

IOLLA FUND

Board of Trustees

11 East 44 Street
Suite 1406
New York, NY 10017

December 17, **2024**

NOTICE:

In compliance with Executive Order 3, *Promotion of Public Access to Government Decision-Making* (January 1, 2007), the Board of Trustees meeting will be videotaped for public internet viewing.

Meeting Agenda

Location: IOLA Fund Offices (New York, NY)

Date: Tuesday December 17, 2024

Time: 4:00 pm

1. CALL TO ORDER

Chair Davis will call the meeting to order.

2. APPROVAL OF MINUTES

Chair Davis will entertain motions to approve the minutes, included at **Tab 2**, for the following meetings:

- a. **Board of Trustees on September 27, 2024**
- b. **Grants Committee on December 10, 2024**

3. EXECUTIVE REPORT

Ms. Fecko will provide her Executive Report. Please see **Tab 3** for materials.

- a. **FY26-FY30 RFP**
- b. **Judiciary Related Matters**
- c. **IOLA Office**
- d. **Announcements**

4. ADMINISTRATIVE AND FINANCIAL REPORT

Ms. Agard will provide her Administrative and Financial Report. Please see **Tab 4** for materials.

- a. **Financial Statement – October 2024**
- b. **Consolidated Bank & Revenue Report**
- c. **Administrative Budget**

5. GENERAL COUNSEL

Ms. Nyiendo will provide her report. Please see **Tab 5** for materials.

- a. **Grantee Matters**
- b. **Attorney and Bar Associations**
- c. **Banking Compliance**
- d. **Ethics Matters**
- e. **Overview of Interest Reimbursement Requests**

6. JUSTICE INFRASTRUCTURE PROJECT

Ms. Fecko will report on the Project. Please see **Tab 6** for materials.

7. MEETINGS

The Trustees will confirm the scheduled meetings for Calendar Year 2025.
Please see **Tab 7**.

8. EXECUTIVE SESSION

Please see **Tab 8** for Motion and materials.

9. OPEN SESSION VOTES

a. Grant Awards

b. Interest Reimbursement Requests

10. ADJOURNMENT

IOLA Fund of the State of New York
Meeting of the Board of Trustees – New York, NY
September 27, 2024
DRAFT

Present: Chair Davis, Trustees Dunham and Lindenauer

Public

Videoconference: Trustees Cirando, Galowitz, Madigan, Ross and Villaverde

Staff: Fecko, Nyiendo and Agard

1. Call to Order.

The meeting was called to order by Chair Davis at approximately 12:05 p.m. Remarks by Chair Davis welcoming Ms. Fecko as the new Executive Director and Ms. Nyiendo as the new General Counsel.

2. Approval of the minutes of the meetings of the Board of Trustees held on June 5, 2024 and August 2, 2024.

The minutes of the above meetings were reviewed. Trustee Lindenauer moved to approve the minutes, seconded by Trustee Madigan, and the Board approved the motion unanimously.

3. Executive Report

Ms. Fecko reported on the completion of the search for General Counsel, noting that there were over 100 applicants. Ms. Fecko welcomed Ms. Nyiendo as the new General Counsel. Ms. Fecko noted that Ms. Nyiendo will generate a General Counsel report starting with the next Board meeting.

Ms. Fecko reported that the Transition Committee has been meeting monthly. Ms. Fecko reported that the Chair intends to convene a Strategic Planning Committee. Ms. Fecko requested the Board authorize up to \$50,000 to retain a consultant to work with the Strategic Planning Committee. Trustee Lindenauer moved to approve the motion and Trustee Cirando seconded. Discussion ensued. Trustee Villaverde moved to amend the motion to authorize up to \$45,000 for a consultant. Chair Davis seconded. Motion was approved unanimously.

Ms. Fecko discussed the pending grant contract modifications. For FY '24 and '25, there are 70 grants that have now been modified to provide an additional \$10 million appropriation in FY '25, eight grants that are in the process of being modified, and two that are on hold.

For FY '26-'30, Ms. Fecko reported that an RFP has been released providing for up to \$562.5 million over a five-year period. The applications are due on October 28. On October 2 at 10 a.m., we will be doing a Bidder's Conference. To date, we have 140 pre-registrants. The Grants Committee is scheduled to meet on December 10, with final decisions on grant applications made by the Board at the

Board meeting on Dec 17. The Board has a new portal to access the applications and we will be training the Board on how to access the materials.

Ms. Fecko reminded the Board that, although we are not required to follow the lobbying prohibition under state law since grants are excluded, we nevertheless will so as to avoid an appearance of any impropriety and to promote fairness in the applications process. Moreover, once the application period has closed, Ms. Nyiendo will circulate to the Board a list of applicants for a conflicts check.

The upcoming 5 year grant cycle is dependent upon state budget considerations. DOB has approved us moving forward with a five year grant term, but advised that it could not approve an RFP that would exceed the annual funding already built into the current financial plan. We will continue conversations with DOB later in the Fall and during the appropriations process regarding the IOLA Fund's annual budget. We intend to advocate to DOB for a budget appropriation in line with our Board's grant authorization of an RFP up to \$562.5 million over a five year period.

Ms. Fecko advised that she met recently with elected and other state officials, including Senators Krueger and Hoylman-Sigal, as well as the Secretary to the Assembly Ways & Means Committee, and the Director of Senate Finance. Ms. Fecko provided information to them on the IOLA Fund and a one-page overview of IOLA's concerns; as well as a graph depicting the volatility of interest rates over the last 20 years.

Ms. Fecko reported that the Office of Court Administration (OCA) reached out to her to discuss shifting the \$18 million sub-allocation from IOLA back to OCA. Ms. Fecko and Ms. Nyiendo have a meeting with OCA in early October to discuss.

Ms. Fecko advised that earlier in the week she and Ms. Nyiendo attended the biannual NYSBA Partnership Conference in Albany where we engaged with over 500 civil legal aid attorneys and advocates from the non-profit community. Ms. Fecko also conducted a CLE over the summer with the NYC Bar, and will be doing another one through NYSBA on September 30, as well as one sponsored by the Monroe County Bar Association later this year, and one sponsored by the Third Department. Ms. Fecko and Ms. Nyiendo will be attending the ABA Forum on Building Access to Justice For All in California on October 23-25. Ms. Fecko will be moderating two plenary sessions on IOLTA programs and supporting generative AI in legal aid projects.

Ms. Fecko advised that the annual report is in the process of being finalized and should be circulated to the Board and state partners in a few weeks.

Ms. Fecko reminded the Board that the annual ethics training is due on December 31. It can be conducted online and is a recorded video.

Ms. Fecko congratulated Trustee Villaverde for his election as the President of the Bronx County Lawyers Association.

4. Administrative and Financial Report

Ms. Agard provided an overview of the Administrative Report. Ms. Agard reported that the cash balance in the beginning of July was approximately \$468 million with interest earnings in the month of July of approximately \$20 million, grant expenses of approximately \$8 million, and administrative expenses of \$168,000. The STIP revenue in July was nearly \$2.2 million, leaving over \$483 million on hand as of August 1.

Turning to the interest data, Ms. Agard reported that 169 banks reported in June with a net yield of 2.60%. There were approximately \$21.43 million in deposit revenue in June. The average daily balances of \$9.4 billion are just above the 12-month average of \$8.7billion.

The year-to-date interest revenue is approximately \$84 million.

With respect to the state's FY '25 Budget transfer of \$55 million from IOLA to other government programs, Ms. Agard reported that \$40 million has already been reappropriated (to fund the Attorney General's homeowner protection program) with the remaining \$15 million (to fund an OTADA eviction prevention program) still untouched in our fund.

Ms. Agard reported that the Federal Reserve met last week, and reduced interest rates by 50 basis points. We have sent letters to our Safe Harbor banks advising them of their obligations, and have started to receive requests from banks for rate changes to IOLA accounts. The benchmark rate will go down to 3.0% from 3.3%. The Fed has signaled that it will likely cut interest rates again by the end of the year as well as into the next year.

5. Justice Infrastructure Project

Ms. Fecko introduced Mr. Neil Steinkamp, IOLA Fund's consultant from Stout, who has been working with us on the Justice Infrastructure Project (JIP). Ms. Fecko and Mr. Steinkamp reported on the progress of the project.

Ms. Fecko advised that we posted on September 25 on our website three documents pertaining to the JIP: Phase I, Vision, and Phase II. Ms. Fecko and Mr. Steinkamp discussed the content of the three documents.

In brief, with respect to Phase I, Mr. Steinkamp discussed the broad listening sessions we engaged in with numerous stakeholders to hear where they felt the gaps in service lay and where the need remained. These stakeholders included legal and non-legal sources, and were in-person meetings, video meetings, as well as online website input.

With respect to the Vision and Phase II, Ms. Fecko relayed that we intend to create a statewide support function for legal services organizations; and a

statewide legal information and referral for the public. These functions include, but are not limited to, a coordinated knowledge management system, a call center, coordinated public outreach, tech support, and use of generative AI.

Ms. Fecko advised that she is continuing to solicit feedback on the Vision over the next few months. We intend to wrap up Phase II around February 2025.

Ms. Fecko spoke on two panels at the NYSBA Partnership Conference last week in Albany about the JIP, and it was well received by the non-profit community.

Mr. Steinkamp left the meeting.

5. Next Meeting

The next Board meeting is Tue December 17 at 4pm in the IOLA Fund offices. We will discuss grant applications at that time. The Grants Committee is meeting on December 10 at a time to be determined.

6. Executive Session

Chair Davis made a motion to enter into Executive Session to consider matters relating to financial matters on two organizations, and potential litigation, which was seconded by Trustee Lindenauer and approved without objection.

There being no further business before the Board, the meeting was adjourned at approximately 2:30 p.m.

Respectfully submitted,
Licha Nyiendo
General Counsel

IOLA Fund of the State of New York
Meeting of the Grants Committee of the Board of Trustees
December 10, 2024

Present: Chair Davis and Trustee Galowitz
Video-Conference: Trustees Lopez-Soto, Madigan and Ross
Staff: Fecko, Nyiendo and Fehringer

1. Call to Order.

The meeting was called to order by Chair Davis at approximately 1:03 p.m.

2. Grant Process Overview

Ms. Fecko provided an overview of the grant process, noting that due to historic revenues, for the first time in its history, the IOLA Fund will award five-year grants. The RFP, which was released on September 28, 2024, will be providing funding up to \$562,500,000 for FY 2026 – 2030. Applications were due on October 28, 2024. Applications were reviewed for completeness by staff and whether they satisfied the requirements of the Bureau of Contracts' Grants Team Unit and the Office of State Comptroller.

These grants will provide significant additional funding as well as stability for civil legal services across New York. Ms. Fecko noted that this also provides an opportunity for the Board of Trustees to support increased immigration legal services, which the Board has recognized as an area of high need. Ms. Fecko generally described the CLS and AOJ categories, including the requirement within CLS of geographic units and the allocation of funds based on the per capita poverty population, as well as the need for breadth of programming. Ms. Fecko advised that grant award recommendations were limited by the amount requested.

Ms. Fecko stated that a summary of the Trustees' conflicts of interest had been previously circulated to the Board by Ms. Nyiendo. Ms. Fecko reminded the Board to abstain from participating in discussion or a vote regarding an applicant to whom they have a conflict.

Trustee Dunham entered the meeting in person at 1:15 p.m. Trustee Villaverde entered the meeting via video conference at 1:20 p.m.

3. Executive Session

Trustee Galowitz made a motion to enter into Executive Session to consider matters relating to the financial history and appointment of particular corporations (i.e., IOLA grantees), which was seconded by Chair Davis and approved without objection. While in Executive Session, Ms. Fecko and Ms. Nyiendo provided the Committee with additional details and answered questions regarding the recommendations as to grant awards for the FY2026 - FY2030 grant cycle.

Trustee Galowitz made a motion for the Committee to advance the staff recommendations on grant awards to the Board of Trustees at its meeting on

Tuesday, December 17, 2024. The motion was seconded by Trustee Lopez-Soto and unanimously approved.

There being no further business, the meeting was adjourned at approximately 3:10 p.m.

Respectfully submitted,

Licha M. Nyiendo
General Counsel

Interest on Lawyer Account Fund of the State of New York

Funding civil legal assistance for low-income New Yorkers since 1984

CHRISTINE M. FECKO, Esq.
Executive Director

DATE: December 11, 2024

TO: IOLA Board of Trustees

RE: December 17, 2024, Board Meeting, Executive Report

1. FY26-FY30 RFP

RFP Details. On September 18, 2024, the IOLA Fund released an RFP to grant out up to \$562,500,000. Approximately 160 people attended the two-hour virtual bidder's conference held on October 1st and, in total, the IOLA Fund responded in writing to a record number of 97 questions received at the bidder's conference and during the application process. 108 applications were received by the deadline on October 28, 2024. The Grant Committee met on December 10th and the individual grant recommendations have been shared with the Board via SmartSimple.

Board Access to Applications. The IOLA Grants Team developed an online portal for IOLA Board members to access grant materials, created a user guide, and provided a short training session to Board members on November 20.

Trustee Conflict Disclosures. As in prior grant cycles, the General Counsel provided all Trustees with a list of grant applicants, the Trustees confirmed their affiliations, and the conflicts have been summarized and shared with the Board.

State Budget Considerations. As in all grant cycles, final grant awards will be subject to available IOLA funding, the State of New York Contract for Grants, and the IOLA Fund's appropriation under the NYS Budget. This language has been included in the RFP and will be included in award letters.

IOLA submitted its formal response to DOB's State Fiscal Year (SFY) 2026 call letter. Additionally, IOLA has advocated for grant appropriations over the next five fiscal years in the total amount of \$600 million, which is in line with the IOLA Board's grantmaking plan, and for a modest increase to the IOLA Fund's administrative budget for SFY 2026.

2. Judiciary Related Matters

Budget. The Unified Court System's (UCS) FY 2026 Budget Request was submitted to the Governor. UCS seeks \$150M for civil legal services, an increase of \$45.5M. With respect to the IOLA Fund, UCS's budget did not include a transfer to IOLA. In an apparent reference to IOLA's plan to grant out \$600M over the next five years, UCS's

budget summary did include, however, the statement that UCS “strongly supports IOLA’s proposed plan for a phased-in growth in grant awards beginning in FY 2026.”

PCAJ. Helaine Barnett has stepped down as co-chair of the Permanent Commission on Access to Justice, continuing to serve on the Commission. Janet Sabel has taken her position, serving as the third co-chair alongside Justices Christina Ryba and Shahabuddeen Ally. In addition to participating in the Technology Committee, I have joined the Expanding Legal Roles Committee, which is chaired by Janet Sabel and Kristin Brown. At the October meeting, which I attended in person in Albany, I presented on the Justice Infrastructure Project, which was well received. The 2024 Annual Report is expected to be released soon.

3. IOLA Office

The lease for the IOLA Office ends November 30, 2025 and IOLA Staff have begun renegotiating the terms, including renovations. Michele Agard will be managing this project.

4. Announcements

ABA Forum. Licha Nyiendo and I attended the annual **ABA Forum on Building Access to Justice For All**, which was held in Southern California, October 23-25. The Forum combines the Joint IOLTA Conference and the National Meeting of State Access to Justice Commission Chairs. I moderated two plenary sessions: *From Interest to Impact! What IOLTA Programs Are Doing with their Increased Revenue and Supporting Generative AI in Legal Aid Organizations and Other Emerging Technology Projects*. In addition to attending many excellent conference programs, we organized an informal discussion of our Justice Infrastructure Project with over a dozen leaders – many of whom have been or are currently working on systemic improvements to their civil legal services delivery – to assist with our research and strategy efforts.

CLE Presentations

- September 30: **NYSBA** sponsored CLE program entitled “Everything You Need to Know About Escrow Accounts”
- November 7: **Monroe County Bar Association** sponsored CLE program entitled “Mastering Ethical Obligations: Best Practices to Avoid Attorney Trust Account Mistakes”
- December 16: **NYC Bar Association** sponsored panel entitled “Client Trust Account Management: Essential Skills Workshop”
- December 18: a special program on escrow accounts for **Third Department** Justices and Court Attorneys

IOLA's Annual Report

IOLA's FY 2024 Report, which contains details about the direct financial benefits and the overall economic impact of IOLA grantees' work as well as the Justice Infrastructure Project, has been released to our appointing authorities, the IOLA Board, and on the IOLA website.

5. Goals for the Next Board Meeting

By the next Board meeting, we have identified the following goals:

- Work with DOB and OSC to obtain approval of the procurement for the FY26-FY30 grant contract.
- Work with our grantees to revise goals and budgets and otherwise make efforts to ensure the prompt execution of the FY26-FY30 grant contracts upon DOB and OSC approval of the procurement.
- Continue to advance the Justice Infrastructure Project, including convenings in January and March relating to the statewide support function and the legal information and referral function, respectively.
- Support the launch of Strategic Planning.
- Advance plans for office space.
- Begin database improvement project relating to attorney information.
- Conduct grantee meetings, including in upstate communities, to introduce the new General Counsel.
- Share the Permanent Commission on Access to Justice's 2024 annual report with the IOLA Board.

**MEETING OF THE BOARD OF TRUSTEES
OF THE IOLA FUND OF NEW YORK
December 17, 2024**

RESOLUTION

WHEREAS, Section 169 of New York Executive Law sets the salaries for commissioners, agency heads, and other specified positions;

WHEREAS, the New York State Commission on Legislative, Judicial and Executive Compensation (the “Commission”), established by Part E of Chapter 60 of the Laws of 2015, as amended, created four categories of commissioners and authorized the Executive, through the Division of Budget, to set forth a plan for classifying state entities into the four categories, referred to as Tiers A-D;

WHEREAS, the IOLA Fund previously was classified as Tier D, but was recently informed by the Division of Budget that, effective January 1, 2025, it had been re-classified as Tier C;

WHEREAS, the Commission released a report dated November 14, 2024, providing that the maximum salary under Tier C is \$200,000.

THEREFORE, BE IT RESOLVED that the Board of Trustees of the IOLA Fund of New York fixes the salary of the IOLA Fund Executive Director to be no less than \$200,000 with any future increases to result in a base salary no less than that of agency heads under Tier C of the Plan; and

BE IT FURTHER RESOLVED that the Board of Trustees of the IOLA Fund of New York certifies and authorizes the New York State Comptroller to make salary payments from the IOLA Fund in accordance with the terms of this resolution.

Motion by: _____

Seconded by: _____

Vote: _____

Vote Recorded by: _____

New York, New York
December 17, 2024

ADMINISTRATIVE REPORT

Prepared by: Michele D. Agard
Director of Administration

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Variance Report (FY' 25 vs. FY'24)

A. Financial Statement October 2024

**IOLA Fund of the State of New York
Financial Statement October 2024**

NYS IOLA Cash Balance: October 1, 2024 **\$ 523,370,693.00**

Adjustments:

Deposit Revenue: October 2024 \$ 18,325,210.00

Deposit STIP Revenue: October 2024 2,202,361.00

IOLA Admin Expense: October 2024 **\$ (166,040.00)**

IOLA Grant Expense - October **\$ (6,917,863.00)**

SUB-TOTAL **\$ 13,443,668.00**

**Opening
November 1, 2024
Cash Balance:** **\$ 536,814,361.00**

B. Consolidated Bank & Revenue Report

TOTAL NO. PARTICIPATING FINANCIAL INSTITUTIONS (REMITTING) 129

average net yield percent October 2024: 2.52%

lowest rate: 0.01%

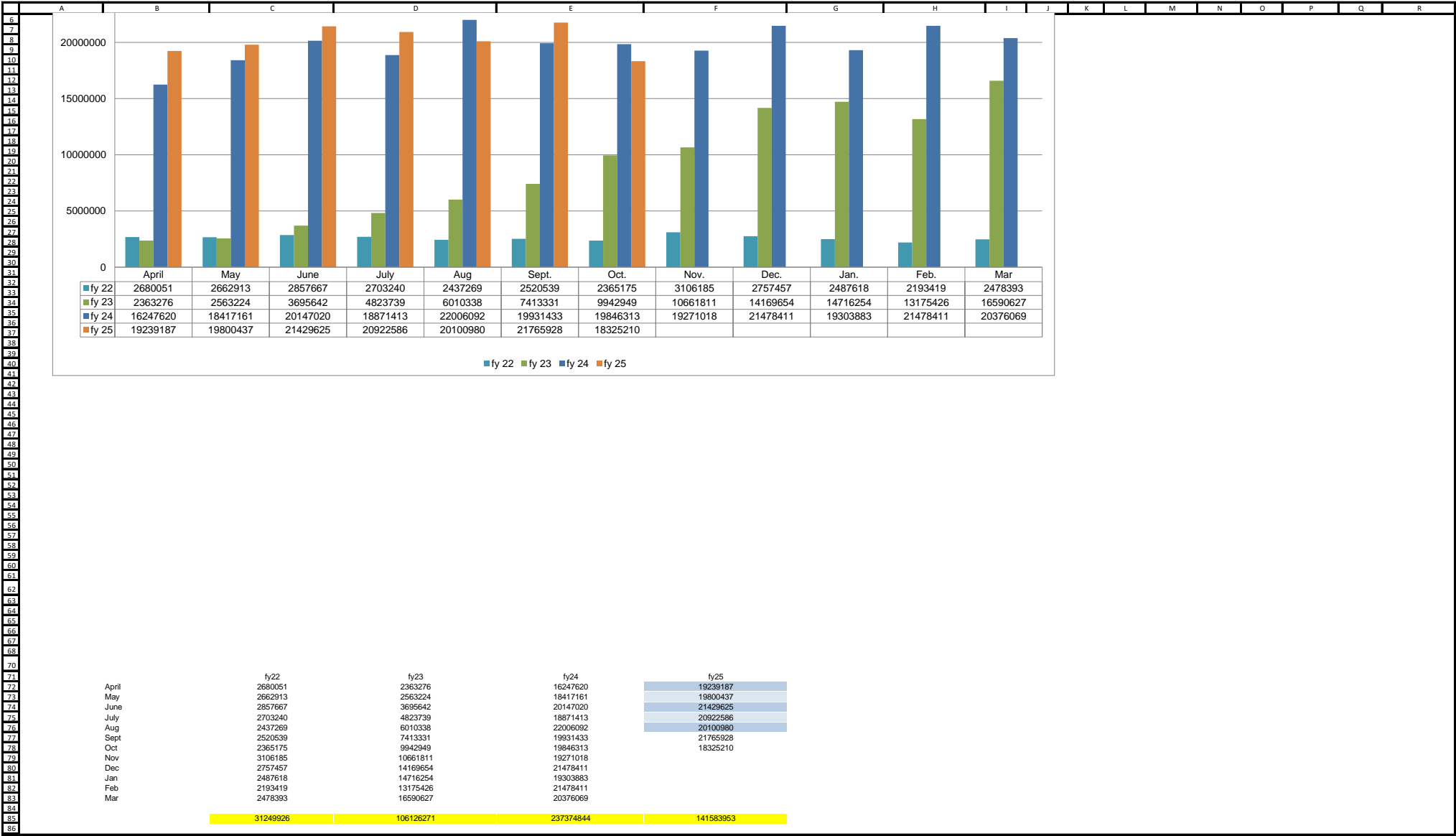
highest rate: 4.89%

percent of all banks remitting this month: 65%

percent of banks waiving fees: 70%

	Oct-24	Oct-23	Change	
Current Month Interest Revenue (Earnings)	18,325,210	19,846,313	(1,521,103)	-7.66%

FY 24-25 vs. FY 23-24 Year-to-date Interest Revenue	\$ 141,583,953	\$ 135,467,052	6,116,901	4.52%
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REVENUE COMPARISON

Month	FY 22	FY 23	FY24	FY25	FY 22	FY 23	FY 24	FY 25
APR	2,680,051	2,363,276	16,247,620	19,239,187	28,684,491	30,933,151	120,010,615	243,302,499
MAY	2,662,913	2,563,224	18,417,161	19,800,437	26,595,047	30,833,462	135,864,552	244,685,775
JUN	2,857,667	3,695,642	20,147,020	21,429,625	29,658,768	31,671,437	152,315,930	245,968,380
Quarter 1	8,200,631	8,622,142	54,811,801	60,469,249				
JUL	2,703,240	4,823,739	18,871,413	20,922,586	30,300,098	33,791,936	166,363,604	247,996,967
AUG	2,437,269	6,010,338	22,006,092	20,100,980	30,579,939	37,365,005	182,359,358	243,113,950
SEP	2,520,539	7,413,331	19,931,433	21,765,928	30,857,325	42,257,797	194,877,460	244,948,445
Quarter 2	7,661,048	18,247,408	60,808,938	62,789,494				
OCT	2,365,175	9,942,949	19,381,910	18,325,210	31,022,942	49,835,571	204,316,421	243,891,745
NOV	3,106,185	10,661,811	19,271,018		31,878,167	57,391,197	212,925,628	
DEC	2,757,457	14,169,654	21,478,411		31,998,760	68,803,394	220,234,385	
Quarter 3	8,228,817	34,774,414	60,131,339	18,325,210				
JAN	2,487,618	14,716,254	19,303,883		29,463,534	81,032,030	224,822,014	
FEB	2,193,419	13,175,426	21,478,411		31,693,104	92,014,037	233,124,999	
MAR	2,478,393	16,590,627	20,776,069		31,249,926	106,126,271	237,310,441	
Quarter 4	7,159,430	44,482,307	61,558,363	0				
GRAND TOTAL	31,249,926	106,126,271	237,310,441	141,583,953				

C. Administrative Budget

Budget Variance Report: Fiscal Year 2024-25

As of October 31, 2024

Administrative Expenses 2024-25	Expenditure October, 2024	Year to Date Expenditures 10/31/24	Current Budget*** 2024-25
SUPPLIES AND MATERIALS	\$ 578	\$ 3,856	\$ 10,000
57010 Food & Related Consum SupMat	\$ 313	\$ 1,061	
57032 Office Supplies	\$ 265	\$ 2,795	
57035 Reference Book/Mag/Map/Subscrip SM	\$ -		
TRAVEL	\$ 1,534	\$ 24,209	\$ 25,000
54010 Travel-Airplane	0	\$ 2,895	
54011 Travel Card Unclassified	\$ 1,534	\$ 2,633	
54013 Travel-Lodging	0	\$ 1,446	
54014 Travel-Meals	0	\$ 620	
54015 Travel-Mileage		\$ 352	
54017 Travel-Parkg, Tolls, IncdnTls	0	\$ 151	
54019 Travel-Public	0	\$ 15,412	
54020 Travel-Rental	0	\$ 362	
54021 Travel-Supplies			
54022 Travel-Train		\$ 298	
54023 Employee Travel- Per Diem		\$ 40	
Contractual Services	\$ 35,167	\$ 312,014	\$ 1,120,000
51010 Telephones	\$ 860	\$ 3,995	
51076 Security/Protection Software	\$ -	\$ -	
51090 Data Management Services	\$ 5,196	\$ 33,093	
51091 Internet Services	\$ -	\$ 2,294	
51092 IT Equipment M&S		\$ 47	
51093 Software Maint & Support	\$ 23	\$ 4,232	
51104 Enhanced Telecommcn Services	\$ 81	\$ 81	
55010 Newspaper/Billboards (ADV/PubNot)	564	\$ 3,773	
55047 Client Services (Unclssfd)	0	\$ 55,366	
55050 In-state Conference, Workshops, Meeting &	\$ -	\$ 665	
55051 Out-of-state Conference, Workshops, Meeting &		\$ 465	
55181 Custodial	\$ -		
55220 Shipping (Postage)	\$ -	\$ 217	
55205 Record Management Services	\$ -	\$ 12,623	
58201 RE - Rental	\$ 27,190	\$ 187,792	
58204 Tax escalation			
58401 Prompt Payment Interest			
58501 Memberships	\$ 275	\$ 976	
58971 Procurement Card Unclassified	\$ 978	\$ 6,395	
Equipment	\$ -	\$ 1,942	\$ 5,000
56009 Office Equipment R&M (include telephone)	\$ -	\$ 1,842	
56020 Equipment Lease	\$ -	\$ 100	
56040 Office Furniture			
Subtotal: Non-Personal Service			
	\$ 37,279	\$ 342,021	\$ 1,160,000
INDIRECT COST	\$ 2,481	\$ 12,103	\$ 28,000
58801 Indirect Costs	\$ 2,481	\$ 12,103	\$ 28,000
PERSONAL SERVICE	\$ 66,015	\$ 471,742	\$ 990,000
50101 Regular Employee - Base Salary	63,787.00	\$ 428,044	\$ 990,000
50107 Regular Employee - Lump Sum		\$ 25,141	
50108 Reg Employee-Additional Comp	2,228	\$ 18,557	
FRINGES	\$ 60,265	\$ 293,909	\$ 652,000
60020 Fringe Benefit	60,265	\$ 293,909	\$ 652,000
Subtotal: Personal Service			
	\$ 128,761	\$ 777,754	\$ 1,670,000
GRAND TOTAL	\$ 166,040	\$ 1,119,775	\$ 2,830,000

MEMO

TO: NY IOLA Management
From: Delta Consulting
RE: IOLA Reporting Package
Date: December 5, 2024

The data in the report represents information for interest earning periods ending **October 31, 2024**, with key data and metrics presented on a monthly, quarterly, or 12 month basis. (Note: October earnings are due and recorded as November deposits).

