to a point that it can be scaled and replicated in other jurisdictions
Social and Economic Impacts	Substantial narrowing of the access to justice gap is achieved Positive economic impacts are realized (e.g., job creation in the legal profession)

C. How the Sandbox Operates

This section outlines the evolution of the Utah Sandbox from August 2020 to February 2025. Specifically covered are the following: 1) *Structure and Oversight* details changes in governance, oversight, and staffing; 2) *Funding* examines the shift from external funding to a sustainable fee-based model; and 3) *Regulatory Scope* defines eligible entities, qualifying criteria, levels of innovation, and legal service areas.

1. Structure and Oversight

The governance structure of the Sandbox has evolved significantly since it launched in August 2020. These changes reflect a shift in administrative oversight and funding for staff while maintaining the Utah Supreme Court's role in final approval decisions. In Figure 19, the left-most column presents information about the structure of the Sandbox when it first launched in August 2020, and the right-most column presents the structure as of February 2025. The middle column highlights the changes that have been made to the Sandbox's structure during that time.

Figure 19: Sandbox Structure, August 2020–February 2025

Structure at Launch Aug. 2020	Key Changes 2020–2025	Current Structure Feb. 2025
Court directly oversaw Innovation Office administrative functions	**Innovation Office Oversight** Administrative functions transferred from Court to Bar	Utah State Bar has direct oversight of the Innovation Office
Court funded Sandbox staff (executive director, data analyst, administrative support) on a contractual basis	**Sandbox Staff Funding** Court shifted the bulk of staffing costs to the Bar	Utah State Bar funds a full-time program director and any needed administrative support Court funds a data analyst at the Utah Administrative Office of the Courts
LSI Committee operated entirely on a volunteer basis	**LSI Committee Volunteer Status** No change	LSI Committee operates entirely on a volunteer basis
Court maintained direct control over final Sandbox approvals	**Authorization Decision-Making** No change	Court maintained direct control over final Sandbox approvals

2. Funding

Due to its nature as entirely experimental, the first three years of Sandbox operations were funded through philanthropic, grant, state, and federal funding. However, as the Sandbox has matured, the funding model has shifted toward one that is meant to make the Sandbox financially self-sustaining: a fee-based model in which entities pay an application fee, a fee to cover costs associated with pre-launch assessments and service quality audits, and an annual revenue-based renewal fee. In addition, the Utah State Bar funds one full-time Innovation Office program director position, as well as any administrative support and

overhead. Importantly, the Sandbox is also reliant on a considerable amount of volunteer time, in particular from members of the LSI Committee.

Figure 20: Sandbox Funding, August 2020–February 2025

Funding at Launch Aug. 2020	**Key Changes** 2020–2025	**Current Funding** Feb. 2025
Utah State Bar does not fund any element of Sandbox operations	**Utah State Bar** Bar took on administrative costs in March 2023	Utah State Bar bears administrative costs of Sandbox operations
Fee policy not instituted	**Entity Fees** Court implemented fee policy in March 2023 Letter	Entities pay fees that are used to fund Sandbox operations
Philanthropic funding from the Hewlett Foundation and the State Justice Institute	**Philanthropic Funding** Philanthropic funding for startup only	Philanthropic funding is not currently supporting the Sandbox
Funding from the Utah Judiciary	**Utah Judiciary** Court funds primarily for startup, but some funding continues	Court continues to provide funding to support the Sandbox, but this funding has been attenuated substantially
Federal funding through the American Rescue Plan Act (ARPA)	**Federal Funding** ARPA funds for startup only	ARPA funding is no longer supporting the Sandbox

3. Regulatory Scope

The Sandbox is a "mechanism by which entities and service methods that have not traditionally been permitted in the Utah legal system may provide legal services."[21] This necessarily entails that services that were permitted in Utah prior to implementation of the Sandbox do not fall within its purview. In addition to this standard, the Court, the LSI Committee, and the Innovation Office have developed eligibility requirements and criteria, as well as defined a set of innovation levels to categorize Sandbox entities. Each of these elements is detailed in the subsections that follow.

a. Eligible and Ineligible Entities

Entities eligible for participation in the Sandbox include those that utilize alternative business structures—involving nonlawyer ownership, investment, or profit-sharing—and those that utilize nonlawyer service providers—either human or software—to provide legal services. In their application, entities must state the rules for which they are requesting waivers (e.g., UPL, 5.4, 5.3). Traditional law firms, those implementing novel marketing strategies, and those where there is concern about adherence to the Rules of Professional Conduct are not eligible. Figure 21 presents the full set of factors that determine entity eligibility or ineligibility.

