

IOLLA FUND

Board of Trustees

11 East 44 Street
Suite 1406
New York, NY 10017

September 27, **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: Friday September 27, 2024

Time: 12:00 pm

1. CALL TO ORDER AND WELCOME LICHA NYIENDO, GENERAL COUNSEL

Chair Davis will call the meeting to order.

2. APPROVAL OF MINUTES OF THE MEETINGS OF THE BOARD OF TRUSTEES

Chair Davis will entertain a motion to approve the following meeting minutes, included at **Tab 2**.

- a. June 5, 2024 Meeting**
- b. August 2, 2024 Meeting**

3. EXECUTIVE REPORT

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

- a. IOLA Leadership Transitions**
- b. Strategic Planning**
- c. FY24 & FY25 Contract Modifications & FY26-FY30 RFP Update**
- d. Budget Appropriation Planning**
- e. Announcements**

4. ADMINISTRATIVE AND FINANCIAL REPORT

Ms. Agard will report on the Fund's financial position, the administrative budget, bank revenue, interest rates and other administrative matters. Please see **Tab 4** for materials.

5. JUSTICE INFRASTRUCTURE PROJECT

Ms. Fecko and Mr. Steinkamp will report on the Project. Please see **Tab 5** for materials.

6. MEETINGS

The Trustees will confirm the scheduled meetings for Calendar Year 2024.

- a. Grants Committee Meeting:** Tuesday, December 10 (time TBD), NYC
- b. December Board of Trustees Meeting:** Tuesday, December 17 (4-6pm), NYC

7. EXECUTIVE SESSION

Please see **Tab 7** for Motion.

8. ADJOURNMENT

IOLA Fund of the State of New York
Meeting of the Board of Trustees – New York, NY
June 5, 2024
DRAFT

Present: Chair Davis, Trustees Dunham, Ross, and Lindenauer

Public

Videoconference: Trustees Cirando, Galowitz, Lopez-Soto, Madigan, and Villaverde

Staff: Agard, Fecko, and O'Malley

1. Call to Order.

The meeting was called to order by Chair Davis at approximately 12:40 p.m.

2. Approval of the minutes of the meetings of the Board of Trustees held on March 13, 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

Mr. O'Malley reported on the Justice Infrastructure Project, noting that listening sessions had been conducted across New York State, which included grantees and community based organizations. In addition, focus group discussions were held with clients from the Hudson Valley, Syracuse, Albany, and Buffalo. Ms. Fecko added that IOLA planned to issue a survey to New Yorkers with legal problems who did not work with IOLA grantees, conduct outreach to NYC based community-based organizations, and hold listening sessions focused on certain legal subject matters. Mr. O'Malley next reported on the 2023 Technology Grants, research efforts, and the RFP for a FY25 technology consultant who will assist IOLA grantees with cybersecurity.

As detailed in the report, Mr. O'Malley described the events leading to his notification on April 15, 2024 that the FY 25 Budget included a transfer of \$55 million from IOLA to other government programs (\$40 million to fund the Attorney General's homeowner protection program ("HOPP") and \$15 million for an OTADA eviction prevention program). He further described IOLA's initial response to oppose this transfer and to notify allies and encourage their opposition to the transfer. When this opposition failed due to the timing of the budget process, IOLA turned to an effort to amend its statute with the goal of preventing this type of transfer in future budgets. The current, amended, version of the bill is attached to Mr. O'Malley's report. As an update to his written report, Mr. O'Malley reported that, on Monday, June 3rd, he learned that the bill was likely to pass the Senate but not the Assembly due to some sentiment that IOLA revenue should be remain accessible for funding future government projects. Mr. Malley asserted that this development would put IOLA's existence in question and requested the opportunity to speak with the Board in Executive Session about potential legal responses.

4. Executive Session

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

5. Executive Report (con't)

Ms. Fecko introduced an updated recommendation for the IOLA Fund's next grant RFP, which would distribute \$600 million over a five-year period (FY26-FY30). First, Ms. Fecko noted that the proposed plan is consistent with the IOLA Fund's statutory directive to provide stable funding to civil legal services for low-income New Yorkers and that a five-year RFP from IOLA would be the same as what the Office of Court Administration has managed successfully for two cycles with its Judiciary Civil Legal Services grant program. Mr. O'Malley added that, historically, IOLA had issued one and then two-year grants based on revenue on hand. In light of our current revenue and conservative projections, a five-year grant of \$600 million would be a longer time period than past grants but in fact consistent with our practice of issuing grants based on available revenue. Second, Ms. Fecko noted that the recommendation provided for stepped up increases across the five years, which would increase grantees' ability to meet pressing recruitment and retention issues. Third, the proposed plan allocates funding for the Justice Infrastructure Project and contains flexibility to support adding new grantees during the five-year period. Finally, Ms. Fecko noted that the IOLA Fund would retain the ability to modify grant amounts within the five-year period based on any revenue changes or grantee performance issues. After further Board discussion, Trustee Galowitz moved and Trustee Lopez-Soto seconded, that the Board pass a resolution approving the proposed plan and authorizing IOLA staff to issue RFPs consistent with the plan. The Board passed the attached Resolution unanimously.

