



Office of Legal Services Innovation

An Office of the Utah Supreme Court

Activity Report: March 2023

Drafted April 20, 2023

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OVERALL METRICS

Total Applications Received	105
Applicants Recommended to Court for Authorization	63
Applicants Denied Recommendation from Innovation Office	2
Applicants Denied Authorization by Court	0
Applicants Tabled (Policy Considerations)	10
Inactive / Withdrawn Applicants Before Recommendation	13
Currently Under Office Review	10
Recommended to Court for Authorization Pending Decision	7
Authorized Entities	55
Entities Withdrawn After Authorization	5
Entities Suspended or Terminated	1
Entities Currently Offering Services	49
Entities Reporting Data in March	15
Licensed Entities	16
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	No complaints

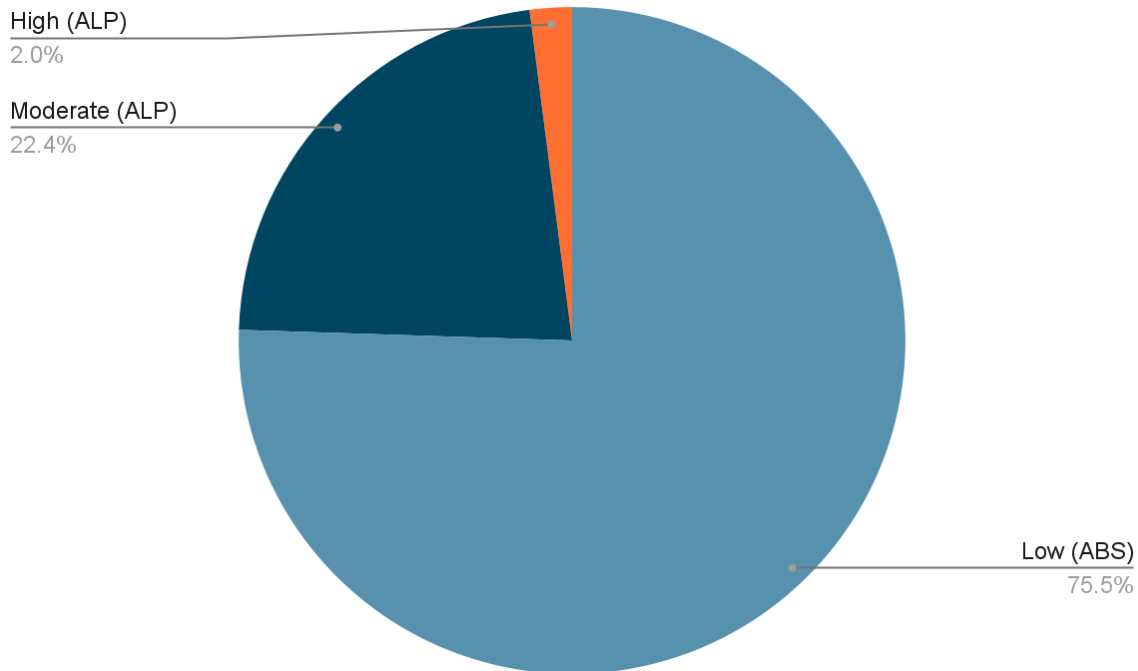
Highlights and Updates

- € March was a heavy reporting period because both monthly and quarterly reports were scheduled. Fifteen approved entities reported data. Six of those are ABSs or Intermediary Platforms which are classified as low innovation. Nine of the reporting entities are classified as moderate innovation because they combine an ABS approach with alternative legal providers.
- € The March data show another 2,500 instances of legal services provided and bring the total for the life of the sandbox to 47,240. Since some consumers have received more than one service, the total number of consumers served is lower; but the March data show an additional 1000 clients to have been served by the authorized providers. As the charts displayed below reflect, the growth in services being provided and clients being served continues to be very robust.
- € As with last month, there were no new complaints of any kind reported during March. All authorized entities remain in the Green status under the Office's enforcement policy.
- € One of the more active providers during this reporting period is Law On Call. Law On Call, which is owned by non-lawyers, uses a subscription-based model to provide access to lawyers for basic legal questions for \$9 per month. Law On Call reported almost 1200 instances of legal service for the March reporting period, of which just over 1000 involved answering legal questions for the client subscribers. According to Law On Call, probably greater than 95% of their clients are small businesses and a high percentage of those are start-ups that need legal advice about how to get their business underway. In addition to providing legal assistance over the phone, Law On Call helps their clients with document preparation/review and trademark application filing, reviewing/drafting non-disclosure/non-compete type documents, service contracts, independent contractor agreements, and other related business documents. These additional services are done on an hourly rate basis like a traditional law firm; however, because of the subscription model Law On Call is able to provide hourly rates services at rates well below a traditional law firm. This innovative pricing approach allows Law On Call to contribute to closing the access to justice gap by providing accessible legal advice to small businesses for an affordable monthly fee.
- € The Office currently has ten applications under review and there are another seven applications pending before the Court. During May and June, the Office will be focused on completing the processing of these applications so, if the Court approves, the Office will be able to reopen the application process on or before July 1. The other main focus for the Office during May and June is to implement the annual licensing process now approved by the Court.
- € Transition of the Office operations to the Utah State Bar has begun. The Bar leadership and staff have been working closely with the Office and the LSI committee to make the transition as smooth as possible. Nuts and bolts like email, file storage and website management have already been addressed.