Figure 21: Entity Eligibility and Ineligibility, Innovation Office Manual

Eligible	Not Eligible
Firms or companies using alternative legal providers (both human and software) to practice law (requires a UPL waiver) Traditional law firms that include nonlawyer investment or ownership (requires a waiver of Rule 5.4)	Partnerships, corporations, and companies entirely owned and controlled by lawyers in good standing Individual lawyers with an active Utah Bar license and legal services nonprofits offering traditional legal services as permitted under the Rules of Professional Conduct or using new advertising or

[21] INNOVATION OFFICE MANUAL, *supra* note 13.

Eligible	Not Eligible
Traditional law firms and lawyers entering into profit-sharing relationships with nonlawyers (requires a waiver of Rule 5.4) Nonlawyer-owned entities employing lawyers to practice law (requires a waiver of Rule 5.4) Lawyers or firms entering into joint ventures or other business partnerships with nonlawyer entities or individuals to practice law (requires a waiver of Rule 5.4) Entities providing intermediary services to connect lawyers to consumers in new ways (could require a waiver of Rule 5.4)	solicitation approaches as contemplated by the Rules of Professional Conduct Entities that cannot ensure that lawyers comply with their rules of professional conduct and other applicable rules or statutes Entities where a disbarred or suspended lawyer owns more than a 10% interest

b. The Innovation Requirement and Additional Qualifying Criteria

In addition to the baseline eligibility requirements described in the previous section, Sandbox entities must also conform to Utah law, be ready to launch services, further the regulatory objective, and demonstrate how they will improve access to justice in underserved communities. This latter criterion—termed the innovation requirement—was implemented as part of the transition following the March 2023 Letter.

Figure 22: Sandbox Qualifiers, August 2020–February 2025

Qualifiers and Requirements at Launch Aug. 2020	Changes 2020–2025	Current Qualifiers and Requirements Feb. 2025
Some aspect(s) of the entity/service qualify for participation in the Sandbox	**Sandbox Qualifier** No change	Some aspect(s) of the entity/service qualify for participation in the Sandbox

Qualifiers and Requirements at Launch Aug. 2020	Changes 2020–2025	Current Qualifiers and Requirements Feb. 2025
Entity/service conforms to applicable requirements of Utah law	**Utah Qualifier** No change	Entity/service conforms to applicable requirements of Utah law
Entity/service must be ready or near ready for launch	**Implementation Qualifier** No change	Entity/service must be ready or near ready for launch
Entity/service will further the regulatory objective of the Sandbox	**Regulatory Objective Qualifier** No change	Entity/service will further the regulatory objective of the Sandbox
No innovation requirement	**Innovation Requirement** Introduced in March 2023	Authorization will allow the entity/service to reach underserved communities
No innovation requirement	**Utah Innovation Requirement** Introduced in September 2024 Letter	Adds an additional component to the *innovation requirement* such that entities must demonstrate that authorization will allow the entity/service to reach underserved communities in Utah, often referred to as the *Utah nexus*

c. Levels of Innovation in the Sandbox

The Sandbox's taxonomy of innovation allows for categorization of Sandbox applicants and entities in accordance with the presumed amount of risk posed to the public—lesser degrees of lawyer involvement are equated with higher levels of risk to consumers, which translates into a higher level of innovation within the Sandbox.

In addition to broad refinement of the language and organization of the taxonomy, two notable shifts have occurred with respect to how entities are categorized within the

Sandbox. First, when the Sandbox was launched, entities were categorized according to four categories, rather than three. The shift to three categories was made based on a determination that three categories adequately captured the different aspects of risk.

Second, there was a shift in terminology, replacing categories of *risk* with categories of *innovation*—this change was made because while both terms recognize the new and uncertain nature of Sandbox services, "innovation" does not inherently invoke negativity in the same way that "risk" does.

Figure 23: Sandbox Innovation Levels, August 2020–February 2025

Risk Levels at Launch Aug. 2020	**Changes** 2020–2025	**Current Innovation Levels** Feb. 2025
Levels identified as *risk levels*	**Terminology** Shift from *risk* to *innovation*	Levels identified as *innovation levels*
Low risk Lawyer employed or managed by a nonlawyer Less than 50% nonlawyer ownership Software provider with lawyer involvement – legal document completion	**Low** Refinements to language and organization Document completion removed as a service in the Sandbox Combined with low-moderate category	**Low innovation** *Alternative Business Structures (ABSs)* Lawyers sharing profits with nonlawyers within the same entity (nonlawyer ownership or investment) Lawyer employed or managed by a nonlawyer *Other Service Methods* Lawyers sharing fees with nonlawyers outside of the same entity Intermediary platform facilitating lawyer-client connections
Low-moderate risk 50% or more nonlawyer ownership	**Low-moderate**	N/A

