PART 3

AN INTERIM EVALUATION OF UTAH'S LEGAL REGULATORY SANDBOX

Outcomes Evaluation

IAALS INSTITUTE FOR THE ADVANCEMENT OF THE AMERICAN LEGAL SYSTEM

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Part 3

Outcomes 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 third report in our four-part series: *An Interim Evaluation of Utah's Legal Regulatory Sandbox: Part 3 — Outcomes Evaluation*. This report includes four substantive sections. The Outcomes Evaluation Design section defines outcomes evaluation and our evaluation questions, and situates the outcomes component within the broader context of the evaluation. The Methods section details the methodological approaches we employed. The Outcomes Evaluation Findings section provides an in-depth discussion of the findings from this component of the evaluation. In particular, we present findings relating to:

- Entity Authorization and Regulatory Compliance
- Legal Service Areas and Delivery Methods
- Quality of Sandbox Services
- Regulatory Governance and Structural Sustainability
- Public Relations and Communications
- Financial Sustainability

- Data Collection and Evaluation
- Goal Alignment

Finally, the Synthesis and Discussion section presents a high-level overview of the extensive findings described in the previous section.

Download the other reports in this series:

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

- **Part 1 — Sandbox Background & Evaluation Design**
- **Part 2 — Process Evaluation**
- **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 third report in our interim evaluation series, covering outcomes evaluation. Outcomes evaluation is the component of program evaluation that speaks to the results generated by the program. The sections that follow detail the outcomes component of this interim evaluation of the Sandbox. The Outcomes Evaluation Design section outlines how the outcomes 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 drew from. The Outcomes Evaluation Findings section provides an in-depth examination of the findings from this component of the evaluation. Lastly, the Synthesis and Discussion section summarizes the findings at a high level.

II. OUTCOMES EVALUATION DESIGN

An outcomes evaluation focuses on the results and impacts of a program, assessing whether it meets its intended objectives and what difference it makes for the people and systems it touches. It examines the outputs that flow from program activities, the short- and medium-term outcomes that emerge, and the broader impacts that may develop over time. In this way, outcomes evaluation provides evidence of effectiveness: Are the program's strategies producing the changes they were designed to achieve? For Utah's Sandbox, outcomes evaluation sheds light on questions about results the Sandbox has generated in Utah, as well as its relevance and potential as a model for other jurisdictions.

Table 1: Definitions for Components of the Sandbox Interim Evaluation

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

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. Table 2 presents our evaluation questions for the outcomes component alongside questions for other components of the evaluation.

Table 2: Evaluation Questions for the Sandbox Interim Evaluation

Process Evaluation	Outcomes Evaluation	Social Return on Investment (SROI)
What are the inputs, activities, outputs, and intended outcomes associated with operating the Sandbox?	To what degree have Sandbox activities resulted in the intended outcomes? What goals do Sandbox entities have when entering the Sandbox and to what	What has been the total estimated investment in the Sandbox, including monetary and non-monetary investments?

[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).

Process Evaluation	Outcomes Evaluation	Social Return on Investment (SROI)
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?	degree do they view those as having been achieved? To what degree do entity goals align with the intended outcomes of the Sandbox?	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 outcomes evaluation. We describe our data collection and analytic methods as they relate to the Monthly Activity Reports published by the Innovation Office, our survey of Sandbox entities, structured discussions with Sandbox leadership, and archival and documentary data.

A. Monthly Activity Reports

The Innovation Office published Monthly Activity Reports for 38 of the 41 months included in this interim outcomes evaluation. Specifically, reports were published every month except for January 2023, April 2023, and February 2024. Each of these reports was published on the Innovation Office website as a standalone, downloadable PDF. To facilitate analysis, we manually extracted all available data from each report.

The data points published in these reports varied over time, however, we typically collected approximately 40-45 data points from each report. Table 3 lays out the range of data points we collected from each report, whenever available.

Table 3: Data Collected from Sandbox Monthly Activity Reports

Data Points Collected		
Applications and Authorization Decisions	**Authorized Entities and Service Provision**	**Service Categories**
• Month and year of report • Total # applications received to date • # applications recommended for authorization • # applications denied recommendation for authorization • # entities denied by court • # entities tabled by court • # entities withdrawn prior to authorization decision • # entities under active review • # entities withdrawn after authorization • # suspended/terminated entities • # entities recommended to exit the Sandbox	• # entities reporting data that month • # entities at each innovation level • # entities having reported data for at least one month • # entities offering services to the public at each innovation level • # Sandbox services sought • # unduplicated Sandbox clients • # Sandbox services provided at each innovation level • # Sandbox services delivered by lawyer, lawyer employee, or software • # Sandbox services delivered by non-lawyer with lawyer involvement (person or software) • # complaints filed, including nature of each complaint	• # services provided in each category o Business o Immigration o Military o End of Life Planning o Accident/Injury o Marriage/Family o Domestic Violence o Financial o Housing/Rental o Real Estate

Data points were manually extracted from each Monthly Activity Report. We ran basic descriptive statistics for each of these quantitative data points across the full data set.

B. Survey of Sandbox Entities

We designed the survey with two broad purposes in mind, each of which constituted a section of the survey: 1) understanding entity goals for entering the Sandbox and 2) estimating the monetary and non-monetary investments the entity had made in establishing Sandbox services. Outcomes relating to the first of these goals are discussed in this report. The monetary and non-monetary investment data is relevant to our social return on investment calculations, which are the subject of the fourth report in this series.[5]

[5] LOGAN CORNETT, JESSICA BEDNARZ, & JAMES TEUFEL, INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., AN INTERIM EVALUATION OF UTAH'S LEGAL REGULATORY SANDBOX: PART 4 – SOCIAL RETURN ON INVESTMENT (forthcoming).

In the survey section relating to entity goals, respondents were first provided with space to enter up to seven goals for participating in the Sandbox. Respondents identified goals in an open-ended format; no response options were provided. After entering their goals, respondents were asked to indicate the degree to which the goal had been achieved on a five-point scale: *much less than expected, somewhat less than expected, as expected, somewhat better than expected,* and *much better than expected*.

We distributed the survey in July 2023 to a total of 90 authorized, pending, withdrawn, and denied entities. A total of 35 entities submitted responses (response rate = 39%). Table 4 provides a breakdown of respondents by entity authorization status.[6]

Table 4: Respondents by Authorization Status

Entity Status	Responses	
	n	**%**
Pending	7	20%
Authorized	24	69%
Denied	1	3%
Withdrawn	3	9%
TOTAL	**35**	**100%**

Entity goals were analyzed using a thematic analysis approach. We systematically reviewed the full set of goals provided by respondents to develop a thematic coding scheme, then applied the codes to the data. These coding procedures allowed us to understand and capture the degree to which entity goals align with the overarching goals of the Sandbox—which in turn provides insight into the outcomes achieved through the Sandbox.

C. Structured Discussions with Sandbox Leadership

The outcomes evaluation also draws on data from structured discussions with Sandbox leadership. Specifically, we spoke with six individuals who have been involved in the

[6] In order to preserve confidentiality of responding entities, additional data describing respondent entities has been omitted.

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.[7] 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.

D. 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

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

underlying the Sandbox. We relied on five primary archival and documentary data resources for the outcomes evaluation, each of which is detailed in Table 5.

Table 5: Key Archival Data Resources for the Outcomes Evaluation

Originating Authority	Resource Type	Resource Details	Resource Description and Analytic Value
Utah Supreme Court	Court Orders	Standing Order 15[8] *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[9] *March 28, 2023*	Outlines significant structural, operational, and governance changes.
		Letter to Legal Services Innovation Committee[10] *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[11] *February 20, 2024*	Provides guidance targeted at prospective and approved Sandbox entities.
	Website	Multiple pages *Last visited: February 28, 2025*	Provides information about the Sandbox to the public.

[8] Utah Supreme Court Standing Ord. No. 15 (Aug. 14, 2020, Amended Sept. 21, 2022) [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] 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.

[10] 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.

[11] 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.

To analyze the archival and documentary data, we utilized a deductive coding strategy through which we first identified the topics of relevance to the outcomes evaluation and developed a coding scheme based on the identified topics. We then applied the coding scheme to the archival and documentary data, as appropriate.

In addition to coding for topics of relevance, we conducted readability analysis on excerpted portions of selected resources. Specifically, we conducted Flesch-Kincaid readability tests, which are two measures designed to assess the ease/difficulty of reading a block of text (Flesch Reading Ease test) and the reading grade level (Flesch-Kincaid Reading Level test) of that text.[12] The Flesch-Kincaid readability tests are frequently utilized in research on education and accessibility.[13]

IV. OUTCOMES EVALUATION FINDINGS

The outcomes evaluation presented in this report reflects findings as of February 2025, offering an in-depth examination of the Utah Sandbox's implementation and its progress toward achieving its intended goals. The analysis is structured around the aspirational outcomes and impacts articulated in the Sandbox logic model, which outlines short-, intermediate-, and long-term objectives for the pilot (for a complete discussion of the Sandbox logic model, see the second report in this report series, *Part 2 – Process*

[12] Rudolf Flesch, *A New Readability Yardstick*, 32 J. OF APPLIED PSYCHOL. 221 (1948); J. PETER KINCAID, RICHARD ROGERS, ET AL., NAVAL TECHNICAL TRAINING COMMAND, DERIVATION OF NEW READABILITY FORMULAS (AUTOMATED READABILITY INDEX, FOG COUNT AND FLESCH READING EASE FORMULA) FOR NAVY ENLISTED PERSONNEL – RESEARCH BRANCH REPORT 8-75 (1975).

[13] *See, e.g.*, Austin R. Swisher, Arthur W. Wu, et al., *Enhancing Health Literacy: Evaluating the Readability of Patient Handouts Revised by ChatGPT's Large Language Model,* 171 OTOLARYNGOLOGY – HEAD AND NECK SURGERY 1751 (2024); Charly McKenna, Mindy Quigley, & Tracy L. Webb, *Evaluating the Readability of Recruitment Materials in Veterinary Clinical Research*, 37 J. OF INTERNAL VETERINARY MED. 2125 (2023).

Evaluation[14]). By aligning data collection and analysis with these predefined outcomes, this evaluation provides a structured and evidence-based assessment of how the Sandbox is evolving within its regulatory framework.

Figure 1: Outcomes and Impacts Expected from the Sandbox

Short Term *(0–2 yrs)*	**Intermediate Term** *(3–5 yrs)*	**Long Term** *(6+ yrs)*
Sandbox services are targeted to meet the regulatory objective Consumer harms are effectively identified/addressed Sandbox attracts a variety of new kinds of services and service providers Processes for risk assessment are accurate Sandbox internal mechanisms are feasible Data reporting requirements for entities are clear and targeted at key metrics	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 service options in the Sandbox Regulatory innovations in other states are informed by Utah's experience	Regulatory objective is fully realized Sandbox model can be scaled and replicated Processes for ongoing Sandbox evaluation and continuous improvement are implemented Measurable changes in access to justice in Utah emerge

Importantly, the findings presented here are formative rather than summative—meaning they offer insights into the Sandbox's ongoing development rather than serving as a final assessment of its effectiveness. This evaluation is designed to inform continuous improvement, highlight areas of strength, and identify challenges that may require attention

[14] LOGAN CORNETT, JESSICA BEDNARZ, & JAMES TEUFEL, INST. FOR THE ADVANCEMENT OF THE AM. LEGAL SYS., AN INTERIM EVALUATION OF UTAH'S LEGAL REGULATORY SANDBOX: PART 2 – PROCESS EVALUATION (2025) [hereinafter PART 2 – PROCESS EVALUATION], https://iaals.du.edu/sites/default/files/documents/publications/utah_interim_process_evaluation.pdf.

in the remaining years of the pilot. As such, the findings should be understood as a snapshot in time, reflecting both measurable progress and emerging trends that can shape future regulatory decisions. While some outcomes are already taking shape, others—particularly those associated with long-term structural and market-level changes—will require continued observation and analysis in the years ahead.

In the sections that follow, we examine key areas of impact, including Entity Authorization and Regulatory Compliance; Legal Service Areas and Delivery Methods; Quality of Sandbox Services; Regulatory Governance and Structural Sustainability; Public Relations and Communications; Financial Sustainability; Data Collection and Evaluation; and Goal Alignment. These areas of evaluation provide a picture of how the Sandbox is functioning, how it is perceived by participants and consumers, and what lessons can be drawn to refine its regulatory approach. By documenting these insights now, we lay the groundwork for the final evaluation, which will provide a summative assessment following the completion of the seven-year pilot period.

A. Entity Authorization and Regulatory Compliance

Understanding how entities navigate the authorization process and comply with regulatory requirements is crucial to understanding the Sandbox's effectiveness. This section provides a detailed look at the data, including considerations relating to accessibility of the Sandbox, potential barriers to participation, and compliance expectations.

1. Overview of Related Data and Outcomes

Data relating to various aspects of entity authorization processes and regulatory compliance is drawn from the monthly activity reports produced by the Innovation Office, the entity survey, and structured discussions with Sandbox leadership. Figure 2 provides detail regarding the sources from which this data is derived, along with the relevant expected outcomes.