Monthly Summary

For the October, 2024 earnings period as shown below, 129 banks reported gross interest of over \$18.44M. Service fees were at \$121,074 which were typical for October. For the month, 42,739 accounts maintained average daily balances just under \$8.6B (which is below the twelve month average of \$8.8B). The gross yield on these accounts, meaning the effective interest rate before fees, was 2.53% for the period, and 2.52% net yield, meaning the return to the Fund after service charges were deducted, which is very good and indicates service fees that are well under control. **Exhibit 1a** displays a chart of the top 30 banks sorted by the amount of balances held at each (as those banks holding the largest balances have the greatest impact on revenue). **Exhibit 1b** is a summary of all banks for the period, sorted alphabetically.

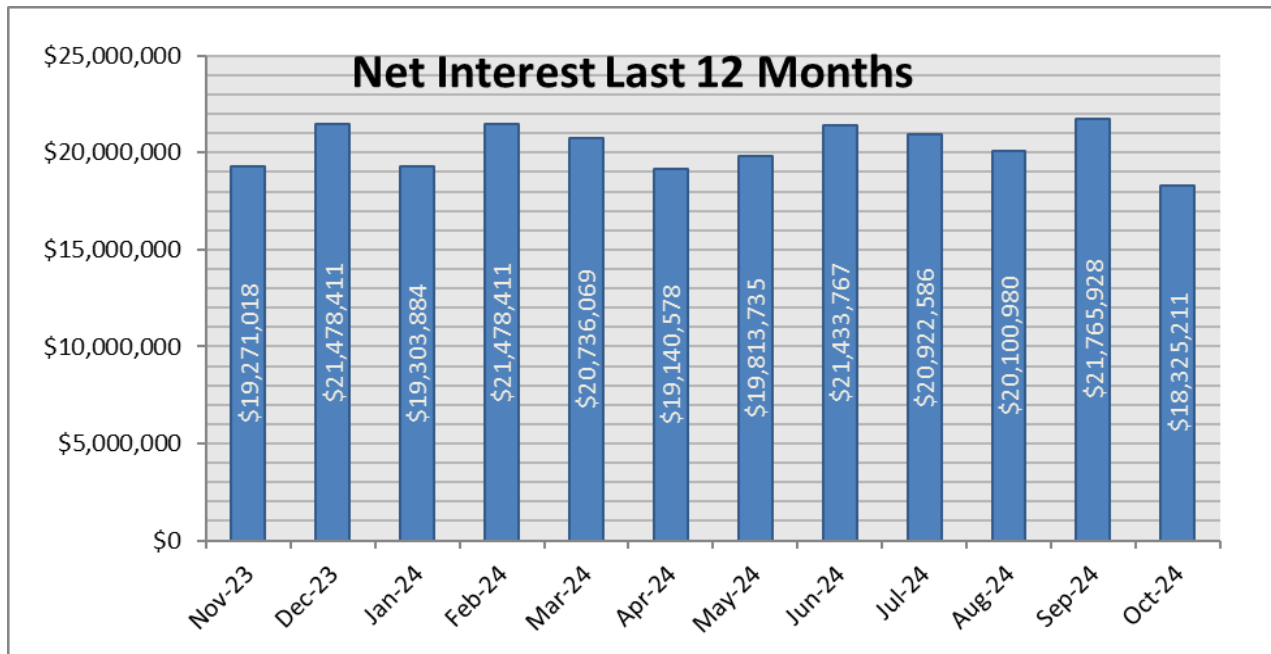
# of Banks Reporting*	Gross Interest	Service Charges	Net Interest	Avg. Daily Balance	Num Accts.	Gross Yield %	Net Yield %
129	18,446,284.78	121,074.09	18,325,210.66	8,582,852,331	42,739	2.53%	2.52%

Key Index Rates as of October 1, 2024

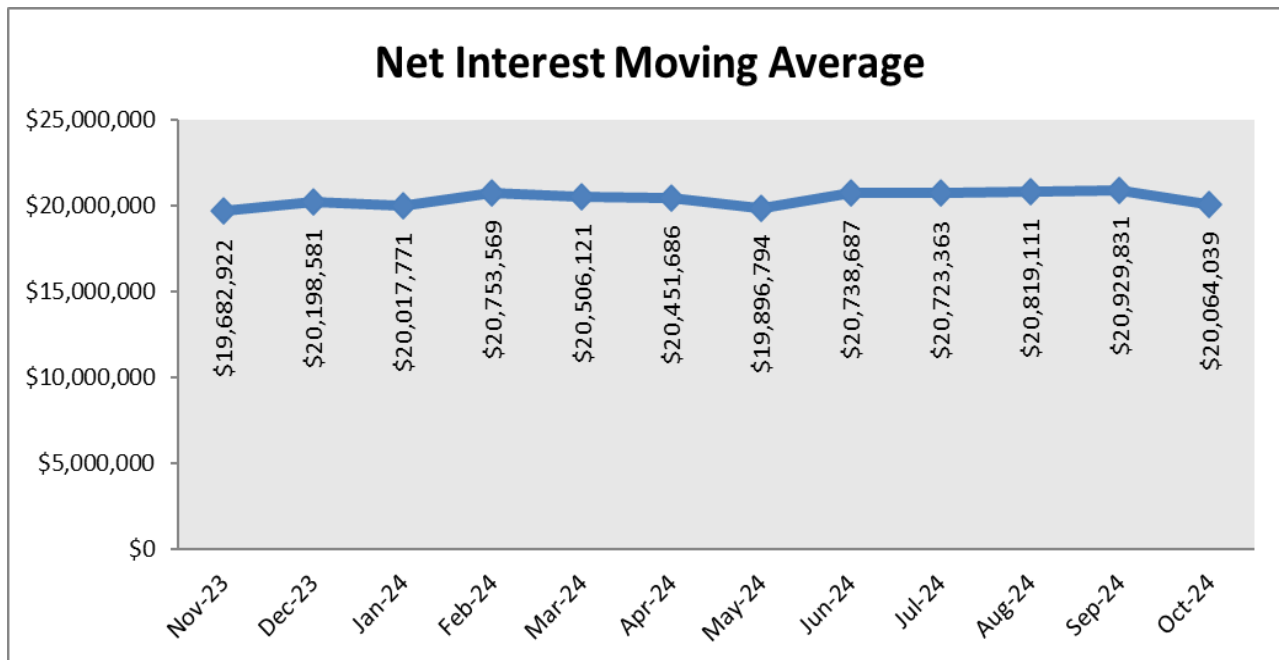
Fed Funds Target Rate (upper range)	5.00%
NY IOLA Benchmark Rate	3.00%
Platinum Partner Rate	3.00%
Gold Partner Rate	2.50%

Key Metrics-Historical

Looking at several key metrics for IOLA over the past twelve months, we note that net interest (gross interest after service fees) has generally ranged from a low of \$18.3M in October 2024 to a high of nearly \$21.5M in February 2024. October's earnings are the lowest in the past 12 months and are below the 12 month average of \$20.31M.

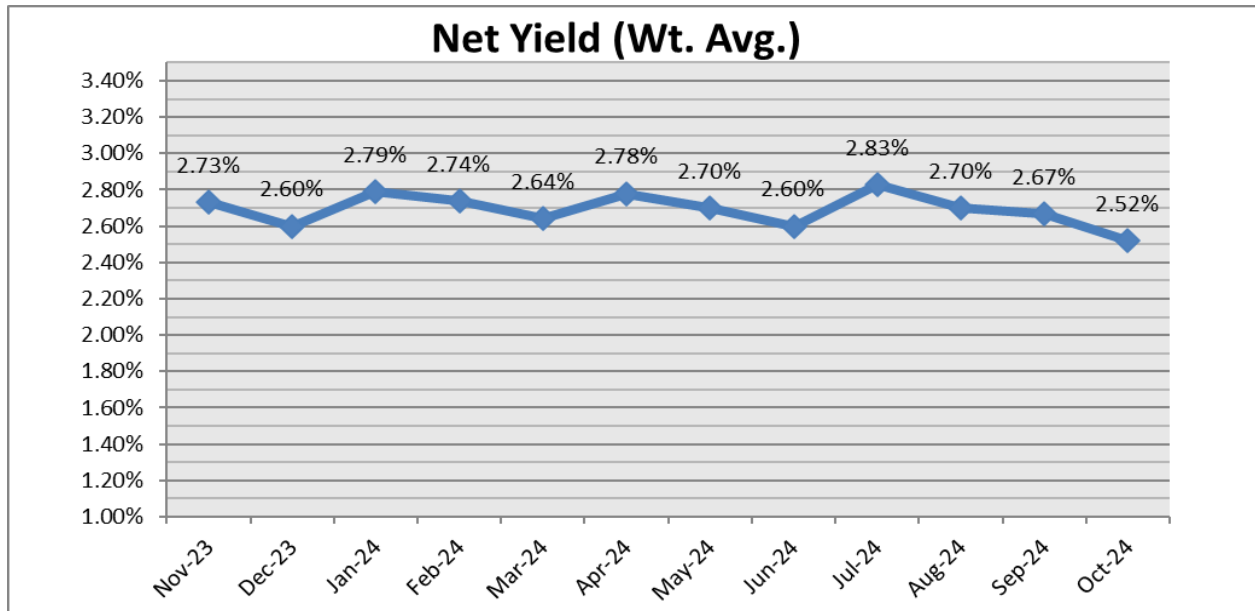


The chart below uses a three month moving average to smooth out the quarterly payments. As can be seen, the net interest moving average as of October is \$20.06M, down from September but on par with the end of 2023. Balances have dropped somewhat from their high in June 2022 of \$10.7B to \$8.58B in October 2024.



Moving to the factors that influence IOLA revenue, the first is the interest rates earned on all IOLA's and second is the balances maintained in those accounts.

Rates prior to October have been relatively flat over the last 12 months fluctuating between 2.60% and 2.83% since August of 2023. October's net yield comes in at 2.52%. This is in line with the Fed Funds Target Rate decrease of 50 basis points in September. Yields will fall slightly over the course of the next few months mainly due to the Fed's inclination to ease rates.



The second of the two factors that determines IOLA revenue is the amount of average balances being held in IOLA depositories. Again, looking at the past twelve months, we see balances generally ranging from \$8.10B to \$9.27B. October's number comes in at \$8.58B down from \$9.27B in September. However, September, and all calendar quarter months, are generally higher than average due to quarterly reporting banks.

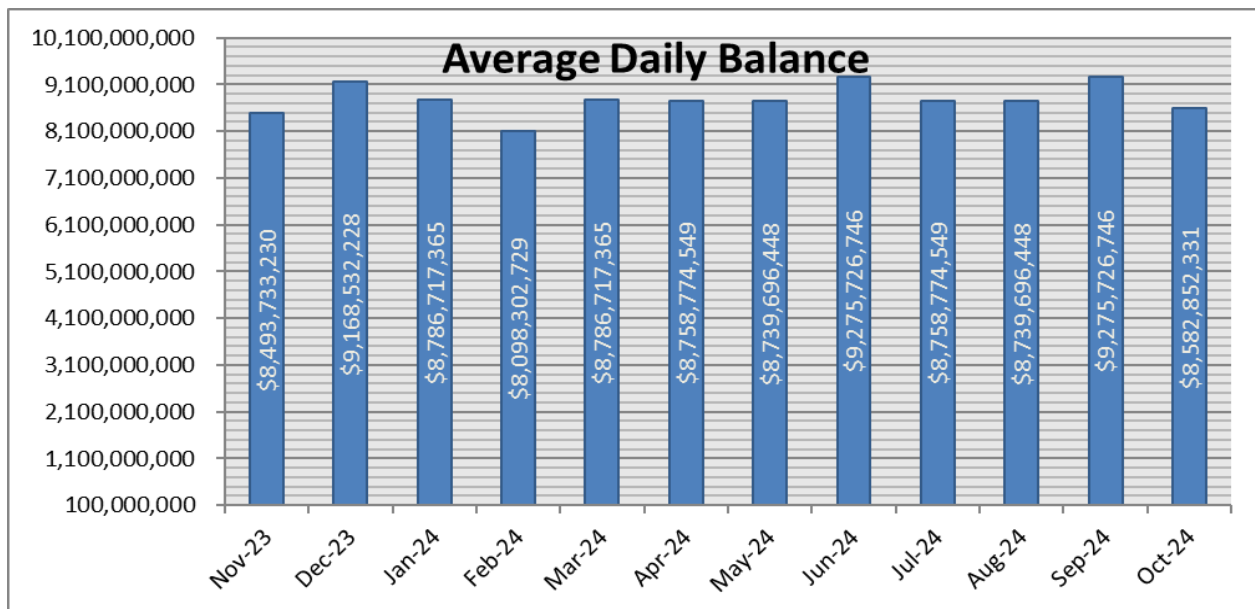


Exhibit 2a displays the historical balance detail for the 30 largest deposit holding IOLA institutions, along with its 12 month average balance and percentage of total deposits. Sorted by largest balances first, this chart shows the outsized impact the largest IOLA depositories will have on IOLA results. During October, balances were roughly in line for these large institutions. The top five institutions account for 65.2% of total IOLA balances, while the top ten institution's share rose to 80.1% of total IOLA balances. **Exhibit 2b** displays the same information for all NY IOLA institutions.

We hope you find this information useful and look forward to discussing any questions you might have.

Monthly Banks Summary - Top 30 Banks by ADB

For Earnings Period of October, 2024

Bank Name	Bank No.	Gross	SVC	Net	Bank ADB	Num Accts.	Gross Yld per Bank ADB	Net Yld per Bank ADB	Avg Acct. Net	Avg Acct. ADB
J.P. Morgan Chase	62	5,502,795.12	50,490.03	5,452,305.09	2,610,656,126	13,104	2.48	2.46	416.08	194,333
Citibank	171	2,766,329.08	0.00	2,766,329.08	1,146,720,202	8,094	2.84	2.84	341.78	237,247
M&T Bank	152	1,637,927.61	0.00	1,637,927.61	642,327,193	2,512	3.00	3.00	652.04	256,132
Webster Bank	46	1,374,646.76	11,702.58	1,362,944.18	536,844,079	1,127	3.01	2.99	1209.36	478,715
flagstar	125	1,177,559.36	12,933.76	1,164,625.60	451,536,526	1,381	3.07	3.04	843.32	334,656
Bank of America	153	982,369.11	0.00	982,369.11	386,677,592	2,234	2.99	2.99	439.74	172,584
TD Bank, NA	118	764,047.54	0.00	764,047.54	333,186,782	2,600	2.70	2.70	293.86	128,149
Dime Community Bank	149	70,892.98	3,555.00	67,337.98	218,596,026	416	0.38	0.36	161.87	1,003,254
Key Bank Services Corp.	21	537,699.47	13,184.83	524,514.64	208,243,293	1,487	3.04	2.97	352.73	140,209
Capital One	173	271,711.88	5,665.58	266,046.30	177,024,091	1,468	1.87	1.83	181.23	118,522
Orange Bank & Trust Company	41	26,832.66	0.00	26,832.66	169,137,260	372	0.19	0.19	72.13	445,344
Valley National Bank	148	331,022.94	3,741.00	327,281.94	131,197,569	324	2.97	2.94	1,010.13	400,980
Citizens Bank, N.A.	90	283,049.46	0.00	283,049.46	114,119,714	846	2.92	2.92	334.57	132,870
NBT Bank N.A.	135	266,348.41	0.00	266,348.41	104,531,199	385	3.00	3.00	691.81	271,518
City National Bank/California	185	346,343.85	509.73	345,834.12	92,127,630	94	4.43	4.42	3,679.09	1,568,351
Wells Fargo	141	226,950.11	-	226,950.11	88,335,045	464	3.03	3.03	489.12	191,965
Bank United	77	211,294.96	0.00	211,294.96	76,109,548	101	3.27	3.27	2,092.03	746,423
Community Bank, N.A.	175	270,337.30	3,431.83	266,905.47	75,801,939	544	4.20	4.15	490.64	132,079
Northfield Bank	48	67,865.36	1,994.02	65,871.34	61,777,090	490	1.29	1.26	134.43	125,441
First National Bank of Long Island	55	51,430.81	3,123.51	48,307.30	60,736,966	286	1.00	0.94	168.91	211,733
Northwest Savings Bank	40	145,576.59	0.00	145,576.59	57,290,024	274	2.99	2.99	531.30	208,522
East West Bank	161	137,020.24	-	137,020.24	54,112,700	90	2.98	2.98	1522.45	606,346
Tompkins Community Bank	224	40,052.61	0.00	40,052.61	47,536,952	236	0.99	0.99	169.71	194,193
Genesee Regional Bank	193	1,965.26	0.00	1,965.26	46,421,019	77	0.05	0.05	25.52	601,022
Canandaigua National Bank & Trust Co.	22	15,701.86	2,006.48	13,695.38	44,356,785	289	0.42	0.36	47.39	172,267
Five Star Bank	39	107,096.77	3,303.10	103,793.67	42,259,946	157	2.98	2.89	661.11	243,385
Santander Bank	121	33,593.13	0.00	33,593.13	40,190,924	224	0.98	0.98	149.97	176,577
ConnectOne Bank	200	62,118.48	-	62,118.48	36,888,100	61	1.98	1.98	1018.34	605559.72
New York Community Bank	66	68,757.38	1,985.80	66,771.58	26,770,971	308	3.02	2.94	216.79	87,615
PNC Bank	34	52,674.37	0.00	52,674.37	25,911,411	95	2.39	2.39	554.47	272,017
	30	17,832,011.46	117,627.25	17,714,384.21	8,107,424,702.00	40,140	2.53%	2.52%		

EXHIBIT 1b

Monthly Banks Summary - All Banks, Alpha Sort

For Earnings Period of October, 2024

Bank Name	Bank No.	Gross	SVC	Net	Bank ADB	Num Accts.	Gross Yld per Bank ADB	Net Yld per Bank ADB	Avg Acct. Net	Avg Acct. ADB
J.P. Morgan Chase	62	5,502,795.12	50,490.03	5,452,305.09	2,610,656,126	13,104	2.48	2.46	416.08	194,333.16
Citibank	171	2,766,329.08	0.00	2,766,329.08	1,146,720,202	8,094	2.84	2.84	341.78	237,246.97
M&T Bank	152	1,637,927.61	0.00	1,637,927.61	642,327,193	2,512	3.00	3.00	652.04	256,131.95
Webster Bank	46	1,374,646.76	11,702.58	1,362,944.18	536,844,079	1,127	3.01	2.99	1,209.36	478,715.08
flagstar	125	1,177,559.36	12,933.76	1,164,625.60	451,536,526	1,381	3.07	3.04	843.32	334,656.34
Bank of America	153	982,369.11	0.00	982,369.11	386,677,592	2,234	2.99	2.99	439.74	172,584.36
TD Bank, NA	118	764,047.54	0.00	764,047.54	333,186,782	2,600	2.70	2.70	293.86	128,148.76
Dime Community Bank	149	70,892.98	3,555.00	67,337.98	218,596,026	416	0.38	0.36	161.87	1,003,254.41
Key Bank Services Corp.	21	537,699.47	13,184.83	524,514.64	208,243,293	1,487	3.04	2.97	352.73	140,208.55
Capital One	173	271,711.88	5,665.58	266,046.30	177,024,091	1,468	1.87	1.83	181.23	118,522.43
Orange Bank & Trust Company	41	26,832.66	0.00	26,832.66	169,137,260	372	0.19	0.19	72.13	445,344.44
Valley National Bank	148	331,022.94	3,741.00	327,281.94	131,197,569	324	2.97	2.94	1,010.13	400,980.25
Citizens Bank, N.A.	90	283,049.46	0.00	283,049.46	114,119,714	846	2.92	2.92	334.57	132,869.70
NBT Bank N.A.	135	266,348.41	0.00	266,348.41	104,531,199	385	3.00	3.00	691.81	271,518.42
City National Bank/California	185	346,343.85	509.73	345,834.12	92,127,630	94	4.43	4.42	3,679.09	1,568,351.20
Wells Fargo	141	226,950.11	0.00	226,950.11	88,335,045	464	3.03	3.03	489.12	191,965.11
Bank United	77	211,294.96	0.00	211,294.96	76,109,548	101	3.27	3.27	2,092.03	746,422.98
Community Bank, N.A.	175	270,337.30	3,431.83	266,905.47	75,801,939	544	4.20	4.15	490.64	132,079.22
Northfield Bank	48	67,865.36	1,994.02	65,871.34	61,777,090	490	1.29	1.26	134.43	125,441.10
First National Bank of Long Island	55	51,430.81	3,123.51	48,307.30	60,736,966	286	1.00	0.94	168.91	211,733.01
Northwest Savings Bank	40	145,576.59	0.00	145,576.59	57,290,024	274	2.99	2.99	531.30	208,521.52
East West Bank	161	137,020.24	0.00	137,020.24	54,112,700	90	2.98	2.98	1,522.45	606,346.29
Tompkins Community Bank	224	40,052.61	0.00	40,052.61	47,536,952	236	0.99	0.99	169.71	194,192.69
Genesee Regional Bank	193	1,965.26	0.00	1,965.26	46,421,019	77	0.05	0.05	25.52	601,022.08
Canandaigua National Bank & Trust Co.	22	15,701.86	2,006.48	13,695.38	44,356,785	289	0.42	0.36	47.39	172,266.70
Five Star Bank	39	107,096.77	3,303.10	103,793.67	42,259,946	157	2.98	2.89	661.11	243,385.04
Santander Bank	121	33,593.13	0.00	33,593.13	40,190,924	224	0.98	0.98	149.97	176,576.80
ConnectOne Bank	200	62,118.48	0.00	62,118.48	36,888,100	61	1.98	1.98	1,018.34	605,559.72
New York Community Bank	66	68,757.38	1,985.80	66,771.58	26,770,971	308	3.02	2.94	216.79	87,615.01
PNC Bank	34	52,674.37	0.00	52,674.37	25,911,411	95	2.39	2.39	554.47	272,016.77
Banco Popular North America	76	59,548.46	0.00	59,548.46	24,167,749	74	2.90	2.90	804.71	320,094.57
Berkshire Bank (Massachusetts)	52	61,391.00	0.00	61,391.00	24,156,427	122	2.99	2.99	503.20	197,494.40
Rhinebeck Savings Bank	160	3,529.37	0.00	3,529.37	22,858,712	66	0.18	0.18	53.48	349,054.32
Empire State Bank	151	8,586.35	337.70	8,248.65	22,605,182	53	0.45	0.43	155.63	427,149.06
Apple Bank For Savings	181	48,005.76	479.17	47,526.59	18,863,667	102	3.00	2.97	465.95	184,705.82
Chemung Canal Trust Company	32	44,554.45	0.00	44,554.45	17,487,883	91	3.00	3.00	489.61	192,158.52
Hanover Community Bank	49	2,787.22	0.00	2,787.22	16,465,257	35	0.20	0.20	79.63	471,793.00