Risk Levels at Launch Aug. 2020	Changes 2020–2025	Current Innovation Levels Feb. 2025
Lawyers sharing fees with nonlawyers (standard) Intermediary platform (software or online platform to connect Utah lawyers with interested consumers; added in 2021)	Combined with low category	
Moderate risk Lawyers sharing fees with nonlawyers (extraordinary) Nonlawyer provider with lawyer involvement Software provider with lawyer involvement	**Moderate** Refinements to language and organization Fee sharing recategorized as low	**Moderate innovation** *Alternative Legal Providers* HALP (Human Alternative Legal Provider) with a Utah-licensed lawyer overseeing service development and playing an ongoing quality assurance role SALP (Software Alternative Legal Provider) with a Utah-licensed lawyer overseeing service development and playing an ongoing quality assurance role
High risk Nonlawyer provider without lawyer involvement Software provider without lawyer involvement	**High** Refinements to language	**High innovation** *Alternative Legal Providers* HALP (Human Alternative Legal Provider) with minimal or no ongoing involvement of a Utah-licensed lawyer SALP (Software Alternative Legal Provider) with minimal or no ongoing involvement of a Utah-licensed lawyer

d. Legal Service Areas in the Sandbox

In addition to categorizing Sandbox entities according to innovation levels, the application to participate in the Sandbox requires entities to identify the legal area(s) in which it is seeking authorization to provide services.[22] As outlined in Figure 24, there have been considerable shifts over time in the legal area categories in the Sandbox, and it is worth noting that the list of legal areas has had multiple iterations since the Sandbox launched. These changes largely serve to improve clarity and detail about the types of services provided in the Sandbox.

Figure 24: Sandbox Legal Service Areas, August 2020–February 2025

Legal Areas at Launch Aug. 2020	**Changes** 2020–2025	**Current Legal Areas** Feb. 2025
Accident/Injury Adult Care Business Criminal Expungement Discrimination Domestic Violence Education Employment End of Life Planning Financial Issues Healthcare Housing (Rental) Immigration Marriage and Family	**Added** Civil and Disability Rights; Consumer; Environmental and Land Use; Intellectual Property; Municipal; Tax; Traffic; Workplace Safety **Renamed** Accident/Injury → Personal Injury Adult Care → Elder Business → Business, Corporate, or Commercial Domestic Violence → Domestic or Intimate Partner Violence Employment → Employment and Unemployment End of Life Planning → Wills/Estates Housing (Rental) → Landlord/Tenant Military → Military/Veteran's Benefits	Business, Corporate, or Commercial Civil and Disability Rights Consumer Criminal Expungement Domestic or Intimate Partner Violence Education Elder Employment and Unemployment Environmental and Land Use Family and Marriage Healthcare Immigration Intellectual Property

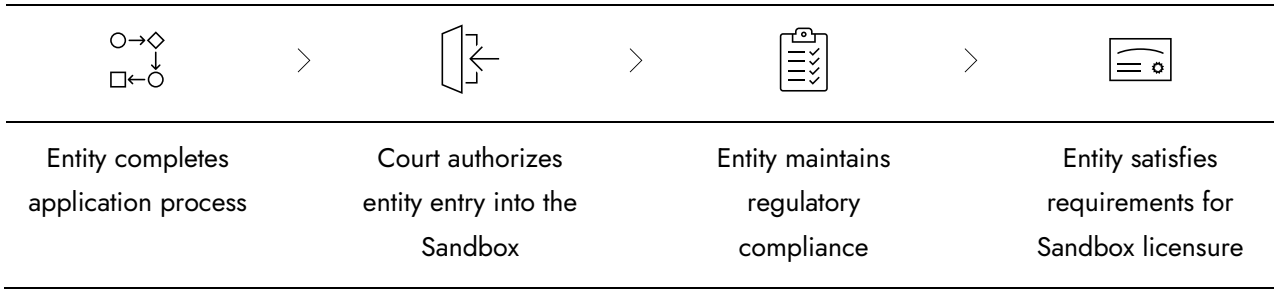
[22] Entities may be authorized to provide services in multiple legal areas.

Legal Areas at Launch Aug. 2020	Changes 2020–2025	Current Legal Areas Feb. 2025
Military	**Recategorized**	Landlord/Tenant
Native American/Tribal Issues	Criminal Expungement ***split*** into Criminal and Expungement	Municipal
Public Benefits	Discrimination ***recategorized*** under Civil and Disability Rights	Native American/Tribal
Real Estate	Financial Issues ***recategorized*** under Consumer	Personal Injury
		Public Benefits
	No Substantial Change	Real Estate
	Education; Family and Marriage; Healthcare; Immigration; Native American/Tribal; Public Benefits; Real Estate	Tax
		Traffic
		Wills/Estates
		Workplace Safety

D. How Sandbox Authorization and Compliance Work

At a very high level, the Sandbox process includes only a few elements: the entity applies to participate in the Sandbox, the Court makes a determination about authorization (informed by the assessment of the LSI Committee, per UCJA Rule 11-704 Legal Services Innovation Office and Committee Powers), and authorized entities complete tasks associated with Sandbox regulatory compliance. After a defined period of time and number of services provided, an entity may be licensed within the Sandbox, which entails fewer reporting requirements. While entities may voluntarily withdraw from the Sandbox (or be suspended or terminated by the Court when necessary), at this time, there is no pathway for entities to exit the Sandbox and obtain permanent licensure to provide legal services in Utah.