Figure 2: Data and Outcomes Summary, Entity Authorizations and Regulatory Compliance

Entity Authorizations and Regulatory Compliance	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office Number of applying entities Number of authorized entities Number of entities authorized within each innovation level Number of entities offering services Number of entities reporting data Trends in the above metrics over time **From Sandbox Entities** Perspectives on the authorization process and regulatory compliance **From Sandbox Leadership** Perspectives on the authorization process and regulatory compliance **From the Utah Supreme Court** *N/A*	**Short Term** *(0—2 years)* Sandbox services are targeted to meet the regulatory objective Sandbox attracts a variety of new kinds of services and service providers Data reporting requirements for entities are clear and targeted at key metrics **Intermediate Term** *(3—5 years)* Entity data reporting processes are refined for improved efficiency and effectiveness **Long Term** *(6+ years)* Processes for ongoing Sandbox evaluation and continuous improvement are implemented

2. Findings

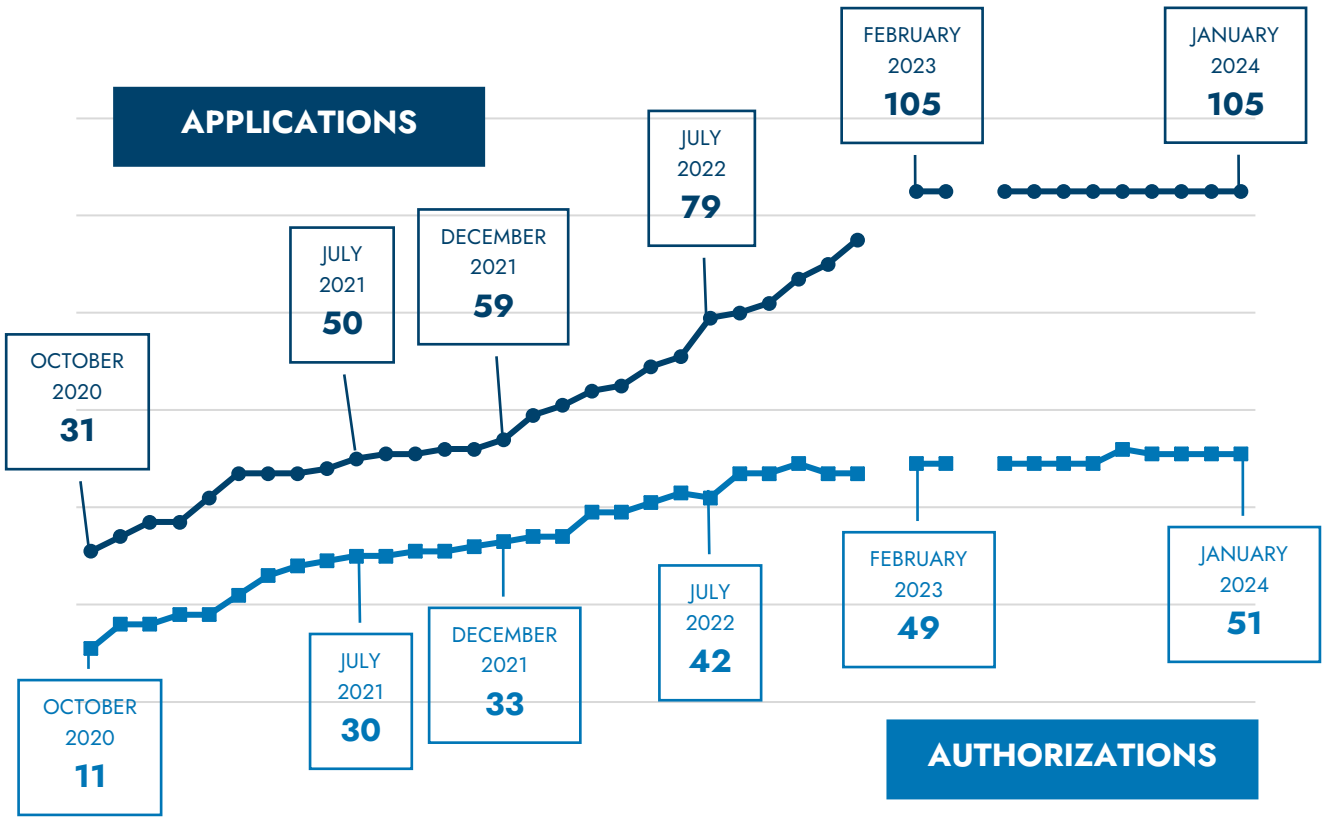
The next subsections detail evaluation findings relating to processes for Sandbox entity authorization and compliance with regulatory requirements.

a. Data from the Innovation Office

In October 2020—when the Innovation Office published its first monthly activity report—a total of 31 entities had applied to provide services in the Sandbox, with 11 of those having been approved at that time. The number of applications and authorizations steadily increased throughout 2021 and 2022. In February 2023, the number of applications reached 105 and, as of January 2024, no additional applications had been submitted due to

a pause in the acceptance of applications. Similarly, the number of authorizations reached 49 in February 2023 and had only risen to 51 by January 2024.[15]

Figure 3: Sandbox Applications and Authorizations, October 2020 – January 2024



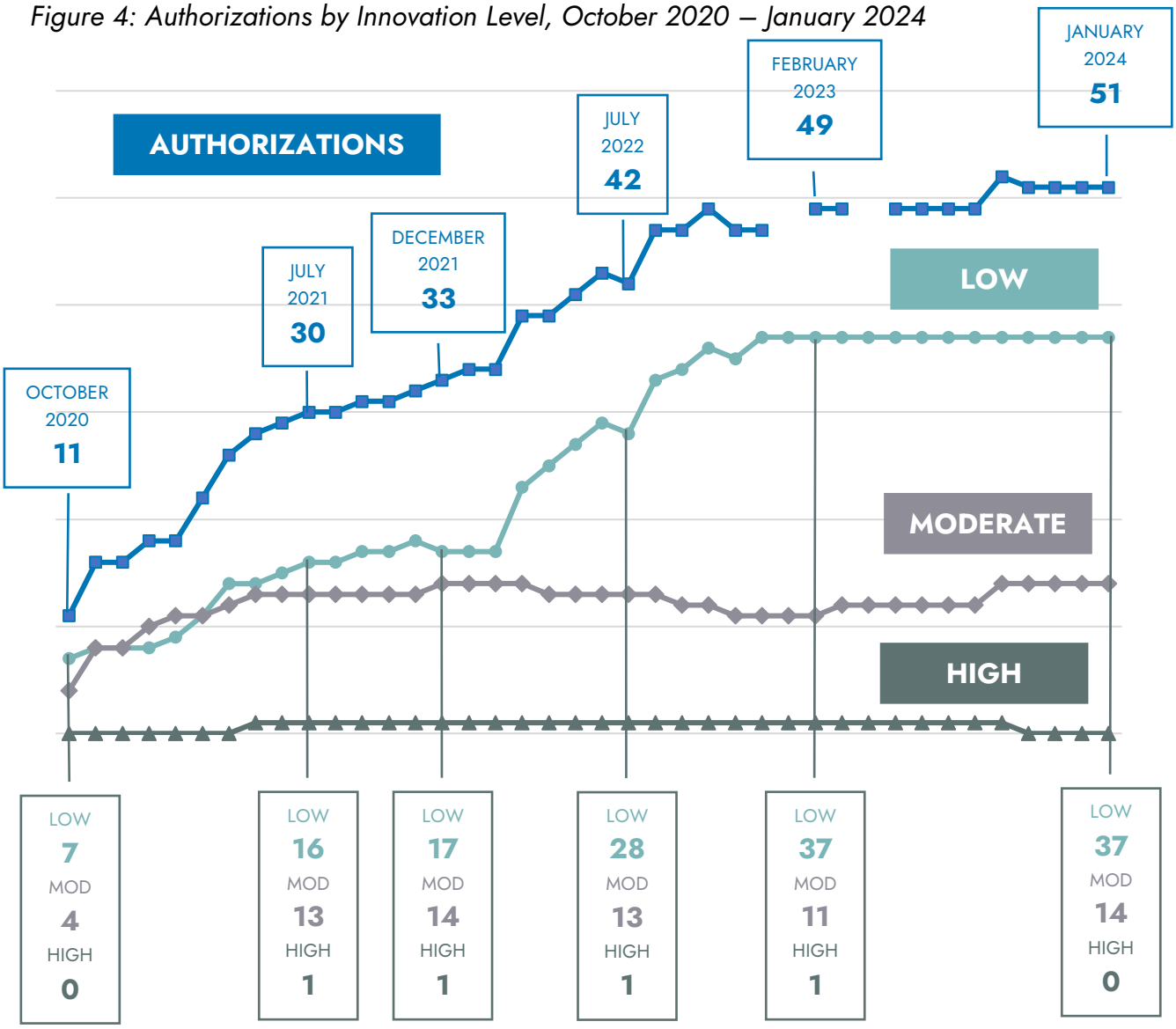
For nearly every month included in our dataset, low innovation entities constituted the largest share within the distribution of authorized entity innovation levels, with the remainder being moderate innovation entities. Only one high innovation entity had been authorized in the Sandbox as of January 2024; this entity never launched services and ultimately decided to withdraw from the Sandbox.

In October 2020, seven out of the 11 authorized entities (64%) were categorized as low innovation. From November 2020 through March 2021, the number of authorized moderate innovation entities equaled or slightly exceeded the number of authorized low

[15] The change from 49 to 51 authorizations reflects three new entities being authorized and one previously authorized entity withdrawing from the Sandbox.

innovation entities. By July 2021, low innovation entities were again a slight majority of those authorized (53%). In March 2022, the proportion of authorized low innovation entities began to rise, with this proportion reaching about three-quarters (76%) in February 2023. These proportions have remained stable since, as the number of authorizations has halted. Figure 4 visualizes the changes in this distribution over time, including total authorizations as well as the breakdown for each innovation level.

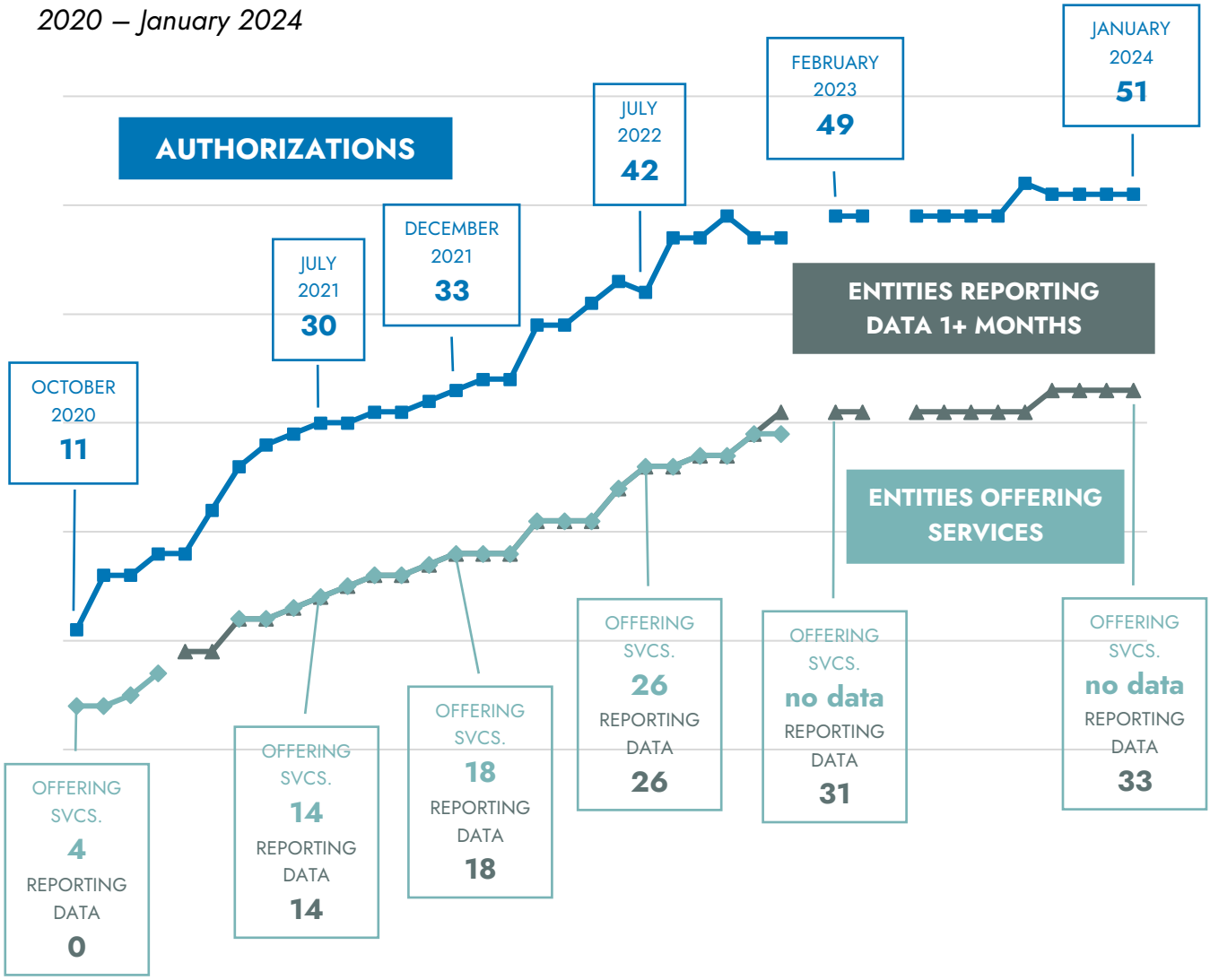
Figure 4: Authorizations by Innovation Level, October 2020 – January 2024



A final relevant lens through which to view this data on entity authorizations entails a comparative look at the number of entities authorized, number offering services to the public, and number that have submitted at least one report per the Sandbox data reporting

requirements.[16] A review of these metrics across the study period—presented in Figure 5—shows that all authorized entities who had launched services had successfully submitted at least one data report to the Innovation Office for virtually every month in the study period for which we have data. This suggests that, despite reported challenges from multiple stakeholders relating to the data reporting requirements,[17] entities are managing to provide data about their Sandbox services to the Innovation Office.

