

IN THE SUPREME COURT OF THE STATE OF UTAH

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Standing Order No. 16

(Authorizing a Housing Stability Legal Advocate Pilot Program)

Effective March 9, 2023

Unstable housing is a significant component of the access to justice gap nationally and in Utah. People facing eviction and foreclosure often have significant barriers to getting legal help and face [major negative consequences](#) from these life events. The [community repercussions](#) of housing instability are also significant and lasting. Allowing additional trained providers to help vulnerable populations facing housing instability could be an impactful means to address the justice gap and its long term impacts.

In November 2022, the Office of Legal Services Innovation (“Innovation Office”) received an application for admission to the legal regulatory sandbox from Innovation 4 Justice (“i4J”), an access-to-justice lab associated with both the University of Arizona and the University of Utah. i4J sought approval in the sandbox not as an organization providing legal services, but rather for a pilot of a certification program for educating, training, and certifying nonlawyers working within other community-based organizations (“CBOs”) as Housing Stability Legal Advocates (“HSLAs”). Under i4J’s Housing Stability Initiative, i4J will offer a free HSLA curriculum, and certify HSLAs who complete the curriculum with satisfactory scores. Upon completion of the i4J educational curriculum and training and assessment protocol, HSLAs will provide free, limited-scope legal advice about legal issues related to housing. i4J would continue to provide a supporting role for the participating CBOs, including availability for legal mentoring (answering questions that come up from the HSLAs) and assisting the CBOs with their regulatory compliance requirements.

The Legal Services Innovation Committee, which oversees the Innovation Office and makes recommendations to the Court on individual applications, determined that the posture of i4J’s application presented significant challenges within the sandbox model. However, the Committee, recognizing the importance of the need for legal help within this substantive area and the high potential access impacts of i4J’s pilot, asked the Court to consider authorization of the pilot by the Court directly with the

requirement that individual CBOs seeking to offer legal services through i4J certified HSLAs be authorized within the legal sandbox. This approach ensures that the Court can develop data around the quality of the legal services provided by i4J's pilot, thereby providing the Court with an empirical basis on which to make future policy decisions on HSLA certification.

By issuing this Standing Order, the Court is not itself certifying any individual HSLA. It is, rather, ensuring that the HSLA providers i4J certifies and their CBO employers are given safe harbor from enforcement based on the unauthorized practice of law and that i4J is not targeted for aiding, abetting, or providing unauthorized practice of law itself. This safe harbor is contingent upon compliance with this Standing Order, the regulatory requirements of the Office of Legal Services Innovation, and all other applicable state and federal statutes and regulations.


Therefore, in accordance with its plenary and exclusive authority and responsibility under article VIII, section 4 of the Utah Constitution to govern the practice of law, the Utah Supreme Court orders that:

1. The Housing Stability Legal Advocate Initiative of Innovation 4 Justice ("i4J"), an access-to-justice lab associated with both the University of Arizona and the University of Utah, is hereby established as a pilot initiative.
2. i4J is authorized to partner with Utah community-based organizations ("CBOs") to train and certify select CBO staff as Housing Stability Legal Advocates ("HSLAs") to provide free limited legal advice related to housing issues across the following four activities:
 - a. Issue spotting for housing stability issues at CBO client intake:
 - i. identifying housing legal issues and alerting clients to them;
 - ii. providing legal advice related to identified housing legal issues.
 - b. Providing legal advice and assistance with identified housing issues before the issue advances to court:
 - i. assisting tenants with responding to and completing legal forms; advising clients on housing-related legal issues, including the civil legal process and timelines;
 - ii. screening for legal defenses;
 - iii. assisting in negotiations to reach solution;
 - iv. providing legal advice and assistance in preparation for court (but see 3 below).
 - c. Providing legal advice and assistance with post-judgment procedures:

- i. identifying whether there is cause for a post-judgment challenge,
 - ii. advising tenants about post-judgment consequences such as garnishments or liens,
 - iii. assisting tenants with removing evictions from credit or housing reports.
 - d. Providing legal advice and assistance related to other state and federal assistance programs:
 - i. identifying fair housing issues that may enable people to find replacement housing post-eviction.
3. HSLAs are not authorized to represent others in any Utah state court at this time.
4. HSLAs authorization by this order is subject to any otherwise existing federal or state statutes, rules, or regulations.
5. i4J will only certify HSLA's who meet the educational and/or experiential, training, and assessment requirements set forth in its proposal (see Appendix A). If i4J wishes to make any material changes to the Housing Stability Initiative, whether to the educational, experiential, training, and assessment requirements, to the authorized legal activities or to substantive legal areas, i4J must notify the Court.
6. i4J will keep a current list of all certified HSLAs and contact information and will provide it to the Court if requested.
7. An individual who has been suspended from practicing law or disbarred by the highest court in any state or who has been denied admission to the practice of law in Utah whether as a lawyer or as a Licensed Paralegal Practitioner is not eligible to participate in this pilot program.
8. HSLAs certified by i4J must work within CBOs authorized by the Court within the legal regulatory sandbox and overseen by the Office of Legal Services Innovation. CBOs within the Housing Stability Initiative must independently apply for authorization within the legal regulatory sandbox.
9. i4J will be required to alert the Office as soon as possible should it learn of any significant consumer harm or other material compliance issues related to any HSLA or CBO within the Housing Stability Initiative.
10. Unless otherwise ordered by the Court, the safe harbor offered by this Order to HSLAs expires upon the occurrence of any of the following:

- a. Termination of the Housing Stability Initiative authorized by this Order, whether by the Court or by i4J;
- b. The HSLA leaving employment from an authorized CBO;
- c. Termination of the employer CBO from the sandbox.

DATED this 10th day of March, 2023



Matthew B. Durrant
Chief Justice
Utah Supreme Court

APPENDIX A

Innovation for Justice

Proposal

Application: 00001-0000000210

Stacy Butler - stacy@innovation4justice.org
Office of Legal Services Innovation

Summary

ID: 00001-0000000210

Last submitted: Oct 21 2022 03:26 PM (MDT)

Labels: Nonlawyer provider with lawyer involvement, Housing - Rental

Personal Information

Completed - Oct 21 2022

Personal Information

Entity Name

Innovation for Justice

Business Email Address

info@innovation4justice.org

Business Phone Number

5209794055

Business Website

innovation4justice.org

Business Address

Address Line 1	1201 E. Speedway Blvd
Address Line 2	(No response)
City	TUCSON
State	Arizona

Mailing Address

Address Line 1	1201 E. Speedway Blvd
Address Line 2	(No response)
City	Tucson
State	Arizona

Contact Name

Stacy Butler

Contact Title

Director

Contact Phone Number

5209794055

Contact Email

stacy@innovation4justice.org

Second Contact Name

(No response)

Second Contact Title

(No response)

Second Contact Phone Number

(No response)

Second Contact Email

(No response)

Bar License No. and State (if applicable)

AZ 021697

1. Proposed Services

Completed - Oct 21 2022

1. Proposed Services

1.1. Describe your proposed legal services offering in detail.

Please include (i) who provides the legal services, (ii) how consumers will access/receive these services,

and (iii) what your service will do for your customers.

i4J proposes launching a Housing Stability Legal Advocate (HSLA) Initiative in Utah. HSLAs would be community-based organization (CBO) staff who already interface with people experiencing housing instability. i4J will offer a free HSLA curriculum, and certify HSLAs who complete the curriculum with satisfactory scores. HSLAs will provide free, limited-scope legal advice about legal issues related to housing. The HSLA training and certification process will be limited in scope to meet the needs of CBO staff who already assist people experiencing housing instability and can benefit from adding limited-scope legal advice to their social service toolkit. The proposed HSLA Initiative is designed to be responsive to the social service sectors' interest in providing limited scope legal advice to better assist the community members they work with, while aligning with the real-world constraints these CBOs are managing.