Figure 25: Entity Authorization Process, Simplified Overview



1. How Entities Enter the Sandbox

The processes for obtaining and maintaining authorization to provide services in the Sandbox are necessarily extensive and intensive for the entities navigating them. The pathway to authorization begins with completion of an application and provision of supporting documentation, background and credit checks, and certifications—these are followed by adherence to rigorous compliance measures and safeguards on a regular and ongoing basis. While some entities will ultimately choose to withdraw from the Sandbox, those who make satisfactory progress over the course of 12 months and meet a series of additional criteria can obtain an annual license.

a. Application Process

Applicants must complete a structured, exhaustive process to obtain authorization to provide services in the Sandbox. This process is designed to gather the full scope of information necessary and relevant for making an initial assessment of a proposed entity's risk level. After first developing the structure and service model of the proposed entity, applicants must submit a comprehensive application that details all aspects of the entity and its proposed service model: 1) entity information, disclosures, and structure; 2) proposed services and satisfaction of the innovation requirement; 3) request for additional rule waivers to the Rules of Professional Conduct, if needed; and 4) self-assessment of the risk posed to consumers by the proposed service model.

In addition to the application itself, applying entities must also consent to background and credit checks for all controlling and financing persons, as well as pay the requisite fees.

Following submission, the Innovation Office or the LSI Committee may contact the applicant for additional information or to make any needed clarifications.

b. Authorization Determination Process

Once the Innovation Office has determined that a submission is complete, all application materials are sent to the LSI Committee. At monthly public meetings,[23] the LSI Committee reviews and discusses applications, identifies any questions or additional information needed, and votes on whether to recommend proposed entities to the Court for authorization.

Recommendation to the Court for authorization may be denied for a variety of reasons—for example, if the proposed entity would be unable to meet data reporting requirements or if it had not sufficiently demonstrated how the service model satisfies the innovation requirement. In these instances, the applicant may either formally request that the LSI Committee reconsider or remedy the issue that resulted in denial and reapply.

Following a vote to recommend authorization, the entity's application materials and the LSI Committee's recommendation are sent to the Court, which makes the final decision about authorization. Depending on the circumstances, the Court may grant full or partial authorization. The Court may also deny authorization.[24]

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[23] UTAH OFFICE OF LEGAL SERVICES INNOVATION, LEGAL SERVICES INNOVATION COMMITTEE MEETINGS, https://utahinnovationoffice.org/legal-services-innovation-committee/ (last visited Sept. 16 2025).

[24] Upon authorization, the Court issues an Authorization Order. Data from the monthly activity reports indicates that, as of June 2024, the Court has not denied authorization to an entity the LSI Committee has recommended for authorization. However, the Innovation Office Manual states that an entity would be able to appeal such a decision. INNOVATION OFFICE MANUAL, *supra* note 13, at 14.

Figure 26: Sandbox Authorization Tiers

Full Authorization	Default authorization for low and moderate innovation entities Extends throughout the entity's participation in the Sandbox without additional requirements
Provisional Authorization	Required for high innovation entities as an initial authorization stage These entities must complete a pre-launch service assessment to transition to full authorization Low and moderate innovation entities may apply for provisional authorization if they need it for fundraising efforts or to refine their service model Provisionally authorized entities cannot provide legal services until they transition to full authorization Provisional status lasts up to 24 months before requiring a status update

It is important to note that authorization decisions can entail varying degrees of complexity. Additional considerations related to entity authorization include:

- Some entities may offer multiple services under different innovation levels, requiring multiple tiers of authorization.
- Authorized Sandbox entities that wish to expand their scope (e.g., adding new service areas) must apply for an authorization change, potentially undergoing additional assessments.

c. Ongoing Entity Compliance

After gaining authorization to provide services in the Sandbox, there are a series of responsibilities that entities must fulfill to remain compliant: 1) periodic data reporting, 2) service quality audits (moderate and high innovation only), 3) disclosures to consumers, and 4) adherence to fee policies.

i. Periodic Data Reporting

Upon authorization, the Innovation Office conducts training with the entity to orient them to the process and expectations regarding data collection and reporting. The frequency and substance of the data required to be reported varies depending on authorization status and

innovation level (provisionally authorized entities are not permitted to provide services, so they are not required to report any data). These tiered reporting schedules ensure that entities with higher levels of regulatory innovation provide more frequent updates, allowing for closer monitoring of potential consumer risks.