Ms. Fecko reviewed the Executive Director transition, including the activity of the Transition Committee. Ms. Fecko provided additional detail respecting the Executive Director salary issue. The Board's March 2024 Resolution was delivered to the Office of the State Comptroller, which recently referred the matter back to the Division of Budget. Chair then Davis issued a letter in late May 2024 to the Director of the Division of Budget; a response is pending. Finally, Ms. Fecko reviewed the quarterly goals listed in the Executive Director Report, amending that the timeline for the next RFP may be adjusted in light of the changes to the next RFP authorized by the Board at this meeting.

6. Administrative and Financial Report

Ms. Agard reported that the cash on hand as of April 1 was approximately \$413 million with interest earnings in April of \$22.2 million, grant expenses of nearly \$1.2 million, and administrative expenses of \$95k, leaving over \$434 million on hand as of May 1.

Turning to the interest data, Ms. Agard reported that 170 banks reported in April with a net yield of 2.62%. The \$22.2 million in earnings reflected a 36.88%

increase over the same period last year. The average daily balances have been holding steady for the last year.

Reporting on administrative expenses, Ms. Agard noted that the total for April was \$95k, out of a total FY25 budget of \$2.83 million. Ms. Agard explained that IOLA's administrative budget had been increased by \$500,000 to allow for expenses related to the Justice Infrastructure Project. Ms. Fecko added that the travel budget was increased from \$10,000 to \$25,000 to allow for greater travel across New York State, including the opportunity for the Executive Director and new General Counsel to meet with grantees.

7. Mr. O'Malley's Retirement

Chair Davis recognized the retirement of Mr. O'Malley after 15 years of service to the IOLA Fund and thanked him for his incredible leadership including through many difficult times. The entire Board joined in thanking Mr. O'Malley and congratulating him on his retirement. Mr. O'Malley observed it had been his great privilege to work at the IOLA Fund and to support the outstanding work of its grantees in serving the legal needs of New Yorkers. He reflected that his first year at IOLA was after the recession and that the grant awards were only \$18 million. He was incredibly proud to be leaving at a time when the IOLA Fund was committing to grants of \$600 million five-years.

8. Next Meeting

The next meeting of the IOLA Board of Trustees will be Friday, September 27 at noon in the IOLA Fund offices.

There being no further business before the Board, the meeting was adjourned at approximately 2:00 p.m.

Respectfully submitted,
Christine Fecko
Executive Director

IOLA Fund of the State of New York
Meeting of the Board of Trustees – New York, NY
August 2, 2024
DRAFT

Present: Trustees Dunham and Galowitz

Public

Videoconference: Chair Davis, Trustees Cirando, Lindenauer, Lopez-Soto, Madigan, and Ross

Absent: Villaverde

Staff: Fecko

1. Call to Order.

The meeting was called to order by Chair Davis at approximately 9:12 a.m.

2. Executive Session

Trustee Galowitz made a motion to enter into Executive Session to consider matters relating to potential litigation related to protecting IOLA's integrity, which was seconded by Trustee Dunham and approved without objection. While in Executive Session, Trustee Cirando made a motion to approve the IOLA Fund's retention of Greenberg Traurig to develop a legal strategy, including authority to commence litigation, to ensure the integrity of the IOLA Fund to fulfill its mission and take action consistent with its enabling statutes, which was seconded by Trustee Ross and approved by a vote of 8 in favor and 0 opposed.

3. Next Meeting

The next regular meeting of the IOLA Board of Trustees will be Friday, September 27 at noon in the IOLA Fund offices.

There being no further business before the Board, the meeting was adjourned at approximately 10:20 a.m.

Respectfully submitted,
Christine Fecko
Executive Director

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: September 20, 2024

TO: IOLA Board of Trustees

RE: September 27, 2024, Board Meeting, Executive Report

1. IOLA Leadership Transitions

After a comprehensive search that included over 100 applicants, the IOLA Fund is proud to announce that, effective September 9, 2024, Licha Nyiendo has joined as our new General Counsel. Ms. Nyiendo brings 24 years of experience as an attorney in non-profit organizations, government, and the private sector. Her most recent position was as the Chief Legal Officer of Human Rights First. In addition, she has served in New York State government as the Commissioner for the Division of Human Rights and as the Deputy Special Counsel for Public Integrity in the Office of the Governor. Formerly, she served as an Assistant U.S. Attorney in the Eastern District of New York for eight years and as an Associate at Sidley Austin. Ms. Nyiendo's bio is attached.

With respect to my continuing transition into the Executive Director position, I would like to thank the Board Members for taking time to meet with me individually to share their feedback on IOLA's work. Many reflected on the pride they felt that IOLA had increased its revenue and has been able to increase funding to grantees as well as devote resources to the Justice Infrastructure Project, which seeks to address systemic issues in the civil legal services system. Many Board Members conveyed appreciation for the administrative improvements in recent years that have provided the Board with greater information about grantees and the grantmaking process.

Finally, I would like to thank the Transition Committee, which includes Chair Davis, Trustee Lindenauer, and Trustee Madigan, which has been meeting monthly and will continue to do so through at least October 2024.