The proposed scope of HSLA service was designed to address high-need areas in the current housing instability landscape. Interviews with 23 CBOs in Arizona and Utah serving individuals across the spectrum of housing issues, demonstrated that the most common housing-related legal issue that tenants experience is eviction. CBOs reported that tenants sought assistance communicating with property owners, understanding and applying for rental assistance, knowing what to do when they receive a notice of nonpayment and if they receive an eviction notice, and trying to secure housing after being evicted. Accordingly, the proposed scope of HSLA services includes four primary components:

1. Issue Spot for Housing Instability at Intake:

Training and licensing CBO staff as HSLAs embeds opportunities for early, upstream intervention at multiple CBOs that interface with people experiencing housing instability in the process of meeting a range of other needs such as rental and utility assistance, public benefits, and food. A primary goal of HSLA services is to interface with and assist people experiencing housing instability before their housing problem becomes a civil legal problem, when tenants have the cognitive capacity to seek services and problem-solve. CBOs already do intake interviews upon meeting a client, and being trained in housing instability legal issue spotting will help them ask the right questions to determine whether this client might be at risk of experiencing a court-involved housing issue. If a HSLA identifies a legal problem, the HSLA could provide advice on issues right at that time, or alert the tenant to a possible legal issue, and schedule a time for follow-up meeting to provide more detailed assistance. Layering legal training and knowledge on-top-of social service knowledge would enable CBOs to catch and assist many renters before those renters realize their problem is legal and would reduce instances of tenants navigating fractured services to receive help.

2. Help Tenants Problem-Solve BEFORE a Housing Issue Goes to Court

To empower HSLAs to identify legal issues and provide legally accurate advice, HSLAs would be trained to understand the common issues tenants experience before eviction, including the rights and obligations specific to tenants and property owners, and strategies for overcoming these problems, such as negotiating payment plans. HSLAs would also be equipped to screen for legal defenses and take an advocacy role in negotiating with property owners and property managers on behalf of tenants. An HSLA certification will carry weight in the legal and nonlegal community, leading to more fair and informed interactions between tenants, property owners, and legal professionals. CBOs interviewed in this research reported that HSLA training and certification would help them feel more confident and qualified to: engage in problem-solving with property owners and the attorneys that represent them; assist tenants with responding to and completing legal forms; and advising clients on housing-related legal issues.

3. Give Legal Advice Regarding Engaging with the Civil Legal System

By the time tenants receive a notice of eviction, they often lack the cognitive capacity to problem-solve. Tenants may not understand their eviction notice or summons, and may not know where to find help. Those who know how to find legal aid could be turned away due to legal aid's inability to meet the overwhelming need for services. As a result, many tenants feel powerless to engage with the civil legal system--as demonstrated by the 35% and 36% default rates in AZ and Utah eviction cases. HSLAs will not represent tenants in court, but by understanding the procedural rules and requirements of eviction proceedings, as well as the timelines involved, HSLAs will be well-positioned to advise people faced with an eviction notice regarding the eviction process and timeline, completion of forms, and the potential value of participating in their case. In addition, HSLAs can screen for viable legal defenses and help tenants feel equipped to assert those defenses in a timely and procedurally accurate manner in court. They may also be able to connect tenants experiencing complex legal issues to legal aid and pro bono lawyers in the area, and equip those lawyers with the information they've already compiled about the client's case.

4. Assisting tenants AFTER an eviction

Robust assistance from HSLAs who engage with tenants before a housing issue becomes court-involved can reduce the number of housing issues that become evictions. But given the magnitude of the housing crisis, we anticipate that CBOs will continue to interface after eviction with tenants who can benefit from legal advice about mitigating the lasting harms of eviction. If HSLAs are trained to understand judgment implications, HSLAs will be able to assist tenants with post-judgment procedures, help them reduce damages, and provide next steps. While HSLAs already provide social services to help tenants navigate the fall out of eviction, they could provide more holistic care if they were able to help tenants navigate

legal consequences. CBOs could be trained to identify whether there is cause for a post-judgment challenge, advise tenants about post-judgment consequences such as garnishments or liens, and assist tenants with removing evictions from credit or housing reports. They may also be able to help tenants find and apply for assistance programs and identify fair housing issues as tenants attempt to find replacement housing.

The full report summarizing the community-engaged research, design and development of the HSLA Initiative is available at: <https://rebrand.ly/hsla-proposal> (please note: this project was initially proposed as an extension of Utah's LLP Program, but has been referred to the Sandbox by the Utah Supreme Court).