Figure 27: Entity Reporting Frequency and Data Requirements

Innovation Level	Reporting Frequency	Data Requirements
Low Innovation	Every 3 months	All consumer survey data For every service provided: • Service initiation date • Service end date • Service sought • Service received • Legal area of service • Legal issue • Service method • Amount paid • Legal outcome • Service status • Consumer complaints (if any)
Moderate Innovation	Monthly	
High Innovation	Monthly	
Annually Licensed Entities *all innovation levels*	Every 6 months	

ii. Service Quality Audits

The purpose of service quality audits is to provide in-depth assessment of the services an entity is providing and how well it is providing them. Both high and moderate innovation entities are subject to service quality audits, though the conditions under which they are required differ: all high innovation entities must complete a service quality audit upon closure of 20-30 service files, while moderate innovation entities may be required to complete one at the discretion of the Court (e.g., in the case of consumer complaints). Note that entities are required to pay a $2,000 fee for service quality audits; the full sum of that fee is paid to the auditor.

Figure 28: Service Quality Audit Process

Pre-Audit	Audit	Post-Audit
Entity gathers 20 service files and redacts client-identifying information to protect confidentiality	Innovation Office removes identifying information about the entity and sends redacted service files to auditors	Innovation Office incorporates audit findings into the entity's overall risk assessment
The Innovation Office selects two auditors with expertise in the relevant legal area from a panel of Utah lawyers	Auditors independently review service files using the Innovation Office's quality assessment protocols	
Auditors are trained to conduct service quality audits based on the Innovation Office's established protocols		

iii. Disclosures to Consumers

Entities are required to "prominently display language to solicit consumer complaints or feedback."[25] This requirement was implemented in the September 2024 Letter and replaced the previous requirement that entities display an "Authorized Legal Services Entity" badge in specified locations.[26] In addition to badging requirements, authorized entities are required to disclose to potential clients their nature as an entity providing services within the Sandbox prior to providing any services to them. Disclosure statements vary by innovation level.

d. Adherence to Fee Policies

In its March 2023 Letter, the Court authorized a fee policy—proposed by the LSI Committee—for entities as part of a strategy to move the Sandbox toward financial sustainability. The policy includes four types of fees: an application fee, a pre-launch service

[25] September 2024 Letter, *supra* note 17.

[26] INNOVATION OFFICE MANUAL, *supra* note 13, at 20.

assessment fee, a service quality audit fee, and an annual review fee. In February 2025, the Court revised the fee policy to include a $5,000 annual fee, rather than a revenue-based annual fee.

Figure 29: Sandbox Fee Policy

Fee Type	March 2023 Structure **Fee Amount**	Feb. 2025 Structure **Fee Amount**
Application Fee	$250 *flat fee*	$250 *flat fee*
Pre-Launch Service Assessment Fee	$1,000 *per legal area assessed*	$1,000 *per legal area assessed*
Service Quality Audit Fee	$2,000 *per service quality audit*	$2,000 *per service quality audit*
Annual Renewal Fee	$250 *flat fee* + 0.5% *revenue from Sandbox services in previous year*	$5,000 *flat fee*

2. Annual Sandbox License

An annual license is available for authorized entities that have 1) at least 12 months of satisfactory progress in the Sandbox (allowing for minor issues with data); 2) the required number of services closed for their innovation level (50 for low innovation, 100 for moderate innovation, and 150 for high innovation); 3) complete and pass a compliance review; and 4) satisfactory performance on a service quality audit (for all high and some moderate innovation entities). Importantly, annual licenses are granted only for the duration of the seven-year pilot period of the Sandbox (and are conditioned upon continued compliance and service quality).

3. How Entities Leave the Sandbox

Currently, there are two avenues for exiting the Sandbox: withdrawal and termination. An entity may choose to withdraw its participation in the Sandbox at its own discretion. Authorized entities may also be involuntarily terminated in cases where less severe enforcement efforts fail.

For authorized entities who remain compliant for an extended period of time and satisfy certain additional requirements, the Court may grant licensure within the Sandbox. Licensure is a status that comes with reduced reporting requirements but does not represent an exit from the Sandbox or permanent authorization to provide legal services.

E. How the Sandbox Mitigates Risks and Harms

Within the Sandbox, the Innovation Office, the LSI Committee, and the Utah Supreme Court have established procedures for assessing risks for each entity before authorization, providing avenues for consumers to provide feedback and submit complaints. These pathways address problems that could arise from noncompliance or consumer harms that occur as a result of Sandbox services. Underpinning all of these processes is the importance of transparency and accountability to the public, and there are measures implemented within the Sandbox to ensure these values are realized. The sections that follow present details on each of these aspects of Sandbox operations.

1. How the Sandbox Assesses and Minimizes Risk Prior to Authorization

The Sandbox has implemented a series of front-end safeguards designed to comprehensively assess an entity's level of innovation—and, thus, the level of risk—and to vet its service model before it is granted authorization to operate in the Sandbox. Some of these safeguards apply to all entities, while others apply only to those at certain levels of innovation.