2. Strategic Planning

In prior meetings, the Board expressed an interest in pursuing a strategic planning process. The Transition Committee has undertaken preliminary discussions and is working to identify a consultant to aid with such an initiative. In the coming months, Chair Davis intends to designate Trustees and IOLA staff to work on the initiative and seeks Board authority for the IOLA Fund to retain an appropriate consultant for no more than \$50,000.

3. FY24 & FY25 Contract Modifications & FY26-FY30 RFP Update

FY24 & FY25 Contract Modifications

IOLA staff have been working to modify the current FY24 & FY25 grant contracts to include the additional \$10M grant appropriation for FY25. Of the 80 grant contracts, 68 are complete, 10 are in process, and 2 are on administrative hold.

FY26-FY30 RFP Update

- **RFP Schedule**

The RFP that seeks applications for grants for FY26-FY30 for up to \$562.5 million was released on September 18th, with a virtual bidder's conference scheduled for October 1st. Applications are due October 28th. The Grant Committee is scheduled for December 10th (time TBD) and final decisions will be made at the Board's December meeting, scheduled for **Tuesday, December 17th from 4-6pm.**

- **Board Access to Applications.** In addition to viewing paper copies of grant applications available in the IOLA Fund office, the IOLA Grants Team has developed an online portal for IOLA Board members to access the materials. IOLA will distribute a user guide and offer a short training session via Zoom to Board members sometime in November (date TBD).

- **Lobbying Prohibition**

As a reminder, State Finance Law §139-J and §139-K restrict grant applicants from making contact with the procuring governmental entity with the intent to influence the governmental entity's conduct or decision regarding the governmental procurement (unless it is a contact within the statutory exceptions set forth in State Finance Law § 139-J(3)(a)). Under Section 139-J(1)(g), grants are excluded from the statutory definition of a procurement contract. Nonetheless, so as to avoid an appearance of any impropriety and to promote fairness in the grant application process, IOLA will apply the aforementioned contact restrictions to applicants for IOLA grants.

- **Trustee Conflict Disclosures.**

As in prior grant cycles, all Trustees will be provided with a list of grant applicants and asked to confirm your affiliations.

As a reminder, the relevant rule is below:

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.

- **State Budget Considerations**

As in all grant cycles, final grant awards are 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.

In preparing this cycle's RFP, the NYS Division of Budget (DOB) approved IOLA moving forward with a five year term, but indicated that it could not approve an RFP that would exceed the annual funding already built into the current Financial Plan (\$60M per year). DOB did, however, indicate a willingness to continue the discussion of this issue in the context of their development this fall of the Executive Budget and the IOLA Fund's appropriation.

4. Budget Appropriation Planning

In June 2024, the IOLA Board of Trustees authorized grant funding of up to \$600 million over the five-year period of FY26-FY30. In the coming months, DOB is expected to engage IOLA in FY26 budget process, whereby IOLA can advocate for budget appropriations in line with the IOLA Board's grant authorization.

In light of the anticipated strategic planning that may result in recommendations for increases to the IOLA Fund staff, it is our intention to advocate with DOB for an increased appropriation to IOLA's administrative budget. If successful, this will enable the IOLA Board to advance its strategic goals.

5. Announcements

- **Intra-Governmental Outreach**

I have begun to build relationships with key stakeholders in State government and share information about IOLA. To date, I have had virtual meetings with Senators Krueger and Hoylman-Sigal as well as Phil Fields, Secretary to the Assembly Ways & Means Committee and David Friedfeld, Director of Senate Finance. Attached are the two documents that I've shared with these stakeholders – a one page overview of IOLA's concerns and a graph depicting the volatility of interest rates over the last 20 years and projected to 2027 (updated with the Federal Reserve's economic projections released this week).

- **OCA's Suballocation to IOLA**

OCA has reached out to discuss shifting its suballocation to IOLA back to OCA starting next year. In the current FY25 fiscal year, this amounts to approximately \$18 million. OCA indicated that it would redirect these funds to its Judicial Civil Legal Services grantmaking. Chair Davis, Ms. Nyiendo, and I have a meeting scheduled with OCA in early October.

- **Conferences**

The General Counsel and I will be attending two important conferences:

- The biennial **NYSBA Partnership Conference** in Albany, September 24-26th with over 500 civil legal aid attorneys and advocates expected. Chief Judge Rowan Wilson will give an address. In two sessions, IOLA will be making presentations on and inviting feedback about the Justice Infrastructure Project.

- The annual **ABA Forum on Building Access to Justice For All** in Southern California, October 23-25. The Forum combines the Joint IOLTA Conference and the National Meeting of State Access to Justice Commission Chairs. With thanks to Kristen Thompson for her assistance with preparation, I will be moderating 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*.
- **CLE Presentations**
I served as Chair and panelist for a NYC Bar Association sponsored CLE program on attorney escrow accounts on June 27 and am planning to serve as a panelist for a NYSBA sponsored CLE program entitled “Everything You Need to Know About Escrow Accounts,” scheduled for September 30.
- **IOLA’s Annual Report**
The FY 2024 Report is nearly complete and is expected to be distributed in the coming weeks. The report will include details about the direct financial benefits and the overall economic impact of IOLA grantees’ work on the State of New York as well as the work on the Justice Infrastructure Project.
- **Ethics Training**
The deadline for staff and Board Members to complete their annual ethics training is December 31. This year, training may be completed via a recorded video and details about how to access this option will be forthcoming.