1.2. Describe the entity business model you want authorized in the Sandbox, including the management structure which will oversee direct legal service providers.

i4J requests Sandbox authorization to serve as the umbrella host organization for the HSLA Initiative. In that capacity, i4J would: assist CBOs with enrolling staff into the HSLA curriculum; enter into MOUs with participating CBOs confirming that their HSLA services conform w the HSLA curriculum, scope of service and professionalism requirements; test and certify HSLAs; host regular meet-ups with participating HSLAs to discuss cases, issues in the field, and connect HSLAs with guidance and mentorship from attorney mentors; and collect data from HSLAs in the field as required by the Sandbox. i4J would NOT be the direct service provider of HSLA services. Thus, this application would need to be supplemented with information from participating CBOs.

1.3. Why is your proposal eligible to enter the Sandbox?

Identify the specific model, service or product innovations that are not permitted under the traditional rules governing the practice of law.

The HSLA Initiative trains community-based advocates to give limited scope legal advice on housing-related issues. These advocates are not lawyers.

1.4. Describe your target consumer(s).

For example: single parents making <\$50,000 in a custody dispute, first generation college students in a landlord-tenant dispute; renters 40+ years planning for retirement; college educated entrepreneurs seeking legal advice in starting a business.

Low-income community members in Utah. i4J will not set eligibility standards for community-members receiving HSLA services, but will instead defer to the eligibility requirements of participating CBOs.

Please attach any supporting materials you'd like to include with your application.

[i4J Report to the AZ and Utah Supreme Courts re Housing Stability Legal Advocates Jan 2022 \(1\).pdf](#)

The full report summarizing the community-engaged research, design and development of the HSLA Initiative is linked in Section 1.1 above, and attached here.

Filename: i4J Report to the AZ and Utah Supreme Courts re Housing Stability Legal Advocates Jan 2022 (1).pdf **Size:** 3.2 MB

1.5. Which service models are you seeking to use?

Select all that apply.

Responses Selected:

<p>Nonlawyer provider¹ with lawyer involvement²</p>

1.6. Which legal service categories are you seeking to offer?

Select all that apply.

Responses Selected:

Housing - Rental

¹ Provider means legal practitioner: a provider who or which is practicing law, including offering legal advice.

² Involvement denotes a range of activities, including guidance on initial development of forms, scripts, processes, software. It could mean a lawyer does sample reviews of product/service performance. It could mean a lawyer is available to advise the nonlawyer provider as needed - including via red flag trap doors in software.

2. Risk Assessment

Completed - Oct 21 2022

2. Risk Assessment

The Innovation Office must assess whether new legal service models cause consumers to get inappropriate or otherwise flawed legal results, fail to exercise legal rights through ignorance or bad advice, or purchase an unnecessary or inappropriate legal service.

2.1. Fully and candidly discuss the risks your customers might face if they use your proposed model, including each of the risks described above.

Risk One: consumers may get inappropriate or otherwise flawed legal results. There is a risk that the HSLAs will not be as successful negotiating with property owners as a lawyer would be. There is also a risk that the client will proceed on a particular course of action regarding their rental housing based on incorrect advice.

Risk Two: consumers may fail to exercise legal rights through ignorance or bad advice. People experiencing housing instability are often also experiencing other legal issues. These may involve family law, debt collection, complex bankruptcies, immigration law, and other areas of the law that fall outside of the HSLA's scope of service. In those circumstances, the clients will be referred to an attorney. However, there is a risk that tenants will not exercise their legal rights or options in those circumstances if they do not end up meeting with an attorney either by choice, because they cannot afford one, or because free legal services from lawyers are not available. There is also a risk that the HSLAs will improperly identify legal issues and fail to recognize that a problem the client is having is a legal one, and therefore will not provide advice on the issue or make the appropriate referral to legal services.

Risk Three: consumers may purchase an unnecessary or inappropriate legal service. There is not a high risk of consumers purchasing unnecessary or inappropriate legal service because the HSLAs are employees of CBOs, which are nonprofit organizations. As such, participating CBOs do not have a financial interest that would lead the HSLAs to encourage clients to purchase an unnecessary or inappropriate legal service. These HSLAs will provide limited-scope legal advice and services as part of their usual interactions with clients. Furthermore, efforts will be made to refer clients to free or low-cost legal aid, the Utah Bar Foundation, or self-help resources and advocates when legal issues outside of the HSLAs' scope of service arise.