Since the Sandbox was first implemented, all entities have been required to disclose any disbarments, criminal convictions, and other specified ethical concerns on the part of a

financing or controlling person or the entity itself. In addition, moderate innovation entities are required to have a Utah-licensed lawyer oversee development of the service model and implementation of quality assurance processes, while high innovation entities are required to specifically articulate the kind of services it will provide and to complete a pre-launch service assessment. In its 2023 letter to the Bar, the Utah Supreme Court created multiple additional requirements for all Sandbox entities including verifying that the entity is in good standing with the Utah Department of Commerce, background checks, and additional disclosures, among other requirements. See Figure 30 for the full list of original and added safeguards.

Figure 30: Sandbox Risk Mitigation, August 2020–February 2025

Risk Mitigation at Launch Aug. 2020	**Changes** 2020–2025	**Current Risk Mitigation** Feb. 2025
All entities must disclose whether any financing or controlling persons have been disbarred, suspended from practice, or have a felony criminal history Disclosure is also required for any affiliated entity with a history of state or federal criminal convictions, consent decrees, or enforcement actions resulting in sanctions, in addition to any ongoing criminal investigations or enforcement actions Each innovation level has specific competency safeguards: *Low Innovation Entities* Services are provided by Utah-licensed lawyers, requiring no additional competency assurance	All original risk mitigation requirements remain in place New requirements created in March 2023 Letter	***In addition to risk mitigation measures in place at Sandbox launch:*** Innovation Office must verify that authorized entities are registered and in good standing with the Utah Department of Commerce Before approving an entity, the Innovation Office must conduct a background check on all financing and controlling persons Financing and controlling persons must disclose if they hold a professional license, such as those for lawyers, licensed paralegal practitioners, social workers, mental health professionals, and accountants, and the Innovation Office will verify that all such persons are in good standing with the applicable licensing agency All financing and controlling persons must complete a sworn disclosure form, confirming

Risk Mitigation at Launch Aug. 2020	Changes 2020–2025	Current Risk Mitigation Feb. 2025
Moderate Innovation Entities Quality assurance must be overseen by a Utah-licensed lawyer who develops the service method and conducts regular quality reviews; robust data reporting requirements *High Innovation Entities* Robust data reporting requirements		whether they have engaged in unethical or criminal violations Approved entity applications must be publicly available on the Innovation Office website *High Innovation Entities* Must identify the specific services they plan to provide and complete a pre-launch service assessment conducted by two independent attorneys *Ethical obligations for financing and controlling persons* • Fiduciary duties similar to those of lawyers must be followed • They must act in good faith and in the best interest of the client • Services must be delivered diligently and promptly • Conflicts of interest must be avoided • They must not mislead or attempt to mislead clients • They must respect the role of lawyers' professional judgment

2. How the Sandbox Solicits Consumer Feedback

A crucial aspect of the Sandbox's operations is ensuring that consumers have avenues to share feedback about the Sandbox services they have received. All authorized entities are required to provide information about submitting complaints to the Innovation Office both in

any physical location where services are provided and on their website. Entities are required to report all consumer feedback data to the Innovation Office.

Consumer feedback requirements have evolved substantially since the Sandbox first launched. While authorized entities were initially required to display a badge on their website indicating that they are regulated within the Sandbox, the September 2024 Letter replaced this requirement with a broad requirement to "prominently display language to solicit complaints or feedback" from consumers.[27] Perhaps the most significant shift in this area is the requirement—which was created in the Court's March 2023 Letter—that entities must proactively seek feedback from clients through, at minimum, asking a Net Promoter Score (NPS) question and an open-ended question asking how the consumer benefited at the conclusion of services.[28]

Figure 31: Sandbox Consumer Feedback Requirements

Feedback Requirements at Launch Aug. 2020	**Changes** 2020–2025	**Current Feedback Requirements** Feb. 2025
All authorized entities are required to display a badge on their website and in physical locations identifying them as a Sandbox entity—the badge must include complaint information	**Entity Locations/Website** Badge retired as of September 2024 New requirements replace badge with language	Entities must display language on their website and in physical locations to solicit complaints or feedback

[27] September 2024 Letter, *supra note* 17.

[28] March 2023 Letter, *supra* note 18.