6. Goals for the Next Board Meeting

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

- Complete preparations for the Board’s grant application review, including providing the Board with an orientation to the online portal for access to the grant applications
- Continue to advance the Justice Infrastructure Project
- Support the preparation for Strategic Planning
- Monitor bank rates in the new declining rate environment
- Assist the IOLA staff and Board Members in meeting their ethics training obligation
- Assist the Permanent Commission on Access to Justice with the technology and economic impact portions of its annual report and share the final report with the IOLA Board



IOLA Fund Names Licha Nyiendo As Its Next General Counsel

The IOLA Fund of the State of New York is pleased to announce the appointment of Licha Nyiendo as its next General Counsel, replacing Christine M. Fecko who was recently appointed as IOLA's Executive Director. Ms. Nyiendo will assume her position on September 9, 2024.

Ms. Nyiendo brings 24 years of experience as an attorney in non-profit organizations, government, and the private sector. Her most recent position was as the Chief Legal Officer of Human Rights First, a non-profit organization that provides legal representation to asylum seekers and promotes human rights around the globe. In that role, she expanded the organization's impact litigation program from immigration matters to include civil rights cases.

Previously, Ms. Nyiendo held various roles in New York State government. She was Commissioner for the New York State Division of Human Rights, where she oversaw agency operations across twelve offices. She also served as the Deputy Special Counsel for Public Integrity in the Office of the Governor.

She formerly served as an Assistant U.S. Attorney in the Eastern District of New York for eight years where she was promoted to Deputy Chief of the Civil Rights Unit. As a federal prosecutor, she was trial counsel on several noteworthy criminal matters, including sex trafficking and forced labor cases.

Early in her career, Ms. Nyiendo was an Associate at Sidley Austin LLP. Ms. Nyiendo clerked for the Hon. Theodore A. McKee, United States Circuit Judge, United States Court of Appeals for the Third Circuit. She also clerked for the Hon. George B. Daniels, United States District Judge, United States District Court for the Southern District of New York.

Ms. Nyiendo graduated from Harvard University with a Bachelor of Arts degree and received her J.D. from Duke University School of Law.

Interest on Lawyer Account Fund of the State of New York

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

Interfering in IOLA's Grantmaking Risks the Permanent Loss of a Critical Revenue Source for New Yorkers Facing Legal Challenges

The New York State FY2025 Enacted Budget removed \$55 million from the IOLA Fund, the first time in its 40-year history that IOLA's revenue was used for purposes outside the stated intent of its statute. The diversion of IOLA revenue undermines the legal and ethical foundation of the entire program and must not continue.

IOLA Fund is a "fiduciary fund" dedicated to ensuring effective access to justice.

- IOLA's enabling statute established it as a "fiduciary fund" with revenue generated from the interest earned on third party monies held in lawyers' trust accounts – not taxes.
- IOLA's purpose is "to provide funding for the providers of civil legal services in order to ensure effective access to the judicial system for all citizens of the state to the extent practicable."

IOLA grantees support the most vulnerable New Yorkers, which generates economic benefit both for their clients and all of New York.

- Through an open, competitive RFP process, IOLA allocates revenue to 80 not-for-profit organizations across the State based on the census data of residents living in poverty. IOLA grantees assist low-income New Yorkers with civil legal problems bearing on the essentials of life: food, shelter, jobs and access to health care.
- In FY24, IOLA grantees closed over 307,000 legal cases, benefitted more than 639,000 low-income people, and generated over \$3.5 billion dollars and 8,000 jobs for the State.

More funding – not less – is needed for civil legal services.

- In 2023, the NYS Permanent Commission on Access to Justice issued a report finding that nearly \$1 billion in additional annual funding is necessary to close the justice gap for low-income New Yorkers involved in civil legal matters.

Diverting IOLA revenue for other purposes threatens to destroy the legal basis for IOLA.

- Attorneys use IOLA accounts to fulfill their fundamental ethical responsibility as fiduciaries for their clients' money and to facilitate their day-to-day law office operations through about 50,000 IOLA accounts located in nearly 200 banks.
- Any ethical uncertainty may lead lawyers to decline to use IOLA accounts, which would eliminate this revenue source.
- New York attorneys and banks are only able to use IOLA accounts because of legal ethics opinions, an IRS private letter ruling, and a U.S. Supreme Court ruling validating the program. These endorsements were predicated on IOLA supporting legal services for low-income people. Using IOLA funds for other government programs - however needed - could undermine the legal and ethical foundation of IOLA and jeopardize IOLA's existence.