2.2. Describe the specific ways you will identify, track, and mitigate the risks to consumers in your proposed model.

These efforts could include quality control measures, training, provider testing.

Conversations with community stakeholders, people experiencing housing instability, attorneys, and judges during the development of the proposal have helped identify potential risks to consumers. Concerns that these organizations and individuals raised were catalogued and this proposal has been

designed to mitigate those concerns as much as possible.

First, the risk that the HSLAs will not be as successful in the delivery of legal services as a lawyer would be, and the risk that consumers will fail to exercise legal rights or options during this pilot, should be viewed in the context of the reality of legal services in the state of Utah and nationally. According to Emily Benfer, Wake Forest Professor and Senior White House Policy Advisory on the American Rescue Plan, “more than 30 percent of tenants move after the first sign of an impending eviction — usually notice from a landlord — without ever going to court.” By the time an eviction complaint is filed, the vast majority of tenants experiencing a civil eviction action will give up or attempt to navigate the system without counsel. Roughly one-third of the tenants who receive an eviction summons and complaint in Utah will not file an answer, appear in court, or otherwise engage with the civil legal system and a default judgment will be entered against them. Engagement is not effective: approximately 50% of the evictions filed in Salt Lake County will result in a judgment against the tenant. And regardless of whether an eviction action ends in a judgment, the filing of an eviction action causes long-term harm to tenants.

Second, to mitigate the risk that HSLAs will provide inadequate or inaccurate legal advice, i4J will train and test HSLAs on their substantive knowledge of legal options for handling housing instability and available defenses, as well as relevant rules of procedure. The HSLA curriculum developed by subject-matter experts; it will be sufficiently robust and the scope of service will be sufficiently limited to alleviate concerns about limited lawyer involvement and potential risk to consumers. Testing in the training period will include both pre- and post- assessments for each module. Only advocates who pass all assigned module assessments will be certified to provide legal advice. Advocates who do not pass the assessment for a particular module will have to retake that assessment until they are successful. Mentor attorneys will be regularly available to answer questions as soon as practicable to help the HSLAs identify legal issues and determine an appropriate course of action, provide general legal advice regarding matters that are not regulated and enforced based solely on Utah law. The HSLAs will also have access to the Utah-licensed subject-matter attorneys who are involved in the HSLA curriculum for questions that arise during the Sandbox pilot phase.

Third, to ensure that the advocates have a robust understanding of their authorized scope of service and maintain a client-centered approach to the provision of limited-scope legal advice and services, a scope of service module and a professional responsibility module are embedded in the HSLA curriculum. These modules will train HSLAs to identify the legal issues which fall outside of their scope of service, to refrain from providing legal advice about those issues, and to refer the client to an attorney or self-help resources. In addition, HSLAs will complete practical training exercises during the training period to simulate identifying legal issues, informing a client that an issue is outside of the HSLAs scope of service,

and providing referrals to appropriate legal services or self-help resources.

Fourth, as part of the HSLA curriculum, the HSLAs will create and complete a checklist of common legal issues that arise in housing cases, which will mitigate the risk that the HSLA will improperly identify legal issues while advising a client. This list and the responses will be reviewed and approved by the subject-matter experts who taught the HSLA curriculum modules. This checklist will become a part of their toolkit in the field, providing structured guidance for identifying issues and standardizing the services provided across advocates.

2.3. Please describe your consumer complaint process.

As part of applying to the HSLA curriculum, CBOs will notify i4J of their consumer complaint process. i4J will ensure that participating CBOs have a standard complaint process, and will require participating CBOs to alert i4J if a consumer complaint involves HSLA services and how the complaint was resolved by the CBO. i4J will maintain an anonymized database of complaints received by CBOs regarding HSLA services.

3. Benefits To Utah Consumers

Completed - Oct 21 2022

3. Benefits To Utah Consumers

The Innovation Office is assessing potential benefits of proposed offerings to the Utah legal market.