Broadview Federal Credit Union	100	1,336.80	0.00	1,336.80	15,789,720	54	0.10	0.10	24.76	291,476.67
Israel Discount Bank of New York	91	18,456.90	0.00	18,456.90	15,446,394	24	1.41	1.41	769.04	667,740.83
Pathfinder Bank	28	40,838.34	135.50	40,702.84	14,553,722	36	3.30	3.29	1,130.63	404,746.22
Glens Falls National Bank and Trust Company	114	35,529.16	405.05	35,124.11	13,966,123	93	3.00	2.96	377.68	149,938.06
Bethpage FCU	54	21,668.31	0.00	21,668.31	12,908,824	137	1.98	1.98	158.16	93,958.08
First Horizon Bank	144	32,042.26	0.00	32,042.26	12,610,172	27	2.99	2.99	1,186.75	465,767.67
Adirondack Trust Company	64	794.39	100.00	694.39	12,021,679	68	0.08	0.07	10.21	137,548.63
Lyons National Bank	123	29,297.16	495.82	28,801.34	11,928,065	64	2.89	2.84	450.02	182,089.55
Evans Bank, N.A.	154	28,722.84	0.00	28,722.84	11,591,568	64	2.92	2.92	448.79	176,139.78
Bank of Greene County	25	1,039.75	311.49	728.26	10,999,236	56	0.12	0.08	13.00	229,263.84
Bank of Millbrook	74	786.47	68.92	717.55	9,536,098	12	0.10	0.09	59.80	771,670.83
Wayne Bank	126	11,574.42	0.00	11,574.42	9,142,108	30	1.49	1.49	385.81	303,971.20
Saratoga National Bank and Trust Co.	94	22,694.91	149.82	22,545.09	8,920,681	58	3.00	2.98	388.71	153,571.38
Jeff Bank	101	717.65	220.86	496.79	8,770,397	45	0.10	0.07	11.04	187,772.24
Adirondack Bank	5	4,427.43	327.18	4,100.25	8,560,744	55	0.61	0.56	74.55	157,967.91
Pioneer Savings Bank	10	20,393.69	0.00	20,393.69	8,519,010	65	2.91	2.91	313.75	115,675.15
Solvay Bank	177	4,420.84	131.79	4,289.02	7,599,548	96	0.68	0.66	44.68	67,775.82
Putnam County National Bank	194	314.01	38.62	275.39	6,935,684	23	0.05	0.05	11.97	311,450.17
Bank of Utica	18	701.00	0.00	701.00	6,859,610	32	0.12	0.12	21.91	205,634.44
Bank on Buffalo, a division of CNB Bank	201	841.88	0.00	841.88	6,608,673	37	0.15	0.15	22.75	178,602.78
Ulster Savings Bank	50	5,276.81	0.00	5,276.81	6,251,509	51	0.99	0.99	103.47	124,310.12
Preferred Bank	83	2,282.76	0.00	2,282.76	6,126,348	2	0.44	0.44	1,141.38	6,719,502.50
Hana Bank USA, NA	84	1,901.34	0.00	1,901.34	5,977,370	25	0.37	0.37	76.05	223,867.44
Trustco	187	48.38	0.00	48.38	5,749,869	166	0.01	0.01	0.29	34,315.34
Maspeth Federal S & L Association	162	2,405.41	0.00	2,405.41	5,699,710	20	0.50	0.50	120.27	288,997.55
Peapack-Gladstone Bank	207	453.11	0.00	453.11	5,652,329	33	0.09	0.09	13.73	165,745.73
ESL Federal Credit Union	217	1,816.69	0.00	1,816.69	5,597,406	40	0.38	0.38	45.42	154,699.20
Provident Bank	182	11,913.25	0.00	11,913.25	4,814,812	15	2.91	2.91	794.22	292,226.93
Amalgamated Bank of New York	157	12,211.85	0.00	12,211.85	4,370,815	36	3.29	3.29	339.22	121,030.94
Woori America Bank	37	15,070.53	0.00	15,070.53	4,130,973	22	4.30	4.30	685.02	187,572.14
Amerasia Bank	172	705.73	0.00	705.73	4,097,807	11	0.20	0.20	64.16	377,700.27
Ballston Spa National Bank	150	99.60	55.67	43.93	3,925,542	32	0.03	0.01	1.37	122,157.19
Northern Trust	183	6,702.78	0.00	6,702.78	3,818,854	2	2.07	2.07	3,351.39	1,786,502.00
Catskill Hudson Bank	127	168.40	0.00	168.40	3,413,858	24	0.06	0.06	7.02	165,231.04
First National Bank of Dryden	57	683.30	0.00	683.30	3,218,180	6	0.25	0.25	113.88	670,442.17
Hudson Valley Credit Union	208	403.31	0.00	403.31	3,165,557	32	0.15	0.15	12.60	98,930.22
Bank of Hope	198	7,854.03	0.00	7,854.03	3,082,745	23	3.00	3.00	341.48	121,837.70
Carver Federal Savings Bank	11	4,652.59	0.00	4,652.59	2,744,034	37	2.00	2.00	125.75	296,110.78
PCSB	63	514.47	0.00	514.47	2,545,620	42	0.24	0.24	12.25	72,112.71
Shinhan Bank America	133	2,436.74	0.00	2,436.74	2,390,135	12	1.20	1.20	203.06	199,240.58
Royal Business Bank	92	4,074.21	0.00	4,074.21	2,238,099	16	2.14	2.14	254.64	101,358.69
Bank of Richmondville	6	87.83	34.94	52.89	2,061,491	10	0.05	0.03	5.29	206,825.30
Modern Bank NA	99	4,414.44	0.00	4,414.44	1,756,364	1	2.96	2.96	4,414.44	1,732,549.00
First National Bank of Scotia	176	71.52	17.91	53.61	1,689,106	16	0.05	0.04	3.35	105,261.19
National Bank of Coxsackie	14	4,193.68	0.00	4,193.68	1,645,899	16	3.00	3.00	262.11	102,869.31

Delaware National Bank of Delhi	1	277.54	8.18	269.36	1,515,128	15	0.22	0.21	17.96	121,030.07
Sawyer Savings Bank	140	61.48	31.58	29.90	1,408,607	11	0.05	0.03	2.72	136,001.27
BCB Community Bank	107	1,113.53	0.00	1,113.53	1,292,260	7	1.01	1.01	159.08	187,298.71
Empower Federal Credit Union	124	1,193.59	0.00	1,193.59	1,257,594	21	1.12	1.12	56.84	43,455.62
Tioga State Bank	170	227.04	12.60	214.44	1,243,404	12	0.21	0.20	17.87	156,902.25
Bank of New York Mellon	166	3,212.86	27.15	3,185.71	1,169,865	6	3.23	3.21	530.95	213,288.50
Maple City Savings Bank FSB	103	465.15	0.00	465.15	1,055,293	10	0.54	0.54	46.52	113,186.40
Western Alliance Bank	228	1,932.37	0.00	1,932.37	905,596	8	2.51	2.51	241.55	113,760.38
Global Bank	158	136.67	0.00	136.67	804,624	7	0.20	0.20	19.52	114,941.29
Metro City Bank	30	1,724.66	0.00	1,724.66	743,970	5	2.73	2.73	344.93	150,551.00
Citizens and Northern Bank	43	1,263.53	20.00	1,243.53	653,152	2	2.28	2.24	621.77	261,000.50
Fulton Savings Bank	58	28.53	0.00	28.53	607,483	5	0.06	0.06	5.71	134,367.00
OceanFirst Bank	165	193.97	0.00	193.97	604,717	6	0.38	0.38	32.33	95,160.17
The First Bank of Greenwich	218	51.10	0.00	51.10	601,942	14	0.10	0.10	3.65	42,975.79
Alpine Capital Bank	47	1,365.89	0.00	1,365.89	535,480	1	3.00	3.00	1,365.89	536,075.00
Cattaraugus County Bank	69	21.95	6.83	15.12	518,177	7	0.05	0.03	2.16	73,841.00
New Millennium Bank	212	858.54	0.00	858.54	514,076	9	1.97	1.97	95.39	58,586.44
ACCESS Federal Credit Union	98	394.27	0.00	394.27	464,228	8	1.00	1.00	49.28	58,027.75
Reliant Community Credit Union	145	19.08	0.00	19.08	449,503	6	0.05	0.05	3.18	74,883.83
Generations Bank, Inc.	95	362.67	18.22	344.45	422,090	18	1.01	0.96	19.14	23,723.00
Berkshire Bank	97	143.00	0.00	143.00	386,594	19	0.44	0.44	7.53	17,723.26
Fieldpoint Private	204	117.37	0.00	117.37	370,727	3	0.37	0.37	39.12	102,366.00
First Federal Savings of Middletown	146	20.85	0.00	20.85	328,291	2	0.07	0.07	10.43	163,661.50
First Citizens Community Bank	102	765.31	11.00	754.31	302,647	1	2.98	2.93	754.31	300,364.00
Industrial and Commercial Bank of China	203	11.67	0.00	11.67	274,739	2	0.06	0.06	5.84	157,761.00
Jovia Financial Federal Credit Union	211	77.08	0.00	77.08	181,908	10	0.50	0.50	7.71	18,151.20
Seneca Savings	104	6.50	0.00	6.50	153,230	10	-	-	0.65	1,195.10
Kearny Bank	138	315.82	0.00	315.82	123,967	13	3.00	3.00	24.29	9,534.62
First National Bank of Groton	188	3.91	0.00	3.91	92,432	3	0.05	0.05	1.30	30,691.33
Gouverneur Savings and Loan Assn.	180	2.95	0.00	2.95	71,081	1	0.05	0.05	2.95	76,911.00
Cayuga Lake National Bank	195	12.52	0.00	12.52	59,112	7	0.25	0.25	1.79	8,423.57
Newtek Bank	16	182.21	0.00	182.21	45,316	2	4.89	4.89	91.11	22,714.00
Patriot Bank, N.A.	17	4.76	0.00	4.76	36,911	6	0.15	0.15	0.79	6,227.17
Upstate National Bank	61	2.26	0.00	2.26	32,599	8	0.08	0.08	0.28	3,856.00
Geddes Federal Savings & Loan Association	26	2.20	0.00	2.20	28,662	8	0.10	0.10	0.28	3,584.88
Interaudi Bank	216	64.23	0.00	64.23	27,500	1	2.75	2.75	64.23	27,500.00
Habib American Bank	168	12.90	0.00	12.90	25,016	3	0.61	0.61	4.30	8,466.67
Deutsche Bank	191	0.84	0.84	-	24,672	1	0.04	-	-	19,781.00
1st Century Bank, a division of MidFirst Bank	215	42.75	0.00	42.75	15,467	1	3.25	3.25	42.75	15,253.00
CFCU Community Credit Union	111	0.18	0.00	0.18	14,045	2	0.02	0.02	0.09	7,064.50
United Orient Bank	128	2.27	0.00	2.27	13,370	1	0.20	0.20	2.27	13,364.00
National Cooperative Bank, N.A.	143	14.04	0.00	14.04	8,260	2	2.00	2.00	7.02	4,133.00

Piermont Bank	220	9.71	0.00	9.71	3,776	1	3.03	3.03	9.71	3,862.00
Brooklyn Cooperative Federal Credit Union	202	0.00	0.00	-	2,753	2	-	-	-	-
Peoples Security Bank	132	0.00	0.00	-	0	1			-	-
Miscellaneous Income	23	2,061.99	0.00	2,061.99		1			2,061.99	-
City National Bank/California	185	48.00	0.00	48.00		1			48.00	20,403.00
	129	18,446,284.78	121,074.09	18,325,210.66	8,582,852,331	42,739	2.53	2.52	362.21	2,161,700.46

EXHIBIT 2a

Top 30 NY IOLA Banks by ADB active in the past 12 months.

12 Month History of Average Daily Balance

Bank Name	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2025	Apr 2024	May 2024	Jun 2024	Jul 2025	Aug 2024	Sep 2024	Oct 2024	Average	% of Total Deposits
J.P. Morgan Chase	3,214,347,540	3,164,307,294	3,256,299,998	3,092,587,311	3,047,075,093	3,309,423,959	3,973,392,370	2,776,781,925	2,763,078,570	2,915,575,840	3,094,462,113	2,546,541,775	3,096,156,149	30.83%
Citibank	1,119,735,091	1,152,696,536	2,109,190,168	1,961,796,429	1,991,655,544	1,714,413,688	1,895,489,145	1,729,675,238	2,008,139,771	1,938,554,655	1,995,232,482	1,920,276,988	1,794,737,978	17.87%
M&T Bank	684,006,218	655,388,288	603,840,756	597,781,959	657,581,436	630,051,312	677,914,553	679,026,124	682,593,238	662,108,974	638,866,713	643,403,469	651,046,920	6.48%
Webster Bank	498,296,729	489,797,613	466,986,238	466,076,867	478,650,497	512,802,015	532,872,462	558,062,823	591,213,219	568,240,801	536,723,768	539,511,900	519,936,244	5.18%
flagstar	505,229,150	528,154,656	513,510,854	495,501,280	471,000,671	457,580,645	464,199,434	486,890,638	485,236,892	469,755,560	453,348,830	462,160,406	482,714,085	4.81%
Esquire Bank	-	346,829,126	-	-	389,268,022	-	-	423,296,777	-	-	424,383,932	-	131,981,488	1.31%
Bank of America	396,429,750	402,164,939	361,726,759	361,354,867	365,002,540	369,130,888	365,919,686	361,684,584	383,455,349	365,086,335	367,020,308	385,553,453	373,710,788	3.72%
TD Bank, NA	320,768,509	313,389,983	294,101,013	278,101,517	276,199,010	302,958,336	307,570,923	317,747,767	335,143,822	336,356,780	349,104,245	333,186,773	313,719,057	3.12%
Capital One	187,654,222	194,603,961	180,973,164	319,816,538	178,375,320	350,597,397	191,842,005	198,872,152	192,586,942	187,267,415	179,337,819	173,990,927	211,326,489	2.10%
Dime Community Bank	186,144,137	155,816,177	150,383,243	179,689,946	152,295,063	174,025,557	183,647,619	205,328,151	165,689,646	201,180,962	217,521,696	417,353,834	199,089,669	1.98%
Key Bank Services Corp.	206,273,537	205,740,387	183,970,457	174,946,205	179,993,198	188,010,808	194,966,145	196,717,647	203,812,080	206,602,535	211,861,779	208,490,111	196,782,074	1.96%
Orange Bank & Trust Company	158,860,030	141,514,416	172,625,444	146,194,460	201,497,322	211,451,618	211,583,460	249,868,051	226,638,451	214,205,742	197,826,196	165,668,133	191,494,444	1.91%
Miscellaneous Income	65,697,567	-	747,741,355	-	1,177	-	-	-	1,628,371	-	3,638,442	242,782,694	88,457,467	0.88%
Valley National Bank	178,459,245	150,912,674	142,546,090	128,268,962	126,139,418	131,430,696	140,080,756	154,677,957	153,750,033	135,938,263	128,293,649	129,917,600	141,701,279	1.41%
HSBC	-	122,484,696	-	-	122,528,055	-	-	113,179,600	-	-	102,960,945	-	38,429,441	0.38%
Citizens Bank, N.A.	108,753,589	114,248,075	108,072,256	108,986,995	107,134,911	106,674,975	116,992,526	116,323,576	113,393,861	110,195,244	111,180,046	112,407,763	111,196,985	1.11%
NBT Bank N.A.	98,914,179	97,434,206	89,888,525	86,871,161	85,764,291	86,691,989	94,021,141	97,106,370	96,063,227	102,940,398	105,808,582	104,534,591	95,503,222	0.95%
First Republic Bank	96,266,795	91,788,630	84,585,657	90,502,235	89,561,669	94,129,188	91,810,027	-	-	-	-	-	53,220,350	0.53%
Wells Fargo	98,873,139	92,185,059	86,329,149	96,981,294	88,188,939	88,789,189	88,022,491	86,803,913	83,594,986	92,992,341	85,996,289	89,071,813	89,819,050	0.89%
City National Bank/California	71,897,868	72,314,280	71,045,259	65,715,631	73,138,695	81,495,567	74,999,183	82,709,595	94,272,621	86,925,146	93,692,399	147,445,416	84,637,638	0.84%
Northwest Savings Bank	75,077,061	76,149,972	74,561,867	72,551,020	67,231,037	55,640,022	61,256,251	121,083,126	62,523,162	118,065,480	62,940,429	57,134,897	75,351,194	0.75%
Bank United	71,494,497	62,193,162	58,134,523	56,029,715	61,415,858	64,086,244	65,566,093	68,623,702	69,513,577	70,803,977	77,587,870	75,388,721	66,736,495	0.66%
Northfield Bank	67,936,546	65,823,939	69,501,100	65,136,182	59,884,691	69,394,424	65,556,866	62,034,590	68,393,522	65,329,627	65,381,021	61,466,139	65,486,554	0.65%
Community Bank, N.A.	61,465,375	67,870,490	57,437,490	56,486,334	59,860,068	59,803,777	59,266,820	71,840,451	70,257,831	73,446,684	71,070,438	71,851,097	65,054,738	0.65%
East West Bank	66,226,158	62,842,390	55,985,476	64,367,482	51,368,184	53,556,863	56,327,937	55,028,311	65,028,463	57,854,170	56,085,170	54,571,166	58,270,148	0.58%
First National Bank of Long Island	48,374,497	50,772,101	51,378,104	53,557,390	55,190,011	62,865,184	63,657,649	61,879,069	61,907,571	65,757,663	59,275,600	60,555,642	57,930,873	0.58%
Canandaigua National Bank & Trust Co.	59,298,212	53,188,128	72,040,023	48,079,203	63,180,702	49,557,586	50,238,388	52,797,088	56,228,645	57,824,260	61,291,488	49,785,077	56,125,733	0.56%
Tompkins Community Bank	46,247,837	49,012,041	44,146,845	40,825,829	40,929,550	45,256,407	52,839,002	52,633,947	50,463,683	47,587,616	49,241,725	45,829,476	47,084,497	0.47%
Five Star Bank	42,353,420	41,124,445	37,803,058	34,586,249	35,620,223	36,275,126	39,077,640	38,073,013	41,132,724	40,630,729	40,599,271	38,211,451	38,790,612	0.39%
Santander Bank	29,597,074	29,631,210	28,436,983	28,974,870	32,069,005	33,153,776	34,379,986	42,884,837	39,100,704	57,256,212	41,432,231	39,553,203	36,372,508	0.36%
Total (top 30 banks)	8,764,677,972	9,050,378,874	10,173,241,854	9,171,767,931	9,607,800,200	9,339,247,236	10,153,490,558	9,461,631,022	9,164,840,961	9,248,483,409	9,882,165,476	9,176,644,515	9,432,864,167	93.94%
Total (all banks)	9,324,885,435	9,710,807,796	10,736,145,207	9,700,903,327	10,217,718,007	9,876,514,715	10,712,228,118	10,162,562,087	9,756,064,716	9,865,275,255	10,635,167,820	9,800,719,650	10,041,582,678	100%

Top 5= 65.2%

Top 10= 77.4%

EXHIBIT 2b

All NY IOLTA Banks active in the past 12 months.