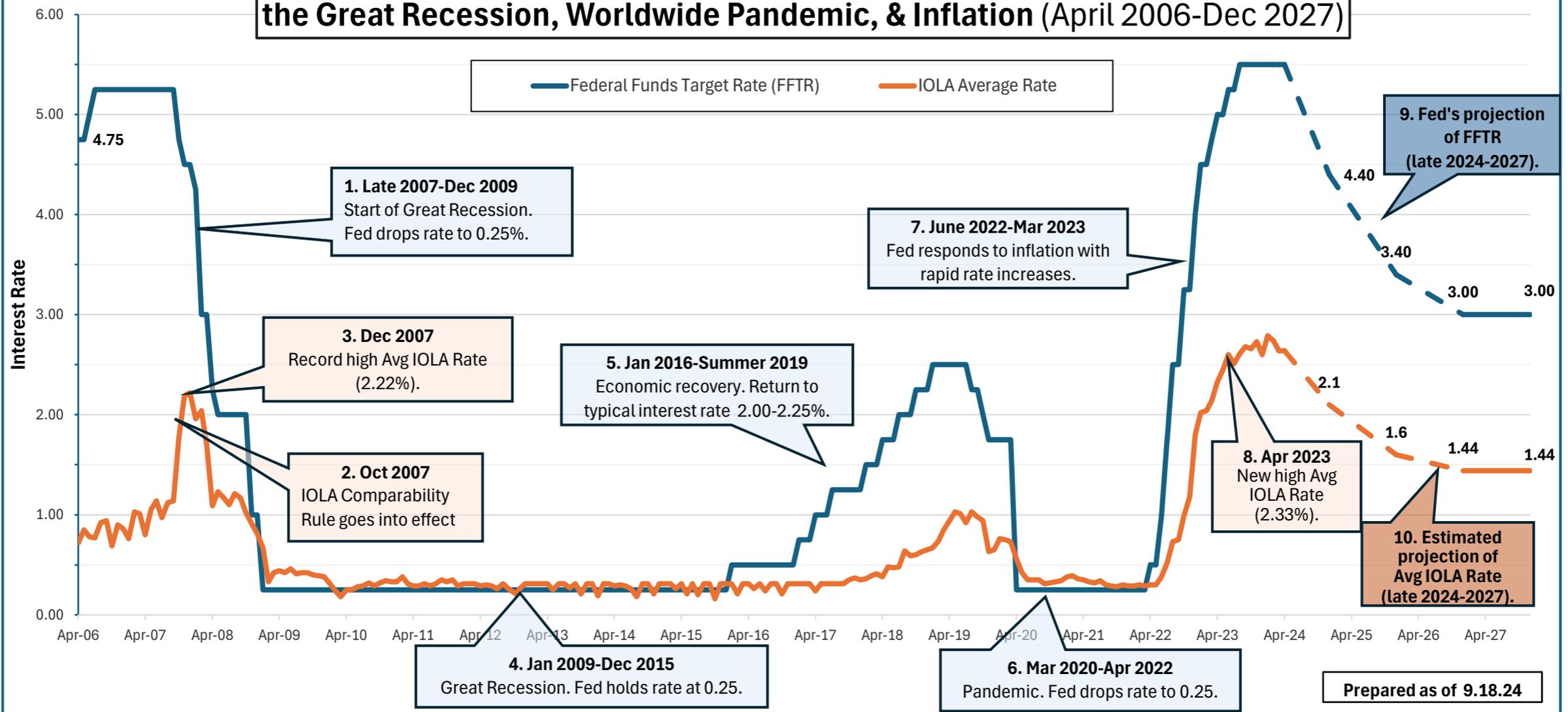
We urge government leaders to preserve IOLA's integrity and funding so that New York can continue to close the massive civil justice gap for people unable to afford legal representation.