3.1. Describe how your model will provide higher quality, more cost effective, and more accessible legal services for your target consumers.

Research demonstrates that tenants who have legal representation experience more successful outcomes than those who do not have legal representation: tenants are 3 to 19 times more likely to have successful case outcomes if they have legal representation. One study in Massachusetts found that two-thirds of represented tenants were able to stay housed following litigation, compared to one-third of unrepresented tenants. When tenants are represented, they are less likely to be evicted, but also less likely to default, more likely to receive rent abatement and repairs, and more likely to obtain favorable settlements.

But current legal aid efforts are catastrophically under-resourced. Nationally, housing-related legal

problems are one of the top three legal problems faced by Americans, with 29% of all renters experiencing at least one legal problem related to their rental. 63% of renters report that their rental problem affected their lives “very much” or “severely.” Yet, only 17% of renters who experience a legal problem related to their rental sought legal help, and an estimated 86% of problems received little or no professional legal help. In a recent report by the Utah Foundation, only half of surveyed low-income Utahns that sought help for any legal problem received some kind of assistance. Of those who received help, “about one-in-five found assistance from a social or human service agency, one-in-five found help online, and another one-in-five hired a paid attorney. Only about one third used free legal help.” In Utah, only 9% of legal aid services involve legal matters related to housing, compared to 31% and 27% of matters related to family law and immigration, respectively.

Pro bono cannot meet the legal needs of renters either: it would take 180 pro bono hours from each licensed attorney in the United States to provide just one hour of legal assistance to every household experiencing a civil legal problem. Nationally, only 20% of attorneys are providing at least 50 pro bono hours per year, as ABA Model Rule 6.1 recommends, and 20% of attorneys had never undertaken any pro bono service. Further, few attorneys delivering pro bono assistance are serving people with housing problems: in a survey of over 47,000 attorneys engaging in pro bono services, only 4% of limited-scope pro bono representation and 4% of pro bono direct representation related to housing law.

Keeping tenants housed requires cross-sector problem-solving and assistance, but legal services are siloed from social services. Nationally, and in Salt Lake County, the most common reason for eviction is nonpayment of rent. A tenant experiencing a threat to their ability to pay rent is more likely to interface with social services than legal services when the risk of a missed rental payment occurs, because the housing instability is not yet court-involved. At that stage, tenants need social services that can connect them with rental assistance and other community resources. Legal services are often not accessible until an eviction is filed, at which point the rapid and rigid eviction process limits a legal advocate’s ability to identify and assert legal defenses. When legal services are coupled with social services, tenants can experience successful outcomes that stabilize housing. For example, Brooklyn Housing Court Navigators in New York City Court Navigator’s Program “provide information, moral support and accompaniment to meetings with judges, attorneys and clerks” and “work with tenant to make connections to benefits and human and social services that can support the timely and full payment of rent.” No tenants assisted by these navigators experienced a formal eviction from a marshal, compared to 11% city-wide.

The ability of social services and legal services to partner on advancing housing justice is curtailed by unauthorized practice of law (UPL) restrictions, which dictate that only lawyers can give legal advice. As a result, in the current landscape, the nonprofit sector’s ability to meet the diverse needs of low-income

tenants is fractured: tenants are navigating social services for rental and resource assistance, and are being referred to legal services for advocacy. That fracturing is problematic for a tenant facing multiple life stressors, particularly given the imbalance between the legal needs of tenants and the legal services available to them. Many tenants drop out of problem-solving due to this “too many doors” problem; tenants are also at risk of re-traumatization as they attempt to navigate multiple service organizations for the same problem.

Most people working in CBOs interviewed in i4J’s research are aware of UPL restrictions, and described various service issues that UPL creates for them. Some stated that UPL has a chilling effect on their capacity to serve, disincentivizing them from providing assistance that could be misconstrued as legal advice. CBO staff stated that they are consistently asked legal questions related to housing, and worry about crossing the line from information to advice to assist clients in crisis who want to know what they should do, not just what their options are. One stakeholder explained how difficult it is to explain the eviction process without giving legal advice, and that this prevents them from fully assisting clients. Other stakeholders explained that they hesitate to refer clients to legal aid, knowing that legal aid can serve only a fraction of those who need and qualify for their services. We can protect our most vulnerable populations from the devastating consequences of eviction, displacement, and homelessness, by re-imagining how UPL reform could increase the capacity of the social service sector to deliver legal advice upstream, before a socio-economic housing problem goes to court.