12 Month History of Average Daily Balance

Bank Name	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024	Sep 2024	Oct 2024	Average	% of Total Deposits
J.P. Morgan Chase	3,214,347,540	3,164,307,294	3,256,299,998	3,092,587,311	3,047,075,093	3,309,423,959	3,973,392,370	2,776,781,925	2,763,078,570	2,915,575,840	3,094,462,113	2,546,541,775	3,096,156,149	30.83%
Citibank	1,119,735,091	1,152,696,536	2,109,190,168	1,961,796,429	1,991,655,544	1,714,413,688	1,895,489,145	1,729,675,238	2,008,139,771	1,938,554,655	1,995,232,482	1,920,276,988	1,794,737,978	17.87%
M&T Bank	684,006,218	655,388,288	603,840,756	597,781,959	657,581,436	630,051,312	677,914,553	679,026,124	682,593,238	662,108,974	638,866,713	643,403,469	651,046,920	6.48%
Webster Bank	498,296,729	489,797,613	466,986,238	466,076,867	478,650,497	512,802,015	532,872,462	558,062,823	591,213,219	568,240,801	536,723,768	539,511,900	519,936,244	5.18%
flagstar	505,229,150	528,154,656	513,510,854	495,501,280	471,000,671	457,580,645	464,199,434	486,890,638	485,236,892	469,755,560	453,348,830	462,160,406	482,714,085	4.81%
Esquire Bank	-	346,829,126	-	-	389,268,022	-	-	423,296,777	-	-	424,383,932	-	395,944,464	3.94%
Bank of America	396,429,750	402,164,939	361,726,759	361,354,867	365,002,540	369,130,888	365,919,686	361,684,584	383,455,349	365,086,335	367,020,308	385,553,453	373,710,788	3.72%
TD Bank, NA	320,768,509	313,389,983	294,101,013	278,101,517	276,199,010	302,958,336	307,570,923	317,747,767	335,143,822	336,356,780	349,104,245	333,186,773	313,719,057	3.12%
Capital One	187,654,222	194,603,961	180,973,164	319,816,538	178,375,320	350,597,397	191,842,005	198,872,152	192,586,942	187,267,415	179,337,819	173,990,927	211,326,489	2.10%
Dime Community Bank	186,144,137	155,816,177	150,383,243	179,689,946	152,295,063	174,025,557	183,647,619	205,328,151	165,689,646	201,180,962	217,521,696	417,353,834	199,089,669	1.98%
Key Bank Services Corp.	206,273,537	205,740,387	183,970,457	174,946,205	179,993,198	188,010,808	194,966,145	196,717,647	203,812,080	206,602,535	211,861,779	208,490,111	196,782,074	1.96%
Orange Bank & Trust Company	158,860,030	141,514,416	172,625,444	146,194,460	201,497,322	211,451,618	211,583,460	249,868,051	226,638,451	214,205,742	197,826,196	165,668,133	191,494,444	1.91%
Miscellaneous Income	65,697,567	-	747,741,355	-	1,177	-	-	-	1,628,371	-	3,638,442	242,782,694	176,914,934	1.76%
Valley National Bank	178,459,245	150,912,674	142,546,090	128,268,962	126,139,418	131,430,696	140,080,756	154,677,957	153,750,033	135,938,263	128,293,649	129,917,600	141,701,279	1.41%
HSBC	-	122,484,696	-	-	122,528,055	-	-	113,179,600	-	-	102,960,945	-	115,288,324	1.15%
Citizens Bank, N.A.	108,753,589	114,248,075	108,072,256	108,986,995	107,134,911	106,674,975	116,992,526	116,323,576	113,393,861	110,195,244	111,180,046	112,407,763	111,196,985	1.11%
NBT Bank N.A.	98,914,179	97,434,206	89,888,525	86,871,161	85,764,291	86,691,989	94,021,141	97,106,370	96,063,227	102,940,398	105,808,582	104,534,591	95,503,222	0.95%
First Republic Bank	96,266,795	91,788,630	91,788,630	90,502,235	89,561,669	94,129,188	91,810,027	-	-	-	-	-	91,234,886	0.91%
Wells Fargo	98,873,139	92,185,059	86,329,149	96,981,294	88,188,939	88,789,189	88,022,491	86,803,913	83,594,986	92,992,341	85,996,289	89,071,813	89,819,050	0.89%
City National Bank/California	71,897,868	72,314,280	71,045,259	65,715,631	73,138,695	81,495,567	74,999,183	82,709,595	94,272,621	86,925,146	93,692,399	147,445,416	84,637,638	0.84%
Northwest Savings Bank	75,077,061	76,149,972	74,561,867	72,551,020	67,231,037	55,640,222	61,256,251	121,083,126	62,523,162	118,065,400	62,940,429	57,134,897	75,351,194	0.75%
Bank United	71,494,497	62,193,162	58,134,523	56,029,715	61,415,858	64,086,244	65,566,093	68,623,702	69,513,577	70,803,977	77,587,870	75,388,721	66,736,495	0.66%
Northfield Bank	67,936,546	65,823,939	69,501,100	65,136,182	59,884,691	69,394,424	65,556,866	62,034,590	68,393,522	65,329,627	65,381,021	61,466,139	65,486,554	0.65%
Community Bank, N.A.	61,465,375	67,870,490	57,437,490	56,486,334	59,860,068	59,803,777	59,266,820	71,840,451	70,257,831	73,446,684	71,070,438	71,851,097	65,054,738	0.65%
East West Bank	66,226,158	62,842,390	55,985,476	64,367,482	51,368,184	53,556,863	56,327,937	55,028,311	65,028,463	57,854,170	56,085,170	54,571,166	58,270,148	0.58%
First National Bank of Long Island	48,374,497	50,772,101	51,378,104	53,557,390	55,190,011	62,865,184	63,657,649	61,879,069	61,907,571	65,757,663	59,275,600	60,555,642	57,930,873	0.58%
Canandaigua National Bank & Trust Co.	59,298,212	53,188,128	72,040,023	48,079,203	63,180,702	49,557,586	50,238,388	52,797,088	56,228,645	57,824,260	61,291,488	49,785,077	56,125,733	0.56%
Tompkins Community Bank	46,247,837	49,012,041	44,146,845	40,825,829	40,929,550	45,256,407	52,839,002	52,633,947	50,463,683	47,587,616	49,241,725	45,829,476	47,084,497	0.47%
Five Star Bank	42,353,420	41,124,445	37,803,058	34,586,249	35,620,223	36,275,126	39,077,640	38,073,013	41,132,724	40,630,729	40,599,271	38,211,451	38,790,612	0.39%
Santander Bank	29,597,074	29,631,210	28,436,983	28,974,870	32,069,005	33,153,776	34,379,986	42,884,837	39,100,704	57,256,212	41,432,231	39,553,203	36,372,508	0.36%
Genesee Regional Bank	28,944,499	30,866,048	27,765,904	23,192,352	27,229,706	27,662,861	32,880,848	34,428,256	40,963,830	54,138,682	46,081,005	46,278,700	35,036,058	0.35%
ConnectOne Bank	22,112,484	29,233,940	27,026,257	33,599,828	37,800,500	36,480,278	37,513,213	40,486,855	36,927,752	38,204,345	40,085,897	36,939,143	34,700,874	0.35%
Flushing Bank	-	31,328,545	-	-	29,180,843	-	-	30,153,891	-	-	28,994,434	-	29,914,428	0.30%
New York Community Bank	29,979,412	35,343,261	30,828,433	27,717,726	25,126,579	27,159,933	24,456,354	27,919,910	27,279,201	28,288,081	24,670,497	26,985,423	27,979,568	0.28%
Berkshire Bank (Massachusetts)	20,343,218	22,365,360	20,411,686	19,415,451	20,779,458	23,569,681	27,452,641	25,573,228	24,944,103	27,624,492	26,902,334	24,094,317	23,622,997	0.24%
Alma Bank	26,640,219	22,639,660	21,465,360	21,010,415	23,564,507	22,734,797	22,583,922	26,120,946	23,438,210	23,855,066	20,685,655	-	23,158,069	0.23%
PNC Bank	21,610,002	23,327,390	27,254,792	20,492,000	19,451,740	22,183,531	20,290,828	17,498,181	18,590,874	19,449,415	21,783,930	25,841,593	21,481,190	0.21%
Rhinebeck Savings Bank	21,502,690	20,105,976	18,900,152	21,738,843	19,830,702	19,735,042	19,224,001	21,842,210	20,675,681	21,425,188	24,861,268	23,037,585	21,073,278	0.21%
Banco Popular North America	21,620,463	13,696,512	20,812,592	23,608,227	21,955,590	22,937,801	16,475,007	19,585,049	17,723,146	20,439,793	26,813,771	23,686,998	20,779,579	0.21%
Apple Bank For Savings	24,343,220	22,964,821	21,266,490	21,399,547	20,638,778	20,260,080	19,502,985	19,391,236	19,407,563	20,021,825	19,638,624	18,839,994	20,639,597	0.21%
Empire State Bank	16,723,302	17,015,217	20,738,929	21,784,477	17,835,179	22,157,555	20,590,247	17,980,071	22,162,246	21,245,902	22,922,458	22,638,900	20,316,207	0.20%
Chemung Canal Trust Company	18,065,809	17,457,896	17,909,077	16,407,636	15,946,414	16,654,792	17,024,254	16,358,509	19,003,820	16,989,835	19,467,745	17,486,425	17,397,684	0.17%
Israel Discount Bank of New York	14,352,731	13,931,183	13,708,337	13,322,331	13,798,317	14,409,899	14,615,623	14,196,051	14,724,992	15,455,745	16,162,077	16,025,780	14,558,589	0.14%
First Horizon Bank	12,894,782	17,974,365	18,943,129	14,453,939	13,434,498	14,606,674	14,393,039	13,484,849	13,912,438	13,115,918	11,819,245	12,575,727	14,300,717	0.14%
Carthage Federal Savings	-	14,511,527	-	-	11,728,933	-	-	12,878,483	-	-	15,696,191	-	13,703,784	0.14%
Pathfinder Bank	11,793,569	11,799,245	13,309,995	11,980,329	13,051,656	13,983,522	13,579,738	12,857,257	12,205,555	13,305,769	13,754,559	14,570,864	13,016,005	0.13%
Bethpage FCU	11,512,005	12,054,652	11,723,055	11,168,278	11,515,093	11,499,805	12,675,361	13,886,618	13,866,818	14,364,524	13,561,734	12,872,257	12,558,350	0.13%
Bank of Greene County	12,556,370	12,570,095	12,440,867	12,423,501	10,970,723	10,194,763	12,366,643	10,697,597	11,729,638	12,308,122	12,580,899	12,838,775	11,973,166	0.12%
Hanover Community Bank	11,878,804	11,024,471	13,844,097	9,300,682	5,484,753	7,423,795	9,298,826	8,550,227	11,507,898	13,431,411	25,222,839	16,512,755	11,956,713	0.12%
Evans Bank, N.A.	10,639,261	8,220,482	11,411,412	10,968,263	12,229,720	12,961,222	12,066,383	12,679,579	13,560,313	14,254,982	12,163,781	11,272,946	11,869,029	0.12%
Glens Falls National Bank and Trust Company	9,392,277	9,183,996	7,846,621	9,222,238	9,539,870	9,166,148	10,651,065	12,275,229	10,434,817	10,622,870	10,256,004	13,944,240	10,211,281	0.10%
Lyons National Bank	10,475,982	10,338,720	9,124,416	9,849,467	8,593,153	8,403,225	8,403,225	9,950,362	10,803,948	10,348,469	11,233,423	11,653,731	10,099,491	0.10%
Bank of Millbrook	8,261,046	9,781,412	9,201,297	10,816,839	10,387,900	7,083,190	10,345,278	10,691,093	12,891,682	12,114,703	9,420,408	9,260,050	10,021,242	0.10%
Saratoga National Bank and Trust Co.	10,759,257	11,581,089	10,180,479	9,892,320	9,709,880	10,116,307	9,483,911	9,329,243	10,582,221	9,402,418	8,585,658	8,907,140	9,877,494	0.10%
Pioneer Savings Bank	12,384,879	10,175,395	10,866,971	9,096,381	7,981,989	7,416,810	9,755,525	10,135,585	11,305,663	8,660,980	10,114,662	7,518,885	9,617,810	0.10%

Top 5=
65.2%

Top 10=
80.1%

First Central Savings Bank	-	8,941,785	-	-	6,135,267	-	-	9,577,116	-	-	13,111,117	-	9,441,321	0.09%
Rondout Savings Bank	-	8,781,965	-	-	10,156,499	-	-	8,208,974	-	-	8,193,330	-	8,835,192	0.09%
Jeff Bank	10,252,000	9,132,892	9,311,381	8,558,496	7,845,146	8,769,369	8,662,862	8,824,361	7,707,505	8,884,923	9,019,272	8,449,751	8,784,830	0.09%
Bank of Holland	-	2,802,883	-	-	2,134,086	-	-	26,675,884	-	-	1,610,141	-	8,305,749	0.08%
Metropolitan Commercial Bank	-	7,380,557	-	-	8,490,821	-	-	8,639,680	-	-	8,100,999	-	8,153,014	0.08%
Broadview Federal Credit Union	5,558,090	6,699,815	4,224,807	4,584,517	4,141,238	4,067,823	5,411,652	8,946,392	11,031,477	13,894,134	12,997,163	15,739,740	8,108,071	0.08%
Wayne Bank	8,124,901	7,512,964	6,836,888	5,842,435	6,861,136	7,522,992	7,252,860	6,958,084	8,103,157	9,482,934	9,564,589	9,119,136	7,765,173	0.08%
Adirondack Trust Company	7,754,669	10,464,013	5,548,239	5,989,146	6,767,571	5,573,674	5,884,859	8,207,028	7,272,332	8,988,544	10,172,916	9,353,307	7,664,692	0.08%
Putnam County National Bank	7,142,932	7,807,352	7,747,353	7,043,529	7,446,459	8,685,350	7,184,343	7,523,237	7,154,001	6,625,210	6,476,275	7,163,354	7,333,283	0.07%
Adirondack Bank	7,119,059	5,634,365	5,982,939	5,057,534	5,763,173	5,860,359	6,006,390	5,988,964	8,037,417	7,344,816	7,967,707	8,688,235	6,620,913	0.07%
Walden Savings	-	8,086,725	-	-	6,792,376	-	-	6,069,958	-	-	5,267,344	-	6,554,101	0.07%
Solvay Bank	8,263,254	6,798,269	9,448,116	9,803,103	5,127,237	5,084,542	5,342,762	4,718,901	5,075,457	4,601,620	6,745,258	6,506,479	6,459,583	0.06%
Bank on Buffalo, a division of CNB Bank	5,219,336	5,691,150	5,963,436	4,811,201	5,336,386	5,935,710	6,425,332	7,145,221	7,816,751	6,834,097	6,585,072	6,608,303	6,197,666	0.06%
Ulster Savings Bank	5,966,447	5,539,205	4,040,577	4,385,380	5,020,097	4,453,347	6,759,525	6,848,816	6,121,317	6,697,952	6,844,880	6,339,816	5,751,447	0.06%
Trustco	6,033,451	5,686,933	4,659,045	5,057,139	4,563,676	5,027,273	5,191,241	5,443,370	6,209,706	6,003,656	6,484,840	5,696,347	5,504,723	0.05%
Hana Bank USA, NA	3,392,521	4,530,091	4,609,332	5,941,695	5,283,554	5,151,943	5,123,864	5,228,414	4,958,966	6,024,266	6,035,973	5,596,686	5,156,442	0.05%
ESL Federal Credit Union	4,452,531	4,079,575	3,675,402	3,078,666	4,793,219	4,212,150	5,063,604	4,739,671	5,200,773	6,358,684	6,275,920	6,187,968	4,759,847	0.05%
Customers Bank	-	3,522,177	-	-	4,676,252	-	-	5,333,470	-	-	5,422,825	-	4,738,681	0.05%
NewBank	-	4,066,882	-	-	3,924,500	-	-	3,763,517	-	-	6,536,995	-	4,572,974	0.05%
Ballston Spa National Bank	5,457,570	4,141,383	4,996,976	4,092,203	3,287,482	3,801,531	3,651,787	4,005,413	6,253,271	5,947,536	4,434,345	3,909,030	4,498,211	0.04%
Provident Bank	2,155,123	2,656,577	2,492,766	2,602,266	3,628,040	3,446,726	4,509,739	6,825,660	7,131,035	6,659,759	6,770,366	4,383,404	4,438,455	0.04%
Bank of Utica	8,587,709	4,582,262	3,941,994	3,494,200	2,790,176	3,498,184	3,503,297	2,777,669	2,759,048	4,215,599	4,437,260	6,580,302	4,263,975	0.04%
PCSB	3,858,422	2,998,950	4,252,840	3,333,836	2,909,230	2,528,056	4,439,460	5,379,252	4,143,161	5,580,203	4,735,087	3,028,734	3,932,269	0.04%
Bank of New York Mellon	2,903,971	2,906,046	14,759,127	3,255,619	3,244,362	3,285,049	3,647,918	3,780,918	1,918,058	1,154,251	1,183,415	1,279,731	3,609,872	0.04%
Bank of Hope	6,976,915	6,087,497	6,551,902	5,426,380	1,795,587	1,714,914	1,683,006	1,811,121	2,398,300	2,315,148	2,536,653	2,802,267	3,508,308	0.03%
Catskill Hudson Bank	4,007,212	3,845,547	3,476,042	3,965,159	3,317,831	3,302,485	3,074,878	3,152,662	3,069,465	3,106,501	3,613,013	3,965,545	3,491,362	0.03%
Ponce Bank	-	2,719,211	-	-	2,790,124	-	-	3,658,063	-	-	4,173,459	-	3,335,214	0.03%
Amalgamated Bank of New York	2,621,221	3,883,165	3,494,574	3,417,728	2,425,415	2,882,507	2,534,003	2,791,819	2,997,302	3,214,998	5,028,382	4,357,114	3,304,019	0.03%
Woori America Bank	2,831,345	2,778,157	2,738,772	2,104,783	2,609,259	3,578,573	4,060,481	3,539,946	2,886,293	2,596,626	3,068,651	4,126,587	3,076,623	0.03%
Modern Bank NA	2,562,804	3,073,143	4,072,455	2,820,712	2,663,144	4,349,624	5,495,339	2,152,713	2,359,429	2,374,420	2,400,539	1,732,549	3,004,739	0.03%
Northern Trust	3,176,685	2,574,753	2,251,982	2,733,311	2,734,639	2,115,711	5,972,812	2,627,365	2,188,545	2,719,508	2,641,048	3,573,004	2,942,447	0.03%
Maspeth Federal S & L Association	2,744,551	2,399,124	3,389,212	2,618,239	1,880,170	2,812,263	2,696,146	2,479,144	2,837,962	1,930,270	2,369,990	5,779,951	2,828,085	0.03%
Carver Federal Savings Bank	434,251	559,137	591,157	576,702	837,216	852,200	2,027,068	2,137,755	2,173,282	2,171,631	10,525,894	10,956,099	2,820,199	0.03%
First National Bank of Scotia	1,967,594	2,100,750	1,520,988	3,009,363	3,178,324	3,795,272	2,973,688	2,712,925	2,756,808	2,483,882	2,446,475	1,684,179	2,552,521	0.03%
Amerasia Bank	1,845,380	2,438,436	2,027,810	2,027,388	1,648,741	1,649,862	3,247,322	3,792,289	2,661,851	2,484,473	2,512,356	4,154,703	2,540,884	0.03%
Lake Shore Savings Bank	-	2,406,195	-	-	2,309,635	-	-	2,232,584	-	-	2,188,398	-	2,284,203	0.02%
Bank Hapoalim B.M.	-	2,631,254	-	-	2,538,154	-	-	2,214,675	-	-	1,532,635	-	2,229,180	0.02%
First National Bank of Dryden	1,385,978	1,282,728	1,025,344	1,096,158	1,288,992	1,602,156	1,944,155	2,758,974	3,598,488	2,537,281	2,953,459	4,022,653	2,124,697	0.02%
Alpine Capital Bank	-	-	-	-	-	1,321,204	2,649,604	2,994,058	6,029,372	1,013,573	154,395	536,075	2,099,754	0.02%
American Community Bank	1,730,457	-	-	1,683,878	-	-	3,109,262	-	-	1,706,968	-	-	2,057,641	0.02%
Peapack-Gladstone Bank	1,332,646	1,075,937	1,711,802	1,526,716	1,300,096	961,332	985,703	969,731	1,812,627	2,777,860	3,885,924	5,469,609	1,984,165	0.02%
Tioga State Bank	3,258,598	3,163,812	3,102,162	2,894,123	1,409,976	1,801,299	1,576,770	971,005	889,549	1,275,726	1,348,017	1,882,827	1,964,489	0.02%
Hudson Valley Credit Union	3,572,053	1,950,671	1,492,732	601,032	533,998	4,832,600	936,047	999,208	820,738	1,036,286	1,339,063	3,165,767	1,773,350	0.02%
Shinhan Bank America	1,276,415	1,058,774	1,675,861	2,226,049	1,023,000	1,515,988	1,467,467	1,563,193	1,802,422	2,163,762	2,327,190	2,390,887	1,707,584	0.02%
New Millennium Bank	4,213,412	2,019,044	1,890,716	1,428,588	1,502,448	1,602,863	1,499,521	1,685,261	1,425,255	644,256	650,243	527,278	1,590,740	0.02%
Suma Yonkers Federal Credit Union	-	770,547	-	-	1,198,163	-	-	1,717,506	-	-	2,662,993	-	1,587,302	0.02%
Delaware National Bank of Delhi	2,034,401	1,371,562	2,145,389	1,242,329	1,245,840	1,360,031	1,189,848	1,330,087	1,361,097	1,760,505	1,848,860	1,815,451	1,558,783	0.02%
Bank of Richmondville	1,399,167	1,468,007	1,138,565	942,203	1,026,003	911,770	1,264,784	1,641,771	1,162,113	1,695,014	3,369,437	2,068,253	1,507,257	0.02%
OceanFirst Bank	1,966,588	3,286,265	2,622,025	1,457,483	1,199,260	1,146,404	1,081,106	1,343,930	1,488,758	1,053,143	764,979	570,961	1,498,409	0.01%
Sawyer Savings Bank	1,238,881	1,380,674	1,126,192	1,237,477	1,681,265	1,463,768	1,379,458	1,543,840	1,914,548	1,588,723	1,661,338	1,496,014	1,476,015	0.01%
Cross County Savings Bank	-	1,729,138	-	-	1,242,768	-	-	1,555,700	-	-	1,361,569	-	1,472,294	0.01%
Alden State Bank	-	1,378,588	-	-	1,393,579	-	-	1,294,748	-	-	1,678,127	-	1,436,261	0.01%
Royal Business Bank	1,390,232	1,017,298	1,058,275	1,338,322	1,052,865	1,325,913	1,608,814	1,493,936	1,609,402	1,616,256	1,491,214	1,621,739	1,385,356	0.01%
National Bank of Coxsackie	1,522,657	1,422,594	1,446,182	1,367,071	965,868	1,062,437	859,105	1,142,767	1,559,427	1,866,703	1,718,817	1,645,909	1,381,628	0.01%
Preferred Bank	243	235	487	252	471	243	471	243	471	235	487	13,439,005	1,120,237	0.01%
Eastbank	-	583,230	-	-	908,828	-	-	1,079,942	-	-	1,517,111	-	1,022,278	0.01%
The First Bank of Greenwich	1,477,885	1,359,449	1,050,377	892,110	938,403	1,110,575	1,161,406	935,129	892,719	889,187	701,774	601,661	1,000,890	0.01%
AmeriCu Credit Union	-	1,149,882	-	-	962,771	-	-	944,615	-	-	870,154	-	981,856	0.01%
Empower Federal Credit Union	963,024	983,773	655,426	720,796	655,035	678,158	1,047,246	836,126	1,222,071	1,438,133	1,562,185	912,568	972,878	0.01%
Maple City Savings Bank FSB	1,437,583	713,380	796,455	720,863	602,225	589,041	737,153	900,468	938,779	1,408,784	1,301,096	1,131,864	939,808	0.01%
Spring Bank	-	650,943	-	-	759,059	-	-	1,021,786	-	-	1,136,347	-	892,034	0.01%
Industrial and Commercial Bank of China	-	320,258	914,148	1,222,876	1,740,932	1,998,983	1,520,519	863,833	457,075	56,281	136,267	315,522	867,881	0.01%

Totals	9,324,885,435	9,710,807,796	10,736,145,207	9,700,903,327	10,217,718,007	9,876,514,715	10,712,228,118	10,162,562,087	9,756,064,716	9,865,275,255	10,635,167,820	9,800,719,650	10,041,582,678	100.00%
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Interest on Lawyer Account Fund of the State of New York

Meeting of Trustees
New York, New York
December 17, 2024

Report of General Counsel

Activities since the last meeting of the Trustees on September 27, 2024:

Grantee Matters

Relevant to the RFP for FY 26-30:

- 1) Attended Bidder's conference on October 1. Reviewed and edited Q&A from Bidder's conference prior to posting on IOLA website.
- 2) Reviewed and evaluated 108 grant applications submitted by October 28 RFP deadline.
- 3) Solicited and received updates on conflicts of interest relating to grantee applicants from Board members. Circulated the final summary of conflicts to the Board (Dec 9) (see attached).
- 4) Met with Grants Committee to discuss and provide recommendations on grant applicants (Dec 10).

Attorney and Bar Association Matters

- 1) Attended NYSBA CLE – Everything You Need to Know About Escrow Accounts (Sept 30).
- 2) Attended ABA Forum on Building Access to Justice for All in Southern California with Christine Fecko. The Forum combines the Joint IOLTA Conference and the National Meeting of State Access to Justice Commission Chairs. Attended multiple panel discussions on ethics of AI, improving banking compliance, and inclusion of affected members of the community. Attended informal discussion with attendees led by Christine Fecko on IOLA's Justice Infrastructure Project (Oct 23-25).
- 3) Attended meetings of NYC Bar Association's Pro Bono and Legal Services Committee (Oct 8, Nov 13).
- 4) Responded to numerous phone calls and emails from attorneys, bank officials and other interested parties regarding administration of IOLA accounts.

Banking Compliance

- 1) Completed twelve full bank compliance evaluations, none of which resulted in retroactive rate interest payments.
- 2) Monitored two separate bank mergers. In the first merger, the IOLA accounts continued with the surviving bank. In the second merger, the IOLA accounts closed due to the lack of a New York banking office by the surviving bank.

- 3) Identified two banks with IOLA deposits who reduced their rates without first seeking authorization. Sent notifications to those banks reminding them of the pre-approval process and to correct the bank's remittance accordingly.
- 4) Sent approval letters to 10 banks authorizing their request for a rate change. Added two additional banks to the program.

Ethics Matters

- 1) Attended COELIG two-hour ethics live training (Oct 28)
- 2) Organized and conducted office-wide training on sexual harassment (Dec 16)
- 3) Reminder that mandatory COELIG ethics training through the SLMS platform is due by Dec 31 for Staff and Board members.

Interest Reimbursement Requests

- 1) IOLA received two requests from attorneys for a refund of IOLA interest, for \$2156.81 and for \$567,088.85, respectively. The relevant laws that govern reimbursement of IOLA interest are, among others: State Finance Law § 97-v, Judiciary Law § 497, and NY Codes, Rules & Regulations § 7000. I have prepared a detailed recommendation for the Board.

SUMMARY OF TRUSTEE CONFLICTS OF INTEREST
(FY 2026 - FY 2030 Grants)

APPLICANT	TRUSTEES WITH CONFLICTS	AFFILIATION	DATES
Adoptive and Foster Family Coalition of NY	Mary Rothwell Davis	Volunteer	Past
Advocates for Children of NY	Paula Galowitz	Business Relationship	Present
Bronx Defenders, The	Paula Galowitz	Business Relationship	Present
Brooklyn Defender Services	Paula Galowitz	Business Relationship	Present
Center for Family Representation	Mary Rothwell Davis	Board Member (spouse)	Past
Association of the Bar of the City of New York Fund (D/B/A City Bar Justice Center)	Mary Rothwell Davis	Officer (spouse)	Past
Community Development Project	Paula Galowitz	Business Relationship	Present
Empire Justice Center	Edwin J. Lopez-Soto	Employee	Past
Erie County Bar Association - Volunteer Lawyers Project	Paulette Ross	Pro Bono Work	Past
Frank H. Hiscock Legal Aid Society	John A. Cirando	Donor	Present
Fund for Modern Courts	Susan Lindenauer	Board Member	Present
Goddard Riverside Community Center	Paula Galowitz	Business Relationship	Past
Human Rights First	Paula Galowitz	Business Relationship	Present
Legal Aid Society of Central New York	Kate Madigan	Firm's Pro Bono Work	Present
Legal Aid Society	Mary Rothwell Davis	Employee	Past
	Paula Galowitz	Former Employee & Business Relationship	Past & Present
	Susan Lindenauer	Employee	Past
Legal Assistance of Western NY (successor to MCLAC)	Edwin J. Lopez-Soto	Employee	Past
Legal Momentum	Susan Lindenauer	Board Member	Present
	Mary Rothwell Davis	Business Relationship	Past
Legal Services NYC	Paula Galowitz	Board Member	Past
Make the Road	Paula Galowitz	Business Relationship	Present
Mobilization for Justice	Paula Galowitz	Business Relationship	Present
Neighborhood Legal Services	Edwin J. Lopez-Soto	Counsel	Past
New York County Lawyers Ass'n	Susan Lindenauer	Board Member	Present & Past
New York Lawyers for the Public Interest (NYLPI)	Mary Rothwell Davis	Board Member (spouse)	Past

New York Legal Assistance Group	Paula Galowitz	Business Relationship	Present & Past
Sanctuary for Families	Mary Rothwell Davis	Board Member	Past
The Door	Paula Galowitz	Business Relationship	Present
Urban Justice Center	Paula Galowitz	Business Relationship	Present & Past
Volunteer Lawyers Project of CNY, Inc.	John Cirando	Donor	Past
Volunteers of Legal Services	Paula Galowitz	Business Relationship	Present

21 NYCRR Part 7000.6 Conflict of Interest

A trustee with a past or present affiliation with an applicant (including employee, officer, director, trustee, counsel or business relationship) for distribution of funds shall declare such affiliation to the trustees, and that trustee shall not participate in a vote on any matter relating directly to such applicant.

Interest on Lawyer Account Fund of the State of New York

Funding civil legal assistance for low-income New Yorkers since 1984

Justice Infrastructure Project **Description of Project Vision (December 2024)**

Provided below are descriptions of two key objectives for the IOLA Justice Infrastructure Project based on IOLA's statewide efforts to engage community, review information, analyze data and solicit feedback on improvements to the civil legal services ecosystem to increase access to justice.

Statewide Function A: Support, Knowledge, and Information for Legal Services

Organizations

This statewide function would seek to create consistency and efficiency for the legal services community by identifying opportunities for coordination, fostering collaboration, improving awareness of legal services, and supporting legal services organizations seeking assistance with technology, policies, governance, training, and other functions essential to the delivery of civil legal aid. This statewide function may develop as a single entity or as a collaborative of uniquely capable organizations but it would operate independently of IOLA.

