OUTSIDE THE BOX

How States Are Increasing Access to Justice Through Evidence-Based Regulation of the Practice of Law

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A new approach to bringing people access to justice "centers the justice experiences of ordinary people, rather than the structure or staffing of justice institutions, the elements of legal families, or the content of laws themselves."[1] This "people-centered" approach requires not just a paradigm shift, but also empirical evidence as a critical tool to redesign systems.

Though evidence-based approaches are standard practice in other fields, like health, they are rare in law. But this is changing. We describe two projects that create regulatory environments to enable evidence-based, people-centered services, each endorsed by its respective state supreme courts: the Utah legal regulatory "Sandbox" and the Alaska Community Justice Worker Program.

Utah's Sandbox allows legal-services-providing entities to explore new business structures and service models, including services that are technology based, offered by people who are not attorneys, or financed or owned by nonlawyers. Entities in the Sandbox are closely monitored through the regular collection and analysis of service data to ensure that consumers are protected from harm.

In Alaska, the Supreme Court has authorized a statewide legal aid provider (the Alaska Legal Services Corporation) to supervise and train community health and other front-line workers to offer legal advice and representation. Such services meet people and their legal needs in those moments when legal issues emerge as parts of other kinds of life issues, such as those involving access to health care, secure and healthy housing, income, or nutrition.[2] The work of these Community Justice Workers would normally violate "unauthorized practice of law" restrictions but in Alaska has been granted a program-specific waiver.[3] Evidence on the effectiveness, sustainability, and scalability of this program is being gathered and analyzed through a first-of-its-kind study funded by the National Science Foundation.

Both projects demonstrate the promise of evidence-based regulation to generate right-sized, targeted legal help for life-altering legal issues, provided to people and communities who usually receive no assistance at all.

IMPETUS FOR CHANGE

Americans experience between 150 million to 250 million new civil justice issues each year[4] that affect core areas of life and often hamper their ability to make a living, have a place to live, and care for those who depend on them.[5] In a country of over 330 million people, diverse in language and culture and spread across a huge geography of communities that range from dense urban areas to tiny rural villages, a monolithic legal profession fails to meet vast unmet legal need. Though the number of lawyers in the United States has increased by 400 percent in the last 50 years, every measure suggests the nation's crisis of access to civil justice has only deepened.

Many factors contribute to the failures that lock people out of access to their own law; the historically restrictive regulation of legal services is key ▸

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among them.[6] The orthodox regulatory model limits the supply of legal help to that provided by highly educated and costly lawyers. The result is a situation in which corporate and very high-wealth consumers can afford and obtain legal services, while most individual consumers and small businesses cannot.[7] In response, Utah and Alaska have created new, evidence-based models of designing and delivering legal services.

These new reforms focus on one or both of two key traditional restrictions embodied in the American Bar Association's Model Rules of Professional Conduct:[8]

1. The broad ban on the unauthorized practice of law (UPL) that generally prohibits (and in many states criminalizes) people from offering legal services unless admitted to the relevant state bar.[9]
2. The ban on fee sharing between lawyers and nonlawyers expressed in Model Rule of Professional Conduct 5.4, which prohibits lawyers from partnering with, taking investment from, or being employed by nonlawyers if offering legal services directly to the public.[10]

The bans prevent alternative sources of legal help from emerging, including less expensive and more accessible sources provided by technology, other kinds of justice workers, and organizations that are not lawyer-owned. When alternative sources of help exist, many remain in a regulatory "gray space," with little oversight, consumer protection, or quality assurance. The Utah and Alaska projects are attempts to rethink regulation in order to expand authorized sources of legal help — similar to the earlier transformation of the medical profession, which now incorporates multiple types of professionals and entities.[11]

Some observers raise concerns about removing regulatory barriers to practicing law and/or financing legal practice.[12] They argue that UPL rules and Rule 5.4 are needed to protect the public, and particularly its most vulnerable members, from harm. They argue that outside investment in legal practices will invite a profit motive to the legal profession, undermining the independent legal judgment of lawyers and the quality of legal services.[13] And some argue that allowing nonlawyers into legal businesses will not actually impact the gap in access to justice.[14] An evidence-based approach, however, can change the terms of the conversation — from a battle of opinions to empirical questions that can be answered with facts.