Cumulative Innovation Office Activity

Entities Authorized to Offer Legal Services

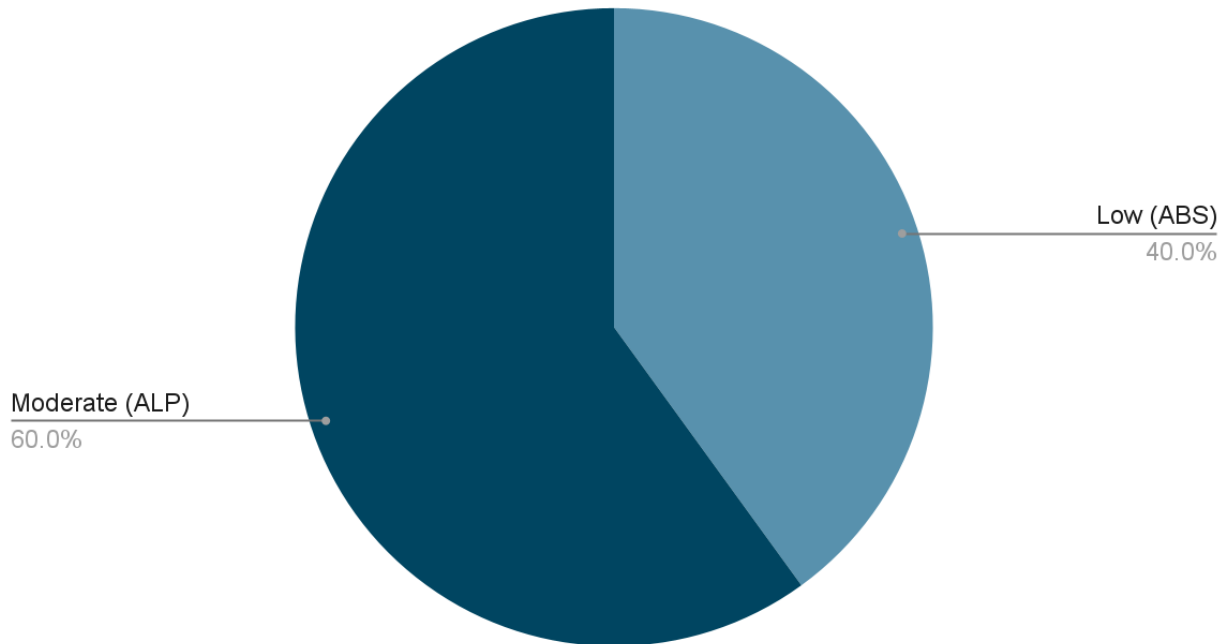
- 49 active entities offering services (authorized and licensed)