Figure 5: Authorizations, Entities Offering Services, and Entities Reporting Data, October 2020 – January 2024



[16] PART 2 – PROCESS EVALUATION, *supra* note 14.

[17] *See* Data from Sandbox Entities, *infra* p. 13; Data from Sandbox Leadership, *infra* p. 14.

b. Data from Sandbox Entities

Multiple respondents provided perspectives on their experiences seeking to be authorized in the Sandbox. Positive comments reflected excitement and optimism about the Sandbox; challenges that entities noted related to delays in the process, needed guidance and resources, and clarity of information and expectations. Table 6 presents a comprehensive view of entity comments related to processes for authorization and compliance with regulatory requirements.

Table 6: Sandbox Entity Perspectives on Positives and Challenges, Entity Authorization and Regulatory Compliance

Insights on **Positives**	Several entities shared broad enthusiasm about the Sandbox and their opportunity to participate
	Many were optimistic about the future growth and evolution of the Sandbox
Insights on **Challenges**	Delays in the authorization process resulted in long periods of limbo for many applying entities
	Many entities expressed uncertainty about the process and upcoming steps due to lack of resources and guidance
	Entities frequently noted challenges related to data reporting requirements including lack of clarity on expectations and lack of support in meeting the requirements
	There is a lack of clarity about long-term authorization and permanent licensure that has created hesitation to engage in the Sandbox
	Some entities ran into barriers related to insufficient information about the regulatory structure of the Sandbox (e.g., unforeseen cross-jurisdictional regulatory conflicts)

c. Data from Sandbox Leadership

Sandbox leadership reflected frequently on topics related to authorization of entities and their compliance with regulatory requirements. Positive comments centered on broad successes related to the innovative space the Sandbox has created and the effect of

remaining flexible and adaptable, particularly early in Sandbox implementation. Table 7 summarizes the relevant feedback from Sandbox leadership.

Table 7: Sandbox Leadership Perspectives on Positives and Challenges, Entity Authorization and Regulatory Compliance

Insights on **Positives**	The Sandbox has created a functional space in which there is constructive experimentation with regulatory innovation
	Flexibility and the ability to refine the regulatory approach over time, as lessons were learned, has had beneficial impacts
Insights on **Challenges**	Limitations in resources available for operating the Sandbox were frequently noted as a significant pain point and cited as resulting in delays and challenges with communication
	Multiple large shifts in application, authorization, and compliance requirements have generated confusion and uncertainty for entities
	Resistance from some sectors of the legal profession has played a role in shaping the Sandbox's regulatory approach
	A variety of problems relating to the data reporting aspect of compliance consistently create obstacles to carrying out regulatory functions on behalf of the Sandbox, as well as barriers for entities fulfilling their regulatory obligations

B. Legal Service Areas and Delivery Methods

A diverse range of services and delivery methods exist within the Sandbox—and examining the types of services provided, the ways they are delivered, and their reach across different populations helps illustrate the Sandbox's role in expanding access to legal help. This section details findings relating to the types of services provided in the Sandbox, as well as the methods by which they are delivered.

1. Overview of Related Data and Outcomes

Findings regarding types and delivery methods for Sandbox services are grounded in multiple data sources, including Sandbox monthly activity reports, the entity survey, and

structured discussions with Sandbox leadership. Figure 6 outlines these data sources and highlights relevant Sandbox outcomes.

Figure 6: Data and Outcomes Summary, Sandbox Service Types and Delivery Methods

Delivery of Sandbox Services	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office Total number of services provided Number of services provided within each innovation level Number of services provided by lawyers vs nonlawyers Trends in the above metrics over time **From Sandbox Entities** Perspectives on Sandbox service provision **From Sandbox Leadership** Perspectives on Sandbox service provision **From the Utah Supreme Court** *N/A*	**Short Term** *(0—2 years)* Sandbox services are targeted to meet the regulatory objective Sandbox attracts a variety of new kinds of services and service providers **Intermediate Term** *(3—5 years)* Sandbox has refined its approaches to carrying out its regulatory function The public is aware of and trusts service options in the Sandbox **Long Term** *(6+ years)* Regulatory objective is fully realized Measurable improvements in access to justice in Utah emerge

2. Findings

The following subsections provide detailed analysis of the findings relating to the types of services provided in the Sandbox and how those services are delivered to the public.

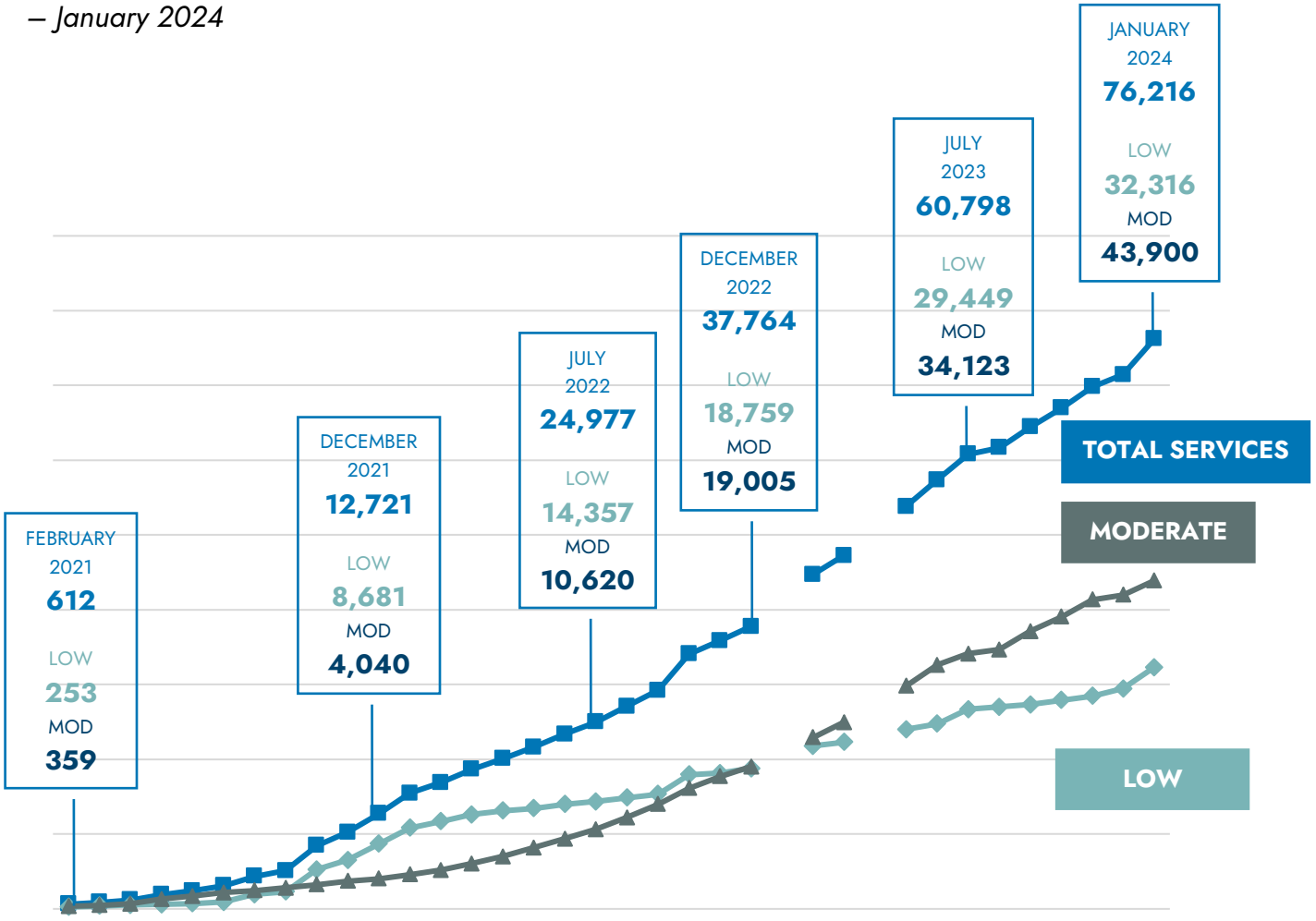
a. Data from the Innovation Office

Multiple elements of the data provided in the Monthly Activity Reports published by the Innovation Office provide valuable lenses through which to consider Sandbox services: number of services provided at each innovation level, number of services provided by different types of providers, and prevalence rankings for types of services provided.

i. Services by Innovation Level

The total number of services provided by Sandbox-authorized entities has steadily risen from 612 in February 2021 (when this data was first reported in the Innovation Office's monthly activity reports) to 76,216 as of January 2024. Between October 2020 and November 2022, a majority of services provided within the Sandbox were in the low innovation category. However, from December 2023 to January 2024, moderate innovation services consistently outnumbered low innovation services. As of January 2024, only low and moderate innovation entities had provided services in the Sandbox. Figure 7 provides the total number of services provided over time, along with breakdowns for each innovation level.

Figure 7: Services Provided in the Sandbox, Overall and by Innovation Level, October 2020 – January 2024



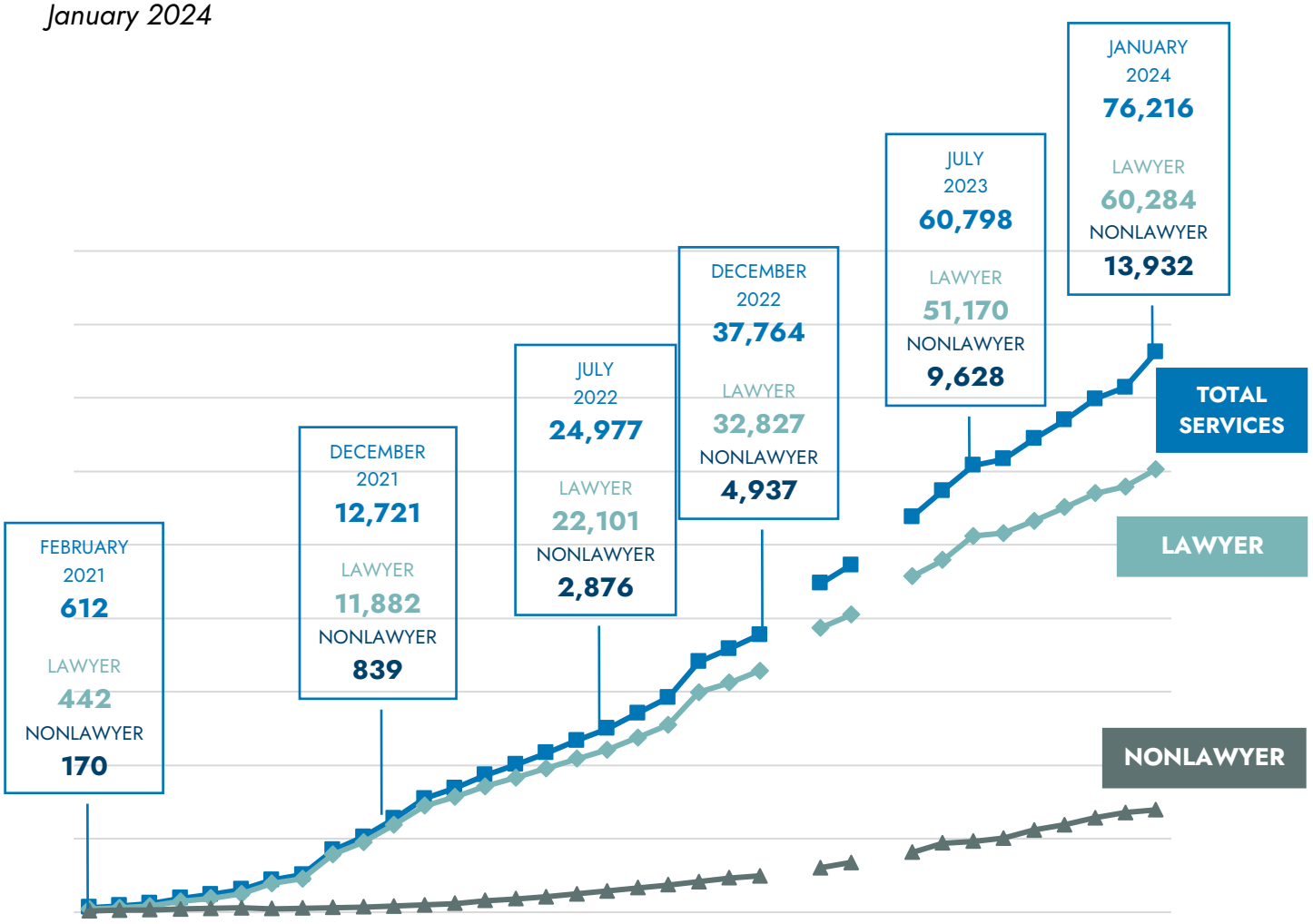
ii. Services by Provider Type

In addition to reporting the total number of services provided during each reporting period (which varies based on innovation level[18]), authorized entities are required to report whether each service delivered was provided by 1) a lawyer, lawyer employee, or software for the purpose of form or document completion with lawyer involvement or 2) a nonlawyer (either a human nonlawyer provider or a software-based provider) with lawyer involvement.

Considering the service data through the lens of provider type, the number of services provided by lawyers has consistently exceeded the number provided by nonlawyers by a substantial margin. In fact, the proportion of services provided by lawyers has constituted at least 80% of all Sandbox services since July 2021. Figure 8 presents the total number of Sandbox services provided over time, in conjunction with breakdowns for services provided by lawyers and nonlawyers.