The old rules of legal-services regulation are traditions: They are not grounded in empirical evidence. In fact, the historical record reveals that these bans have roots in anticompetitive motivations of the organized bar.[15] Current debates about them also often proceed in the absence of evidence. The challenge of developing evidence for activities that are unauthorized (in some places, criminally) — and so cannot be performed or tested — is part of the reason that evidence on this issue is so lacking.[16]

But the evidence we do have demonstrates clearly that people who are not lawyers can perform much of the practice of law quite well and with strong consumer satisfaction.[17] Increasingly, evidence also reveals that allowing people who are not attorneys to invest in and/or own legal practices is not harmful to consumers. For example, in England and Wales, which have permitted nonlawyer ownership of firms since 2007,[18] consumer satisfaction with legal services is high (84 percent) across the regulated sector, and data suggest little or no difference between these new kinds of firms (known as "alternative business structures") and conventional law firms.[19] And we certainly have evidence regarding the need: Already many consumers do not get legal help from lawyers,

and it seems likely that consumers may increasingly turn to alternative sources of help.[20]

UTAH'S LEGAL REGULATORY SANDBOX

In 2019, the Utah Supreme Court embarked on a "profound[] reimagining"[21] of the regulation of legal services, shifting the rules away from restrictive prescription and toward an approach that can more effectively respond to the rapidly changing nature of the legal-services market and the unaddressed needs of consumers. The Sandbox has three key components:[22]

1. **Evidence-based regulation:** Regulations governing practice in the Sandbox are grounded in evidence collected from the regulated market. Becoming authorized to practice law in the Sandbox requires surmounting relatively low barriers — primarily that applicants regularly (e.g., monthly) provide detailed data on their legal services. Regulatory action is triggered by empirical evidence that consumer harm is occurring at an unacceptable level.
2. **Entity regulation:** Instead of regulating individuals in licensed roles, the Sandbox authorizes and regulates entities, both for profit and nonprofit, to practice law.
3. **Relaxation of the rules banning UPL and fee-sharing with nonlawyers:** Both the broad ban on UPL by people who are not lawyers and the ban on fee sharing between lawyers and others can undermine the ability of the legal-services market to serve consumers. Entities in the Sandbox can be authorized to provide legal services by means other than attorneys — including people, software, or both — and/or for investment and ownership by people who are not attorneys and entities that are not lawyer-controlled.

The Sandbox launched in August 2020.[23] The Legal Services Innovation Committee of the Utah Supreme Court administers the Sandbox, while ultimate regulatory authority remains with the court.[24] The court itself reviews and votes on each entity that applies for admission.[25]

Regular submission of detailed data about legal services provided by Sandbox participants gives a clear sense of what is happening with consumers and reveals emerging trends. The Innovation Office, which hosts the innovation committee, publishes a monthly report on Sandbox activity, making these insights publicly available.[26] The data show that Sandbox entities are providing an increasing number of services across a range of legal areas, with very low incidence of measured consumer harm.

As of January 2024, 51 entities had been authorized[27] and over 75,000 services provided to approximately 24,000 unique consumers.[28] Just under 14,000 of those services were delivered by people who were not licensed attorneys or by software.[29] Key areas of service include business law services (45.6 percent),[30] likely primarily to small businesses, as few entities in the Sandbox serve large corporate clients.[31] Other key areas include immigration, veterans' benefits, end-of-life planning, accident/injury, and marriage and family issues.[32]

Consumer complaints are part of the required data reporting.[33] As of January 2024, the office had received a total of 14 complaints, approximately one per 4,011 services delivered.[34] The office determined that nine of those complaints raised potential consumer harms caused by the legal services provided, a ratio of one complaint per 8,468 services. Comparison to consumer complaints about lawyers is difficult, in part because the Sandbox counts discrete (unbundled) legal services rather than cases and in part because there are limited data on harms caused by lawyers. Social scientific studies grounded in expert peer review of lawyers' work product find that lawyers typically commit impactful errors in one-fifth to one-quarter of cases.[35] As of January 2024, entities operating in the Sandbox have responded to all reported consumer complaints "adequate[ly] and acceptabl[y], according to the Utah Office of Legal Services Innovation.[36]

Underneath these high-level statistics are a variety of companies and nonprofits offering legal services to consumers in new ways. Examples include:

- ZAF Legal is an accident/injury legal tech company owned by lawyers with venture capital investment.[37] Using the influx of capital, ZAF Legal has developed a sophisticated software platform to help injured consumers advance their own personal-injury claim. ZAF's model addresses a lack of legal aid for injured consumers whose likely damages claims are too low for traditional personal-injury attorneys to risk representation.[38]
- Rasa Legal is a public benefit corporation using both advocates who are not attorneys and a software system to help people determine their eligibility for criminal expungement and navigate the process to get their records expunged.[39] Rasa charges flat fees for various expungement-related services. These fees are about one-eighth of the average cost for such services charged by a lawyer.[40] ▸

In the absence of federal legislation or litigation resulting in changes of national scope, driving real and scalable impacts on the access-to-justice crisis requires this kind of bold reform across multiple states.

- Holy Cross Ministries is a nonprofit, community-based organization partnering with Innovation 4 Justice to train and deploy lay medical-debt legal advocates to help people negotiate and resolve their medical debt.[41]
- Rocket Lawyer is one of the largest legal-technology companies providing automated legal-document services in the country. It hires and partners with lawyers to supplement its existing services with comprehensive legal assistance and advice.[42]
- In Timpanogos Legal Center's Certified Advocate Partner Program, trained lay domestic violence advocates offer legal advice to victims seeking protective orders and stalking injunctions. Advocates do not charge for their services.[43]
- Estate Guru is a legal-services company offering estate planning services through software, lay assistants, and lawyers. Consumers can access services at a variety of price points.[44]

ALASKA'S COMMUNITY JUSTICE WORKERS

Alaska's Supreme Court has taken a different approach to permitting innovative practice through evidence-based regulation. In 2022, it was the first in the country to authorize a waiver of UPL restrictions that permits a legal aid provider, Alaska Legal Services Corporation (ALSC), to train and supervise Community Justice Workers (CJWs) — justice workers without law licenses — to offer legal advice and representation.[45]

CJWs complete focused trainings in specific legal issues and procedures, culminating with handling a case under the supervision of an ALSC attorney. Currently, over 400 CJWs are at work or in training, helping their neighbors in over 40 different communities across the vast and rural state with problems such as denials of SNAP benefits, Indian Child Welfare Act issues, domestic-violence protection orders, and wills. Hundreds of cases have been handled by CJWs, the majority of whom work in remote Alaska Native communities without lawyers and inaccessible by road.

Both the program's expansion on the ground in Alaska and a study of its effectiveness, sustainability, and scalability are funded through the National Science Foundation's Civic Innovation Challenge grant program, a research and action funding mechanism that prioritizes "community engagement, transdisciplinary research, and real-world pilots that center communities and their priorities."[46] The research is in its early stages, but so far the program boasts a 100 percent client success rate.[47] While the effectiveness of justice work has been empirically explored, this is the first project to center sustainability and scalability of such work, two critical elements of successful access-to-justice solutions in a diverse country with vast unmet legal need.

THE FUTURE OF ACCESS TO JUSTICE

Both the Utah and Alaska models hold the potential to allow new types of programs to develop and flourish. The Utah Sandbox employs market reforms and entity regulation to create space for new kinds of practice, while the Alaska waiver uses entity regulation to permit new kinds of services. The Utah approach creates an avenue for alternative providers seeking to develop services that use new sources of capital or leverage software and providers who are not attorneys. The Alaska project seeks to inscribe community priorities into the design and delivery of legal services from the ground up, working with members of specific communities to provide linguistically and culturally accessible assistance around basic life issues of nutrition, shelter, and safety.

Though different in their details, these regulatory innovations share similar qualities that are critical if we hope to address an access-to-

justice crisis of such extraordinary scale. They:

1. **Prioritize empirical evidence of people's actual experience and outcomes** in the design of regulation and services.
2. **Expand innovation** by allowing nontraditional providers.
3. **Demonstrate the power of evidence-based regulation** by harnessing data on impact and outcomes.

Both projects are ambitious efforts to rethink regulating legal services in order to increase public engagement, satisfaction, and access. In the absence of federal legislation or litigation resulting in changes of national scope, driving real and scalable impacts on the access-to-justice crisis requires this kind of bold reform across multiple states.