Feedback Requirements at Launch Aug. 2020	Changes 2020–2025	Current Feedback Requirements Feb. 2025
Consumer complaint form available on the Innovation Office website	**Innovation Office Website** No change	Consumer complaint form available on the Innovation Office website
No requirement for entities to proactively, directly seek consumer feedback	**Consumer Feedback** Requirement introduced in March 2023	All entities must seek feedback from all clients who receive an authorized Sandbox service, including at a minimum: Net Promoter Score (NPS) question, such as *On a scale of 0-10, how likely are you to recommend this service to someone with similar legal needs?* Open-ended client feedback question, such as *How did you benefit from using this legal service?*

3. How the Sandbox Responds to Harms and Noncompliance

There are multiple circumstances that may prompt the Innovation Office to take enforcement measures with a Sandbox entity: failure to meet Sandbox participation requirements, refusal to cooperate with the Innovation Office, making misrepresentations to the Innovation Office, indications in data submitted to the Innovation Office that cause concern, consumer complaints, and other issues that the Innovation Office deems to create concern regarding harm to consumers.

There are five enforcement statuses that the Innovation Office may assign to an entity based on noncompliance or identified (or suspected) harms: Green/Satisfactory, Blue/Watch, Yellow/Warning, Orange/Suspended, and Red/Terminated.[29]

Figure 32: Sandbox Entity Enforcement Statuses

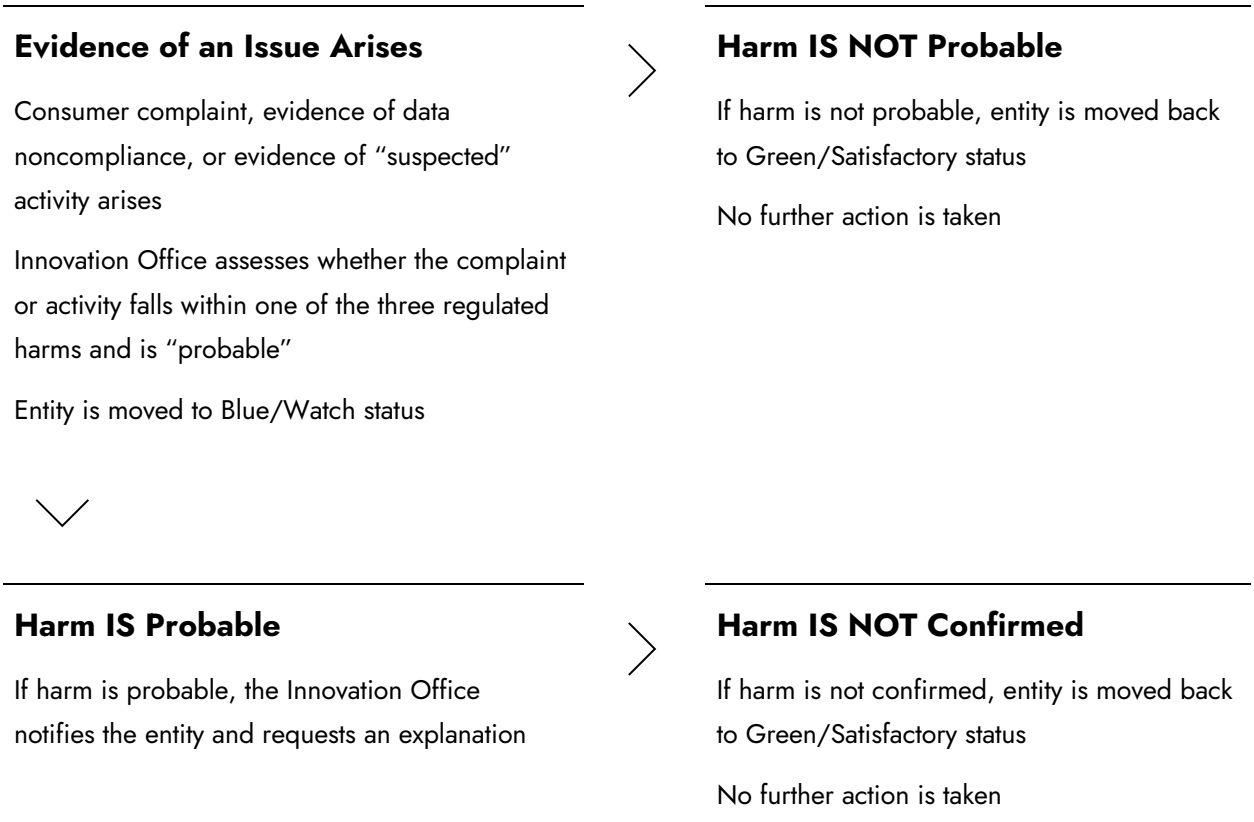
Status	Evidence of Harm	Regulatory Action
Satisfactory *Green*	No compliance issues or evidence of consumer harm	None
Watch *Blue*	Minor compliance issues or evidence of consumer harm	No restriction on services Resolved upon entity's adequate response to the issue(s)
Warning *Yellow*	Ongoing or multiple minor or moderate compliance or consumer harm issues	No restriction on services Resolved upon entity's adequate response to the issue(s)
Suspended *Orange*	Ongoing or multiple minor, moderate, or severe	All Sandbox services are suspended until resolved

[29] Examples of Blue/Watch activity include reporting data late but within 3 days of the deadline, failure to respond to Innovation Office communications for 15 days, and *suspected* service provision in an area outside authorization. Examples of Yellow/Warning activity include reporting data late but within 14 days of the deadline, failure to respond to Innovation Office communications for 30 days, and *probable* service provision in an area outside authorization. Examples of Suspended/Orange activity include missing the data reporting deadline by 15 or more days, failure to respond to Innovation Office communications for 60 days or more, and *confirmed* service provision in an area outside authorization. The Red/Terminated status is assigned where there are chronic, multiple, and/or severe issues with compliance. INNOVATION OFFICE MANUAL, *supra* note 13, at 31-32.