[18] PART 2 – PROCESS EVALUATION, *supra* note 14, at 37.

Figure 8: Services Provided in the Sandbox, Overall and by Provider Type, October 2020 – January 2024



iii. Service Area Prevalence Rankings

Table 8 presents the prevalence rankings for each legal service area defined within the Sandbox from February 2021 (the first month in which this data was reported) to January 2024—that is, for each month, the service area indicated in the *1st* column made up the largest share of services provided in that month, *2nd* made up the second largest share, and so on.[19] One important aspect of these categorizations to remember in understanding

[19] The rankings are drawn directly from the Innovation Office's Monthly Activity Reports.

this data is that a single entity may be authorized to provide services in multiple legal areas.[20] In reviewing these rankings across the study period, several key trends emerged:

- Only three legal areas held the first rank: End of Life Planning, Business, and Accident/Injury.
- Business services were dominant. This legal area held the first, second, or third slot for every month for which we have data.
- End of Life Planning services constituted the largest share of Sandbox services for 15 of the first 18 months for which we have data but was ranked fourth for all but one of the remaining months.
- Housing/Rental held a ranking for most of the first half of the study period but dropped out of the rankings starting in September 2022.
- Immigration appeared in the rankings in September 2022, holding the third spot from October 2022 through July 2023 and the second spot from August 2023 through January 2024.
- Military services held the second rank from September 2022—when it first appeared in the rankings—through July 2023. It was ranked third from August 2023 through January 2024.
- Marriage/Family, Financial, and Accident/Injury services maintained middle or lower rankings for the bulk of the study period.

In addition to noting what the data shows, it is also important to note what the data does not show. For example, while the Monthly Activity Reports generally provide data on the top 5–7 legal areas, the distribution of services across the remaining service area categories is unknown. It is also not clear from the reports precisely which categories are in active use each month.

[20] Also important to note here is that the legal areas in Table 8 do not fully align with the categories as presented in *Part 2 – Process Evaluation*. This is because the current categories were adopted after January 2024, when the data collection period for the outcomes evaluation concluded—and there were intermediary changes not presented elsewhere in this report, as complete data on those changes is not available. PART 2 – PROCESS EVALUATION, *supra* note 14.

Table 8: Service Provision Rankings by Legal Service Area, February 2021 – January 2024

	1st	2nd	3rd	4th	5th	6th	7th
February 2021	EOL Planning	Business	Marriage/Family	Financial	Housing/Rental	*No data*	*No data*
March 2021	EOL Planning	Business	Marriage/Family	Financial	Housing/Rental	*No data*	*No data*
April 2021	EOL Planning	Business	Marriage/Family	Financial	Accident/Injury	*No data*	*No data*
May 2021	EOL Planning	Business	Marriage/Family	Financial	Accident/Injury	*No data*	*No data*
June 2021	EOL Planning	Business	Marriage/Family	Financial	Accident/Injury	*No data*	*No data*
July 2021	Business	EOL Planning	Marriage/Family	Financial	Accident/Injury	*No data*	*No data*
August 2021	Accident/Injury	Business	EOL Planning	Marriage/Family	Financial	*No data*	*No data*
September 2021	Accident/Injury	Business	EOL Planning	Marriage/Family	Financial	*No data*	*No data*
October 2021	EOL Planning	Marriage/Family	Business	Accident/Injury	Financial	Housing/Rental	*No data*
November 2021	EOL Planning	Marriage/Family	Business	Accident/Injury	Financial	Housing/Rental	*No data*
December 2021	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
January 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
February 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
March 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
April 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
May 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
June 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
July 2022	EOL Planning	Business	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
August 2022	Business	EOL Planning	Marriage/Family	Accident/Injury	Financial	Housing/Rental	*No data*
September 2022	Business	Military	Accident/Injury	EOL Planning	Marriage/Family	Immigration	Financial
October 2022	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
November 2022	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
December 2022	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
January 2023	*No data*	*No data*	*No data*	*No data*	*No data*	*No data*	*No data*
February 2023	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
March 2023	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
April 2023	*No data*	*No data*	*No data*	*No data*	*No data*	*No data*	*No data*
May 2023	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
June 2023	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
July 2023	Business	Military	Immigration	EOL Planning	Accident/Injury	Marriage/Family	Financial
August 2023	Business	Immigration	Military	EOL Planning	Accident/Injury	Marriage/Family	Financial
September 2023	Business	Immigration	Military	EOL Planning	Accident/Injury	Marriage/Family	*No data*
October 2023	Business	Immigration	Military	EOL Planning	Accident/Injury	Marriage/Family	*No data*
November 2023	Business	Immigration	Military	EOL Planning	Accident/Injury	Marriage/Family	*No data*
December 2023	Business	Immigration	Military	EOL Planning	Accident/ Injury	Marriage/Family	*No data*
January 2024	Business	Immigration	Military	EOL Planning	Accident/ Injury	Marriage/Family	Financial

EOL Planning = End of Life Planning

a. Data from Sandbox Entities

Entity comments reveal some insights into their perspectives on these topics. These insights are outlined in Table 9.

Table 9: Sandbox Entity Perspectives on Positives and Challenges, Legal Service Areas and Service Delivery

Insights on **Positives**	There is a shared view among many authorized entities that they are effectively reaching people and communities in need Many entity goals relate to ensuring clients, particularly those who are underserved, can access the legal services they need
Insights on **Challenges**	Some report that the highly innovative or unique aspects of their models have created barriers to public understanding of their services Costs associated with developing the service delivery model and process delays can contribute to entity attrition

b. Data from Sandbox Leadership

Sandbox leadership shared a few relevant viewpoints relating to legal service areas and service delivery, which are presented in Table 10. In general, positive comments related to perceptions of success in narrowing the access to justice gap through Sandbox services, while challenges related to the nature of entity participation in the Sandbox.

Table 10: Sandbox Leadership Perspectives on Positives and Challenges, Legal Service Areas and Service Delivery

Insights on **Positives**	Individual and small business consumers are benefiting from access to nonlawyer service providers Sandbox services are thought to be reaching people who would otherwise not be able to access legal help

Insights on **Challenges**	There has been some concern that some entities have used authorization as a kind of endorsement from the court Some entities that would have liked to participate in the Sandbox decided not to do so, as feasibility was a barrier given their innovative model could only be implemented in Utah

C. Quality of Sandbox Services

Ensuring the quality of services provided within the Sandbox is a central consideration for regulators, consumers, and service providers alike. This section explores key findings related to service quality, highlighting both successes and areas for improvement.

1. Overview of Related Data and Outcomes

Despite being of utmost importance, data relating to quality of services within the Sandbox is extremely limited, with the only usable insights coming from the Sandbox Monthly Activity Reports. Although it is limited, this data provides critical information relating to Sandbox service quality.

Figure 9: Data and Outcomes Summary, Quality of Sandbox Services

Quality of Sandbox Services	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office Number and rate of consumer complaints Nature of consumer complaints **From Sandbox Entities** *N/A* **From Sandbox Leadership** *N/A* **From the Utah Supreme Court** *N/A*	**Short Term** *(0–2 years)* Sandbox services are targeted to meet the regulatory objective Consumer harms are effectively identified/addressed Processes for risk assessment are accurate Sandbox internal mechanisms are feasible Data reporting requirements for entities are clear and targeted at key metrics

	Intermediate Term *(3–5 years)* Sandbox has refined its approaches to carrying out its regulatory function **Long Term** *(6+ years)* Regulatory objective is fully realized Sandbox model can be scaled and replicated Processes for ongoing Sandbox evaluation and continuous improvement are implemented

2. Findings

As noted both previously and in the section that follows, there is currently little data relating to service quality in the Sandbox. While the findings from this limited data certainly have value, the lack of data emphasizes a conclusion that is mirrored in other parts of this report: there is much room for improving strategies and tactical approaches to collecting data on service quality. It is important to note here that equivalent data on traditional legal services is not currently systematically tracked or accessible for research purposes.

a. Data from the Innovation Office

A cardinal element of the Sandbox is its implementation of mechanisms for service quality assurance, including ensuring consumers of Sandbox services have easy access to processes for submitting complaints and for providing feedback about the services they receive, as well as conducting service quality audits with moderate and high innovation entities. While data on service quality audits and consumer feedback was limited, analysis of the data that we do have provides information that is key to understanding the quality of Sandbox services.

With respect to service quality audits, three were conducted during the study period. Those that were conducted found no evidence of "material or substantial harm to consumers, and

services were found to be at least satisfactory"[21] in terms of the quality of services provided by the audited entities, all of which were categorized as moderate innovation.

Monthly Activity Reports provided a bit more data on consumer complaints, with each report including an overview of complaints received to date. As of January 2024, the Innovation Office had received a total of 14 consumer complaints, 9 of which were linked to one of the three defined consumer harms (i.e., inaccurate or inappropriate legal result, failure to exercise legal rights, purchase of unnecessary or inappropriate service).[22] In relation to the total number of Sandbox services provided, these numbers translate into 1 out of every 4,011 Sandbox services resulting in a consumer complaint and 1 out of every 8,468 Sandbox services resulting in a harm-related complaint.[23] Viewed slightly differently, the data shows that consumer complaints were submitted for less than 0.01% of all services provided in the Sandbox.

D. Regulatory Governance and Structural Sustainability

Data collected through this evaluation also provides crucial information on outcomes relating to governance and structural sustainability in the Sandbox. Specifically, these findings relate to operational oversight of the Sandbox and the various authorities that exist within it (and in its periphery). This section provides a detailed review of the data and findings that relate to these topics.

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[21] UTAH OFFICE OF LEGAL SERVICES INNOVATION, JANUARY 2024 ACTIVITY REPORT 7 (2024), [hereinafter JANUARY 2024 ACTIVITY REPORT] (note that this or similar language appears in multiple Monthly Activity Reports).

[22] PART 2 – PROCESS EVALUATION, *supra* note 14, at 12 (details information about the consumer harms regulated in the Sandbox).

[23] Note that these figures are drawn directly from the Innovation Office's activity report for January 2024. JANUARY 2024 ACTIVITY REPORT, *supra* note 21.

1. Overview of Related Data and Outcomes

A variety of data sources—including the Entity Survey, Structured Discussions with Sandbox Leadership, and the March 2023 Letter—speak to issues relating to Sandbox governance and structural sustainability. Figure 10 outlines relevant data and outcomes as described in the Sandbox logic model.

Figure 10: Data and Outcomes Summary, Regulatory Governance and Structural Sustainability

Regulatory Governance and Structural Sustainability	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office *N/A* **From Sandbox Entities** Perspectives on governance and structural topics **From Sandbox Leadership** Perspectives on governance and structural topics **From the Utah Supreme Court** Relevant portions of the March 2023 Letter	**Short Term** *(0—2 years)* Sandbox internal mechanisms are feasible Data reporting requirements for entities are clear and targeted at key metrics **Intermediate Term** *(3—5 years)* Sandbox has refined its approaches to carrying out its regulatory function Entity data reporting processes are refined for improved efficiency and effectiveness **Long Term** *(6+ years)* Sandbox model can be scaled and replicated Processes for ongoing Sandbox evaluation and continuous improvement are implemented

2. Findings

The next subsections present in-depth information on findings that speak to the intended outcomes relating to Sandbox regulatory governance and structural sustainability.

a. Data from Sandbox Entities

Some responding entities provided feedback relevant to these aspects of the Sandbox, which are summarized in Table 11.

Table 11: Sandbox Entity Perspectives on Positives and Challenges, Regulatory Governance and Structural Stability

Insights on **Positives**	Several entities expressed optimism and enthusiasm about the future of the Sandbox and their participation in it, which suggests there is confidence in the Sandbox regulatory model
Insights on **Challenges**	Some observed that the authorities that oversee and make decisions about the Sandbox need additional staff support to successfully carry out their regulatory functions Substantial uncertainties have arisen from lack of clarity about the potential for exiting the Sandbox (e.g., annual licensure) in the future and the nature of the Sandbox as a pilot program These realities have frequently created substantial barriers to entry, as well as barriers to sustained participation, for entities

b. Data from Sandbox Leadership

Protocols for our discussions with Sandbox leadership included several questions that captured information relevant to regulatory governance and structural sustainability. While there is positivity among Sandbox leadership about the long-term success of the Sandbox, many comments relating to governance and structure reflected recognition of various challenges. In addition to the structured discussion data, information in the Utah Supreme Court's March 2023 Letter provides key observations relating to Sandbox governance and structure.

Table 12: Data from Sandbox Leadership on Positives and Challenges, Regulatory Governance and Structural Sustainability

Insights on **Positives**	The Sandbox has benefitted substantially from the dedication and commitment of a core group of leaders and champions of regulatory innovation
	There is optimism that the Innovation Requirement for Sandbox authorization—which was introduced in the March 2023 Letter and narrows the Sandbox scope to entities whose services are targeted at closing the justice gap—will further the regulatory objective
	Expansion of the LSI Committee to increase representation from the Utah legal community and the Utah public is expected to improve decision-making
Insights on **Challenges**	Continued reliance on volunteers to carry out regulatory functions (i.e., the LSI Committee) is viewed as not sustainable over the long term
	There is a shared view that creating a pathway for entities to exit the Sandbox is critical to ongoing feasibility and sustainability
	The original formulation of the regulatory structure has resulted in over-regulation and overuse of resources on entities that pose low risk to consumers
	Some expressed concern that state supreme courts are not trained to think like regulators or on best practices in regulatory governance
	There is unease regarding changes to Sandbox governance and structure that are seen as rushed and reactive

E. Public Relations and Communications

A crucial factor in Sandbox outcomes relates to how information about the Sandbox regulatory framework is provided to the public. This section details findings pertaining to the content, structure, and clarity of public information.