Increasingly, other states are answering this call as well. Several — including Oregon, Colorado, Arizona, Minnesota, New Hampshire, and Texas — either have moved forward or likely will move forward with the licensing of paraprofessionals to offer limited legal services in specific areas of law.[48] Programs authorizing legal aid providers or community-based organizations to use different kinds of justice workers to deliver legal services have begun operating in Alaska, Delaware, and Arizona[49] and are being explored in several other states.

Of course, challenges remain. The new approaches upend traditional regulation, which attempts to ensure competent and ethical legal services with up-front restrictions on who and what can provide them. The new models replace entry barriers that are grounded in tradition rather than evidence with contemporaneous empirical evidence about actual consumer experience and legal impact. This new way of regulating can be challenging for jurisdictions to pull off. Implementing evidence-based regulation requires skills in research design and data analysis that traditional legal-services regulators typically do not have and have usually not considered how to fund. People-centered justice solutions often de-center lawyers, and so may face resistance from lawyers who fear losing their place as gatekeepers of justice.

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But these challenges are worth the effort. And these programs stand as testaments to the judiciary's willingness to adapt and evolve. By fostering innovation, promoting access, and safeguarding consumers, they exemplify the spirit of progress and give hope for a future where justice is accessible to all.

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1 Rebecca L. Sandefur, et al, Just. Data Observatory,. People-Centered Access to Justice Research: A Global Perspective 3 (2023), *https://www.americanbarfoundation.org/wp-content/uploads/2023/11/People-Centered-Access-to-Justice-Research-A-Global-Perspective.pdf*

2 *See* Rebecca L. Sandefur; *Access to What?* 148 Daedalus 49, 51–52 (2019) (noting that people's legal needs are enmeshed with basic life experiences); *see also* Rebecca L. Sandefur, *Fulcrum Point of Equal Access to Justice: Legal and Non-legal Institutions of Remedy*, 42 Loy. L.A. L. Rev. 949, 951–52 (2009) (same).

3 Alaska Bar Association, Proposed Bar Rule 43.5 (2022), https://alaskabar.org/wp-content/uploads/Memo-and-Proposed-Bar-Rule-43.5.pdf.

4 Inst. for the Advancement of the Am. L. Sys. (IAALS) & The Hague Inst. for Innovation of L. (HIIL), Justice Needs and Satisfaction in the United States of America, (2021)

5 *Id.* at 755; *see also* Rebecca L. Sandefur, *Access to What?* 148 Daedalus 49 (2019) (summarizing the nature of justice problems that arise in the United States).

6 *See generally* Deborah L. Rhode, *Access to Justice: A Roadmap for Reform*, 41 Fordham Urban L.J. 1229 (2014) (synthesizing causes of the justice gap); Gillian K. Hadfield & Jamie Heine, *Life in the Law-Thick World: The Legal Resource Landscape for Ordinary Americans*, *in* Beyond Elite Law 21, 45 (Gillian K. Hadfield & Jamie Heine eds., 2016) (highlighting the effects of regulation on limiting the scope of legal services); Matthew Burnett & Rebecca L. Sandefur, *Designing Just Solutions at Scale: Lawyerless Legal Services and Evidence-Based Regulation*, 19 RDP 104 (2022) (framing the problem of access to the justice worldwide).

7 *See, e.g.*, William D. Henderson, State Bar of Calif., Legal Market Landscape Report 13–14 (2018) (noting that individual clients' spending on legal services declined by nearly $7 billion while business' spending increased by more than $26 billion in California's legal market between 2007 and 2012.). There is very little empirical research available on the legal needs of small businesses in the United States, but one study, *e.g.*, Legal Shield, The Legal Needs of Small Business 4 (2013), found that nearly 60 percent of small business owners who experienced a legal event in the preceding two years had not hired an attorney to help them. And a report from the United Kingdom, *e.g.*, Legal Serv. Bd., Small Business Legal Needs: Wave Four Survey 2021, at 33 (2022), found that when responding to a legal issue, 8 percent of small businesses took no action, 44 percent tried to resolve it on their own, and 25 percent sought professional assistance.