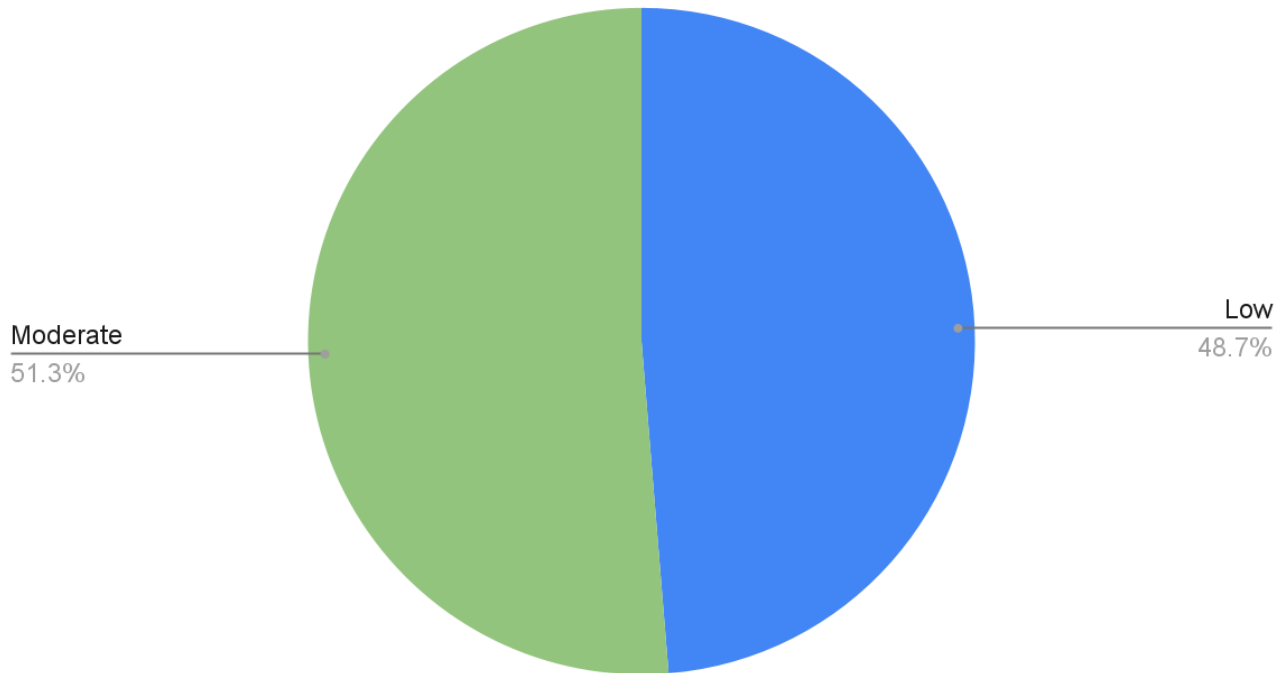
- Low Innovation (ABS) = 37
 - AGS Law, Angel Advocates, Believe First, Bike Legal, Blue Ridge Law Group, Boundless Immigration, D4U Immigration, Darrow AI, Davis and Sanchez, Esquire Law, Fair Credit (Credit Cop), Firmly, GovAssist Legal, Hello Divorce, Herbert-Greenwald Law, HW Human Capital, Immigration Office Solutions, LawPal, Legal Atoms, Lindenberg Law Group, Mina Legal Services, Motion Law, Mountain West Legal Protective, My Immigration, Off the Record, Olsen & Partners Law, PD Digital Logistics Design, Fiduciary Law Firm (R&R Legal Services), Rocket Lawyer, Rocky Mountain Justice, Savvi Technologies, Standout Legal, Trajan Estate, Trajector Legal (Legal Claims, Inc.), Truinta, WayLit, Xira
- Moderate Innovation (ALP) = 12
 - 1Law, DSD Solutions, Estate Guru, Holy Cross Ministries, LawGeex, Law on Call, Elysium Holding, Rasa Public Benefit Corporation (Sudbury Consulting), Timpanogos Legal Center, Zaf Legal by Nuttall, Brown & Coutts
- High Innovation (ALP) = 1
 - AAA Fair Credit

Active Entities Reporting Data

- 31 approved entities have launched services reporting data since October 2020
- 15 approved entities reporting in March
 - 6 low innovation entities (ABS / Intermediary Platforms)
 - 9 moderate innovation entities (ALP + ABS)