1. Overview of Related Data and Outcomes

Findings in the section that follows are derived from a broad array of sources and perspectives. These findings include a variety of types of data including archival data from

the Innovation Office and the Utah Supreme Court, along with perspectives from Sandbox entities and leadership.

Figure 11: Data and Outcomes Summary, Public Relations and Communications

Public Relations and Communications	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office Analysis of information provided to the public in the Innovation Office Manual and on the Innovation Office Website **From Sandbox Entities** *N/A* **From Sandbox Leadership** *N/A* **From the Utah Supreme Court** Analysis of information provided to the public in Court-issued documentation of Sandbox regulatory framework	**Short Term** *(0—2 years)* Sandbox services are targeted to meet the regulatory objective Consumer harms are effectively identified/addressed Sandbox attracts a variety of new kinds of services and service providers Processes for risk assessment are accurate Sandbox internal mechanisms are feasible Data reporting requirements for entities are clear and targeted at key metrics **Intermediate Term** *(3—5 years)* Sandbox has refined its approaches to carrying out its regulatory function The public is aware of and trusts service options in the Sandbox Entity data reporting processes are refined for improved efficiency and effectiveness **Long Term** *(6+ years)* Regulatory objective is fully realized Measurable improvements in access to justice in Utah emerge

2. Findings

The following sections outline findings from our analysis of data that speaks to questions about information provided to the public by the Innovation Office, as well as information issued by the Court.

a. Data from the Innovation Office

Findings derived from available Sandbox resources reveal valuable information about the clarity of information provided to the public about operation and administration of the Sandbox, data reporting requirements and the data that has been reported, and decision-making processes and outcomes. To help us approximate the degree to which this information is understandable to the public, we conducted readability analyses on many of the archival data sources. Analyses relating to the degree to which these resources can be relied upon are also included (e.g., consistency across resources, frequency of updates, etc.).

i. Sandbox Operations and Administration

Analysis of information that the Innovation Office provides to the public about how the Sandbox works—and the ways in which that information is presented—gives us invaluable insights into how public audiences are able to consume it. Figure 12 outlines findings related to public information about the application process as detailed in the Innovation Office Manual and more general information presented to the public about the Sandbox on the Innovation Office Website.

Figure 12: Public Information about Sandbox Operations and Administration, Innovation Office

Details of the Application Process *Information accurate as of February 28, 2025*	**Format:** The Innovation Office Manual provides extensive and highly detailed information about the process for entities to obtain Sandbox authorization. **Readability Analysis:** The Innovation Office Manual includes a section that defines key terms for applying entities: Important Application Terms. Collectively, the definitions provided in this section score in the *very difficult* range and are written at the college graduate level (*Flesch Reading Ease* = 18.7; *Flesch-Kincaid Grade Level* = 15.3).

	Reliability of Information: The Manual has undergone multiple revisions and iterations to reflect changes in the Sandbox framework. As of February 2025, the posted version of the Manual was last updated in February 2024, meaning that it reflects multiple outdated policies, such as those relating to badging, entity annual fees, consumer feedback requirements, and others.
General Sandbox Information for the Public *Information accurate as of February 28, 2025*	**Format:** The Innovation Office Website serves as a clearinghouse for information about the Sandbox. It provides historical information relating to the development and implementation of the Sandbox; answers to frequently asked questions; the Innovation Office Manual; relevant orders and other official communications from the Court and the LSI Committee; entity authorization packets; key metrics about Sandbox entities and services; important updates about the Sandbox; and tools to assist prospective and participating entities in navigating the Sandbox. **Readability Analysis:** On the FAQ section of the Innovation Office Website, the response to the question "*I submitted a Sandbox application. Now what?*" scores in the *very difficult* range (*Flesch Reading Ease* = 29.1; *Flesch-Kincaid Grade Level* = 13.3), indicating content readability is suited only for advanced readers. **Reliability of Information:** The website is periodically updated in terms of key policy changes about Sandbox operations and administration. It prominently presents key policy changes established in the September 2024 Letter (i.e., changes not reflected in the Innovation Office Manual as of February 2025). Some key policy changes are stated on the website, but no official documentation from the Court is provided (e.g., the updated fee policy adding a $5,000 annual fee for entities).

The Innovation Office Manual offers a thorough and highly technical explanation of the entity application process, including detailed definitions and procedural requirements; however, readability analyses show that these materials are written at a graduate level, making them difficult for non-specialist audiences to digest. Moreover, while the Manual has been revised several times to align with evolving Sandbox policies, the version publicly available as of February 2025 remains outdated in several key areas—including badging, annual fees, and consumer feedback requirements—resulting in some inconsistencies between written policy and current practice. The Innovation Office Website functions as a more dynamic source of public-facing information, serving as a repository for official documents, FAQs, policy updates, and tools for prospective and current Sandbox participants. Yet, even these materials are written at an advanced reading level, and some posted updates lack corresponding documentation from the Court. Together, these findings

highlight that while the Innovation Office provides considerable transparency regarding Sandbox operations, the complexity, reading difficulty, and uneven updating of these materials may limit public comprehension and confidence in the regulatory process.

ii. Compliance and Data Reporting

The Innovation Office Manual and Website provide information relating to compliance and data reporting for Sandbox entities—including data reporting requirements, reported data and key metrics, and other compliance requirements. Evaluation findings relevant to these topics are presented in Figure 13.

Figure 13: Information about Compliance and Data Reporting, Innovation Office

Data Reporting Requirements *Information accurate as of February 28, 2025*	**Format:** The Innovation Office Manual contains a section that details data reporting requirements for entities, including specific data points needed and frequency of reporting at each innovation level and authorization status. **Readability Analysis:** The Sandbox Data Reporting section presents introductory information about entity requirements related to reporting data back to the Innovation Office. This introductory information scores in the *very difficult* range for readability and is written at a college level (*Flesch Reading Ease* = 25.4; *Flesch-Kincaid Grade Level* = 14.8). **Reliability of Information:** The posted version of the Manual, which was last updated in February 2024, contains incomplete information in some places (the Court mandated use of an NPS score in the March 2023 Letter, but this requirement does not appear in the Manual).
Reported Data and Key Metrics *Information accurate as of February 28, 2025*	**Format:** The Innovation Office issued and posted Monthly Activity Reports October 2020 – January 2024. These reports were removed from the website in early 2025 and replaced by a single metrics summary table on the Innovation Office Website that presents a portion of the information typically provided in the Monthly Activity Reports. **Readability Analysis:** Not conducive to readability analysis. **Reliability of Information:** Monthly Activity Reports are generally consistent in terms of the information provided, as well as the format in which it is presented. No information about the reason for removal of these reports is provided.
Other Compliance Requirements	**Format:** The Innovation Office Manual contains several sections that detail regulatory compliance requirements for entities to disclose their participation in the Sandbox to consumers. Changes to these requirements—and the reasons for

Information accurate as of February 28, 2025	them—have been described in communications from the Court that are linked on the Innovation Office Website (e.g., September 2024 Letter). **Readability Analysis:** Information included in the Innovation Office Manual regarding compliance for licensed entities that have exited the Sandbox scores just on the line between the *difficult* and *very difficult* ranges for readability and are written at a college/college graduate level (*Flesch Reading Ease* = 30.1; *Flesch-Kincaid Grade Level* = 15.1). **Reliability of Information:** The posted version of the Manual, as of February 2025, was last updated in February 2024 and is, therefore, missing information about updates to these requirements that have occurred in the intervening time. (e.g., it instructs entities to follow badging protocols that the Court retired in the September 2024 Letter and does not include information about the $5,000 annual entity fee implemented in early 2025).

Evaluation findings indicate that while the Manual provides clear procedural guidance and defines the data elements required at each innovation level, portions of the publicly available information are incomplete or outdated, reflecting a lag between Court-mandated updates and formal revisions. Readability analyses show that key compliance sections—particularly those addressing data reporting and post-exit requirements—are written at a college level, creating potential accessibility barriers for some audiences. Public reporting of aggregate data has also changed over time: monthly activity reports, which provided detailed and consistent insights into Sandbox operations, were discontinued in early 2025 and replaced by a single online metrics summary table that presents a narrower set of indicators without accompanying narrative context. Finally, some compliance instructions—such as those related to badging protocols and the newly instituted annual entity fee—do not yet appear in the Manual, underscoring the importance of timely updates to maintain transparency and regulatory clarity.

iii. Regulatory Framework, Decision-Making Processes, and Outcomes

Information about the Sandbox regulatory framework, how regulatory decisions are made, and the outcomes of those decisions is found in multiple locations on the Innovation Office Website, as well as in the Innovation Office Manual. Figure 14 presents the relevant findings.

Figure 14: Public Information about the Regulatory Framework, Decision-Making Processes, and Outcomes

Criteria and Processes for Entity Authorization Decisions *Information accurate as of February 28, 2025*	**Format:** Outlined in detail in the Innovation Office Manual. Elements of these criteria and processes can also be found in multiple locations on the website (e.g., FAQs, landing page, page providing information for interested/prospective entities). **Readability Analysis:** The Sandbox Application Review section of the Innovation Office Manual is in the *very difficult* range for readability and is, thus, best suited for college-graduate-level readers (*Flesch Reading Ease* = 21.9; *Flesch-Kincaid Grade Level* = 16.1).[24] **Reliability of Information:** There are inconsistencies in the information presented across these resources. For example, the Innovation Office Manual lists *Immigration* as one of the legal areas that can operate in the Sandbox, which is inconsistent with information on the Innovation Office Website (and current Sandbox policy).
Decisions Made about Entity Authorizations *Information accurate as of February 28, 2025*	**Format:** The Authorized Entities page on the Innovation Office Website summarizes information about each authorized entity (e.g., innovation level, service models, etc.). In addition, authorization packets for authorized entities are posted on the website. Packets include the full authorization order issued by the Court, as well as details about the entity and the services it is authorized to provide. Packets for entities who terminate or withdraw after being authorized, or are asked to leave the Sandbox but are granted an accommodation, are removed and replaced with documentation about their termination/withdrawal (e.g., termination order).[25] **Readability Analysis:** Scores for the combined descriptions for each of the entities outlined on the Authorized Entities page fall in the *extremely difficult* range and are written at a level appropriate for professional or specialized readers (*Flesch Reading Ease* = 9.5; *Flesch-Kincaid Grade Level* = 16.8). **Reliability of Information:** Authorization packets vary in terms of format, but are largely consistent with respect to the content included in them. The replacement of authorization packets with termination orders for entities that leave the Sandbox means that access to information about those entities is limited.

[24] INNOVATION OFFICE MANUAL, *supra* note 11, at 13.

[25] To preserve confidentiality for entities not yet authorized, LSI Committee discussions and decisions about entity authorization recommendations made to the Court take place during closed sessions in the committee's monthly meetings.

Sandbox Regulatory Framework and Policies *Information accurate as of February 28, 2025*	**Format:** Information about Sandbox regulatory policies is found in multiple locations on the Innovation Office Website including the landing page, What We Do page, FAQs page, Information for Interested Applicants page, Sandbox Phase 2 page, and Sandbox Resources page (which includes links to key documents such as the March 2023 Letter and the Innovation Office Manual). **Readability Analysis:** We analyzed the section titled Some Key Requirements on the Information for Interested Applicants page. The readability score for this section falls in the *very difficult* range and is written at the college graduate level (*Flesch Reading Ease* = 26.8; *Flesch-Kincaid Grade Level* = 14.2). **Reliability of Information:** There are inconsistencies across some sections of the Innovation Office Website where information about Sandbox policy is provided. As an example, the Information for Interested Applicants page highlights the Utah nexus requirement added in the September 2024 Letter, but this policy change is not reflected in the Innovation Office Manual posted on the website.[26]

Collectively, these policy materials provide a relatively comprehensive view of how entities are evaluated, authorized, and overseen within the Sandbox; however, they vary in completeness, readability, and consistency. The Innovation Office Manual offers the most detailed account of the criteria and processes guiding entity authorization, yet portions of this information are repeated or summarized elsewhere in ways that occasionally conflict—such as discrepancies regarding permitted legal areas. Readability analyses show that key sections describing authorization procedures and policy requirements are written at a level suitable for graduate or professional audiences, which may limit accessibility for lay readers. Information about authorized entities and their associated Court orders is publicly available through authorization packets, though these materials are removed from the website when entities exit the Sandbox, reducing transparency over time. Finally, while website pages such as FAQs and resources for interested applicants summarize key regulatory policies, inconsistencies between those summaries and the most current Court communications—particularly recent policy updates not yet reflected in the Manual—

[26] There is a note adjacent to the link to download the manual indicating that the Innovation Office is in the process of updating it, but it is unclear from the note precisely which portions of the manual are out of date and which still apply.

underscore the need for a centralized and regularly updated repository of authoritative information.

b. Data from the Utah Supreme Court

Empirical, qualitative observations derived from analysis of information and documentation issued by the Utah Supreme Court are largely presented in the previous section outlining findings from Innovation Office data. This is because those resources are posted publicly on the Innovation Office Website. Still, there are aspects of that Court-issued documentation worth remarking on outside the context of the website.

i. Responsiveness to New Information and Outside Perspectives

The archival data provides multiple examples of situations in which the Court has heard stakeholder feedback or has received other new information about the Sandbox—and has adjusted the regulatory framework accordingly. Several of these examples are provided in Figure 15.