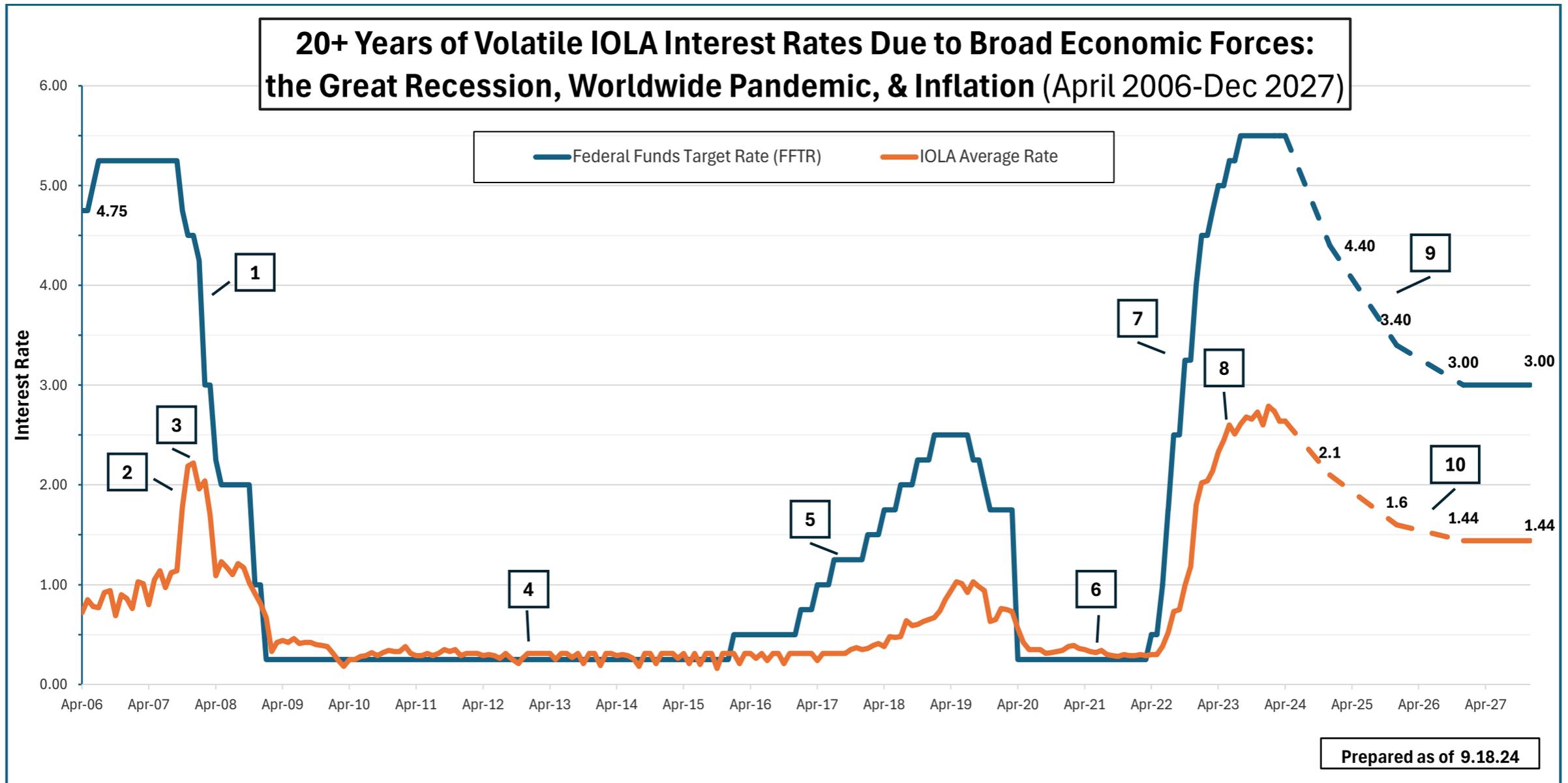
11 East 44th Street
Suite 1406
New York, NY 10017-0055

Christine Fecko, Executive Director
office: (646) 865-1541
mobile (917) 574-0405 www.iola.org

20+ Years of Volatile IOLA Interest Rates Due to Broad Economic Forces: the Great Recession, Worldwide Pandemic, & Inflation (April 2006-Dec 2027)



Prepared as of 9.18.24



NOTES

- 1 Late 2007-Dec 2009: Start of Great Recession. Fed drops rate to 0.25%.
- 2 Oct 2007: IOLA Comparability Rule goes into effect.
- 3 Dec 2007: Record high Avg IOLA Rate (2.22%).
- 4 Jan 2009-Dec 2015: Great Recession. Fed holds rate at 0.25.
- 5 Jan 2016-Summer 2019: Economic recovery. Return to typical interest rate 2.00-2.25%.
- 6 Mar 2020-Apr 2022: Pandemic. Fed drops rate to 0.25.
- 7 June 2022-Mar 2023: Fed responds to inflation with rapid rate increases.
- 8 Apr 2023: New high Avg IOLA Rate (2.33%).
- 9 Sept 2024: Fed's projection of FFTR (late 2024-2027).
- 10 Estimated projection of Avg IOLA Rate (late 2024-2027).

ADMINISTRATIVE REPORT

Prepared by: Michele D. Agard
Director of Administration

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FY'22 thru FY'25

C. Administrative Budget

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

A. Financial Statement July 2024

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

NYS IOLA Cash Balance: July 1, 2024 **\$ 468,968,140.00**

Adjustments:

Deposit Revenue: July 2024 \$ 20,900,000.00

Deposit STIP Revenue: July 2024 2,199,982.00

IOLA Admin Expense: July 2024 **\$ (168,326.00)**

IOLA Grant Expense - July **\$ (8,071,683.00)**

SUB-TOTAL **\$ 14,859,973.00**

**Opening
August 1, 2024
Cash Balance:** **\$ 483,828,113.00**

B. Consolidated Bank & Revenue Report

TOTAL NO. PARTICIPATING FINANCIAL INSTITUTIONS (REMITTING) 130

average net yield percent July 2024: 2.83%

lowest rate: 0.01%

highest rate: 4.80%

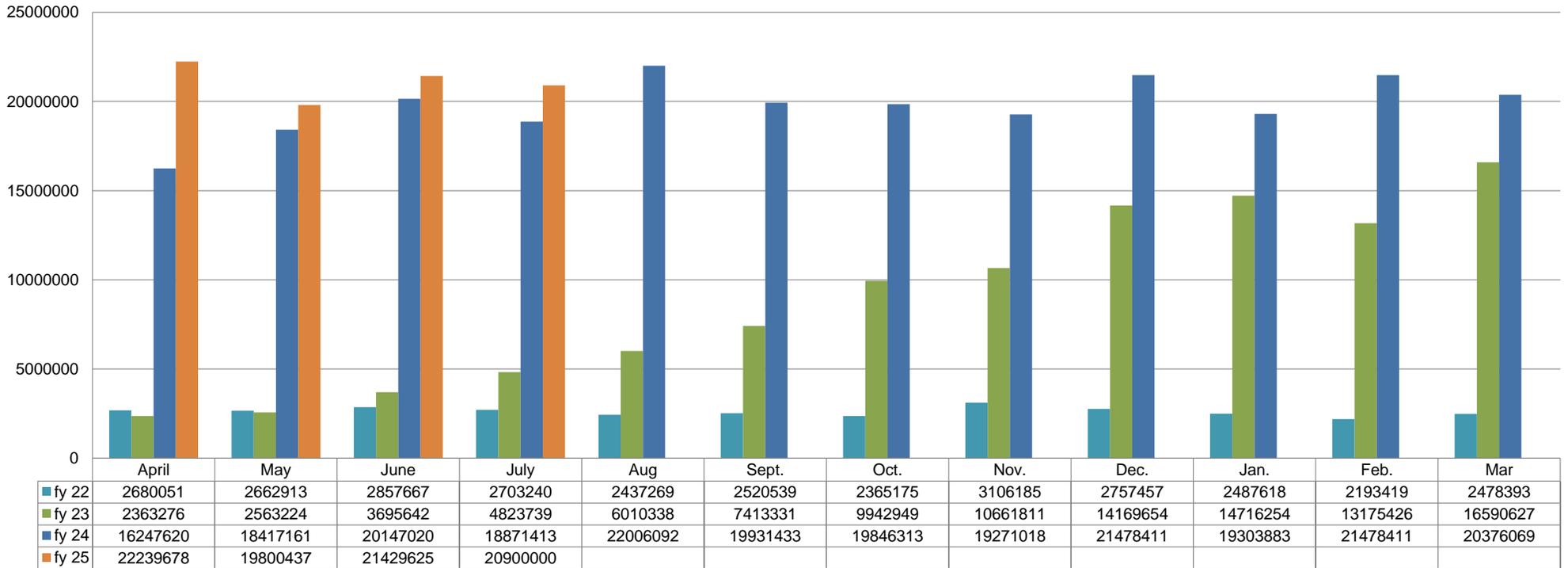
percent of all banks remitting this month: 66%

percent of banks waiving fees: 68%

	Jul-24	Jul-23	Change	
Current Month Interest Revenue (Earnings)	20,900,000	18,871,413	2,028,587	10.75%

FY 24-25 vs. FY 23-24 Year-to-date Interest Revenue	\$ 84,369,740	\$ 73,683,214	10,686,526	14.50%
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IOLA Monthly Revenue Comparison FY'22 - FY'25



fy 22 fy 23 fy 24 fy 25

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	22,239,678	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	63,469,740				
JUL	2,703,240	4,823,739	18,871,413	20,900,000	30,300,098	33,791,936	166,363,604	247,996,967
AUG	2,437,269	6,010,338	22,006,092		30,579,939	37,365,005	182,359,358	
SEP	2,520,539	7,413,331	19,931,433		30,857,325	42,257,797	194,877,460	
Quarter 2	7,661,048	18,247,408	60,808,938	20,900,000				
OCT	2,365,175	9,942,949	19,381,910		31,022,942	49,835,571	204,316,421	
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	0				
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	84,369,740				

C. Administrative Budget

Budget Variance Report: Fiscal Year 2024-25

As of July 31, 2024

Administrative Expenses 2024-25	Expenditure July, 2024	Year to Date Expenditures 7/31/24	Current Budget*** 2024-25
SUPPLIES AND MATERIALS	\$ -	\$ 1,684	\$ 10,000
57010 Food & Related Consum SupMat		\$ 264	
57032 Office Supplies	\$ -	\$ 1,420	
57035 Reference Book/Mag/Map/Subscrip SM	\$ -		
TRAVEL	\$ (1,347)	\$ 8,022	\$ 25,000
54010 Travel-Airplane	670	\$ 2,018	
54011 Travel Card Unclassified	\$ (2,915)	\$ 1,972	
54013 Travel-Lodging	233	\$ 1,100	
54014 Travel-Meals	133	\$ 527	
54015 Travel-Mileage		\$ 352	
54017 Travel-Parkg, Tolls, Incdncls	68	\$ 141	
54019 Travel-Public	102	\$ 1,312	
54020 Travel-Rental	362	\$ 362	
54021 Travel-Supplies			
54022 Travel-Train		\$ 238	
54023 Employee Travel- Per Diem		\$ 40	
Contractual Services	\$ 39,111	\$ 220,788	\$ 1,155,000
51010 Telephones	\$ -	\$ 1,907	
51076 Security/Protection Software	\$ -	\$ -	
51090 Data Management Services	\$ 3,464	\$ 22,551	
51091 Internet Services	\$ -	\$ 1,840	
51092 IT Equipment M&S		\$ 47	
51093 Software Maint & Support	\$ -		
51104 Enhanced Telecommnctn Services	\$ -		
55010 Newspaper/Billboards (ADV/PubNot)		\$ 1,470	
55047 Client Services (Unclssfd)	0	\$ 55,366	
55050 In-state Conference, Workshops, Meeting &	\$ -	\$ 50	
55051 Out-of-state Conference, Workshops, Meeting &		\$ 465	
55181 Custodial	\$ -		
55220 Shipping (Postage)	\$ -	\$ 216	
55205 Record Management Services	\$ 3,250	\$ 12,623	
58201 RE - Rental	\$ 26,555	\$ 106,221	
58204 Tax escalation			
58401 Prompt Payment Interest			
58501 Memberships	\$ -	\$ 702	
58801 Indirect Costs	\$ 1,680	\$ 7,031	\$ 28,000
58971 Procurement Card Unclassified	\$ 4,162	\$ 10,299	
Equipment	\$ -	\$ 1,707	\$ 5,000
56009 Office Equipment R&M (include telephone)	\$ -	\$ 1,607	
56020 Equipment Lease	\$ -	\$ 100	
56040 Office Furniture			
Subtotal: Non-Personal Service	\$ 37,764	\$ 232,201	\$ 1,188,000
PERSONAL SERVICE	\$ 89,758	\$ 287,229	\$ 990,000
50101 Regular Employee - Base Salary	86,968.00	\$ 273,966	\$ 990,000
50107 Regular Employee - Lump Sum			
50108 Reg Employee-Additional Comp	2,790	\$ 13,263	
FRINGES	\$ 40,804	\$ 170,759	\$ 652,000
60020 Fringe Benefit	40,804	\$ 170,759	\$ 652,000
Subtotal: Personal Service	\$ 130,562	\$ 457,988	\$ 1,642,000
GRAND TOTAL	\$ 168,326	\$ 690,189	\$ 2,830,000