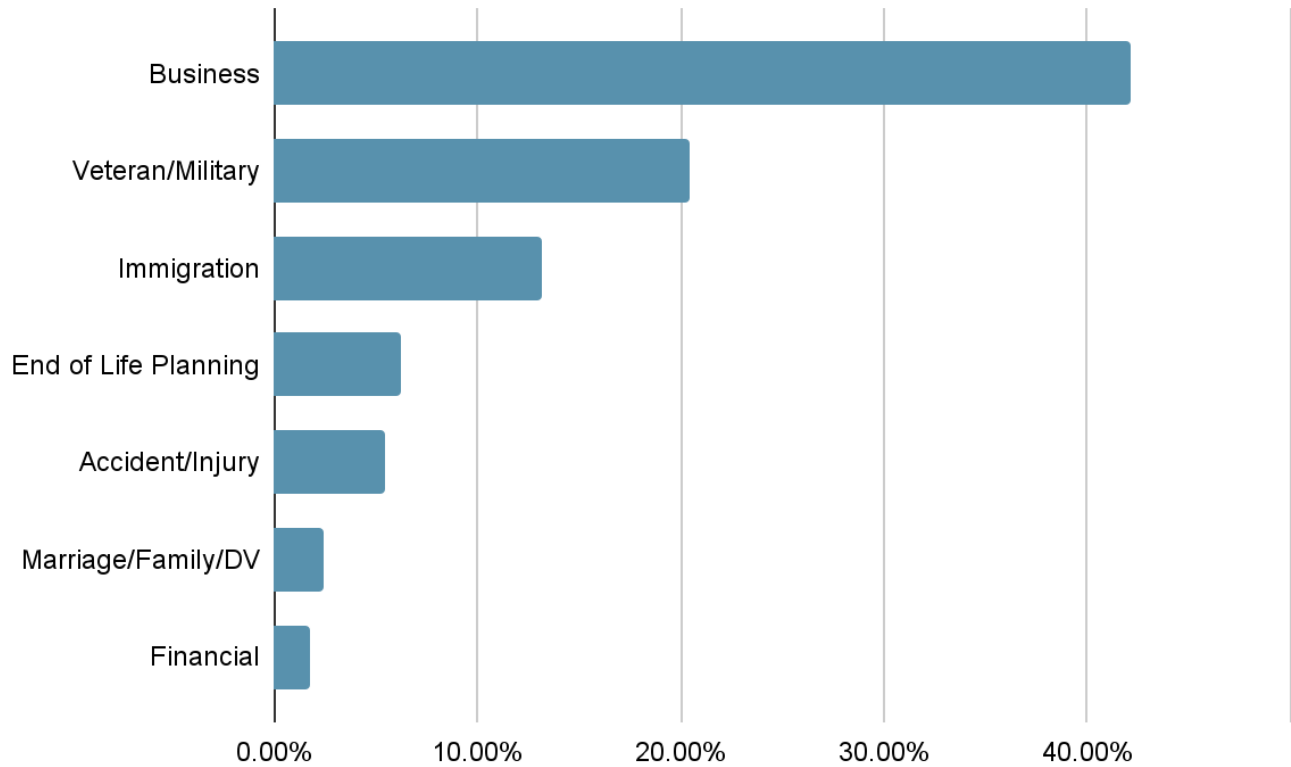


Total Services by Innovation Level



- **47,240 legal services sought** from approximately 24,000 **unduplicated consumers**
 - Low (ABS) = 22,279 legal services sought
 - Moderate (ALP+ABS) = 24,961 legal services sought
 - **40,477 (85.7%)** legal services have been delivered by a **lawyer**, lawyer employee, or **software tool like document completion**
 - **6,763 (14.3%)** legal services have been delivered by **non-lawyers (software or person) with lawyer involvement.**