Initial functionality and features of this statewide function would include:

- Development and maintenance of statewide **training materials** for staff assisting clients in civil legal matters and various administrative proceedings
- Coordinated **knowledge management** – curated, organized and accessible information, opinions, memos, research, etc. for each civil matter type
- Development and maintenance of consistent **outreach and informational materials**, including brief videos, that can be used by legal services organizations for public engagement
- Centralized **technology support** for grantees interested in utilizing current IT infrastructure (IT support) as well as adopting technology innovations (such as AI tools) and implementing new technologies (such as new case management systems or call center platforms as well as various IT and cybersecurity training for all staff), including coordination of grantees with similar interests and sharing best practices from grantees who have already implemented certain technologies or other efforts
- Maintenance of a **comprehensive statewide directory** of legal services resources and capacity

IOLA would seek to prioritize the development of initial capabilities of this statewide support function. However, IOLA also expects that additional opportunities for statewide coordination, collaboration and support will emerge over time. As such, the statewide support function will need to evolve and adapt to the needs, challenges and opportunities of the New York legal services community. For example, there may be opportunities for coordinated data collection that could inform strategic advocacy, identify best practices, assist with evaluation, reduce data analysis and reporting burden by individual grantees and foster collaboration.

Statewide Function B: Legal Information and Referral for the Public

This statewide function is intended to foster an integrated ecosystem of consistent, reliable, comprehensive and updated information for critical and complex life problems, including legal problems. It will seek to amplify current resources, integrate with existing platforms, enhance functionality, and facilitate coordination among stakeholders. IOLA is mindful that various information and referral mechanisms for legal and social organizations have been developed and launched in recent years that may warrant strengthening and expanding. During Phase 1, many organizations shared their experience with these systems – describing both the benefits of these platforms and the challenges. Importantly, many community organizations communicated that the current infrastructure does not adequately respond to their needs or those of their clients, noting that information was often incomplete or inaccurate, and that the platforms were often difficult to use, did not provide closed-loop referrals, did not allow for user accounts, and did not integrate with informational resources when referrals could not be made. As such, IOLA’s vision is to leverage the resources and platforms that currently exist, while finding opportunities to integrate and enhance them to make the user experience more efficient and impactful.

This function is intended to be public-facing and combine technology, information and multiple means for engagement (call center, web and mobile with human response, live chat and AI tools) to enable effective triage of an individual’s issues and circumstances. Using real-time information from community resources (including legal services organizations), this function (both human and technology-enabled) would advise individuals and organizations about resources that could assist them or information they can use to effectively resolve their circumstances when a referral is not possible.

Effective, comprehensive and consistent statewide outreach would be used to develop a pervasive sense of awareness encouraging New York residents – and the trusted community-based organizations that people in need turn to for help – to seek assistance from the platforms using the comprehensive information developed for this function. Grantees would be encouraged to direct clients to such platforms for intake, screening and referral services. A statewide, centralized intake for participating grantee organizations may develop as an element of this function.

When possible, the statewide information and referral function would seek to integrate other platforms providing assistance to New York residents, such as 2-1-1, LawHelpNY, NY Crime Victims Legal Help, HOPP (Home Owner Protection Program), and the NYC Bar Association’s Lawyer Referral and Information Service (LRIS), Just-Fix, Unlock NYC, Heat Seek, virtual hearing platforms of the courts or administrative agencies, online dispute resolution, e-filing and court record platforms, administrative records and other platforms that can enhance the breadth of information that can assist New York residents experiencing complex and critical life problems. **Appendix A** provides illustrative client journeys intended to demonstrate how an integrated function of information and referral would work for New Yorkers and the organizations that assist them. The extent of this integration and the full functionality will evolve over time with the phases of its development and implementation subject to various considerations.

The development of this function will include implementation of a comprehensive data strategy to provide pathways to strategic advocacy enabling continual efforts to understand and reduce the justice gap in New York.

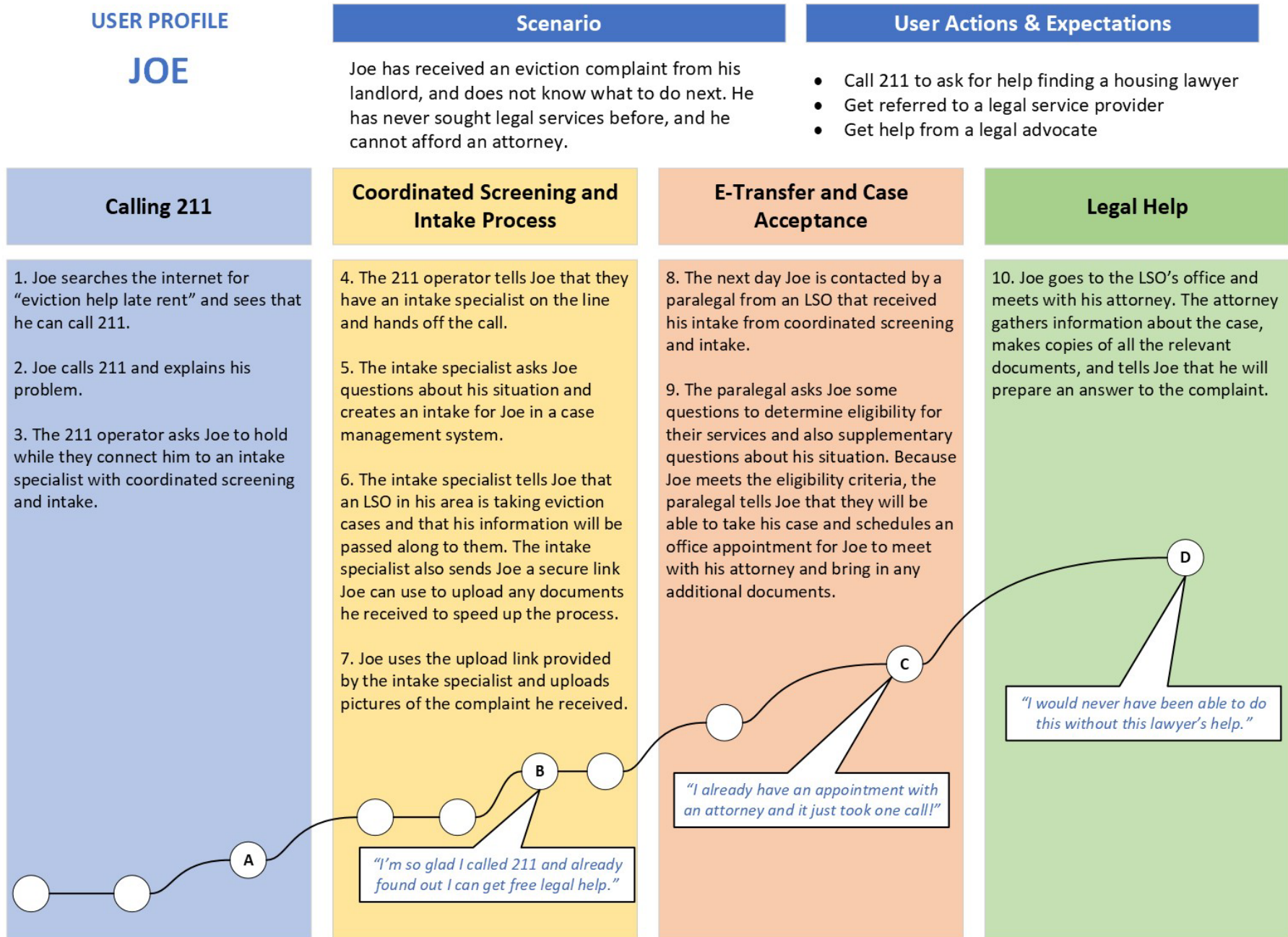
Initial functionality and features of this statewide function would include:

- Development of an authoritative source of information about **available legal resources** and information in New York that can be integrated into other Information & Referral platforms
- Fully-staffed, **state-of-the art call center** with trained and certified advisors available for intake, screening and referral
- **Real-time information** about capacity and availability for community-based organizations across the state to provide assistance, including legal services organizations
 - Centralized intake and referral to local organizations with available capacity, when possible
- Web-Based and Mobile-Enabled Technology
 - **User accounts** enabling people to store and share key documents and information
 - The ability for grantees and other organizations to assist users in creating accounts
 - **Specialized access** and capabilities for trusted community members who assist in connecting clients to social and government resources
 - **Live chat**
 - **Generative AI** that can assist residents with assessing their circumstances and identifying new steps or the need for further assistance
 - Augmented intelligence to assist individuals in their decision making
 - Negotiation assistance to assist individuals in the use of constructive language that will facilitate resolution
 - Direct **appointment scheduling** with service providers
 - Push notifications and **text reminders** for key dates and appointments
 - Library of **plain-language information**, including short videos, designed to assist individuals who are able to use such information in seeking effective resolution
 - The platform will leverage the coordinated, statewide resources developed and maintained by the statewide support function (above) for legal issues
 - Processes to ensure that individuals with complex matters, health and safety risks, and particular vulnerabilities are promptly and effectively connected to resources that can assist them

The design, development and implementation of these two key statewide Functions is intended to be done through an inclusive lens mindful of the importance of cultural competency, language access, disability access, elder access and the ability for all persons to effectively access and use these resources. Achieving this objective will require a continual and adapting commitment to this ideal and the involvement of stakeholders with lived experience that can inform this design, development and implementation.

The development of these statewide functions will require careful consideration of governance, data security, data standards, technology resiliency, maintenance, quality control, testing and evaluation. To inform these design and structural issues, IOLA will create advisory group(s) of grantees, community-based organizations and other experts with particularly relevant experience and expertise.

Appendix A
Illustrative Client Journeys



USER PROFILE

Sasha

Scenario

Sasha works as a nanny and left their previous employer because they weren't getting paid overtime. They think they're owed a lot of money, but they've never hired a lawyer before and don't know where to go for help.

User Actions & Expectations

- Find legal information about unpaid wages
- Apply for help online and communicate through text messages
- Obtain legal help

Online Search and Application

1. Sasha searches the internet for “unpaid overtime help” and finds LawHelpNY.
2. They read the information available on LawHelpNY and realize that they are entitled to much more pay. They also see that there is a link to apply for legal services help.
3. Sasha completes an application for legal services help and provides their cell phone number to receive text message updates.

“I really hope it’s this easy... I don’t have time to make a ton of phone calls trying to find help.”

Coordinated Screening and Intake Process

4. A coordinated screening and intake specialist receives and reviews Sasha’s request for assistance.
5. The intake specialist reviews the referral database and finds that no LSOs are currently accepting clients with overtime and unpaid wages claims.
6. The intake specialist sends Sasha a text message explaining that no LSO referrals are available but that he can send Sasha a referral to the local bar association lawyer referral service.
7. Sasha agrees and the intake specialist sends them an SMS message telling them that their application will be passed along to the lawyer referral service.

“I can’t believe I’m getting referred to a lawyer and I didn’t even have to call anyone.”

Referral and Follow-Up

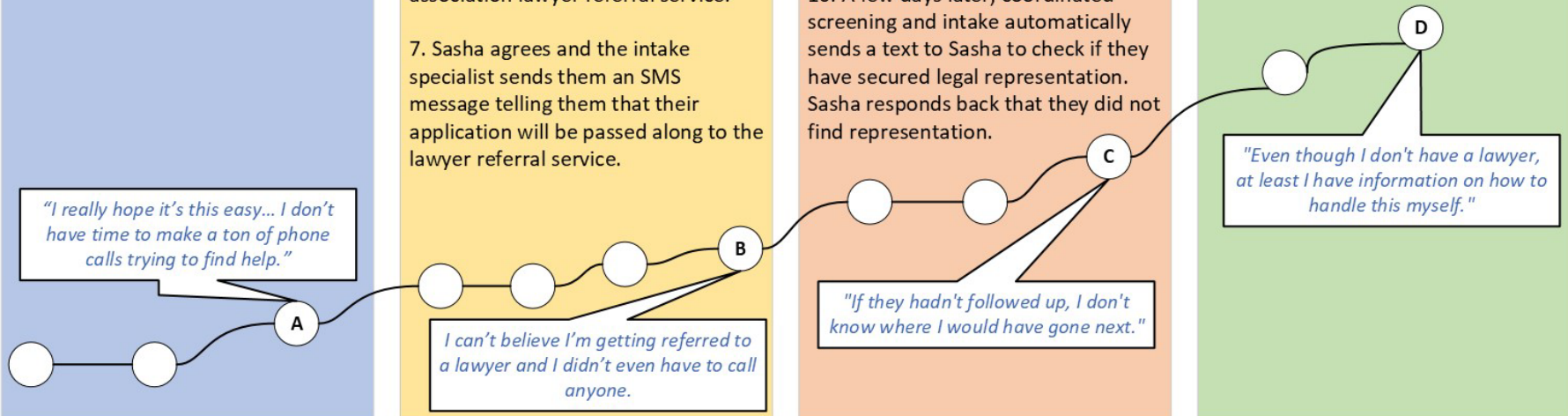
8. The next day Sasha is contacted via text message by the lawyer referral service to set up a screening call.
9. During the screening call, the referral service explains that it charges a \$100 screening fee in order to meet with an attorney. Sasha explains that they don't have \$100 to pay an attorney. Sasha asks if there are any attorneys who might take the case for free but is told that there are none.
10. A few days later, coordinated screening and intake automatically sends a text to Sasha to check if they have secured legal representation. Sasha responds back that they did not find representation.

“If they hadn’t followed up, I don’t know where I would have gone next.”

Legal Self-Help

11. Via text, coordinated screening and intake asks Sasha if they would like more information on how to handle the issue on their own. Sasha responds that they would like more information.
12. Coordinated screening and intake texts Sasha a link to resources that Sasha can review in order to handle their case pro se.

“Even though I don’t have a lawyer, at least I have information on how to handle this myself.”



USER PROFILE

Mary

Scenario

Mary relies on food stamps to feed her family. She was recently denied her food stamps benefits and doesn't know what to do.

User Actions & Expectations

- Identify next steps for benefits appeal
- Get legal self-help materials to assist with appeal
- Find additional social services

Find and Call Coordinated Screening and Intake

1. Mary goes to OTDA to ask about the denial of her food stamps application. She's told that she needs to appeal the decision, but that OTDA cannot help her with that.
2. As she is leaving the office, she sees a poster advertising free legal help for issues like housing and public benefits.
3. Mary calls coordinated screening and intake.

Coordinated Screening and Intake Process

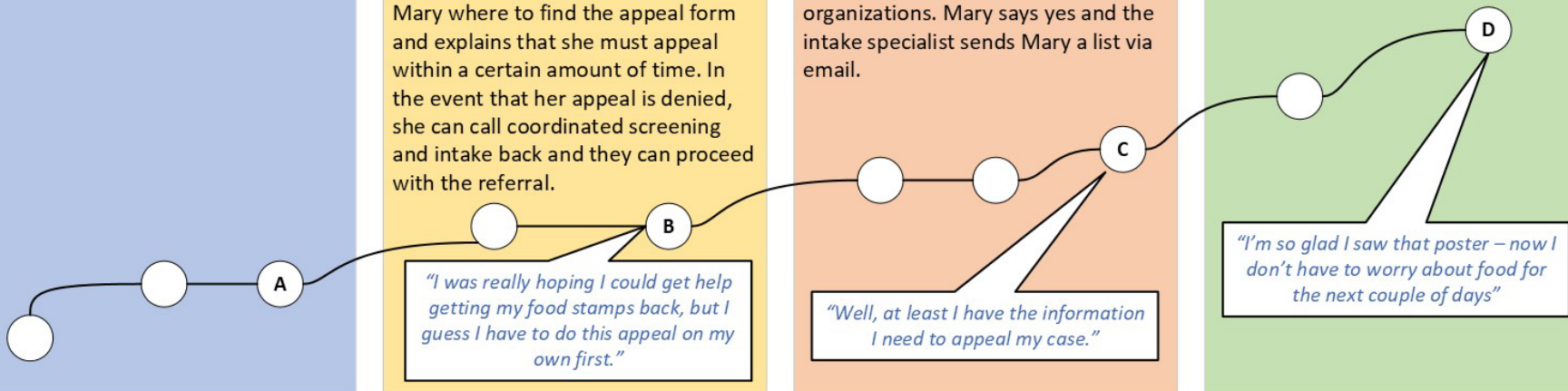
4. The intake specialist asks Mary questions about her situation and creates a pre-screen in the case management system to record her information. The intake specialist lets Mary know that if she needs to call back, all of the information Mary has shared, as well as any referrals made, will be stored in a secure system, so that Mary will only have to update any new information on her next call.
5. The intake specialist tells Mary that she must first file an appeal of the denial before she can be referred to an LSO. The intake specialist tells Mary where to find the appeal form and explains that she must appeal within a certain amount of time. In the event that her appeal is denied, she can call coordinated screening and intake back and they can proceed with the referral.

Legal Self-Help Materials

6. The intake specialist asks Mary if she would like to receive a link by email or text message to a website that has information about how to file an appeal of a food stamps denial.
7. Mary says she'd like to receive it in a text message and the intake specialist sends the link.
8. The intake specialist tells Mary that while she is waiting for a decision on her appeal, there may be community organizations that can help her. The intake specialist asks if she would like to receive a list of those organizations. Mary says yes and the intake specialist sends Mary a list via email.

Social Service Help

9. Mary contacts a local food bank that she didn't know about which was included in the list of organizations provided by coordinated screening and intake.
10. Mary goes to the food bank and is able to get donated canned goods and fresh fruit and vegetables for her family.



USER PROFILE

Helen

Scenario

Helen has recently become permanently injured and is unable to work. She applied for and was denied Social Security Disability Insurance benefits.

User Actions & Expectations

- Get referred directly to an LSO
- Identify next steps for benefits appeal
- Find additional social services

Calling a Non-Profit

1. Helen’s friend suggests that she call a community-based organization’s specialized hotline to see if they can help her figure out what to do.
2. Helen calls the specialized hotline and explains her problem.
3. The hotline operator asks Helen to hold while they connect her to an intake specialist at coordinated screening and intake.

Coordinated Screening and Intake Process

4. The hotline operator tells Helen that they have an intake specialist on the line and hands off the call.
5. The intake specialist asks Helen questions about her situation and creates a pre-screen and intake in the case management system to record her information.
6. The intake specialist tells Helen that her case can be referred to an LSO that may be able to help and that her information will be passed along.
7. The intake specialist also asks if Helen would like a list of community service providers that might be able to provide other types of assistance in the meantime.

E-Transfer and Case Acceptance

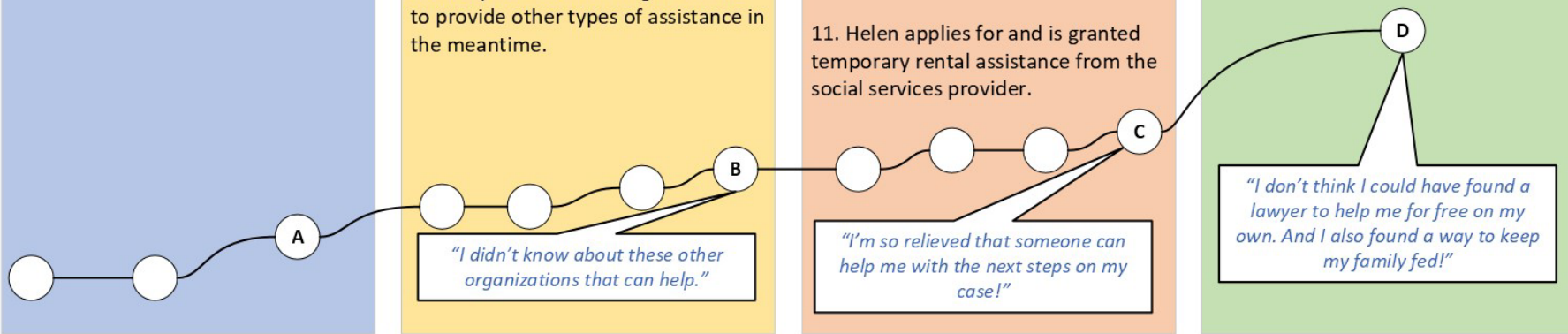
8. The next day Helen is contacted by a paralegal from an LSO that received her intake from coordinated screening and intake.
9. The paralegal asks Helen some questions to determine eligibility for their services. Because Helen meets the eligibility criteria, the paralegal tells her that they will be able to take her case and schedules an office appointment for her to meet with her attorney.

Social Services Referral

10. Helen contacts a rental assistance provider that she found on the list of organizations provided by coordinated screening and intake.
11. Helen applies for and is granted temporary rental assistance from the social services provider.

Legal Help

12. Helen goes to the LSO’s office and meets with her attorney. The attorney confirms the information about the case and makes copies of all the relevant documents, and tells Helen that they will prepare an appeal of her denial.



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Justice Infrastructure Project

Preliminary Description of Project Vision (September-December 2024)

Provided below are ~~preliminary~~ descriptions of two key objectives for the IOLA Justice Infrastructure Project based on IOLA's statewide efforts to ~~solicit feedback~~ engage community, review information ~~and~~, analyze data and solicit feedback on improvements to the civil legal services ecosystem to increase access to justice.

Statewide Function A: Support, Knowledge, and Information for Legal Services

Organizations

This statewide function would seek to create consistency and efficiency for the legal services community by identifying opportunities for coordination, fostering collaboration, improving awareness of legal services, and supporting legal services organizations seeking assistance with technology, policies, governance, training, and other functions essential to the delivery of civil legal aid. This statewide function may develop as a single entity or as a collaborative of uniquely capable organizations but it would operate independently of IOLA.

Initial functionality and features of this statewide function would include:

- Development and maintenance of statewide **training materials** for staff assisting clients in civil legal matters and various administrative proceedings
- Coordinated **knowledge management** – curated, organized and accessible information, opinions, memos, research, etc. for each civil matter type
- Development and maintenance of consistent **outreach and informational materials**, including brief videos, that can be used by legal services organizations for public engagement
- Centralized **technology support** for grantees interested in utilizing current IT infrastructure (IT support) as well as adopting technology innovations (such as AI tools) and implementing new technologies (such as new case management systems or call center platforms as well as various IT and cybersecurity training for all staff), including coordination of grantees with similar interests and sharing best practices from grantees who have already implemented certain technologies or other efforts
- Maintenance of a **comprehensive statewide directory of legal services resources and capacity**

IOLA would seek to prioritize the development of initial capabilities of this statewide support function. However, IOLA also expects that additional opportunities for statewide coordination, collaboration and support will emerge over time. As such, the statewide support function will need to evolve and adapt to the needs, challenges and opportunities of the New York legal services community. For example, there may be opportunities for coordinated data collection that could inform strategic advocacy, identify best practices, assist with evaluation, reduce data analysis and reporting burden by individual grantees and foster collaboration.

Statewide Function B: Legal Information and Referral for the Public

This statewide function is intended to foster ~~a unified, an~~ integrated ~~model that can continually evolve into a single-stop resource ecosystem of consistent, reliable, comprehensive and updated information~~ for critical and complex life problems, including legal problems. It will seek to amplify current resources, integrate ~~with existing~~ platforms, enhance functionality, and ~~coordinate/facilitate coordination~~ among stakeholders. IOLA is mindful that various information and referral mechanisms for legal and social organizations have been developed and launched in recent years: ~~that may warrant strengthening and expanding~~. During Phase 1, many organizations shared their experience with these systems – describing both the benefits of these platforms and the challenges. Importantly, many community organizations communicated that the current infrastructure does not adequately respond to their needs or those of their clients, noting that information was often incomplete or inaccurate, and that the platforms were often difficult to use, did not provide closed-loop referrals, did not allow for user accounts, and did not integrate with informational resources when referrals could not be made. As such, IOLA’s vision is to leverage the resources and platforms that currently exist, while finding opportunities to integrate and enhance them to make the user experience more efficient and impactful.

This function is intended to be public-facing and combine technology, information and multiple means for engagement (call center, web and mobile with human response, live chat and AI tools) to enable effective triage of an individual’s issues and circumstances. Using real-time information from community resources (including legal services organizations), this function (both human and technology-enabled) would advise individuals and organizations about resources that could assist them or information they can use to effectively resolve their circumstances when a referral is not possible.

~~Over time, IOLA is hopeful this integrated function will become a single, integrated door, but not the only door, by which people can access information and referral for critical and complex life problems.~~ Effective, comprehensive and consistent statewide outreach would be used to develop a pervasive sense of awareness encouraging New York residents – and the trusted community-based organizations that people in need turn to for help – to ~~use~~ seek assistance from the platforms using the comprehensive information developed for this function as the first action step. Grantees would be encouraged to direct clients to ~~such platforms~~ for intake, screening and referral services, ~~thus serving as a~~. A statewide, centralized intake for participating grantee organizations may develop as an element of this function.

When possible, the statewide information and referral function would seek to integrate other platforms providing assistance to New York residents, such as 2-1-1, LawHelpNY, NY Crime Victims Legal Help, HOPP (Home Owner Protection Program), and the NYC Bar Association’s Lawyer Referral and Information Service (LRIS), Just-Fix, Unlock NYC, Heat Seek, virtual hearing platforms of the courts or administrative agencies, online dispute resolution, e-filing and court record platforms, administrative records and other platforms that can enhance the breadth of information that can assist New York residents experiencing complex and critical life problems. **Appendix A** provides illustrative client journeys intended to demonstrate how an integrated function of information and referral would function/work for New Yorkers and the organizations that assist them. The extent of this integration and the full functionality will evolve over time with the phases of its development and implementation subject to various considerations.

The development of this function will include implementation of a comprehensive data strategy

to provide pathways to strategic advocacy enabling continual efforts to understand and reduce the justice gap in New York.