Figure 15: Examples of Court Responsiveness to Stakeholder Perspectives and Other Information

Responsiveness to **Feedback**	**March 2023 Letter** Summarizes policy decisions relating to stakeholder feedback—largely from the bar—sought by the Court. Details certain specific elements of feedback and discusses how the policy changes address them, or the reasons policy decisions differ from them. **September 2024 Letter** Details policy decisions made based on recommendations from the LSI Committee—which issued those recommendations following a period of extensive review of Sandbox operations and activity. Notably, the Court indicates a change in its previous stance on utilizing volunteer auditors (rather than paid auditors) to conduct service quality audits.

Responsiveness to **Sandbox Entity Needs**	**Standing Order 16**[27] Issued to grant authorization to an individual entity that is structured in a manner that does not fit neatly within the Sandbox model but is targeted at an area of high need for underrepresented populations in Utah and would risk running afoul of unauthorized practice of law rules without explicit authorization from the Court.
Responsiveness to **Emerging Data and Information**	**September 2024 Letter** Implements the requirement that Sandbox entities' services be targeted at underserved Utahns and mandates withdrawal or termination of any authorized entities that do not satisfy this additional element of the innovation requirement (originally introduced in the March 2023 Letter). This Utah nexus requirement is a response to the challenge that "a number of low-innovation entities have consumed a disproportionate amount of Innovation Office resources that could be better spent processing applications and regulating entities with more potential to benefit consumers."[28]

These materials demonstrate that the Utah Supreme Court has actively refined the Sandbox regulatory framework in response to stakeholder input, entity experience, and emerging data. Letters and orders issued by the Court document a pattern of iterative responsiveness, illustrating the Sandbox's adaptive regulatory approach.

ii. Comprehensibility of the Sandbox Regulatory Framework

Key to achieving transparency is ensuring that the public is able to access and understand information about what the Sandbox is and how it works. Figure 16 details findings relating to these aspects of comprehensibility of the Sandbox regulatory framework.

[27] Utah Supreme Court Standing Ord. No. 16 (March 9, 2023), https://legacy.utcourts.gov/rules/urapdocs/16.pdf.

[28] September 2024 Letter, *supra* note 10, at 3.

Figure 16: Comprehensibility of the Sandbox Regulatory Framework as Defined by the Utah Supreme Court

Reliability and Availability of Information	**Consistency in Content:** Court-issued documents outlining the Sandbox regulatory framework cross-reference one another in multiple places. These references are largely consistent and contribute to clarity of the framework. The notable exception is Standing Order 15, for which the most recent amendment to reflect Court-mandated changes to the Sandbox was made in September 2022 (i.e., prior to many of the changes the Court has made to the Sandbox framework). **Access to Information:** The Innovation Office Website houses the bulk of regulatory framework documents from the Court: Standing Order 15, March 2023 Letter, September 2024 Letter, etc. However, the most recent policy change adding the $5,000 annual fee for entities is described on the Innovation Office website, but there is no associated Court-issued information provided.
User-Friendliness for Public Audiences	**Organization of Information:** The Court has provided substantial detail and explanation regarding the Sandbox framework, as well as most changes it has implemented to date. This information about the framework is provided in multiple separate documents issued by the Court (i.e., Standing Order 15, March 2023 Letter, September 2024 Letter, Referral Fee Statement). There is no single document or resource that provides a comprehensive, up-to-date view of the Sandbox regulatory framework. **Readability Analysis:** Scores for the General Provisions section of Standing Order 15 indicate the text is in the *extremely difficult* range for readability and suitable only for professional audiences or those with specialized knowledge (*Flesch Reading Ease* = -0.14; *Flesch-Kincaid Grade Level* = 21.5).

Overall, court-issued documents such as Standing Order 15 and subsequent policy letters exhibit strong internal consistency and cross-referencing, which helps maintain conceptual clarity. However, because Standing Order 15 has not been updated since September 2022, it does not reflect several major policy changes implemented in 2023 and 2024. Most key regulatory documents are publicly accessible through the Innovation Office Website, but recent updates—such as the introduction of a $5,000 annual fee for entities—have been described only online without an accompanying Court order, reducing the transparency and verifiability of that information. From a usability standpoint, the regulatory framework is spread across multiple documents with no single, authoritative source that consolidates all

current provisions. Readability analyses further indicate that core framework materials are written at an advanced professional level, placing them well beyond the comprehension of most public audiences. Together, these findings suggest that while the Court has made significant strides toward transparency, the accessibility and comprehensibility of the regulatory framework remain limited by both its complexity and its fragmented presentation.

F. Financial Sustainability

A crucial goal that the Court has articulated for the Sandbox is that it becomes financially self-sustaining. The next sections describe the data and findings relating to the Sandbox's financial sustainability over the long term.

1. Overview of Related Data and Outcomes

The available data relating to financial sustainability of the Sandbox comes from Sandbox entities, Sandbox leadership, and the Utah Supreme Court. Figure 17 lists the documents in which this data is drawn, as well as relevant outcomes and impacts as defined in the Sandbox logic model.

Figure 17: Data and Outcomes Summary, Financial Sustainability and Scalability of the Sandbox

Financial Sustainability	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office *N/A* **From Sandbox Entities** Perspectives relating to financial sustainability and scalability **From Sandbox Leadership** Perspectives relating to financial sustainability and scalability	**Short Term** *(0—2 years)* Sandbox internal mechanisms are feasible **Intermediate Term** *(3—5 years)* Sandbox sustains itself financially and operates in a cost-efficient manner **Long Term** *(6+ years)* Sandbox model can be scaled and replicated Processes for ongoing Sandbox evaluation and continuous improvement are implemented

From Utah Supreme Court
Relevant portions of the March 2023 Letter
Relevant portions of the September 2024 Letter

2. Findings

The following sections detail findings related to the financial sustainability of the Sandbox. These results are drawn from three sources: Sandbox entities, Sandbox leadership, and the Utah Supreme Court.

a. Data from Sandbox Entities

Respondents shared a few relevant insights relating to the financial sustainability of the Sandbox. Note that these topics mirror some of those discussed in the previous Regulatory Governance and Structural Sustainability section. They are reiterated briefly here, as they are factors that can result in a reduction in entities within the Sandbox—and, thus, the number of entities contributing fees to the Sandbox.

- **Delay-Related Costs**
  The costs that entities incur as a result of delays in regulatory processes can be a substantial factor in an entity's decision to withdraw from the Sandbox.
- **Jurisdictional Issues**
  Some entities encountered difficulties developing models that are compliant with Sandbox regulations, as well as regulations in other jurisdictions. This can contribute to entities deciding to withdraw from the Sandbox.
- **Recognition of Resource Challenges**
  There is an awareness for some that the Innovation Office contends with resource-related difficulties that result in delays that ultimately impact the entities—and their ability to remain in the Sandbox.

b. Data from Sandbox Leadership

Discussions with Sandbox leadership touched on questions of financial sustainability at a high level. Two key insights are discussed here. Like the insights described in the previous section, those listed here reflect insights also relevant to—and discussed in—the previous Regulatory Governance and Structural Sustainability section.

- **Reliance on Volunteer Time**
  Sandbox leadership expressed that a reliance on volunteers as key decisionmakers in the regulatory process—that is, the LSI Committee—is unsustainable over the long term.
- **Innovation Office Resources**
  Perspectives also aligned around the view that the Innovation Office is significantly under-staffed and under-resourced relative to what is needed to achieve financial sustainability.

c. Data from the Utah Supreme Court

Two key resources issued by the Court provide information related to the Sandbox's financial sustainability: the March 2023 Letter and the September 2024 Letter. At a high level, the story that these documents collectively tell is that, while grant funding was imperative to the early success and financial sustainability of the Sandbox, a fee policy was implemented about two and a half years into Sandbox operations—a step taken for the explicit purpose of moving toward self-sustainability. Further Court policy decisions have been made with that goal in mind, including shifting Sandbox administrative functions to the Utah State Bar and narrowing its regulatory scope. Details are provided in Figure 18.

Figure 18: Sandbox Policy Relating to Financial Resources

Startup Investments and Funding	**March 2023 Letter:** States that "[t]he first two years of Sandbox operations were funded entirely by grants."[29]
Fee Policy for Sandbox Entities	**March 2023 Letter:** The Court "authorized a fee policy for Sandbox entities with the intent that the project will eventually become fully self-funded, just as the regulation of lawyers is self-funded."[30] Initial fee structure included an

[29] March 2023 Letter, *supra* note 9, at 5.

[30] March 2023 Letter, *supra* note 9, at 6.

	application fee ($250), fees for pre-launch assessment ($1,000) and service quality audits ($2,000), and an annual fee ($250 + 0.5% Sandbox revenue).[31]
Shift of Administrative Functions to the Bar	**March 2023 Letter:** Turned over administrative responsibilities and associated costs to the Utah State Bar. "Under this plan, the Court would pay for and provide a data analyst, and the LSI Committee would continue to operate on a volunteer basis. The Bar would be responsible for funding one FTE for a program director housed at the Bar, plus any associated administrative support and overhead costs for the IO and LSI Committee."[32]
Narrowed Regulatory Scope	**March 2023 Letter:** Created the *innovation requirement* to allow the Innovation Office "to direct its limited resources toward those entities with the potential to reach consumers currently underserved by the legal market."[33] **September 2024 Letter:** Added the *Utah nexus* to the *innovation requirement*, mandating that Sandbox entities "demonstrate that a Sandbox authorization will allow it to reach Utah consumers currently underserved by the legal market."[34] Also mandated the exit of any previously authorized entities that did not meet this new requirement. Changes made to "avoid wasting time and resources on efforts that do not move the needle."[35]

G. Data Collection and Evaluation

Dedication to empirically based approaches has been emphasized since the Sandbox was first established, and policies relating to data collection are embedded across multiple components of the Sandbox. The sections that follow provide an overview of relevant data and outcomes, followed by a discussion of the findings.

[31] Following conclusion of data collection, the Innovation Office announced an updated fee policy to include a flat $5,000 annual fee. UTAH OFFICE OF LEGAL SERVICES INNOVATION, INFORMATION FOR INTERESTED APPLICANTS, https://utahinnovationoffice.org/info-for-interested-applicants/ (last visited September 23, 2025).

[32] March 2023 Letter, *supra* note 9, at 3.

[33] March 2023 Letter, *supra* note 9, at 9.

[34] September 2024 Letter, *supra* note 10, at 3.

[35] September 2024 Letter, *supra* note 10, at 6.

1. Overview of Related Data and Outcomes

Four sources provide key data and insights relating to data collection and evaluation in the Sandbox: the Innovation Office, Sandbox entities, Sandbox leadership, and the Court. Figure 19 provides additional details about the data from which the findings are derived, along with the associated short-, intermediate-, and long-term impacts delineated in the Sandbox logic model.

Figure 19: Data and Outcomes Summary, Data Collection and Evaluation

Data Collection and Evaluation	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office Relevant portions of the Innovation Office Website **From Sandbox Entities** Perspectives on data reporting requirements **From Sandbox Leadership** Perspectives on data collection in the Sandbox **From the Utah Supreme Court** Relevant portions of Standing Order 15 Relevant portions of the March 2023 Letter	**Short Term** *(0—2 years)* Consumer harms are effectively identified/addressed Processes for risk assessment are accurate Data reporting requirements for entities are clear and targeted at key metrics **Intermediate Term** *(3—5 years)* Sandbox has refined its approaches to carrying out its regulatory function Entity data reporting processes are refined for improved efficiency and effectiveness **Long Term** *(6+ years)* Regulatory objective is fully realized Processes for ongoing Sandbox evaluation and continuous improvement are implemented Measurable improvements in access to justice in Utah emerge

2. Findings

The following sections present findings related to data collection and evaluation in the Sandbox. This data is drawn from the Innovation Office, Sandbox entities, Sandbox leadership, and the Utah Supreme Court.

a. Data from the Innovation Office

Observations based upon information found on the Innovation Office Website yield key insights pertaining to data collection and evaluation in the Sandbox. More precisely, these insights relate to how data about the Sandbox is shared with the public: 1) the specific set of metrics included in monthly reports over time and 2) changes in availability of information to the public. These findings highlight current and likely future difficulties with evaluating and understanding the degree to which the Sandbox achieves its regulatory objective.

Figure 20: Publication and Accessibility of Sandbox Data to the Public

Specific Metrics Published in Monthly Reports *Information accurate as of February 28, 2025*	**Data Quality:** Indications from other components of this evaluation point to potential issues with the clarity and feasibility of data reporting requirements as currently formulated in the Monthly Activity Reports.[36] **Consistency in Publication:** Monthly Activity Reports were published on the Innovation Office Website for nearly every month from October 2020 through January 2024. The specific metrics and information included varied somewhat over time but remained largely the same. One of the most substantial changes has been that, initially, the reports included details about each authorized entity (innovation level, service models, service categories); as the number of authorized entities increased over time, the specificity of information included about them decreased.
Accessibility of Sandbox Metrics	**Availability of Historic Data:** From October 2020 through January 2024, the Innovation Office Website provided access to the full archive of Monthly Activity Reports. In early 2025, the reports were removed.[37]

[36] *See, supra* Public Relations and Communication section, p.26.

[37] Note that the Innovation Office has since resumed posting metrics monthly. However, the data points reported are limited and an archive of previous reports is unavailable.