8 Consensus exists among scholars regarding which parts of the current legal professional framework limit broader access to justice. *See generally* Thomas Clarke & Lucy Ricca, A Framework for Designing and Implementing Regulatory Reform 22–23 (2022), https://law.stanford.edu/publications/designing-and-implementing-legal-regulation/; Rebecca L. Sandefur, *Legal Advice from Nonlawyers: Consumer Demand, Provider Quality, and Public Harms*, 26 Stan. J. C.R. & C.L. 283 (2020); Gillian K. Hadfield and Deborah L. Rhode, *How to Regulate Legal Services to Promote Access, Innovation, and the Quality of Lawyering*, 67 Hastings L.J. 1191, 1193–94 (2016). ▶

9 *See* Model Rules of Prof'l. Conduct R. 5.5 cmt. (2019) ("[L]imiting the practice of law to members of the bar protects the public against rendition of legal services by unqualified persons."). The Model Rules of Professional Conduct are not law, in and of themselves, but they do reflect the language adopted by most states in regulating the unauthorized practice of law.

10 *See Id.* R. 5.4 (2020).

11 *See* News Release, Arizona Sup. Ct., Arizona Supreme Court Makes Generational Advance in Access to Justice (Aug. 27, 2020) (drawing a comparison between similar reforms in Arizona and reforms in the medical field).

12 *See, e.g.*, F.M. Apicella, John A. Hallbauer & Robert H. Gillespy II, *Keeping Standards High Protects the Public*, 77 A.B.A. J. 37, 37 (1995) (arguing that the provision of legal services by non-lawyers "would result in the most unwary, guileless members of the public being incompetently represented and advised, if not victimized and defrauded"); *See* Stephen P. Younger, *The Pitfalls and False Promises of Nonlawyer Ownership of Law Firms*, 132 Yale L.J.F. 259, 267–74 (2022).

13 *See* Younger, *supra* note ix, 267–74.

14 *Id.* at 275–83.

15 Nora Freeman Engstrom & James Stone, *Auto Clubs and the Lots Origins of the Access-to-Justice Crisis*, Yale L.J. (forthcoming) (finding "compelling new proof that today's UPL bans—which continue to stymie the delivery of affordable legal services—have fundamentally rotten roots").

16 Burnett & Sandefur, *supra* note 4.

17 Sandefur, *supra* note 6; Burnett and Sandefur, *supra* note xiii.

18 Legal Services Act 2007, c. 29 (UK).

19 *See generally* Legal Services Bd., The State of the Legal Services Market 2020 Evidence Compendium 64 (2020), https://legalservicesboard.org.uk/wp-content/uploads/2020/11/The-State-of-Legal-Services-Evidence-Compendium-FINAL.pdf. In particular, satisfaction with the quality of advice rose from 76 percent in 2012 to 82 percent in 2020. Id. A 2020 study found that people using unregulated providers were mostly likely to be dissatisfied with the service they received. YouGov et al., Legal Needs of Individuals In England and Wales 66 (2020), https://www.lawsociety.org.uk/topics/ research/legal-needs-of-individuals-in-england-and-walesreport. On consumer harm, *see* Ctr. for Strategy and Evaluation Servs., Impact Evaluation of Sra's Regulatory Reform Programme: A Final Report for the Solicitors' Regulation Authority 5 (2018), https://www.sra.org.uk/globalassets/documents/ sra/research/abs-evaluation.pdf?version=4a1ac2.

20 Rebecca L. Sandefur, *What We Know and Need to Know About the Legal Needs of the Public*, 67 S.C. L. Rev. 443, 448 (2016); Rebecca L. Sandefur, *Legal Advice from Nonlawyers: Consumer Demand, Provider Quality, and Public Harms*, 26 Stan. J.C.R. & C.L. 283, 289–291 (2020).

21 Utah Work Grp. on Regul. Reform, Narrowing the Justice Gap by Reimagining Regulation 1 (2019), https://utahinnovationoffice.org/wp-content/uploads/2021/08/Narrowing-the-Justice-Gap-Report-August-2019.pdf.

22 *See* Utah Sup. Ct., Standing Ord. No. 15 (2020), https://utahinnovationoffice.org/wp-content/uploads/2024/01/1.-Standing-Order-No.15-Amended-9.21.22.pdf.

23 Press Release, Utah Supreme Court (August 13, 2020), https://legacy.utcourts.gov/utc/news/2020/08/13/to-tackle-the-unmet-legal-needs-crisis-utah-supreme-court-unanimously-endorses-a-pilot-program-to-assess-changes-to-the-governance-of-the-practice-of-law/.