Initial functionality and features of this statewide function would include:

- Development of an authoritative source of information about available legal resources and information in New York that can be integrated into other Information & Referral platforms
- Fully-staffed, **state-of-the art call center** with trained and certified advisors available for intake, screening and referral
- **Real-time information** about capacity and availability for community-based organizations across the state to provide assistance, including legal services organizations
 - Centralized intake and referral to local organizations with available capacity, when possible
- Web-Based and Mobile-Enabled Technology
 - **User accounts** enabling people to store and share key documents and information
 - The ability for grantees and other organizations to assist users in creating accounts
 - **Specialized access** and capabilities for trusted community members who assist in connecting clients to social and government resources
 - **Live chat**
 - **Generative AI** that can assist residents with assessing their circumstances and identifying new steps or the need for further assistance
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 - Direct **appointment scheduling** with service providers
 - Push notifications and **text reminders** for key dates and appointments
 - Library of **plain-language information**, including short videos, designed to assist individuals who are able to use such information in seeking effective resolution
 - The platform will leverage the coordinated, statewide resources developed and maintained by the statewide support function (above) for legal issues
 - Processes to ensure that individuals with complex matters, health and safety risks, and particular vulnerabilities are promptly and effectively connected to resources that can assist them

The design, development and implementation of these two key statewide Functions is intended to be done through an inclusive lens mindful of the importance of cultural competency, language access, disability access, elder access and the ability for all persons to effectively access and use these resources. Achieving this objective will require a continual and adapting commitment to this ideal and the involvement of stakeholders with lived experience that can inform this design, development and implementation.

The development of these statewide functions will require careful consideration of governance, data security, data standards, technology resiliency, maintenance, quality control, testing and evaluation. To inform these design and structural issues, IOLA will create advisory group(s) of grantees, community-based organizations and other experts with particularly relevant experience and expertise.

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Justice Infrastructure Project Report on Phase 2 Activities (September – December 2024)

Provided below is a description of Phase 2 activities and key themes from the feedback received about the preliminary vision of the JIP.

Vision Presentation and Feedback

After completing Phase 1, IOLA shared on its [website](#) a summary of Phase 1 activities, a preliminary vision for the JIP, and preliminary plan for Phase 2. These materials were also emailed directly to all participants in Phase 1 listening sessions. Phase 2 was intentionally designed to reflect back to the community IOLA's observations, findings and vision for JIP and to seek feedback from the community to ensure IOLA was listening to community and engaging with the community as it considered its vision for the JIP.

The Phase 2 feedback activities IOLA has completed to date include:

- NYSBA Partnership Conference Presentations – 2 sessions – approximately 50 participants (One presentation was recorded and shared on IOLA's website)
- Virtual Feedback Sessions – 3 sessions (1 with ASL) – approximately 122 participants
- Stakeholder Meetings – 10 meetings with organizations involved in the New York civil justice ecosystem

In addition, IOLA continued to maintain a website where stakeholders could share feedback and questions or request a follow-up meeting.

IOLA also supported, and participated in, a one-day convening in NYC for legal services intake staff, initiated and organized by Legal Services NYC. IOLA supported this convening financially and assisted in developing the agenda, distributing invitations to grantees, and participating in a presentation of relevant findings from Phase 1 of the JIP. IOLA is hopeful the ideas generated from this convening can be incorporated in the development of elements of the JIP vision. Approximately 140 people attended, about 80 in person and 60 virtually, from over 60 IOLA grantee organizations.

Stakeholder Engagement

From these activities, IOLA received valuable feedback from community organizations, grantees and justice stakeholders from across the state. In many instances, the feedback received offered points of emphasis for topics discussed in the Phase 1 activities.

Provided below is a summary of key elements of stakeholder feedback:

- Overwhelming support for Phase 1 observations and preliminary JIP Vision
 - Cautious excitement about the potential of Statewide Function B of the JIP Vision: Legal Information and Referral for the Public
- Encouragement for collaborative design techniques, with substantial and substantive input from residents, community organizations, grantees and other stakeholders
- Local inter-organization collaboration and trust is critical
- Support for coordinated statewide call center operations, but calls should be routed to people with local expertise
- Leverage existing platforms, technology and content
- Data privacy and security will need to be a focus of any program, platform or integration
- Coordinated and consistent outreach will be essential
 - Outreach strategies can facilitate access to justice by leveraging the trust and credibility established with local stakeholders and community organizations
 - Social media may be a particularly impactful form of outreach
- Work toward models of holistic triage and intake with the assistance of human support enhanced with technology
 - Empower local community organizations with effective tools to assist members of the community in efficiently accessing information and referral
- Intentionally incorporate feedback loops using qualitative and quantitative information
- Incorporate feedback from IOLA grantees – including both leadership and staff
- Continue to seek connection with additional stakeholders across New York

During the course of the Phase 2 feedback sessions (and throughout Phase 1) stakeholders across New York expressed how the elements of the JIP (particularly Statewide Function B: Legal Information and Referral for the Public) could impact their communities, if collaboratively developed and sustainably and effectively implemented. Provided below are examples of ways in which these stakeholders envisioned the JIP would improve access to justice in their communities:

- Improved language and disability access
- Reduced number of attempts to identify and schedule assistance for people seeking help
- Greater connection rates and reduced time seeking to connect with people requesting help
- Reduced need for referral across legal services organizations
- More efficient and accurate triage of legal and social care issues
- More equitable deployment of limited resources
- Greater efficiency for delivery of civil legal services
- Greater dignity and empowerment for individuals seeking assistance
- Improved transparency regarding the availability of legal assistance
- Greater access to effective information when legal assistance is not available
- Improved trust in civil legal and social systems
- Comprehensive data that can inform strategic advocacy, collaboration and resource allocation

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Justice Infrastructure Project Planned Activities for Remainder of Phase 2 (December 2024 – March 2025)

The activities planned for Phase 2 of the Justice Infrastructure Project (“JIP”) included:

1. Vision presentation and feedback;
2. Stakeholder engagement;
3. Advisory Committee development;
4. Vision refinement; and
5. Initial development of Statewide Functions.

As of December 2024, activities 3 and 5 remain to be completed. Provided below are IOLA’s plans to advance the development of the Statewide Functions and Advisory Committees.

Initial Development of Statewide Functions (December 2024 – March 2025)

Statewide Function A: Support, Knowledge, and Information for Legal Services Organizations

IOLA is planning a convening of grantees (in a hybrid format allowing for in-person and virtual participation) interested in discussing the development of this Statewide Function on January 16th. At this convening, IOLA will present research regarding other statewide support functions for legal services communities around the U.S. It will then facilitate discussions of certain essential initial elements of this function, such as organizational structure, governance, funding, staffing, models for participation, and key initial support activities. Following the convening, IOLA will seek to continue the initial development with ongoing advisory groups that can develop recommendations for the creation of this Statewide Function. IOLA intends to provide compensation to organizations participating in these advisory groups.

Statewide Function B: Legal Information and Referral for the Public

IOLA is similarly planning a convening of both grantees, community organizations, and subject matter experts (in a hybrid format allowing for in-person and virtual participation) interested in discussing the development of this Statewide Function in early March 2025. IOLA will present research regarding information and referral functions for legal services communities and social care networks around the U.S. It will then facilitate discussions of certain essential initial elements of this function, such as resource directory, maintenance and sustainability, staffing, content management, AI tools, capacity and scheduling, coordinated intake, call center resources, community engagement, and outreach. From these facilitated discussions, IOLA will seek to continue the initial development with ongoing advisory groups that can develop recommendations for the creation of this Statewide Function. IOLA intends to provide compensation to organizations participating in these advisory groups.

In addition to this convening, IOLA intends to organize a convening of government funders in New York to explore opportunities for integration and collaboration. IOLA is hopeful that this convening can be scheduled in April or May 2025.



JUST  TECH

Cybersecurity Improvement and Technical Assistance Project

*Mid-Cohort Progress Report
September 2024*

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INTRODUCTION

This report provides an update on the Cybersecurity Improvement and Technical Assistance Project (CyTAP), which aims to enhance the technology infrastructure and security compliance of 80 IOLA NY grantees. Key areas of focus include multi-factor authentication (MFA) implementation, artificial Intelligence (AI)-powered technology solutions, and tailored consulting services.

CyTAP has made significant progress, particularly in engaging grantees through a cohort-based approach. This report outlines completed and planned activities, challenges encountered, recommendations for future cohorts, and opportunities for additional services.

Project Purpose and Overview

CyTAP is designed to support legal services providers by improving their cybersecurity posture and technical capabilities. The primary purpose of the project is to equip these organizations with the tools, knowledge, and technical capacity to protect sensitive client data. Currently, the project is addressing the need for enhanced security through MFA and broader adoption of AI-powered tools in legal services and operations. By improving these critical areas, grantees will be better positioned to maintain data integrity, comply with security standards, and operate more efficiently in delivering legal services to their clients. Additional phases of the project will expand to include more advanced technology solutions that go beyond basic security measures. By introducing new technologies and providing long-term support, CyTAP aims to enable grantees to better serve their communities with greater security, technological preparedness, innovation, and effectiveness.

COHORT STRUCTURE AND GRANTEE ENGAGEMENT

The cohort-based structure has been a cornerstone of the project's success, allowing for focused, organized engagement with grantees while addressing their diverse needs in a scalable manner. The design of the cohorts, which groups grantees based on their readiness and specific technical needs, ensures that each group receives tailored support and can move through the implementation process at a sustainable pace. This approach minimizes the risk of overwhelming grantees who may be less familiar with technology, while also allowing more advanced organizations to explore cutting-edge tools like AI and enhanced cybersecurity practices.

In Cohort 1, the emphasis on MFA implementation has provided an excellent foundation for grantees to improve their security postures. Smaller group sizes have allowed for more individualized attention, which has been particularly important in addressing the unique challenges grantees face, such as integrating MFA for organizations with limited internal IT resources. Regular group meetings, combined with one-on-one consultations, allow grantees to troubleshoot in real-time, fostering an environment of collaboration and shared learning.

As the project expands beyond Cohort 1, the cohort structure will continue to play a vital role in facilitating deep engagement. Further cohorts will introduce more advanced topics like Single Sign On (SSO) integration. The project's design allows each grantee to access the level of support they require based on their own organizational capacities and technological maturity.

PROJECT MILESTONES

Completed Activities

Cohort 1 - MFA

The first cohort, composed of five IOLA grantees, has focused on the implementation of MFA. Implementing MFA was identified as a critical step in improving grantees' security postures. The work completed includes in-depth assessments and working meetings aimed at helping grantees configure and integrate MFA into their existing systems.

Through moderated meetings, grantees are guided through the technical requirements of MFA, including strategies to overcome change management challenges and integration with existing infrastructure. By the end of this phase, participating grantees will complete adoption of MFA for critically important technology systems.

Group Meetings & Feedback Survey Collection

Cohort 1 participants have engaged in comprehensive discussions about their security needs and experiences. These meetings have provided valuable insights into the unique challenges faced by each grantee, fostering a collaborative environment where participants could share best practices and troubleshoot common issues.

To measure the impact of these efforts, a pre-survey has been conducted. After the completion of the project, a post-survey will be conducted to measure the changes in confidence, competence, understanding, and security posture.

1-1 Consultations & MFA Implementation

Cohort 1 also has involved tailored one-on-one consultations, during which grantees receive personalized technical support. These consultations are addressing specific challenges, such as dealing with limited internal IT resources and user resistance.

The success of these individualized sessions highlights the need for continued, customized support in future cohorts. By the conclusion of Cohort 1, all participating grantees will have taken important steps toward securing their operations, and the lessons learned during this phase will lay the groundwork for future cohorts to build upon.

Cohort 2 - AI

Cohort 2, a workshop series on artificial intelligence, is designed to engage all interested grantees over the course of six to nine months. The overarching goals for Cohort 2 include:

Raising Awareness and Understanding of AI

- Educate participants on the basics of AI and its potential applications in legal aid.
- Highlight AI's role in improving access to justice, automating tasks, and enhancing decision-making.

Demonstrate Real-World Use Cases

- Showcase AI tools and technologies that are specifically relevant to legal aid services, such as document automation, predictive analytics, chatbots, and data management tools.
- Provide case studies from similar organizations that have successfully implemented AI.

Foster Practical Skill Building

- Offer hands-on sessions or demos where participants can interact with AI tools.
- Focus on skills needed to implement, manage, and optimize AI tools within their organizations.

Address Ethical and Compliance Concerns

- Discuss the ethical implications of using AI, particularly in sensitive legal contexts.
- Provide information on data privacy, compliance, and how to manage AI responsibly within legal frameworks.

Support Decision-Making and Strategic Planning

- Help organizations understand how to assess AI needs and the potential return on investment.
- Guide participants on how to align AI strategies with their overall goals and missions.

Create a Collaborative Support Network

- Build a community of legal aid organizations, AI experts, and vendors who can continue sharing resources and best practices after the workshop.
- Foster partnerships that can provide ongoing support as organizations implement AI tools.

Facilitate Q&A and Problem Solving

- Ensure time is dedicated to answering participant questions and addressing concerns specific to their organizations.
- Provide opportunities for one-on-one or small group consultations with experts to troubleshoot issues.

Promote Long-Term AI Integration

- Help firms create action plans or roadmaps for AI integration tailored to their size, capacity, and needs.
- Encourage participants to develop policies for AI governance and continuous evaluation.

AI Workshop Preparation

Preparation has begun for AI-powered legal solutions workshops, which will begin shortly after the NYSBA Partnership Conference. Workshops will include presentations from legal AI product vendors and experts on legal AI, working sessions to discuss grantees' goals and challenges related to AI, and practical sessions during which grantees can complete actual AI-related work, like drafting or improving AI technology policies.

By the end of the cohort, grantees will understand the benefits and risks of using AI in legal practice and how it can be integrated into their workflows to improve service delivery and operational efficiency. While the workshops have not yet been fully developed, the groundwork is in place, and preliminary discussions have started with grantees about their interest in adopting AI technologies.

Grantee Learning Community

A valuable part of Cohort 2 will be a focus on fostering a learning community among the IOLA NY grantees in which they feel safe to share their challenges and successes and can continue to rely on each other in the future as technology inevitably changes. We will foster learning and community building by creating small group cohorts of the larger AI series cohort and encourage communication and sharing via smaller grantee meetings in between the larger cohort meetings.

ONGOING AND PLANNED ACTIVITIES

After the success of Cohort 1, the project plans to build on the achievements of the MFA rollout by offering an integrated MFA solution for organizations needing it across multiple applications, which will be accomplished through the implementation of single sign-on (SSO). Combining SSO with MFA makes logging in easier and more secure by allowing users to use one set of credentials for multiple applications while adding an extra layer of protection. For example, we will use an SSO product to secure sign-on for other existing applications used by grantees, such as case management, human resources, and accounting systems.

Pre-Post-Cohort Survey & Feedback Loop

At the beginning of each cohort, participants complete a baseline survey to assess their confidence and knowledge levels before starting activities. At the conclusion of each cohort, the same questions, along with additional feedback on the effectiveness of the training and workshops, will be asked in a post-cohort survey. This feedback loop will allow the project team to make necessary adjustments for future cohorts, ensuring the program remains responsive to grantee needs. By incorporating participant input, the project can continue to evolve and improve, ultimately enhancing the impact of the technology solutions being implemented.

RECOMMENDATIONS FOR FUTURE PHASES

Based on the progress so far, we recommend the following steps to ensure continued success and scalability of the project, we suggest adding more cohorts to engage all 80 grantees in a timely manner. Each cohort should focus on specific areas such as AI, SSO, and security awareness.

Opportunities for Additional Cohorts

As the project advances, several opportunities for additional cohorts have emerged that could provide grantees with ongoing support and enhance their technological capabilities. We propose running multiple cohorts concurrently throughout the year. As the original scope only anticipated 4 cohorts run over the course of the year, adding additional cohorts and topics would require additional funding.

As an additional benefit, this cohort-focused approach offers the opportunity to be an incubator for testing on a smaller scale before full-scale implementation.

1. AI

- a. **AI Consulting:** Providing AI-powered solutions for knowledge management, operational efficiency, and case management would help grantees modernize their operations. This service would involve detailed planning around how AI can be used not just for efficiency gains but also for innovation in legal services delivery, such as client outreach, data analytics for funding opportunities, and more advanced predictive modeling for case management.
- b. **AI and Data Analytics Integration:** Integrating AI with data analytics will help grantees leverage these tools to improve operational efficiency, client services, and data management. Grantees can benefit from AI applications such as automated document processing, legal research enhancements, and predictive analytics to better manage case outcomes and resources. Focusing on data-driven decision-making will allow grantees to better track performance, identify trends, and use data to secure funding or report on outcomes to stakeholders.

2. Security

- a. **Ongoing Security Audits:** Offering regular cybersecurity audits would ensure grantees maintain compliance with evolving security standards. Regular audits and monitoring services would ensure that grantees maintain their compliance with the latest security protocols, detecting vulnerabilities early and offering a proactive approach to risk mitigation.
- b. **Staff Security Awareness Training:** Security awareness should become embedded in the organizational culture of each grantee, ensuring that cybersecurity is not just the responsibility of IT staff but is embraced across

the entire organization. Future phases could offer staff training sessions that are tailored for non-technical staff, emphasizing the role every employee plays in maintaining security. Topics could include phishing prevention, password management, and secure communication practices. Additionally, grantees could benefit from training sessions focused on creating cybersecurity leadership teams within their organizations, ensuring that there is a clear strategy and accountability for managing ongoing security risks.

- c. **Technology Planning Services:** Assisting grantees with long-term technology planning, budgeting, and change management would enable them to align their infrastructure with future needs and challenges. As grantees adopt more sophisticated technologies, they may encounter resistance or confusion within their teams. Providing services that focus on change management—including training for leadership, staff education on technology adoption, and strategies for managing organizational transformation—could be critical in ensuring the successful long-term use of new technologies.

3. Policy Drafting and Review

- a. An essential part of technological governance and security involves the drafting and regular review of organizational policies. Cohorts focusing on policy drafting would assist grantees in establishing clear, concise, and actionable policies that align with operational best practices. We propose assisting grantees in drafting or improving one policy per cohort session. Potential policies include:

- Employee Technology Acceptable Use Policy
- Tech incident response plan
- Data Protection and Privacy Policy
- Information Security Policy
- IT Governance Policy
- Cloud Storage and Services Policy
- AI Use Guidelines

The policies drafted through these cohorts will ensure that grantees establish foundational governance that supports operational integrity, security, and compliance.

CONCLUSION

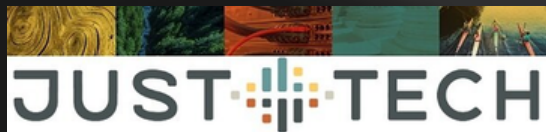
Even early on in the project, CyTAP has proven to be an impactful initiative for IOLA's grantees, significantly enhancing their cybersecurity capabilities and laying the groundwork for future technological advancements. The adoption of MFA has already strengthened security for many grantees, and as more cohorts complete their implementations and training, the broader legal aid community will become more resilient in the face of evolving

cyber threats. This project's success in fostering collaboration, providing tailored support, and addressing technical challenges in real-time has helped grantees become better equipped to manage both current and future risks.

Looking ahead, the project is well-positioned to expand its focus on advanced technologies such as AI and broader data management strategies, helping grantees not only secure their operations but also improve service delivery and operational efficiency. By continuously refining the cohort model and exploring opportunities for additional services like AI consulting and ongoing security audits, the project will remain an essential resource for these organizations, ensuring they are prepared to meet the growing demands of the legal services landscape.

IOLA GRANTEE MFA SURVEY REPORT

SEPT.
2024



Prepared by Jessica Greco, Project Specialist

Approved by: Ellen Samuel, Director of Consulting

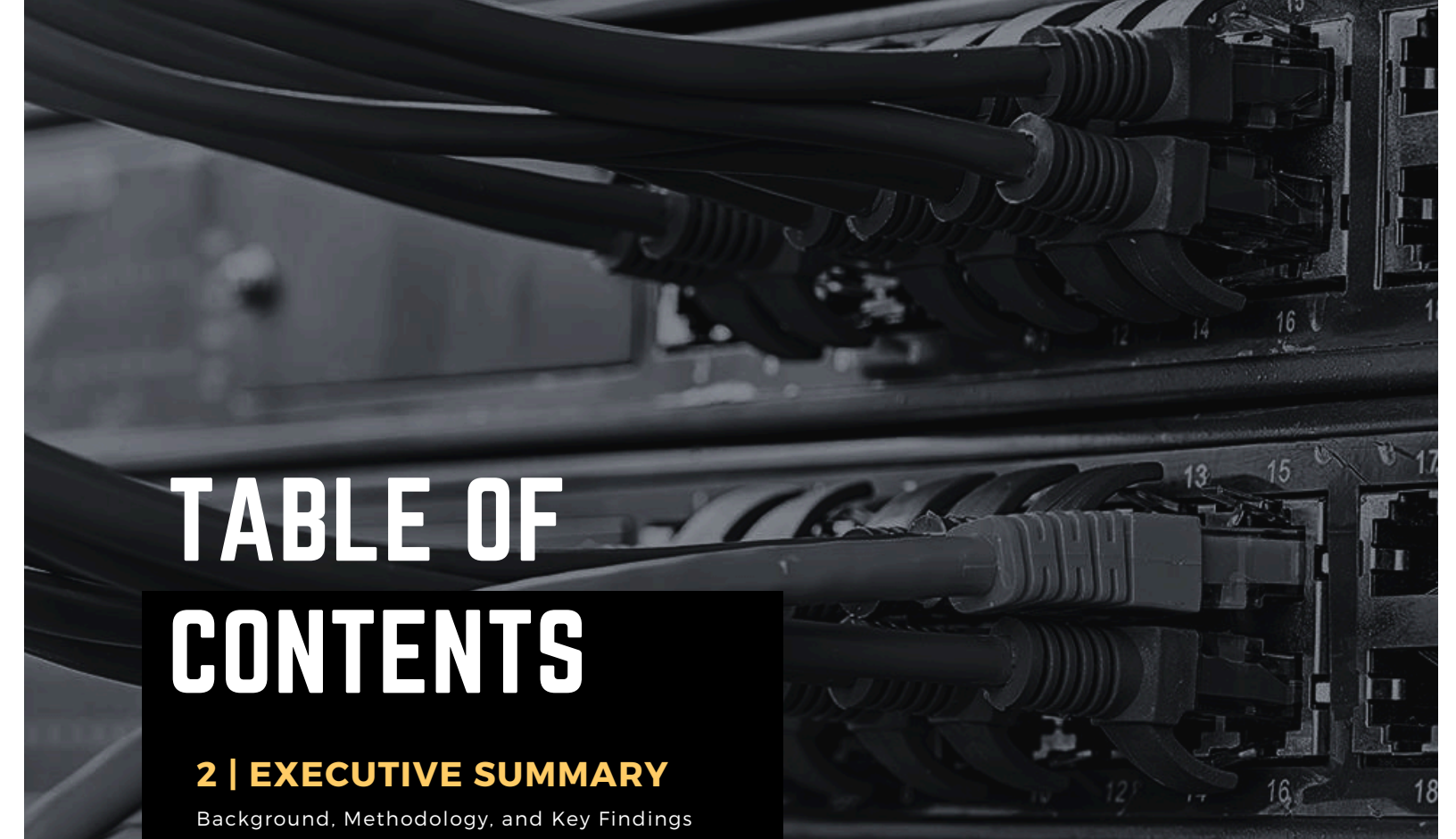


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Summary Results & Recommendations

EXECUTIVE SUMMARY

BACKGROUND & METHODOLOGY

Just-Tech, in partnership with IOLA New York, created and distributed a 12-question 2024 IOLA-Just-Tech MFA Survey to 81 IOLA grantee organizations. The survey was collaboratively designed by Data and IT professionals to gain a deeper understanding of MFA usage across IOLA grantee organizations, highlighting areas where additional resources or improvements may be necessary. The survey was open to grantees from August 1st-31st, 2024. Responses were collected from 76 organizations through self-identified IT contacts in each organization.

The following report provides a valuable foundation for understanding the state of MFA implementation and offers recommendations to enhance security practices across the surveyed organizations.

KEY FINDINGS

- The majority of polled organizations (**95%**) either fully or partially utilize MFA
- Over half of polled organizations (**65.7%**) have not gathered user feedback regarding the MFA implementation
- MFA Implementation challenges include user resistance (**28.6%**), integration with existing systems (**18.6%**), and technical issues (**17.1%**)
- One-third (**33.3%**) of organizations are developing policies to ensure MFA is implemented for new applications handling sensitive data

SURVEY RESULTS

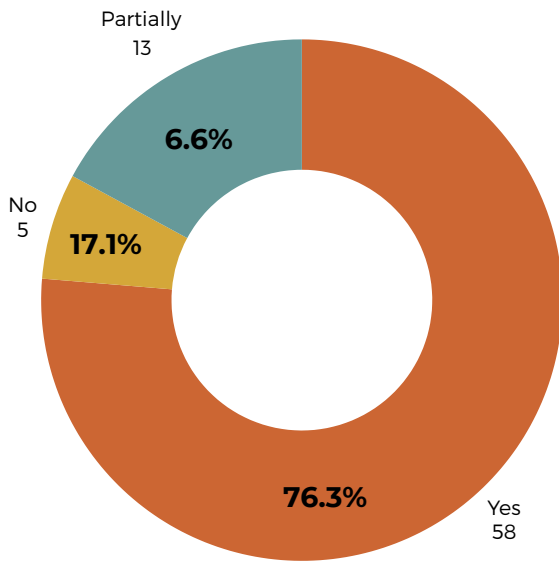
List of Questions

1. Does your organization use Multi-Factor Authentication (MFA)?
2. Have you gathered user feedback regarding the MFA implementation?
3. What challenges are you encountering with your MFA implementation, if any?
4. What support does your organization provide to staff using MFA?
5. Does your organization have any regulatory or compliance requirements that mandate the use of MFA?
6. For which of the following types of applications do you have MFA implemented?
7. What types of MFA methods do you use in your organization?
8. How do you verify that MFA is correctly implemented and enforced across your organization?
9. Do you have a policy or procedure in place to ensure that MFA is implemented for any new applications that handle sensitive data?
10. How often do employees receive training on the importance and use of MFA?
11. Do you have any plans to expand or improve your MFA implementation in the next 12 months?
12. What kind of support would be most helpful for improving or expanding your MFA implementation?

Q1. MFA USAGE | RESPONSE RATE: 100%

n = 76

Does your organization use Multi-Factor Authentication (MFA)?