Information accurate as of February 28, 2025	**Reduced Reporting Frequency:** The final Monthly Activity Report was published in January 2024. As of February 2025, the Innovation Office Website indicates future reports will be published on an annual basis.

b. Data from Sandbox Entities

Input from Sandbox entities provides limited—yet still valuable—information about data reporting requirements from their perspectives. Some entities commented that the data reporting requirements were unclear and/or inconsistent; one indicated that satisfying the data reporting requirements was the hardest part of participating in the Sandbox.

c. Data from Sandbox Leadership

Perspectives on topics related to data collection and evaluation arose at multiple points in our discussions with Sandbox leadership. From these comments, two key insights emerged.

- **Recognition of Data as Critical**
  When asked to reflect on the most essential elements of a legal sandbox, having a basis in empirical data was described as a "drop-dead feature" that is "non-negotiable" by one person—a perspective that was reinforced by other Sandbox leadership participants.
- **Identifying and Collecting Meaningful Data**
  Comments from Sandbox leadership indicated that there have been challenges with understanding how to discern what data and metrics will lead to meaningful conclusions about the efficacy of the Sandbox and, more generally, difficulties with developing and implementing effective processes for data collection.

d. Data from the Utah Supreme Court

The Court has been emphatic in its recognition of the crucial nature of data collection to the Sandbox regulatory model, and it has also been upfront in acknowledging issues the Sandbox has encountered in collecting the needed data and metrics. Figure 21 provides further details.

Figure 21: Data Collection Importance and Challenges

Early and Ongoing Recognition of Data as Critical *Information accurate as of February 28, 2025*	**Embedded in Initial Sandbox Framework:** The earliest versions of documents defining the regulatory framework of the Sandbox acknowledge the crucial nature of data collection and evaluation. For example, four out of the five regulatory principles articulated in Standing Order 15 demonstrate how the role of data in the Sandbox has been centered since the outset.[38] **Policy Refinements and Ongoing Commitment:** Implementation of changes meant to improve the amount and quality of data collected about Sandbox services—such as the addition of a consumer feedback survey requirement—reflect the Court's commitment to empirically driven approaches. Furthermore, the Court emphasizes in multiple locations the sentiment that "[t]he purpose of this pilot project is to gather information to better inform the Court's future policy decisions."[39]
Acknowledgement of Issues in Gathering Useful Data *Information accurate as of February 28, 2025*	**Consumer Perspectives and Experiences:** The March 2023 Letter discusses feedback from some stakeholders that soliciting consumer complaints as the only method for assessing client experiences is too passive. In response to this feedback, the Court implemented in this letter a policy requiring entities to proactively send surveys to their clients. Also indicates that there is "very little data on whether and how these reforms may be benefitting consumers."[40] **Collecting and Analyzing Entity Data:** A brief, but consequential, portion of the September 2024 Letter discusses data collection and analysis, noting that "the number and variety of entities in the Sandbox poses significant challenges for collecting and analyzing data in a meaningful way."[41]

[38] *See, e.g.*, Standing Order 15, *supra* note 8, at 8 ("(1) Regulation should be based on the evaluation of risk to the consumer. (2) Risk to the consumer should be evaluated relative to the current legal services options available. (3) Regulation should establish probabilistic thresholds for acceptable levels of harm. (4) Regulation should be empirically driven."); UTAH OFFICE OF LEGAL SERVICES INNOVATION, OFFICE MANUAL (2020) (on file with the author).

[39] March 2023 Letter, *supra* note 9, at 16.

[40] March 2023 Letter, *supra* note 9, at 16.

[41] September 2024 Letter, *supra* note 10, at 3.

H. Goal Alignment

The Utah Supreme Court established the Sandbox to expand access to justice through fostering innovation in legal service delivery while maintaining consumer protection. Each participating entity sets its own goals within this framework, but when these goals closely mirror the Sandbox's regulatory objective and other goals, the opportunities for meaningful progress expand. For example, when an entity's primary aim is to streamline legal processes for underserved communities, it actively advances the Sandbox's goal of closing the access-to-justice gap. Similarly, entities that integrate robust consumer protections reinforce the Sandbox's commitment to empirically driven, risk-based regulation.

By evaluating the degree of alignment between entity-specific goals and those that guide the Sandbox, we gain a clearer picture of how well the regulatory experiment is functioning as a whole. Strong alignment suggests that entities are internalizing the Sandbox's mission, making regulatory oversight more effective and increasing the likelihood that innovative service models will become sustainable and scalable. Conversely, weaker alignment may indicate areas where additional regulatory refinements or recalibrations are necessary.

The sections that follow describe the data and findings relating to the degree to which there is alignment across the goals that entities have for their participation in the Sandbox and the regulatory objective and goals that the Utah Supreme Court has articulated for establishing the Sandbox.

1. Overview of Related Data and Outcomes

Findings pertaining to goal alignment are derived from the entity survey and from information issued by the Utah Supreme Court. Figure 22 outlines these sources and presents the associated outcomes as defined in the Sandbox logic model.

Figure 22: Data and Outcomes Summary, Progress Toward Achieving the Regulatory Objective

Alignment of Entity Goals with Sandbox Regulatory Goals	
Relevant Data and Sources	**Related Outcomes and Impacts**
From the Innovation Office *N/A* **From Sandbox Entities** Survey questions targeted at defining the range of individual entity goals **From Sandbox Leadership** *N/A* **From the Utah Supreme Court** Relevant portions of Standing Order 15 Relevant portions of March 2023 Letter Relevant portions of September 2024 Letter	**Short Term** *(0—2 years)* Sandbox services are targeted to meet the regulatory objective **Intermediate Term** *(3—5 years)* *N/A* **Long Term** *(6+ years)* Regulatory objective is fully realized

2. Findings

Direct, side-by-side comparison between the Sandbox entities' goals and the Court's goals provides an understanding of how well-aligned they are with each other. Unlike other sections in this report where evaluation findings are discussed, insights relevant to goal alignment are merged into a single section (rather than presented separately) for each stakeholder source to facilitate comparisons between them.

In the Entity Survey, we asked respondents to identify and describe their entity's goals (listing up to seven) in seeking authorization to enter the Sandbox. In total, 156 goals were reported across the 36 responding entities—which include pending, authorized, and withdrawn entities. Analysis of individual entity goals points to four broad thematic goals: client-centered service delivery, improving access to justice, expanding the business, and innovation in service delivery. Each of these thematic goals has substantial overlap with the regulatory goals that the Utah Supreme Court has defined for the Sandbox. Many entities identified goals related to providing client-centered services. Within this thematic goal,

analysis revealed three associated subcategories: 1) educating the community about their legal rights, 2) preparing communities for the future, and 3) helping people navigate legal issues. Figure 23 presents the relevant data for entity and regulatory goals relating to consumer-centered regulation and provision of legal services.

Figure 23: Entity Goals and Regulatory Goals, Focus on Clients and Consumers

Entity Goals for Sandbox Participation		**Regulatory Goals** for the Sandbox
Client-Centered Service Provision		**Consumer-Focused Regulation**
Thematic Goal Subcategories	**Examples from the Data**	**Standing Order 15**
Community education Community preparation for future Helping people navigate their legal issues	"Empower victims of violence to make informed decisions about civil protective orders" "Assist clients in understanding and asserting their immigration rights" "Provide a service which gives consumers a path to financial stability"	"The Utah Supreme Court's view is that adherence to this objective will improve access to justice by **improving the ability of Utahns to meaningfully access solutions** to their justice problems."[42] **March 2023 Letter** "[T]he purpose of this pilot project is to address unmet **consumer needs**."[43]

The Sandbox aims to improve access to justice by encouraging entities to provide affordable, high-quality legal services to underserved communities. Figure 24 highlights the alignment between Sandbox entities' goals—such as increasing service accessibility, affordability, and consumer choice—and the overarching regulatory objective of improving access to legal solutions for Utahns.

[42] Standing Order 15, *supra* note 8, at 8.

[43] March 2023 Letter, *supra* note 9, at 9.

Figure 24: Entity Goals and Regulatory Goals, Improving Access to Justice

Entity Goals for Sandbox Participation		**Regulatory Goals** for the Sandbox
Improving Access for Clients		**Improving Access for Utahns**
Thematic Goal Subcategories	**Examples from the Data**	**Standing Order 15**
Provision of affordable, low-cost, or free services	"Increase access to justice in emerging areas of law"	"The overarching goal of this reform is to ***improve access to justice***."[44]
Serving underserved communities	"Ensure that more immigrants, especially those in underserved communities, have access to quality and affordable legal representation"	**September 2024 Letter**
Increasing consumer choice		"[T]he Sandbox is a pilot project designed to test whether changing the way we regulate the practice of law can ***increase access to legal services*** without increasing consumer harm."[45]
Delivery of high-quality legal services	"Increase accessibility, affordability, and timeliness of justice for accident victims"	

Innovation in legal service delivery is central to the Sandbox's mission. Figure 25 demonstrates how Sandbox entities are leveraging technology, partnerships, and novel service approaches to improve legal service delivery. These efforts align with the regulatory objective of fostering a well-developed, high-quality, and competitive legal market that benefits consumers.

[44] Standing Order 15, *supra* note 8, at 8.

[45] September 2024 Letter, *supra* note 10, at 1.

Figure 25: Entity Goals and Regulatory Goals, Innovation in Service Delivery and the Marketplace

Entity Goals for Sandbox Participation		**Regulatory Goals** for the Sandbox
Innovation in Service Delivery		**Innovation in the Utah Legal Market**
Thematic Goal Subcategories	**Examples from the Data**	**Standing Order 15**
Development and implementation of tech-based solutions (e.g., AI integration, automation)	"Automate certain legal services where automation can provide outcomes similar to those provided by a competent subject-matter expert"	"The Innovation Office will be guided by a single regulatory objective: To ensure consumers have access to a well-developed, high-quality, ***innovative***, affordable, and competitive market for legal services."[46]
Collaboration across professions and communities	"Partner with local organizations, nonprofits, and community centers to expand the reach and efficacy of our legal services"	
Improving how legal services are delivered	"Leverage technology to accelerate and enhance the claims process"	

A key function of the Sandbox is to encourage the expansion of legal services to better meet consumer demand. Figure 26 illustrates how participating entities are working to grow the number of services offered, expand their client base, and introduce new service providers. These efforts align with the regulatory goal of ensuring a robust and competitive legal market in Utah, where consumers have access to an array of high-quality, innovative legal service options.

[46] Standing Order 15, *supra* note 8, at 8.

Figure 26: Entity Goals and Regulatory Goals, Growth in Service Delivery and the Marketplace

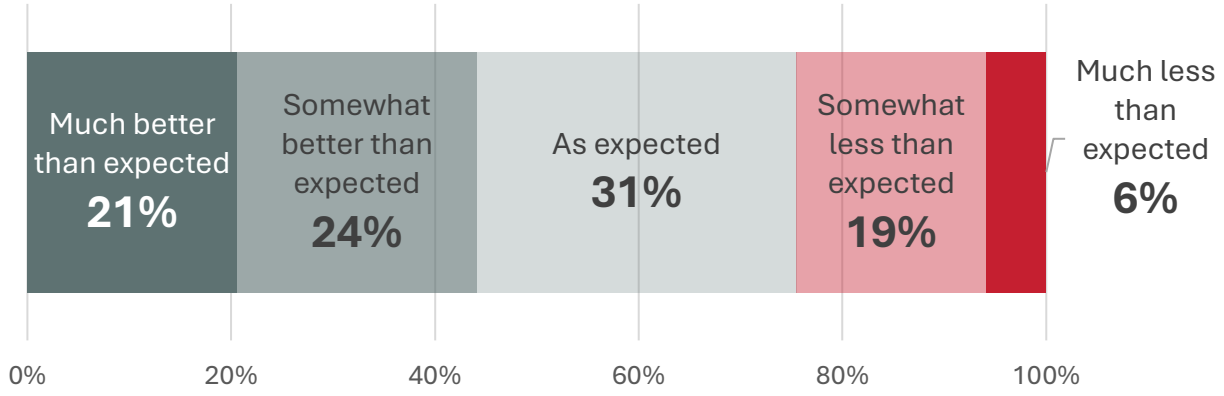
Entity Goals for Sandbox Participation		**Regulatory Goals** for the Sandbox
Growth in Quality and Reach of Services		**Growth in the Utah Legal Market**
Thematic Goal Subcategories	**Examples from the Data**	**Standing Order 15**
Increasing the number of services provided	"Reach more in need of our services"	"The Innovation Office will be guided by a single regulatory objective: To ensure consumers have access to a ***well-developed***, ***high-quality***, ***innovative***, ***affordable***, and ***competitive*** market for legal services."[47]
Increasing the number of clients served	"Begin a successful marketing strategy and help clients access our personal injury services"	
Adding new service providers to entity teams	"Diversify kinds of services provided"	

Given the substantial overlap in the goals the Court has articulated for the Sandbox and the goals the Sandbox entities have, a review of the extent to which these entity goals have been achieved provides key insight into the progress that has been made towards achieving the Sandbox's regulatory objective. For each goal described in the Entity Survey, we asked entities to indicate the degree to which they perceived that the goal had been achieved. The associated five-point response scale included the options 1) *much better than expected*, 2) *somewhat better than expected*, 3) *as expected*, 4) *somewhat less than expected*, and 5) *much less than expected*.

Overall, entities reported that a substantial majority (76%) of their goals had been achieved at least to the degree expected—with nearly half (45%) of goals considered to have been achieved to a level exceeding expectations. The remaining quarter had been achieved to a level somewhat or much less than expected (25%). Figure 27 provides a full breakdown of entity perceptions of goal achievement.

[47] Standing Order 15, *supra* note 8, at 8.