24 *Id.*

25 *Id.*

26 A more detailed report goes to the Supreme Court each month as well. Because that report delves into entity regulatory data and potentially confidential business information, it is not made public. *See* Utah Sup. Ct. Standing Order, *supra* note xvii.

27 Off. of Legal Servs. Innovation, Utah Sup. Ct., Innovation Office Activity Report: January 2024, at 1 (2023), https://utahinnovationoffice.org/wp-content/uploads/2024/03/January-2024-Activity-Report.pdf.

28 *Id.* at 4.

29 *Id.*

30 *Id.* at 5.

31 *See* David Freeman Engstrom, et al., Legal Innovation After Reform: Evidence from Regulatory Change 41 (2022) (finding that most entities authorized in Utah (and Arizona) are primarily serving individual consumers and small businesses).

32 Innovation Office Activity Report, *supra* note 21, at 5.

33 *See* Utah Sup. Ct. Standing Order, *supra* note 17.

34 Innovation Office Activity Report, *supra* note 11, at 6.

35 Rebecca L. Sandefur, *Legal Advice from Nonlawyers: Consumer Demand, Provider Quality, and Public Harms*, 16 Stan. J. C.R. & C.L. 283, 306–08 (2020). Two studies from the UK, comparing lawyer provided services with nonlawyer provided services found similar rates of failure across both groups: between 20 and 25 percent. *E.g.*, Legal Servs. Consumer Panel, Regulating Will-Writing 63 (2011) (finding 20 percent failure rate for both solicitors and will-writing companies); Richard Moorhead et al., Quality and Cost: Final Report on the Contracting of Civil, Non-Family Advice and Assistance Pilot, at tbl.5.6 (The Stationery Office 2001) (finding that nonlawyers and solicitors were equally likely to receive failing grades for their work, with 25 percent of wills prepared by each failed quality review).

36 Innovation Office Activity Report, *supra* note 11, at 6.

37 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Nuttall, Brown & Coutts (2020), https://utahinnovationoffice.org/wp-content/ uploads/2021/04/Auth-Packet-Nuttall-Brown.pdf. *See also* Engstrom, et al., *supra* note 26, at 28.

38 *Id.*

39 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Rasa Public Benefit Corp. (2022), https://utahinnovationoffice.org/wp-content/uploads/2022/11/Amended-Auth-Packet-Rasa-9.22.pdf

40 Engstrom, et al., *supra* note xxvi, at 34.

41 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Holy Cross Ministries 1–2 (2022), https://utahinnovationoffice.org/wp-content/uploads/2022/09/Amended-Auth-Packet-Holy-Cross-8.22.pdf.

42 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Rocket Lawyer 1 (2022), https://utahinnovationoffice.org/wp-content/uploads/2024/02/Rocket-Lawyer-Auth-Order-8.22.pdf.

43 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Timpanogos Legal Center 1 (2022), https://utahinnovationoffice.org/wp-content/uploads/2024/02/TLC-Auth-Order-8.22.pdf.

44 Off. of Legal Servs. Innovation, Utah Sup. Ct., Sandbox Authorization Packet: Estate Guru (2022) 1, https://utahinnovationoffice.org/wp-content/uploads/2022/09/Amended-Auth-Packet-Estate-Guru-8.22.pdf.

45 Alaska Bar Rules, R. 43.5 (Alaska Bar Ass'n).

46 CIVIC-FA Track B: Bridging the Rural Justice Gap: Innovating & Scaling Up Civil Access to Justice, U.S. Nat'l Sci. Found., https://www.nsf.gov/awardsearch/showAward?AWD_ID=2321920&HistoricalAwards=false.

47 Nikole Nelson, Presentation to National Association of IOLTA Programs Webinar (Apr. 4, 2024).

48 The Inst. for the Advancement of the Am. Legal Sys., Allied Legal Professionals Knowledge Center, https://iaals.du.edu/projects/allied-legal-professionals (last visited Feb. 15, 2024).

49 The Inst. for the Advancement of the Am. Legal Sys., Regulatory Models, https://iaals.du.edu/projects/unlocking-legal-regulation/regulatory-models#community (last visited Feb. 15, 2024). These programs are similar to several of those authorized within the Utah Sandbox and outlined above including Timpanogos Legal Center and Holy Cross Ministries.