3.2. Does your proposal comply with applicable Utah legal requirements?

For example: staffed by UT licensed attorneys, built to complete state legal forms.

Yes. The HSLA curriculum is roughly 80 hours in length. Within this curriculum, there is a module devoted to compliance with Utah's Rules of Professional Conduct. The portions of the curriculum which train HSLAs to identify the relevant court forms to refer clients to will reference the forms available at the Utah State Court Self-Help Website. In addition, HSLAs will be trained to identify the legal issues which fall outside of their scope of service, to refrain from providing legal advice about those issues, and refer those issues to a licensed attorney.

The HSLA curriculum was created by i4J, a law school program, with input from Utah-licensed attorneys. i4J also received feedback on the curriculum from members of the Court, attorneys representing tenants, attorneys representing property owners, and people experiencing housing instability. Utah-based subject-matter experts, including attorneys, will be creating and contributing content to the course modules. This training will be supervised by subject-matter experts, including attorneys, who will remain available to assist HSLAs as needed throughout their work as advocates.

3.3. Identify which of your service models are ready to immediately implement.

The Office of Innovation is only authorized to consider proposals which are ready to begin offering legal services not currently authorized in Utah at the time of authorization.

The HSLA Initiative is ready to begin offering services once funding is secured and the HSLA curriculum is constructed within its online platform. i4J is actively applying for grant funding for this initiative. The HSLA curriculum will be complete within six months of funding being secured, and the HSLAs will begin providing services immediately following completion of the curriculum.

4. Confirmation Of Eligibility

Completed - Oct 21 2022

4. Confirmation Of Eligibility

4.1. List all persons and entities who wholly or partially direct the management or policies of your proposed entity and/or the direct provision of legal services to consumers, whether through ownership of securities, by contract, or otherwise (“controlling persons”).

Innovation for Justice is jointly housed at the University of Arizona and the University of Utah. Neither i4J nor its host entities are direct legal service providers.

Participating CBOs will provide supplements to this application that provide organization-specific responses to this question.

4.2. List all persons and entities who will wholly or partially (greater than 10%) finance the business of your proposed entity (“financing persons”).

Innovation for Justice is funded by the University of Arizona and the University of Utah. Additional donors are listed on our website at: <https://www.innovation4justice.org/team>

Participating CBOs will provide supplements to this application that provide organization-specific responses to this question.

4.3. Please note that no financing person may be a disbarred or suspended lawyer. List all controlling persons who are disbarred or suspended lawyers.

None.

i4J will require CBOs applying to the HSLA Initiative to confirm that no disbarred lawyers are in managerial control, and will screen and exclude CBOs as appropriate.

4.4. List all controlling persons or financing persons of your proposed entity who have a felony criminal history

None.

i4J will require CBOs applying to the HSLA Initiative to confirm that no controlling persons or financing persons at the CBO have a felony criminal history, and will screen and exclude CBOs as appropriate.

4.5. List all persons who will be in a managerial role over the direct provision of legal services to consumers who are disbarred lawyers.

None.

i4J will require CBOs applying to the HSLA Initiative to confirm that no disbarred lawyers are in managerial control, and will screen and exclude CBOs as appropriate.

4.6. List all persons who will be in a managerial role over the direct provision of legal services to consumers who have a felony criminal history.

None.

i4J will require CBOs applying to the HSLA Initiative to confirm that no persons in a managerial role over the direct provision of legal services have a felony criminal history, and will screen and exclude CBOs as appropriate.

4.7. Please select the most accurate description: My proposed entity has a material corporate relationship and/or business partnership with:

Neither a disbarred / suspended lawyer nor an individual with a felony criminal history

4.8. Disclose any history of state or federal criminal (misdemeanor or felony) conviction, state or federal consent decree, or state or federal enforcement action resulting in sanctions (disgorgement, civil penalties, and/or injunction) for the entity and, if applicable, its parent and other affiliated companies.