Figure 27: Entity Self-Assessment of Goal Achievement (n = 102)[48]



V. SYNTHESIS AND DISCUSSION

Taken as a whole, this outcomes evaluation provides a robust set of invaluable insights into the efficacy of Utah's Sandbox as a mechanism for improving access to justice. Because this outcomes evaluation includes multiple components—each of which includes multiple data sources and multiple stakeholder perspectives—understanding the full spectrum of outcomes and their implications can be challenging. To facilitate a complete understanding, this section provides a high-level synthesis of our findings.

Entity Authorizations and Regulatory Compliance

Since its launch in October 2020, the Sandbox has experienced notable growth, expanding from 31 applications submitted and 11 entities authorized to 105 applications submitted and 51 entities authorized by January 2024. During this time, the share of entities designated as low innovation, as compared with moderate innovation, also increased modestly from 64% to 73%. There were no high innovation entities authorized during the study period. This

[48] Note that the unit of analysis here is the goal, rather than the entity—which is why *n* > # of responding entities.

data suggest that the Sandbox is successfully attracting interest and sustaining participation, particularly among lower-risk models.

Entities generally report optimism about their participation, and the Utah Supreme Court has emphasized that the Sandbox's flexibility has allowed for important adaptations as the program has matured. However, the growth has not been without challenges. Delays in application review and authorization have created significant obstacles for entities, and ongoing shifts in policy—while reflecting responsiveness—have at times contributed to confusion about requirements. Likewise, clarity in data reporting expectations remains an area of need, and recognition that the Sandbox is under-resourced points to structural limitations that may constrain its effectiveness going forward.

Legal Service Areas and Delivery Methods

The number of services sought in the Sandbox has expanded dramatically, growing from just 612 in October 2020 to more than 76,000 by January 2024. Although most authorized entities throughout the study period were designated as low innovation, the majority of services delivered came from moderate innovation entities. In October 2020, 59% of services were provided by moderate innovation entities, and in January 2024 that proportion was about the same (58%), despite fluctuations along the way. The distribution of who provided services also stayed fairly constant: in October 2020, 72% of services were delivered by a lawyer, lawyer employee, or document completion software with lawyer involvement, while 28% were provided by a human or software-based nonlawyer with lawyer involvement. By January 2024, these figures shifted only slightly to 79% and 21%, respectively. What did change substantially were the types of services most commonly provided. Between October 2020 and August 2022, End of Life Planning, Business, and Marriage/Family dominated; from September 2022 onward, Business, Military, and Immigration became the top service categories.

Entities and the Court observed that services are reaching individuals and communities in need, highlighting the Sandbox's potential to expand access. At the same time, challenges remain: innovation can complicate public understanding and implementation, the high cost

of entry may contribute to entity attrition, and concerns persist that some entities have overstated Sandbox authorization as a form of endorsement from the Court.

Quality of Sandbox Services

Data on service quality in the Sandbox remains limited, but the available information provides useful insight. During the study period, three service quality audits were conducted, each of which found no evidence of material or substantial harm to consumers and concluded that services were at least satisfactory; all three audits involved entities categorized as moderate innovation. Monthly Activity Reports also tracked consumer complaints, which were relatively rare in light of the total number of services provided. As of January 2024, the Innovation Office had received 14 complaints overall, nine of which related to one of the three defined consumer harms: inaccurate or inappropriate legal results, failure to exercise legal rights, or the purchase of an unnecessary or inappropriate service. This translates to one harm-related complaint per 8,468 services, or less than 0.01% of all services delivered through the Sandbox.

Regulatory Governance and Structural Sustainability

Feedback from both entities and Sandbox leadership highlights a mix of optimism about the Sandbox's regulatory model and concern about its long-term sustainability. Several entities expressed enthusiasm for their participation and confidence in the Sandbox's future, but they also pointed to barriers created by limited staff capacity within the overseeing authorities and by uncertainties surrounding the Sandbox's pilot nature and the possibility of permanent licensure or exit pathways.[49]

Sandbox leadership echoed some of these concerns while also emphasizing the program's strengths. Leaders credited the dedication of a core group of champions with sustaining progress and noted optimism that the introduction of the Innovation Requirement—which

[49] Note that the Entity Survey was administered in 2023, so results reflect perspectives held at that time.

narrows the scope of Sandbox authorization to entities targeting the justice gap—would strengthen alignment with the regulatory objective. They also anticipated that the court-directed expansion of the LSI Committee to include broader representation from Utah's legal community and the public would enhance decision-making. At the same time, leaders acknowledged ongoing governance challenges, including heavy reliance on volunteer regulators, the need to establish a clear pathway for entities to exit the Sandbox, and the strain created by over-regulation of low-risk entities. Additional concerns included the perception that state supreme courts are not well positioned to operate as regulators, as well as unease that changes to Sandbox governance have at times been rushed and reactive.

Public Relations and Communications

Public-facing communications from the Innovation Office and the Court play a central role in shaping how the Sandbox is understood by participating entities, the legal community, and the general public. These communications include detailed manuals, website resources, authorization packets, and Court-issued letters and orders. Together, they demonstrate a strong commitment to transparency and keeping stakeholders informed. At the same time, the effectiveness of these efforts has been constrained by challenges relating to clarity, accessibility, and consistency, which affect how well the Sandbox is able to build public understanding and confidence.

The Innovation Office Manual and Website provide extensive detail about how the Sandbox operates, including application requirements, reporting obligations, and regulatory policies. While these resources are comprehensive, readability analyses indicate that they are written at a level accessible primarily to professionals and advanced readers, limiting their value as tools for broader public communication. Moreover, the Innovation Office Manual is often out of date, with posted versions lagging behind recent policy changes. The Innovation Office Website is updated more frequently, but at times contributes to confusion. For example, it sometimes lists new requirements without accompanying Court documentation, leaving key policies without an authoritative source. These gaps diminish the ability of the Sandbox to communicate clearly and consistently with public audiences.

Communication challenges also extend to the reporting of compliance and performance data. For several years, the Innovation Office published Monthly Activity Reports that offered accessible updates on services delivered, complaints received, and other key metrics. These reports were discontinued in 2025 and replaced with a static metrics table on the Innovation Office Website that provides considerably less information. As this shift reduced transparency, it also weakened a key communication channel between the Sandbox and its stakeholders. Similarly, compliance requirements communicated through the Innovation Office Manual often fail to reflect more recent Court decisions, leaving entities to piece together expectations from multiple and sometimes inconsistent sources. These communication gaps contribute to uncertainty for entities and limit the ability of the public to follow Sandbox developments over time.

Court-issued communications illustrate the strengths and weaknesses of the Sandbox's public messaging. On the one hand, letters from the Court have demonstrated responsiveness to stakeholder input, including changes to the innovation requirement and revisions to audit protocols. These communications signal accountability and adaptability, which are important features of effective public relations. On the other hand, there remain gaps in coverage and readability analyses that confirm key Court documents are extremely difficult for lay readers to understand, further limiting their effectiveness as communication tools.

Taken together, these findings suggest that while the Sandbox has invested significant effort in public-facing communications, there is considerable room for improvement in terms of clarity, accessibility, and consistency. Effective public relations in this context is not only about making information available, but also about ensuring that it can be readily understood, trusted, and used by the audiences it is intended to reach.

Financial Sustainability

From the standpoint of Sandbox entities, the financial burdens created by regulatory processes were a recurring concern. Costs resulting from delays in the authorization process emerged as a particular challenge. Entities also noted that jurisdictional challenges—such as aligning business models with both Sandbox rules and regulations in

other states—added to financial pressures. Entities acknowledged the resource limitations of the Innovation Office in carrying out its regulatory functions.

Sandbox leadership echoed these concerns, pointing to two key threats to sustainability. First, leaders emphasized that continued reliance on volunteer decisionmakers through the LSI Committee is not sustainable in the long run, as the workload and demands of regulatory oversight grow. Second, leadership consistently expressed that the Innovation Office itself is significantly under-staffed and under-resourced, limiting its ability to support the program's operations and undermining the goal of financial stability.

The Utah Supreme Court has taken steps to address these issues over time. Initially, the Sandbox was sustained entirely by grant funding, but in 2023 the Court authorized a fee policy designed to move the program toward self-sufficiency. That policy introduced application fees, charges for assessments and audits, and an annual fee tied to Sandbox revenue. The Court has also made structural changes intended to shore up sustainability, including transferring administrative responsibilities to the Utah State Bar and narrowing the Sandbox's scope through the introduction of the innovation requirement and subsequent Utah nexus requirement. These changes were explicitly framed as efforts to focus limited resources on higher-need consumers and to reduce investment in entities that did not advance the Sandbox's core objectives.

Data Collection and Evaluation

Findings related to data collection and evaluation in the Sandbox underscore both the centrality of empirical evidence to the regulatory model and the persistent challenges of implementing robust systems for collecting and sharing that evidence. The Innovation Office has been the primary vehicle for reporting Sandbox data to the public, most notably through Monthly Activity Reports. These reports provided consistent, though evolving, sets of metrics on authorized entities and services. Over time, as the number of entities grew, the level of detail about individual entities decreased. In early 2025, the archive of reports was removed from the website and replaced with a summary table of metrics. While this change reduced the frequency and depth of public reporting, it also reflected the growing difficulty

of sustaining detailed monthly updates without additional resources as the Sandbox expanded.

Entities themselves provided limited, but valuable, input on data reporting. Several noted that reporting requirements were unclear or inconsistent, and at least one entity described meeting these obligations as the most difficult part of Sandbox participation. These perspectives suggest that while reporting has been central to the Sandbox's accountability model, its design and implementation have not always been feasible or transparent from the standpoint of participating entities.

Sandbox leadership placed even stronger emphasis on the importance of data, describing empirical evidence as a non-negotiable feature of a sandbox. At the same time, leaders acknowledged difficulties in identifying which metrics meaningfully capture the Sandbox's success or failure, as well as in creating effective processes for gathering and analyzing those metrics. Their comments highlight the tension between a strong conceptual commitment to data and the practical challenges of implementing a workable system.

The Utah Supreme Court has consistently noted this dual reality. Since the outset, Court documents such as Standing Order 15 have embedded data at the heart of the Sandbox framework. Policy refinements over time, such as the requirement for Sandbox entities to administer consumer feedback surveys, reflect the Court's ongoing commitment to data-driven regulation. At the same time, Court-issued letters have candidly acknowledged shortcomings: that consumer complaint mechanisms alone are insufficient for capturing client experiences, that there is very little data on consumer benefit, and that the diversity of Sandbox entities creates significant challenges for producing meaningful, comparable analyses.

Goal Alignment

Analysis of Sandbox entity goals alongside the regulatory goals articulated by the Utah Supreme Court reveals substantial alignment. Across 36 responding entities—including pending, authorized, and withdrawn participants—a total of 156 goals were reported in the Entity Survey. These goals cluster into four broad thematic areas: client-centered service

delivery, improving access to justice, innovation in service delivery, and growth in service reach and quality.

Client-centered service delivery goals related to educating the community, preparing individuals for future needs, and helping consumers navigate legal problems. These commitments align with the Court's regulatory emphasis on consumer-focused services, as reflected in Standing Order 15 and subsequent Court communications. Improving access to justice was also a central priority. Entities articulated goals such as delivering affordable or free services, serving underserved communities, expanding consumer choice, and ensuring the provision of high-quality representation. These objectives closely parallel the Court's stated intent that the Sandbox serves as a vehicle for expanding meaningful access to legal services without increasing consumer harm. Innovation in service delivery was another area of strong alignment. Entities reported goals involving the development of technology-based solutions, cross-professional collaboration, and improvements to the delivery of legal services. These aims reflect the Court's regulatory objective of fostering a competitive, innovative market for legal services that benefits consumers. Many entities emphasized goals related to growth, including expanding the number of services offered, increasing the number of clients served, and adding new providers to their teams. These ambitions align with the Sandbox's goal of ensuring a robust and competitive legal marketplace in Utah. The close mapping of entity goals onto the regulatory goals defined for the Sandbox suggests that the aspirations of participating entities are largely consistent with the Court's vision for the pilot project.

Beyond alignment, analysis of goal achievement offers insight into how well entities feel they have advanced toward their objectives. Entities reported that 76% of their goals had been achieved at least to the level expected, with nearly half (45%) achieved at a level exceeding expectations. The remaining 25% of goals were considered to have been achieved somewhat or much less than expected. These findings suggest that, while challenges remain, most entities perceive that their participation in the Sandbox has allowed them to make meaningful progress toward goals that closely mirror the regulatory objectives set forth by the Court.

VI. CONCLUSION

This outcomes evaluation provides a comprehensive assessment of the impacts of Utah's Sandbox from its launch in October 2020 through February 2025. Through multiple data sources and stakeholder perspectives, we have examined the extent to which the Sandbox has achieved its intended goals, how entity-level objectives align with the Court's regulatory objectives, and what progress has been made toward improving access to justice. Our findings highlight the Sandbox's capacity to expand legal services, support innovation in service delivery, and maintain consumer protection, while also identifying the various challenges the Sandbox encountered during the study period. These findings provide a data-driven foundation for understanding the Sandbox's outcomes to date and inform considerations about its long-term potential. They also set the stage for our social return on investment analysis, which quantifies the economic and social value generated by the Sandbox.

Looking ahead, IAALS will continue to monitor the Sandbox's evolution and refine our assessment as new data becomes available. The final evaluation—slated for publication following the conclusion of the Sandbox's seven-year pilot period—will offer an extensive analysis of the Sandbox's impact over the course of its implementation. This final assessment, along with the findings from this four-part interim evaluation, will be crucial in determining the future of legal regulatory innovation in Utah and beyond.

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