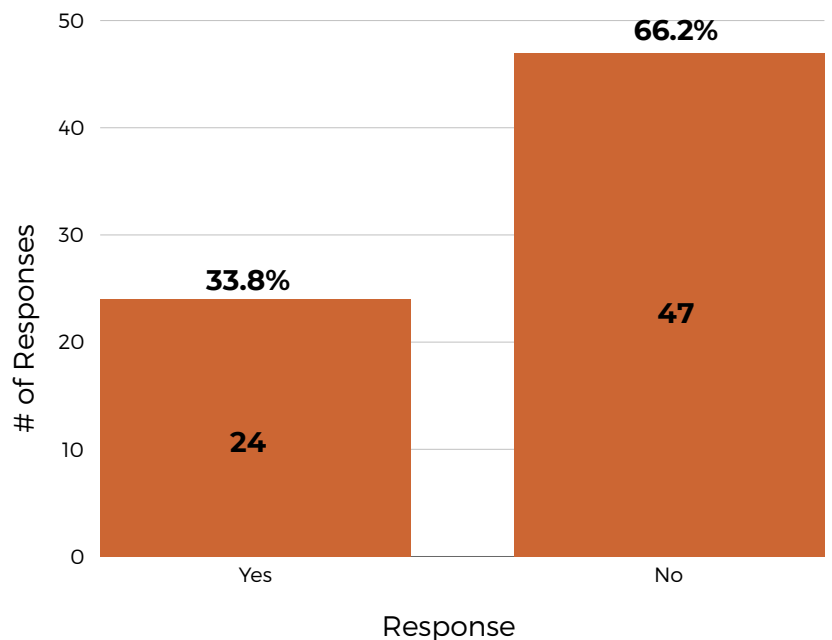


76% of organizations use MFA, while **7%** use it partially, and **17%** do not use it at all

Q2. USER FEEDBACK | RESPONSE RATE: 93%

n = 71

Have you gathered user feedback regarding the Multi-Factor Authentication (MFA) implementation?



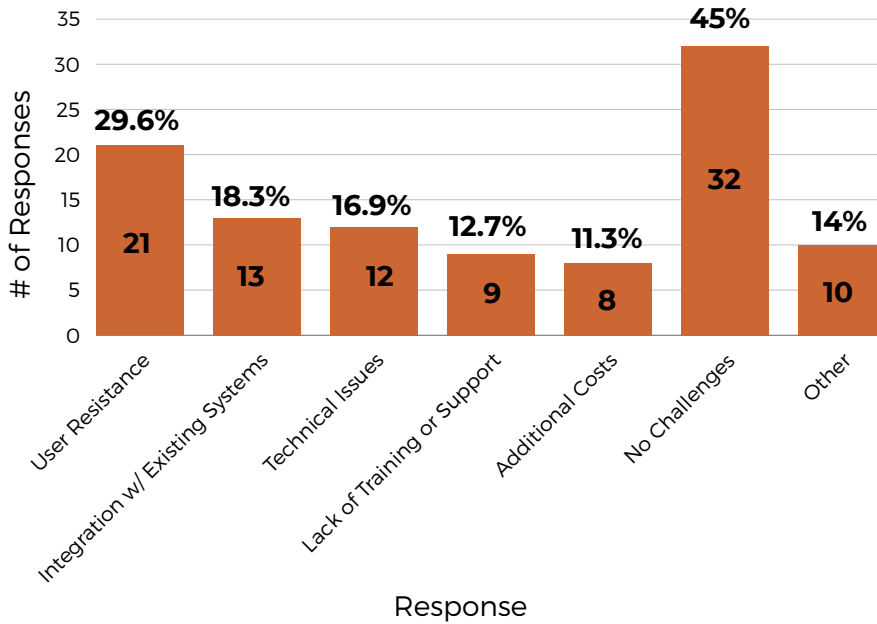
Of the organizations that have implemented MFA, over half (**66%**) have not gathered **user feedback** on the MFA implementation process

Q3. CHALLENGES | RESPONSE RATE: 93%

n = 76

What challenges are you encountering with your Multi-Factor Authentication (MFA) implementation, if any?

(Select all that apply)

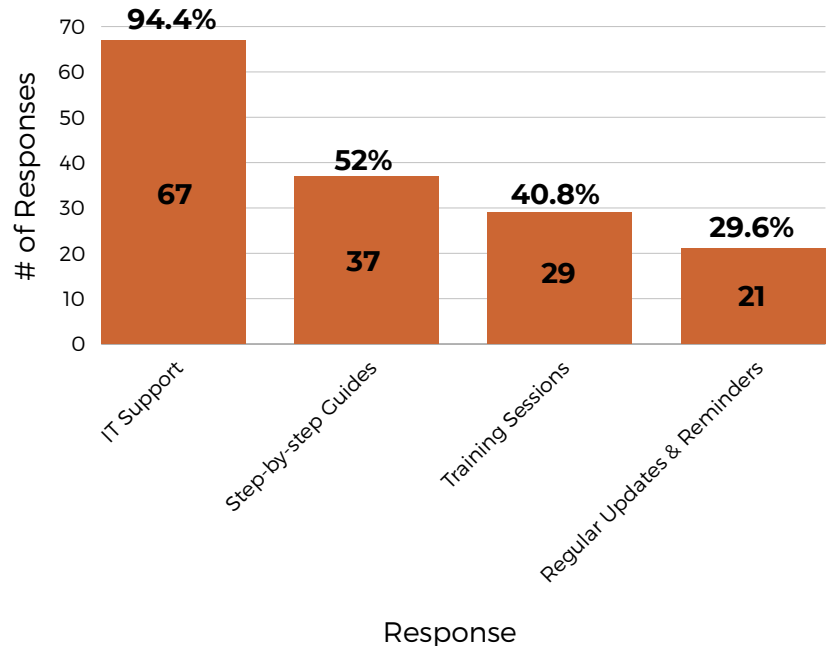


45% of respondents encountered no challenges when implementing MFA in their organization

Q4. SUPPORT PROVIDED | RESPONSE RATE: 93%

n = 71

What support does your organization provide to staff using Multi-Factor Authentication (MFA)? (Select all that apply)

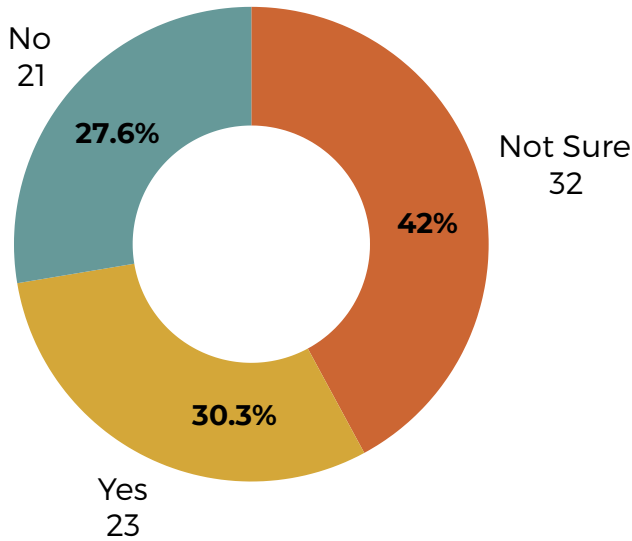


Most polled organizations **(94.3%)** offer **IT Support** for staff using MFA

Q5. REGULATORY REQUIREMENTS | RESPONSE RATE: 100%

n = 76

Does your organization have any regulatory or compliance requirements that mandate the use of Multi-Factor Authentication (MFA)?



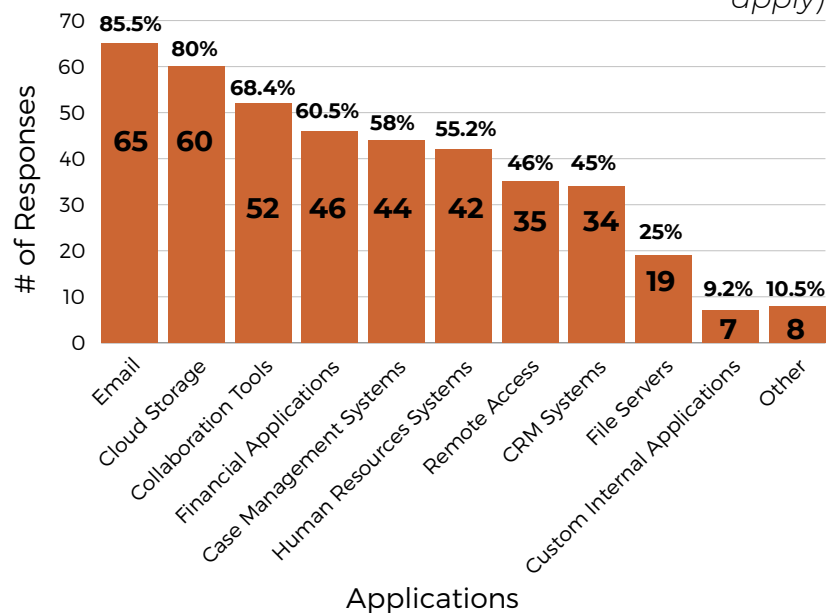
42% of polled organizations were unsure of **compliance regulations** within their organization mandating the use of MFA

Q6. APPLICATIONS WITH MFA | RESPONSE RATE: 100%

n = 76

For which of the following types of applications do you have Multi-Factor Authentication (MFA) implemented? (Select all that apply)

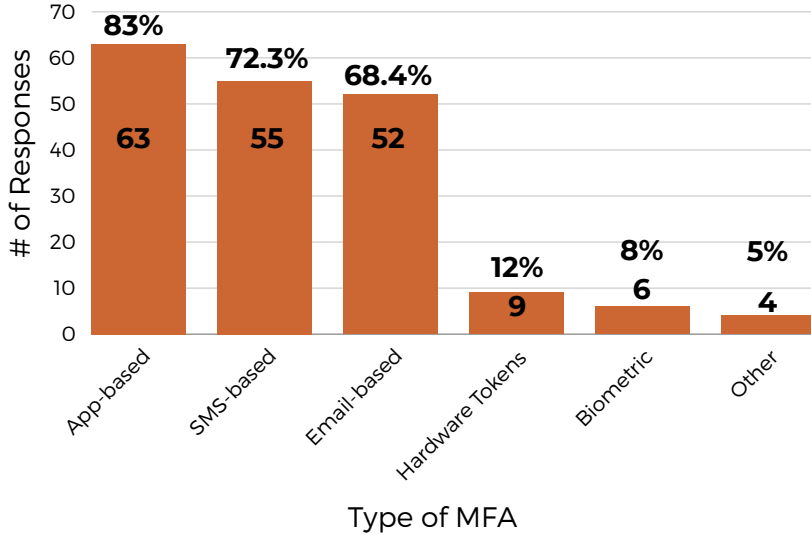
Over half (**58.7%**) of polled organizations have MFA implemented in their **Case Management Systems**



Q7. MFA METHODS | RESPONSE RATE: 100%

n = 76

What types of Multi-Factor Authentication (MFA) methods do you use in your organization? (Select all that apply)

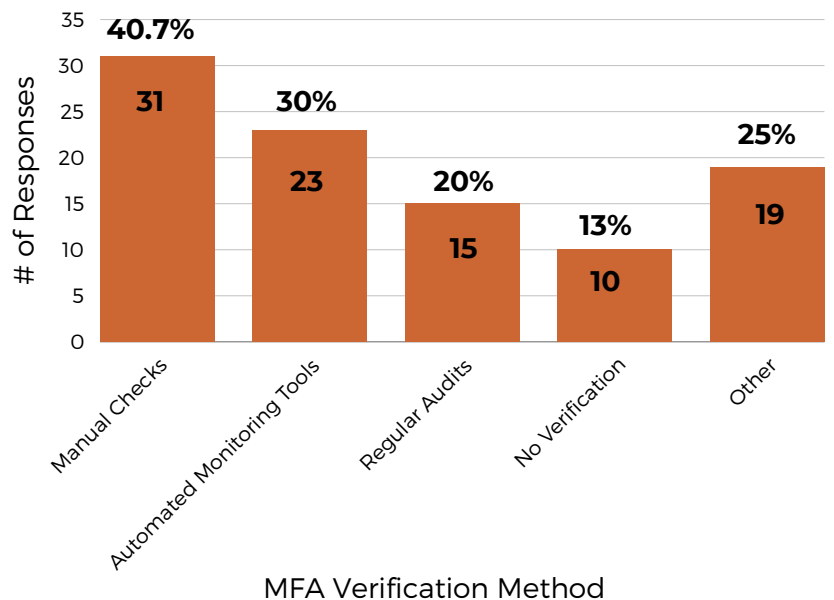


The majority (82.9%) of organizations utilize **app-based MFA**

Q8. MFA VERIFICATION | RESPONSE RATE: 100%

n = 76

How do you verify that Multi-Factor Authentication (MFA) is correctly implemented and enforced across your organization? (Select all that apply)

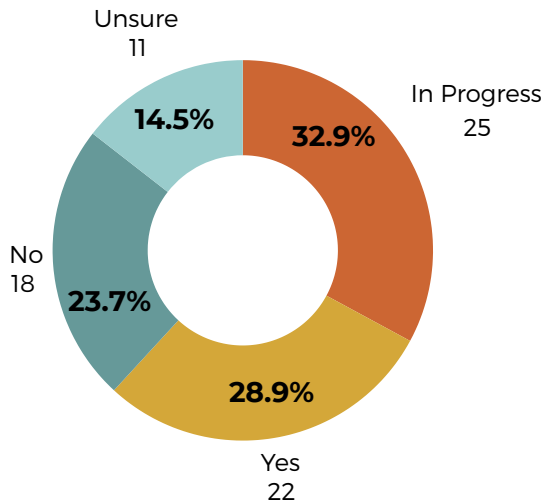


40.8% of polled organizations conduct **manual checks** to ensure that MFA is implemented and working

Q9. MFA POLICIES | RESPONSE RATE: 100%

n = 76

Do you have a policy or procedure in place to ensure that Multi-Factor Authentication (MFA) is implemented for any new applications that handle sensitive data?

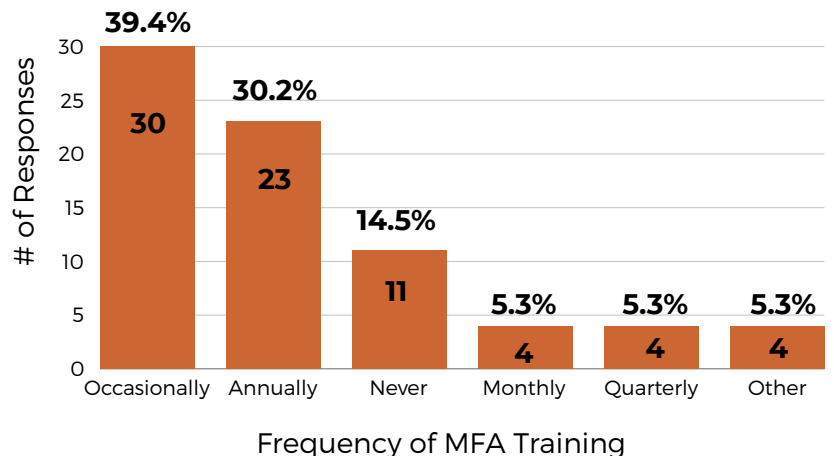


28.9% of organizations have a policy in place to ensure MFA is implemented for any new applications handling sensitive data

Q10. MFA TRAINING | RESPONSE RATE: 100%

n = 76

How often do employees receive training on the importance and use of Multi-Factor Authentication (MFA)?

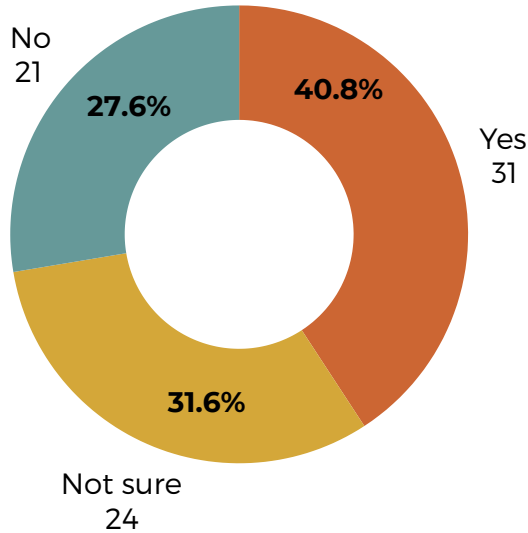


39.5% of organizations give occasional MFA importance and use trainings to staff, compared to **30%** that train annually

Q11. FUTURE PLANS | RESPONSE RATE: 100%

n = 76

Do you have any plans to expand or improve your Multi-Factor Authentication (MFA) implementation in the next 12 months?

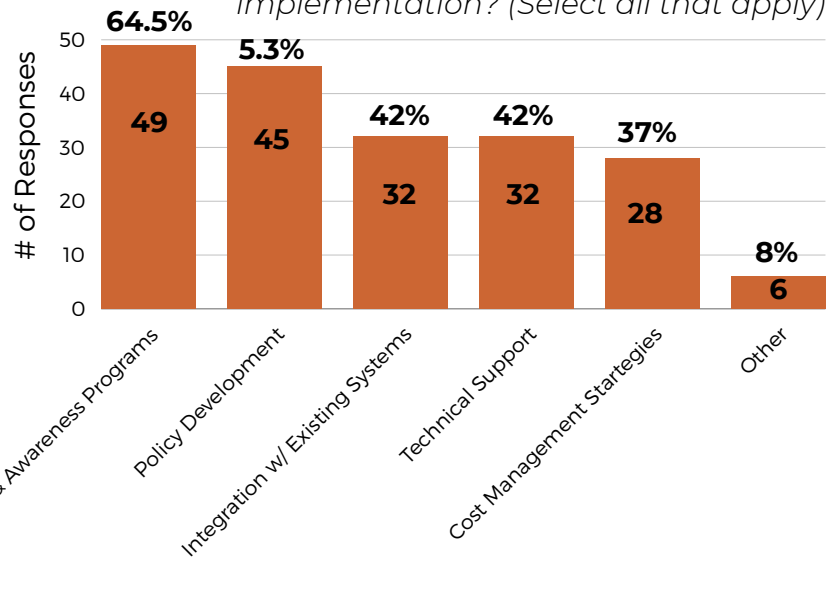


40.8% of organizations have plans to expand or improve MFA in the next 12 months

Q12. SUPPORT NEEDS | RESPONSE RATE: 100%

n = 76

What kind of support would be most helpful for improving or expanding your Multi-Factor Authentication (MFA) implementation? (Select all that apply)



Type of Support

Over half (**64.5%**) of organizations indicated that **user training and awareness programs** would be most helpful for improving or expanding their MFA implementation



FINDINGS & RECOMMENDATIONS

76%

FULL MFA ADOPTION

30%

ENCOUNTER USER RESISTANCE

65%

WOULD LIKE MFA USER TRAINING

Focus on enhancing MFA adoption by addressing user resistance through education, improving integration with existing systems, and offering more technical support.

Organizations are encouraged to gather user feedback regularly, expand MFA to more critical applications, and implement automated monitoring tools for verification.

Additionally, increasing training frequency and finalizing policies for new applications are emphasized to ensure stronger security and compliance.

The following recommendations have been sectioned into three categories: training, security, and compliance.

#1

TRAINING

1.) INCREASE THE FREQUENCY OF TRAINING SESSIONS.

Infrequent training can result in staff not fully understanding MFA's importance or how to use it effectively. Increasing training frequency will improve awareness and knowledge, reducing the likelihood of errors and improving compliance with security protocols.

WHY?

Training on MFA is provided **occasionally** by **38.7%** of organizations and **annually** by **30.7%**, with only **5.3%** offering it **monthly** or **quarterly**.

WHY?

65.7% of organizations **have not gathered user feedback** on their MFA implementation process

2.) IMPLEMENT REGULAR USER FEEDBACK MECHANISMS.

Without regular feedback, organizations may be unaware of user frustrations or issues, leading to reduced effectiveness and user adoption of MFA. Collecting feedback will help organizations identify pain points and make necessary adjustments to improve user experience and system efficiency.

3.) PROVIDE USER-EDUCATION PROGRAMS.

User resistance often stems from a lack of understanding or perceived inconvenience. Educating users on the benefits of MFA and how it enhances security can help reduce resistance, increase buy-in, and improve overall adoption rates.

WHY?

User resistance is one of the main challenges, cited by **28.6%** of organizations.

#2

SECURITY

1.) PROMOTE THE USE OF SECURE MFA METHODS.

Less secure MFA methods, such as SMS or email-based authentication, are more vulnerable to attacks. Encouraging the use of stronger methods, like app-based authentication, will provide more robust protection against security threats.

WHY?

App-based MFA is used by **82.7%** of organizations, while less secure methods like **SMS-based (72%)** and **email-based (69.3%)** are still common. **Biometric methods** are used by only **5.3%**.

WHY?

41.3% of organizations use **manual checks**, **30.7%** use **automated monitoring tools**, and **20%** conduct **regular audits** to verify MFA implementation. However, **13.3%** do not verify at all.

2.) ENCOURAGE REGULAR AUDITS AND AUTOMATED MONITORING TOOLS.

Manual checks are prone to human error and can be less effective than automated tools or audits. By promoting automated monitoring and regular audits, organizations can ensure that MFA is consistently enforced and functioning as intended, reducing the risk of security gaps.

3.) INCREASE AWARENESS OF REGULATORY REQUIREMENTS FOR MFA

Lack of awareness about regulatory requirements can lead to non-compliance, resulting in legal and financial repercussions. Raising awareness and providing clear guidance on these requirements will help organizations ensure they are in full compliance, avoiding potential penalties and safeguarding sensitive data.

WHY?

41.3% of respondents are unsure about whether their organization has **regulatory requirements for MFA**, indicating a need for greater clarity on compliance.

#3

COMPLIANCE

1.) DEVELOP TARGETED STRATEGIES TO ADDRESS CHALLENGES

Integration and technical difficulties can hinder the effectiveness of MFA and slow down its adoption. By providing targeted technical support and solutions, organizations can resolve these issues, ensuring smoother implementation and reducing downtime or security gaps.

WHY?

18.6% of respondents reported **challenges with system integration**, while **17.1%** encountered **technical issues**.

WHY?

MFA is used primarily for **email (85.3%)** and **cloud storage (78.7%)**, with lower adoption for **financial applications (60%)**, **HR systems (56%)**, and **custom internal applications (9.3%)**

2.) EXPAND REQUIRED MFA USAGE TO CRITICAL APPLICATIONS.

Limiting MFA to a few applications leaves other critical systems vulnerable. Expanding MFA to additional key areas, especially those handling sensitive or financial data, will help mitigate the risk of unauthorized access and strengthen overall organizational security.

3.) IMPLEMENT POLICIES ENSURING MFA IS IN PLACE FOR ALL NEW APPLICATIONS HANDLING SENSITIVE DATA.

A lack of formal policies means that new applications handling sensitive data may not be properly protected with MFA. Implementing clear policies will ensure that MFA is consistently applied to all new systems, reducing the risk of security breaches in the future.

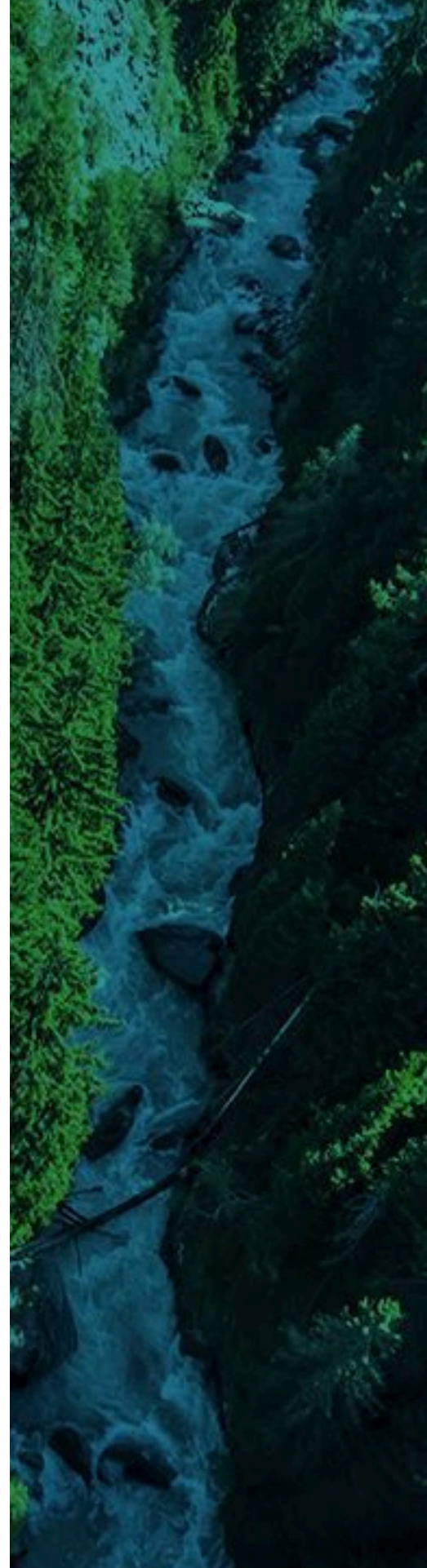
WHY?

Only **28%** of organizations have policies in place for new applications, and **38.7%** **do not have or are unsure of any such policies**.

CONCLUSION

The 2024 IOLA-JT MFA Survey highlights the substantial progress made by grantee organizations in adopting Multi-Factor Authentication (MFA), with 76% having implemented it fully. However, the results of the survey also uncover significant challenges, including **user resistance, integration issues, and gaps in training and feedback collection**. While most organizations provide IT support and basic training, there is room for improvement in **expanding MFA to more critical applications, enhancing training frequency, and promoting more secure authentication methods**.