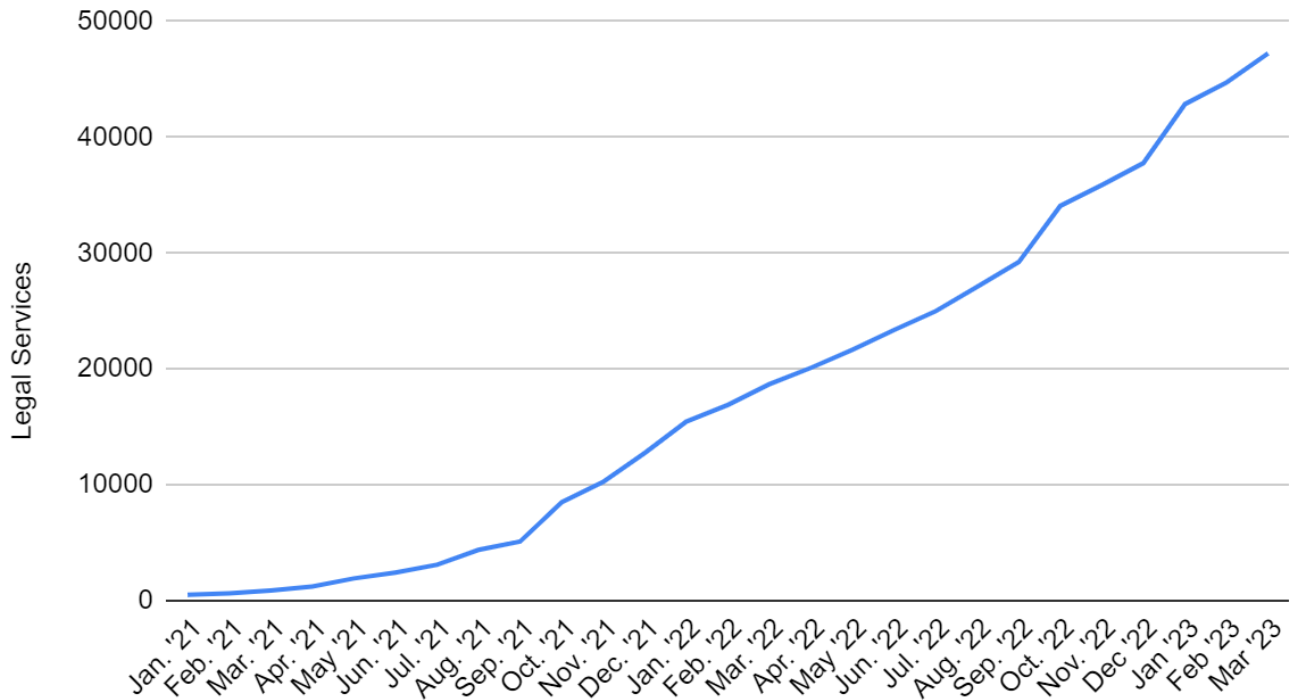
Services by Legal Area



- **Seven legal categories** accounted for **92.1% of legal services**¹
 - 1) Business (43.6%; e.g., intellectual property, contracts/warranties, and entity incorporation)
 - 2) Military/Veterans Benefits (19.3%)
 - 3) Immigration (13.0%)
 - 4) End of Life Planning (6.2%)
 - 5) Accident/Injury (5.4%)
 - 6) Marriage/Family (2.4%)
 - 7) Financial (1.7%; e.g., individual bankruptcy and collections practices)
- The top three categories accounted for 75.9% of legal services
- The remaining 13 possible legal categories accounted for 24.1%

¹ Note that housing rental and housing ownership (real estate) legal matters were collapsed to create the category of Housing and that Marriage & Family and Domestic Violence were collapsed into a single category.

Cumulative Legal Services by Month



Harm Assessment: Consumer Complaints

To date, entities have reported fourteen complaints to the Office, approximately 1 complaint per 3,634 services delivered. The ratio of harm-related complaints to services was approximately 1 complaint per 6,749 services. To date, entity response to harm-related complaints has been adequate and acceptable as related to harm mitigation and prevention.

The Innovation Office collects a range of measures from the entities designed to assess the occurrence of three consumer harms: rights, results, payment. This can also be understood as “actualized risk.” The assessment of consumer harm is based on the prevalence of consumer complaints indicating the occurrence of one or more of the three harms. Social scientific studies grounded in expert peer review of lawyers’ work product typically find that lawyers commit errors in one fifth to one quarter of the cases reviewed.

Taking this finding as a baseline, the harm assessment classifies receipt of harm-related complaints from more than 25% of consumers as a significant warning of harm, which would indicate an immediate need for the entity to work with the Office to develop and implement quality improvement plans to prevent harms and might also lead the Office to recommend that the Court suspend the entity’s operations in the Sandbox.

Receipt of harm-related complaints from 11-25% of consumers would trigger a watch to better understand and prevent potential harms and would likely include the requirement of additional information from entities so classified. Receipt of harm-related complaints from 10% or fewer of an entity’s consumers is considered reasonable risk and does not trigger the need for any additional risk assessment.

Complaint Harm Category	# Consumer Harm-Related Complaints	% Services with a Harm-Related Consumer Complaint
Consumer achieves an inaccurate or inappropriate legal result.	2	<0.01%
Consumer fails to exercise legal rights through ignorance or bad advice.	3	<0.01%
Consumer purchases an unnecessary or inappropriate legal service.	2	<0.01%

Complaint History is as follows:

- April 2021 - linked to the harm of an inappropriate/inaccurate legal result
- May 2021 - not linked to any of the three harms
- June 2021 - linked to exercising legal rights
- September 2021 - linked to exercising legal rights
- October 2021 - linked to exercising legal rights
- December 2021 - two complaints reported but neither was harm-related
- April 2022 - one linked to a legal result, and one complaint not harm-related
- June 2022 - one not harm-related, and one related to a payment harm
- July of 2022 - one complaint not harm-related
- November 2022 - one not harm-related, one linked to entity disclosures
- December 2022 - related to the purchase of an unnecessary legal service.

Quality Assessments

Audit materials were collected from three moderate risk entities, and reviewed by the Innovation Office. Independent lawyer audit panelists then assessed randomly selected representative legal service files of the three entities. The Office drafted entity audit reports and distributed them to the Legal Services Innovation Committee and the Utah Supreme Court. Based on audit findings, there was no evidence of material or substantial harm to consumers, and services were found to be at least satisfactory by the Office, the LSI Committee, and independent lawyer auditors. The three entities were authorized to continue to offer services within the Sandbox.