None.

i4J will require CBOs applying to the HSLA Initiative to disclose any history of state or federal criminal conviction, state or federal consent decree, or state or federal enforcement action resulting in sanctions, and will screen and exclude CBOs as appropriate.


4.9. Disclose whether the entity, parent, and other affiliated companies are, to their knowledge, currently subject to a state or federal criminal investigation or state or federal enforcement action.

None.

i4J will require CBOs applying to the HSLA Initiative to confirm that they are not subject to a state or federal criminal investigation or state or federal enforcement action, and will screen and exclude CBOs as appropriate.

I confirm that no financing persons listed in this application are disbarred or suspended lawyers.

Signature

A handwritten signature in black ink on a light gray background. The signature is stylized and appears to read "Stacy Butler". It consists of several overlapping loops and a long horizontal stroke extending to the left.

Printed Name

Stacy Butler

Title

Director, Innovation for Justice

Date

Oct 21 2022

Selling of Consumer Data Disclosure

Please indicate whether your business model includes the sharing or selling of consumer data in any form to third parties.

No

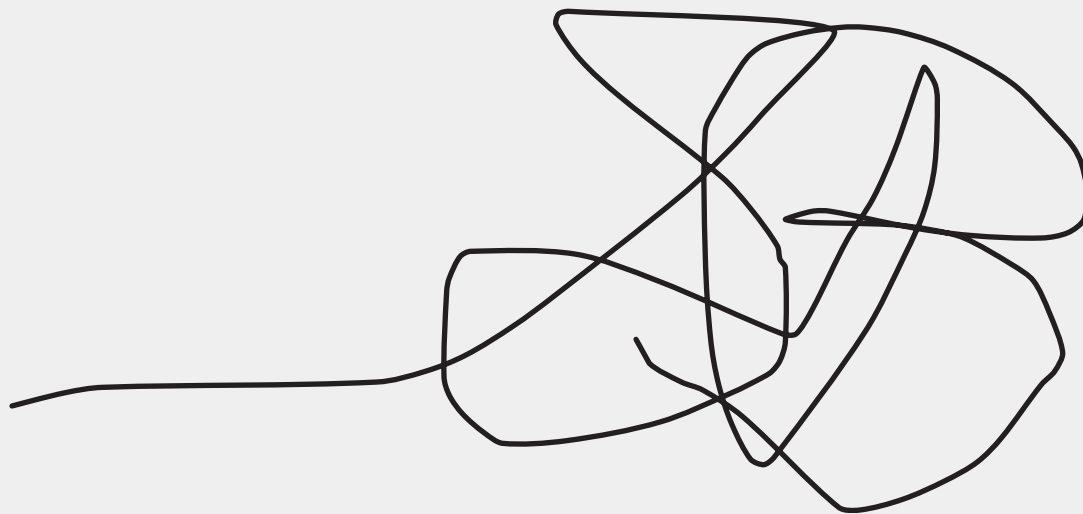
Public Application

Your application will be made publicly available. You will have the opportunity to make a claim of business confidentiality for specific information that would qualify for protection under GRAMA Section 63G-2-305. Making false or materially misleading statements in this application is a basis for loss of authorization to practice within the Sandbox. Other criminal and civil sanctions may also apply.

Responses Selected:

I understand.

Signature

A handwritten signature in black ink on a light gray background. The signature is highly stylized and abstract, consisting of several overlapping loops and lines that do not clearly resemble a specific name.

Printed Name

Stacy Butler

Title

Director, Innovation for Justice

Date

Oct 21 2022

GRAMA

In Progress - Last edited: Oct 21 2022

GRAMA

SANDBOX PARTICIPANT GRAMA CLAIM OF BUSINESS CONFIDENTIALITY

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, Innovation for Justice (company name) asserts a claim of business confidentiality to protect the following information submitted as part of an Application for authorization to offer legal services in the Sandbox.

No Responses Selected

This claim is asserted because this information requires protection as it includes:

No Responses Selected

Following is a concise statement of reasons supporting the claim of business confidentiality:

(No response)

Signed

On behalf of (company): Innovation for Justice

Date

Oct 21 2022