Addressing these challenges will not only improve MFA effectiveness but also strengthen overall organizational security and compliance. By focusing on **user education, system integration, and the implementation of clear policies**, organizations can further safeguard sensitive data and ensure that their security practices meet regulatory requirements. **Continued investment in training, technical support, and automated monitoring will be essential to sustaining these improvements**.





JUST  TECH

Cybersecurity Improvement and Technical Assistance Project

**Training Effectiveness and Insights:
Cohort 1 Assessment Results
December 2024**

Introduction

As part of the ongoing Cybersecurity Improvement Technical Assistance Project (CyTAP), a self-selected group of six IOLA grantee organizations participated in a Multifactor Authentication (MFA) training and implementation cohort. The MFA cohort met with Just-Tech for three training, education, and support sessions over the course of three months. Between sessions, each organization worked closely with Just-Tech to implement MFA.

The program aimed to:

1. Increase participants' understanding of MFA.
2. Improve participants' confidence and preparedness to apply the training content.
3. Assess the training's relevance to job roles and overall satisfaction.

The following report details the findings of the pre- and post-survey.

Methodology

Background

The survey was designed to assess the impact of the training program on participants' knowledge, confidence, and engagement. It included a combination of pre-training and post-training questions to measure changes in these areas. Participants were also asked about their preferred learning methods and perceptions of the training's difficulty and effectiveness. This dataset represents the first of several planned cohorts, and additional data will be incorporated as new cohorts complete the training. This phased approach will enhance the robustness of the analysis and offer a clearer understanding of trends over time.

Survey Participants

Surveys were administered during the first and last large group cohort meetings in August and October 2024. A total of 10 respondents participated in the surveys with seven completing both the pre and post surveys. Due to incomplete responses, paired t-tests were conducted with data from the seven participants who completed both the pre- and post-surveys for each question.

Analysis

The survey responses were analyzed using both descriptive statistics and inferential tests to understand the training program's impact.

1. **Descriptive Statistics:** Data summaries, including averages, frequency distributions, and response patterns, were used to understand overall trends. For example, responses to post-training questions about training relevance and effectiveness were summarized to identify common themes.
2. **Paired Sample t-Tests:** These tests were conducted to compare participants' responses to pre- and post-training questions. This method is used to determine whether there was a

significant change in participants' knowledge, confidence, or preparedness after completing the training. The analysis focused on questions with paired responses from the seven participants who completed both pre- and post-training surveys.

- 3. Correlation Analysis:** Relationships between pre- and post-training responses were explored to understand consistency or variation in responses. Where post-training responses lacked variability (e.g., unanimous scores for training relevance), correlations were not applicable.

Limitations

- **Small Sample Size:** With 10 respondents in the first cohort and only seven providing complete data, results are not generalizable to all participants in the program. As additional cohorts are rolled out, the dataset will grow, allowing for more robust analyses.
- **Post-Training Uniformity:** Some post-training responses, such as those about training relevance, showed limited variability, making it difficult to explore nuanced differences among participants.

Key Findings

The evaluation results highlight the training program's success in improving participants' knowledge, preparedness, and perceptions of resource sufficiency, while also demonstrating high satisfaction and effectiveness ratings. These findings indicate that the training addressed critical areas effectively, aligning well with participants' professional needs. However, the results also point to opportunities for refinement, particularly in boosting confidence and engagement.

The following sections summarize the findings across three areas: Training Effectiveness, Positive Perceptions, and Opportunities for Improvement.

Training Effectiveness

Statistically significant improvements were observed in several key areas:

- **Increased Preparedness:** Post-training, 100% of respondents felt "Well prepared" or "Very well prepared" to apply what was learned in the training to their jobs, compared to only 22% pre-training.
- **Improved Knowledge:** Post-training, 88% of respondents rated their knowledge of the training topic as "High" or "Very high," compared to only 22% pre-training.
- **Resource Sufficiency:** Post-training, 88% of respondents felt that the resources available to them for understanding the training topic were "Very sufficient" or "Sufficient." Pre-training, zero grantees felt that available resources were "Very sufficient," and only 33% rated the resources as "Sufficient."
- **High Relevance:** Post-training, 88% of respondents felt that the training topic was "Very relevant" to their current job role, compared to only 44% pre-training.

Positive Perceptions

- **Participant Satisfaction:** All participants reported positive satisfaction overall with 75% of respondents indicating that they were "Very satisfied" and 25% that they were "Satisfied."

- **Effectiveness Ratings:** The majority of participants rated the training as highly effective, with 63% selecting “Very effective,” and an additional 25% selecting “Effective.”
- **Simplification of Complex Topics:** Post-training, 75% of respondents rated the training topic as “Easy” or “Very easy,” compared to only 22% pre-training.

Opportunities for Improvement

- **Confidence in Skills:** While understanding and confidence increased post-training, the improvement was not statistically significant.
- **Engagement:** Engagement levels remained static, suggesting room for more interactive or dynamic elements in the training, such as:
 - **Interactive Elements:** Incorporate group discussions, role-playing exercises, or case studies.
 - **Gamification:** Use quizzes or challenges to maintain attention and interest throughout the session.
 - **Breakout Sessions:** Provide smaller group activities for deeper engagement and discussion.

Table 1. Paired Samples Testing Results

Metric	Pre-Survey Mean	Post-Survey Mean	Percent Change	P-Value
Understanding (Q1)	3.57	4.43	+24%	0.078
Confidence (Q2)	3.29	4.14	+26%	0.078
Difficulty (Q3)	2.86	3.86	+35%	0.004*
Preparedness (Q4)	2.86	4.29	+50%	<0.001*
Knowledge Level (Q5)	3.14	4.14	+32%	0.018*
Engagement (Q6)	4.14	4.14	+0%	1.000
Relevance (Q7)	4.29	5.00	+16%	0.047*
Resource Sufficiency (Q8)	2.86	4.29	+50%	0.003*

*Pairs marked with an asterisk denote a statistically significant improvement where $p < 0.05$.

Recommendations

Based on the survey findings, we recommend the following actions:

- **Addressing Variability in Participant Needs**
 - While overall trends were positive, the training may not have fully addressed the individual needs of participants with lower pre-survey confidence or engagement levels. Tailored approaches, such as offering optional breakout sessions for advanced topics or foundational content, could help bridge these gaps.
- **Provide Ongoing Support**
 - To sustain the gains observed in knowledge and preparedness, providing follow-up materials or sessions, such as refresher workshops, quick-reference guides, or one-on-one coaching, could help participants retain and apply their learning over time.
 - Incorporate hands-on activities that allow participants to practice and apply their skills in realistic scenarios.
- **Expand the Training Program**
 - Maintain focus on relevance and satisfaction by ensuring training content aligns with participants' job roles and real-world challenges.

Conclusion

The training program successfully improved key metrics, including preparedness, knowledge, and satisfaction. By addressing areas for growth—such as confidence and engagement—the program can continue to deliver impactful results and scale effectively. These findings serve as a strong foundation for refining and expanding the CyTAP program to future cohorts. To build on this success, future iterations should enhance confidence-building components, continually adapt resources to evolving needs, implement regular feedback mechanisms, and expand the program to a broader audience while preserving quality and relevance.

Appendices

Appendix 1: Pre-Training Survey Questions

1. On a scale from 1 (not at all) to 5 (very well), how well do you understand the topic of the upcoming training?
2. On a scale from 1 (not at all confident) to 5 (very confident), how confident are you in your current skills related to the training topic?
3. On a scale from 1 (very difficult) to 5 (very easy), how difficult do you anticipate the training topic to be?
4. On a scale from 1 (not at all prepared) to 5 (very well prepared), how prepared do you feel for the training on the upcoming topic?
5. On a scale from 1 (very low) to 5 (very high), how would you rate your current knowledge level on the training topic?
6. On a scale from 1 (not at all interested) to 5 (very interested), how interested are you in the topic of the upcoming training?
7. On a scale from 1 (not at all relevant) to 5 (very relevant), how relevant do you think the upcoming training topic is to your current job role?
8. On a scale from 1 (not sufficient at all) to 5 (very sufficient), how sufficient are the resources currently available to you for understanding the training topic?
9. On a scale from 1 (reading materials) to 5 (formal training sessions), how do you prefer to learn about new technology topics?

Appendix 2: Post-Training Survey Questions

1. On a scale from 1 (not at all) to 5 (very well), how well do you understand the topic after completing the training?
2. On a scale from 1 (not at all confident) to 5 (very confident), how confident are you in your current skills related to the training topic?
3. On a scale from 1 (very difficult) to 5 (very easy), how difficult did you find the training topic after completing the training?
4. On a scale from 1 (not at all prepared) to 5 (very well prepared), how prepared do you feel to apply what you learned in the training to your job?
5. On a scale from 1 (very low) to 5 (very high), how would you rate your current knowledge level on the training topic?
6. On a scale from 1 (not engaged at all) to 5 (very engaged), how engaged were you during the training sessions?
7. On a scale from 1 (not likely) to 5 (very likely), how relevant do you think the training topic was to your current job role?
8. On a scale from 1 (not sufficient at all) to 5 (very sufficient), how sufficient are the resources currently available to you for understanding the training topic?
9. On a scale from 1 (not effective) to 5 (very effective), how effective was the training in improving your skills related to the topic?
10. On a scale from 1 (not satisfied) to 5 (very satisfied), how satisfied are you with the training overall?



JUST  TECH

Cybersecurity Improvement and Technical Assistance Project

Bridging Gaps: AI Integration and Support Needs in Legal Aid
December 2024

Introduction

This report presents key findings from a comprehensive survey conducted to understand the adoption, challenges, and support needs for AI integration among legal aid organizations. The survey was administered to IOLA grantees, aiming to uncover insights into how AI tools are currently perceived and used, the barriers to adoption, and the types of support needed to maximize AI's potential in legal aid work. This work aligns with Just-Tech's development of a specialized AI University, which will serve as a hub for legal aid professionals to access tailored training, ethical guidance, and governance resources. The AI University initiative is designed to address the exact challenges surfaced in this survey, bridging gaps in expertise and fostering responsible AI adoption across the sector.

Methodology

The survey consisted of both qualitative and quantitative questions. Ranking questions captured respondents' priorities and preferences, while open-ended questions provided deeper insights into concerns and challenges. Quantitative data was analyzed to calculate weighted averages and trends, while qualitative responses were reviewed to identify themes and align with the quantitative findings.

Survey Participants

The survey received responses from 227 participants across various roles, including staff attorneys, managing attorneys, support staff, and operational leadership. Respondents represented a diverse cross-section of legal aid organizations, providing a robust dataset for analysis.

Approximately 25% of respondents identified as support staff (legal or operational), while 24% were operational management professionals such as executive directors, finance directors, or IT directors. Staff attorneys made up 22% of the participants, and managing or supervising attorneys constituted 19%. The remaining 10% included a variety of roles, such as paralegals, program directors, and volunteer managers. This diversity of roles underscores the wide-reaching implications of AI adoption across different facets of legal aid work.

Key Findings

1. High Demand for Policy and Ethical Guidance:

- a. The top-ranked priority was "Policy development and implementation support" (Q15). Respondents emphasized the importance of having structured AI governance frameworks, including clear guidelines for ethical AI use, training protocols, and risk assessment processes. Several participants called for templates or sample policies that address common challenges, such as "managing client confidentiality with AI tools" and "evaluating the ethical implications of AI-driven decisions." One respondent noted, "A well-defined policy acts as both a safeguard and a roadmap for responsible AI implementation."

- b. The top-ranked priority was "Policy development and implementation support" (Q15). Respondents emphasized the importance of having structured AI governance frameworks, with one participant noting, "Clear policies ensure we don't misuse AI inadvertently."

2. Skills Development is Critical:

- a. Training topics such as "Introduction to AI for legal professionals" and "Practical applications of AI in legal aid" were the most requested (Q19). A respondent shared, "We need practical, scenario-based training to feel confident in using these tools."
- b. Staff attorneys expressed strong interest in legal research and drafting applications for AI, while operational leaders prioritized training on tools for case management and reporting.

3. Barriers to Adoption:

- a. Lack of internal expertise and ethical concerns were identified as the most significant barriers (Q20). One organization highlighted, "We don't have in-house expertise to evaluate AI tools, and that's holding us back." Another respondent shared concerns about the complexity of implementation, stating, "Integrating AI with our existing systems feels overwhelming without proper guidance." Additionally, a participant noted, "The cost of AI tools creates a barrier for smaller organizations like ours, where budgets are already stretched thin."
- b. Ethical concerns exacerbated by the lack of internal expertise were identified as the most significant barriers (Q20). One organization highlighted, "We don't have in-house expertise to evaluate AI tools, and that's holding us back."
- c. Support staff worried about job displacement due to automation, while managing attorneys highlighted challenges in balancing AI's analytical potential with ethical considerations.

4. Concerns About Privacy and Confidentiality:

- a. Responses highlighted the importance of ensuring AI does not compromise client confidentiality and trust or case integrity (Q22). For instance, a respondent warned, "If clients feel their data isn't secure, it could undermine our credibility."
- b. Managing attorneys were particularly vocal about ensuring compliance with ethical standards in the use of client data.

Recommendations

1. Addressing the High Demand for Policy Development and Ethical Guidance:

- a. Develop standardized templates and customizable frameworks for AI governance tailored to legal aid organizations.
- b. Offer workshops focused on creating and implementing AI policies that address ethical considerations, risk management, and data privacy.

2. Enhancing Skills Development:

- a. Prioritize training programs on "Introduction to AI for legal professionals" and "Practical applications of AI in legal aid," as these were the most requested topics.

- b. Incorporate scenario-based exercises to help participants understand real-world applications of AI tools in legal contexts.
3. **Overcoming Barriers to AI Adoption:**
- a. Provide technical assistance to help organizations build internal expertise and navigate the complexities of AI integration.
 - b. Create funding opportunities or subsidies to reduce the cost barrier for smaller organizations that struggle with budget constraints.
 - c. Partner with AI vendors to offer free or discounted trials of tools to organizations new to AI.
4. **Alleviating Privacy and Confidentiality Concerns:**
- a. Develop training modules on ethical AI use, focusing on safeguarding client confidentiality and complying with legal standards.
 - b. Encourage the adoption of AI tools that prioritize data security and include transparency in how client information is handled.
5. **Increasing Awareness and Accessibility:**
- a. Centralize resources, training, and support, addressing the diverse needs highlighted by respondents.
 - b. Disseminate success stories and case studies from organizations that have effectively implemented AI tools to demonstrate tangible benefits.

These recommendations provide a strategic roadmap to address the challenges and opportunities highlighted in the survey. Let me know if you'd like these added explicitly to the "Recommendations" section in the report.

Qualitative Analysis

The following is a qualitative analysis of the survey's open-ended questions. Responses to these questions were analyzed to identify major concerns and hesitations regarding AI adoption in legal work. The feedback provided critical insights into the varied perspectives of legal professionals and highlighted areas for potential improvement and support in AI integration.

1. Q10: "What factors or concerns influence your decision not to use AI tools in your work? Please share a brief explanation."
 - a. **Accuracy and Reliability:** Many respondents are concerned about the accuracy of AI output in legal work, citing risks like hallucinations or incorrect data.
 - b. **Trust and Ethical Issues:** A lack of trust in AI's ability to deliver reliable results and ethical concerns regarding bias and misuse.
 - c. **Job Impact:** Concerns about AI replacing human roles or diminishing skill development in staff.
 - d. **Technological Hesitancy:** Respondents worry about how AI integrates into existing workflows or feel resistant to technological changes.

2. Q18: "Could you please share a few reasons for your lack of interest in participating in an AI-focused training workshop or speaker series with staff from other legal aid organizations?"
 - a. **High Workload:** Some find it difficult to dedicate time to additional training due to heavy workloads.
 - b. **Lack of Tech Savviness:** A general unfamiliarity or discomfort with technology is a recurring theme.
 - c. **Perceived Irrelevance:** A few respondents do not see AI as directly relevant or beneficial to their work.

3. Q21: "What additional support or resources do you feel your organization needs to fully integrate AI into your work?"
 - a. **Training and Guidance:** Respondents emphasize the need for comprehensive training on AI tools, ethics, and implementation strategies.
 - b. **Financial Resources:** Many note cost barriers to accessing AI tools and training.
 - c. **Policy and Ethical Frameworks:** There is a need for policies to guide the ethical use of AI in legal services.
 - d. **Expertise and Support Systems:** Suggestions include having internal or external experts to assist in integrating AI and ongoing technical support.

4. Q22: "Do you have any concerns or challenges regarding the use of AI in legal services that haven't been addressed?"
 - a. **Job Security:** Concerns about AI threatening support staff roles disproportionately.
 - b. **Environmental and Ethical Issues:** Some worry about AI's environmental impact and ethical implications, such as privacy and dehumanization of services.
 - c. **Accuracy and Dependence:** Repeated concerns about over-reliance on AI and the validity of its outputs.
 - d. **Client Impact:** Fears that AI may alienate or marginalize vulnerable clients.

These themes highlight a need for careful planning, ethical considerations, and robust support mechanisms for AI adoption in legal services.

Appendix 1: Survey Instrument

Survey Questions

Section 1: Introduction

- 1) What IOLA grantee organization are you a part of?
 - a) Open-ended
- 2) What is your job role?
 - a) Support Staff (legal or operational)
 - b) Staff Attorney
 - c) Managing/Supervising Attorney
 - d) Operational Management (e.g., Executive Director, Deputy Director, Director of Human Resources, Director of Finance, IT Director, etc.)
 - e) Other (please specify)

Section 1.1: SSO Cohort Interest (Conditional Questions)

- 3) You may be using multifactor authentication (MFA) for two or more applications that you use in your daily work. Are you interested in implementing Single Sign-On (SSO) to streamline user access to these applications? *(Select the option that best applies.)*
 - a) Yes
 - b) No
- 4) What identity management solution do you use? *(Select the option that best applies.)*
 - a) Azure
 - b) Okta
 - c) Duo
 - d) Google
 - e) Not Sure
- 5) What applications would you like to integrate with SSO?
 - a) Open-ended
- 6) Would someone from your organization be available to participate in an SSO cohort in mid-December 2024 and January 2025? *(Select the option that best applies.)*
 - a) Yes
 - b) No
 - c) Not Sure

Section 2: AI Policy and Governance

- 7) Does your organization have a formal, written AI policy or protocol beyond the general technology use policy? *(Select the option that best applies.)*
 - a) Yes
 - b) No
 - c) In development
 - d) Desired or planned
 - e) Not sure

- 8) How valuable is having a dedicated organizational AI policy or protocol to you? *(Select the option that best applies.)*
- a) 1 (Not Valuable at All)
 - b) 2 (Slightly Valuable)
 - c) 3 (Moderately Valuable)
 - d) 4 (Very Valuable)
 - e) 5 (Extremely Valuable)

Section 3: AI Tools

- 9) Do you use AI at work? *(Select the option that best applies.)*
- a) Yes
 - b) No
 - i) What factors or concerns influence your decision not to use AI tools in your work? Please share a brief explanation.
 - (1) Open-ended
 - ii) Are you interested in using AI tools at work?
- 10) Which of the following AI tools are officially sanctioned by your organization? *(Check all that apply.)*
- a) ChatGPT
 - b) Microsoft Copilot
 - c) Gemini
 - d) AI-driven document automation tools (e.g., Gavel, Lawmatics, etc.)
 - e) AI-powered legal research tools (e.g., Lexis+, CoCounsel, vLex, etc.)
 - f) Other (please specify)
 - g) Not sure
- 11) Which AI tools are you actually using for work purposes, regardless of official policy? *(Check all that apply.)*
- a) I don't use any AI tools for work purposes
 - b) ChatGPT
 - c) Microsoft Copilot
 - d) Gemini
 - e) AI-driven document automation tools (e.g., Gavel, Lawmatics, etc.)
 - f) AI-powered legal research tools (e.g., Lexis+, CoCounsel, vLex, etc.)
 - g) Custom-built AI tool specifically designed for my organization
 - h) Other (please specify)
- 12) What types of activities are you using AI tools for at work? *(Select all that apply.)*
- a) Case analysis
 - b) Document review
 - c) e-Discovery
 - d) Contract analysis
 - e) Contract drafting
 - f) Due diligence

- g) Predictive analytics
- h) Client management
- i) Client communication
- j) Billing and financial analysis
- k) Compliance and risk management
- l) Knowledge management
- m) Administrative tasks (e.g. managing case timelines, workflows)
- n) Brief and memo writing
- o) Translation
- p) Readability
- q) Tone detection and suggestions
- r) Emails
- s) Other document drafting
- t) Data analysis
- u) Data visualization
- v) Creating presentations
- w) Creating outreach materials
- x) Supervisory tasks
- y) Other (please specify)

Section 4: AI Training and Support Needs

- 13) What kind of AI-related support would your organization benefit from the most? *(Please rank in order of priority where 1 = the highest priority.)*
- a) Policy development and implementation support
 - b) Guidance on ethical use of AI in legal services
 - c) Hands-on training for staff
 - d) Regular updates on AI advancements relevant to legal aid (including examples/updates)
 - e) Money for licenses for AI tools
 - f) Other (please specify)
- 14) What, if any, AI tools would you like to start using but aren't currently?
- a) Open-ended

Section 5: Training and Workshop Development

- 15) Are you interested in participating in an AI-focused training workshop or speaker series with staff from other legal aid organizations?
- a) Yes
 - b) No
 - i) Could please you share a few reasons for your lack of interest in participating in an AI-focused training workshop or speaker series with staff from other legal aid organizations?
- 16) Please rank the following hands-on training topics in order of preference for inclusion in the workshop or speaker series. *(Please rank in order of priority where 1 = the highest priority.)*

- a) Ethical considerations in AI use
 - b) Introduction to AI for legal professionals
 - c) Introduction to AI for administrators/operations
 - d) Practical applications of AI in legal aid
 - e) AI-powered legal research tools
 - f) AI-based document automation
 - g) Client-facing AI tools (chatbots, online intake, information portals, etc.)
 - h) Other (please specify)
- 17) Please rank the following barriers to adopting AI tools in your organization in order of impact.
(Please rank in order of priority where 1 = the highest priority.)
- a) Lack of internal expertise
 - b) Concerns over ethical use
 - c) Concerns about bias implicit in AI tools
 - d) Quality control concerns
 - e) Cost / Budget limitations
 - f) Integration with current systems
 - g) Legal/regulatory concerns
 - h) Lack of support from leadership
 - i) Concerns about environmental impact
 - j) Other (please specify)

Section 6: Open-Ended Feedback

- 18) What additional support or resources do you feel your organization needs to fully integrate AI into your work?
- 19) Do you have any concerns or challenges regarding the use of AI in legal services that haven't been addressed?
- 20) Do you have any AI projects completed or under development that you would be willing to talk about with the NY legal aid community?
- 21) Please provide your contact information below for Just-Tech to follow-up with you about the AI projects you are willing to share with the NY legal aid community.

2025 SCHEDULE

BOARD OF TRUSTEES MEETINGS

1st Quarter 2025

March 12, 2025

TBD

IOLA Fund, NYC

2nd Quarter 2025

June 11, 2025

TBD

IOLA Fund, NYC

3rd Quarter 2025

September 17, 2025

TBD

IOLA Fund, NYC

4th Quarter 2025

December 3, 2025

TBD

IOLA Fund, NYC

2025

Holidays & Observances

January

Su	M	Tu	W	Th	F	Sa
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

February

Su	M	Tu	W	Th	F	Sa
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23	24	25	26	27	28	

March

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23	24	25	26	27	28	29
30	31					

April

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27	28	29	30			

May

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25	26	27	28	29	30	31

June

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22	23	24	25	26	27	28
29	30					

July

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August

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31						

September

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28	29	30				

October

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26	27	28	29	30	31	

November

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30						

December

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7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

- Jan 01** New Year's Day
- Jan 20** Martin Luther King Day
- Jan 29** Chinese New Year
- Feb 14** Valentine's Day
- Feb 17** President's Day
- Mar 01** Ramadan, 1st day
- Mar 05** Ash Wednesday
- Mar 17** St. Patrick's Day
- Mar 20** March equinox (GMT)
- Apr 01** April Fool's Day
- Apr 13** Passover
- Apr 20** Easter
- Apr 22** Earth Day
- Apr 23** Admin Assistants Day
- May 05** Cinco de Mayo
- May 11** Mother's Day
- May 26** Memorial Day
- Jun 08** Pentecost
- Jun 14** Flag Day
- Jun 15** Father's Day
- Jun 19** Juneteenth
- Jun 21** June Solstice (GMT)
- Jul 04** Independence Day
- Sep 01** Labor Day
- Sep 22** September equinox (GMT)
- Sep 23** Rosh Hashanah
- Oct 13** Federal Holiday
- Oct 31** Halloween
- Nov 11** Veterans Day
- Nov 27** Thanksgiving
- Dec 14** Hanukkah begins
- Dec 21** December Solstice (GMT)
- Dec 25** Christmas Day
- Dec 26** Kwanzaa begins
- Dec 31** New Year's Eve

**MEETING OF THE BOARD OF TRUSTEES
OF THE IOLA FUND OF NEW YORK
December 17, 2024**

MOTION FOR EXECUTIVE SESSION

I, _____, hereby move, pursuant to the New York Open Meetings Law, Section 105, including subparagraphs (f), that this meeting of the Board of Trustees of the IOLA Fund of New York shall now enter into Executive Session for the purposes of considering matters relating to (1) the financial history and appointment of particular corporations, specifically IOLA grant applicants and grantees; (2) the financial history of two individuals seeking reimbursement of interest; and (3) proposed litigation.

Seconded by: _____

Vote:

Yea ___ Nay ___ Abstain ___

Vote Recorded by: _____

New York, New York
December 17, 2024