Status	Evidence of Harm	Regulatory Action
	compliance or consumer harm issues	Resolved upon entity's adequate response to the issue(s)
Terminated *Red*	Ongoing or multiple minor, moderate, or severe compliance or consumer harm issues	All Sandbox services are terminated Termination status is publicly reported

Upon authorization, Sandbox entities are automatically assigned the Green/Satisfactory status. Whenever the Innovation Office identifies potential noncompliance or consumer harm issues, it initiates an investigation process; this process is detailed in Figure 33.

Figure 33: Compliance Investigation Process



Entity is moved to Yellow/Warning status and given an opportunity to remedy the harm

Innovation Office conducts further investigation



Harm is Confirmed

If an investigation confirms harm, the Innovation Office makes a recommendation to the LSI Committee regarding enforcement action

Entity may be given an opportunity to resolve the issue(s), or it may be suspended or terminated

Suspended or terminated entities may appeal or apply for reinstatement

F. How the Sandbox Maintains Transparency and Accountability

Transparency and accountability are critical for the Sandbox to earn and maintain the trust of both the profession and the public. To this end, the Innovation Office posts on its website as much information about Sandbox operations as is possible, within the confines of ethical and practical limitations. This includes, but is not limited to, authorization packets for Sandbox entities that provide details about what services they are allowed to provide; monthly activity reports that summarize the data that entities have reported to the Innovation Office; the Innovation Office Manual, which presents details about Innovation Office operations; resources for entities and consumers; agendas and minutes for LSI Committee meetings; and forms for contacting the Innovation Office, submitting a complaint to the Innovation Office, and requesting public records. The March 2023 Letter created the additional requirement that the LSI Committee meetings must be open to the public (though the committee members may vote to go into closed session for purposes of discussing confidential matters).

Figure 34: Transparency and Accountability in the Sandbox, August 2020–February 2025

Transparency Measures at Launch Aug. 2020	**Changes** 2020–2025	**Current Transparency Measures** Feb. 2025
Innovation Office maintains a public-facing website that provides robust information about all aspects of the Sandbox, including but not limited to: • Sandbox entity authorization packets for all authorized entities • Monthly activity reports in downloadable format, including archive of all reports • Innovation Office Manual • Resources for prospective and current Sandbox entities • Resources for consumers • LSI Committee meeting agendas and minutes • Contact and complaint forms • Public records request forms	**Sandbox General Information** Limited access to entity authorization packets Removed access to archive of monthly activity reports Limited access to monthly activity reports	Innovation Office maintains a public-facing website that provides robust information about all aspects of the Sandbox, including but not limited to: • Sandbox entity authorization packets for currently authorized entities • Termination orders for previously authorized entities • Monthly metrics posted without access to report archive • Innovation Office Manual • Resources for prospective and current Sandbox entities • Resources for consumers • LSI Committee meeting agendas and minutes • Contact and complaint forms • Public records request forms
No requirement for LSI Committee meetings to be open to the public or for meeting information to be posted in advance.	**LSI Committee Information** Added requirements to conduct open meetings and to post meeting info in advance	LSI Committee conducts open and public meetings, including publicly posting: • Meeting dates • Meeting agendas at least 24 hours prior to each meeting • Location of the meeting and/or link to virtually join the meeting

V. CONCLUSION

This process evaluation provides a comprehensive look at how Utah's Sandbox has been designed and implemented—from its initial establishment in August 2020 through February 2025. Through this evaluation, we have collected and collated crucial information about the Sandbox's origins and objectives, how it is situated within the Utah Supreme Court's authority and broader goals of regulatory reform, key processes and procedures within the Sandbox, and successes and challenges in the Sandbox during the evaluation period. Our findings underscore that the Sandbox has not been a static experiment but an evolving regulatory framework responsive to both internal lessons and external pressures. They also provide an evidence-based foundation for understanding the Sandbox's implementation.

Our process evaluation has generated deep insight into how the Sandbox functions—and its findings set the stage both for designing and interpreting findings from our outcomes evaluation and social return on investment analysis.

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- **Part 2 — Process Evaluation**
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- **Part 4 — Social Return on Investment Analysis**
  Available January 2026