MEMO

TO: NY IOLA Management
From: Delta Consulting
RE: IOLA Reporting Package
Date: September 17, 2024

The data in the report represents information for interest earning periods ending June 30, 2024, with key data and metrics presented on a monthly, quarterly, or 12 month basis. (Note: June earnings are due and recorded as July deposits).

Monthly Summary

For the June, 2024 earnings period as shown below, 169 banks reported gross interest of over \$21.57M. Service fees were at \$138,828 which were typical for June. For the month, 45,309 accounts maintained average daily balances just under \$9.4B (which is above the twelve month average of \$8.7B). The gross yield on these accounts, meaning the effective interest rate before fees, was 2.62% for the period, and 2.60% 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.

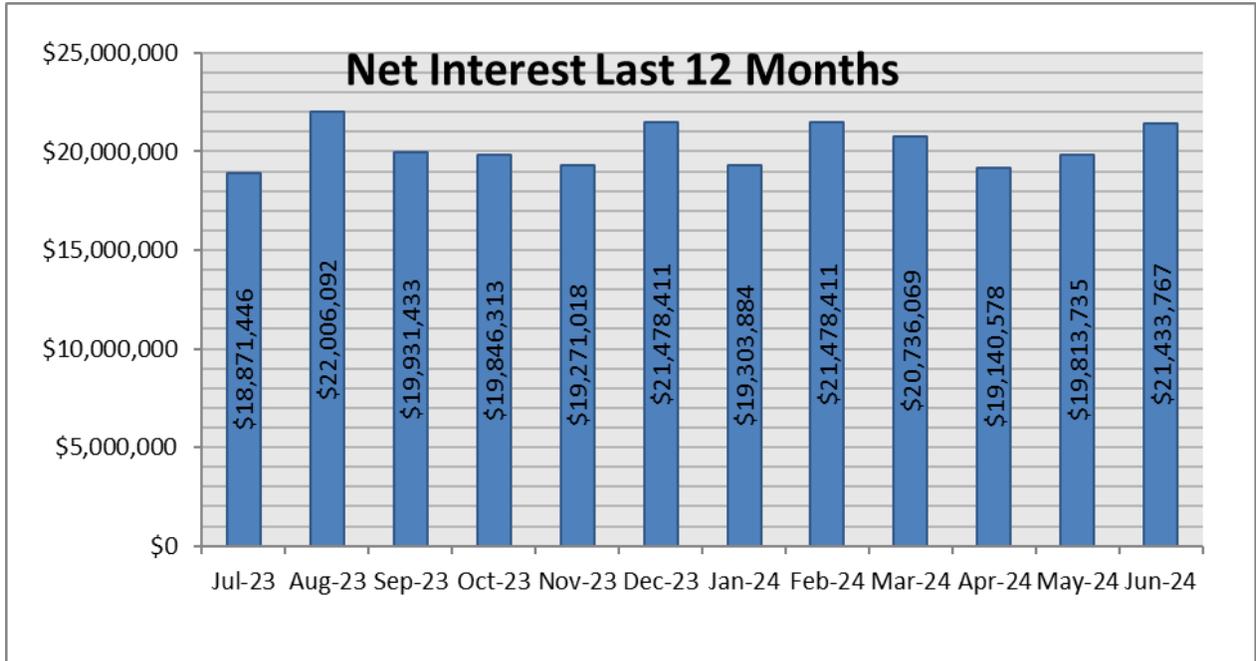
# of Banks Reporting*	Gross Interest	Service Charges	Net Interest	Avg. Daily Balance	Num Accts.	Gross Yield %	Net Yield %
169	21,573,595.54	138,828.21	21,433,767.33	9,364,153,494	45,309	2.62%	2.60%

Key Index Rates as of June 1, 2024

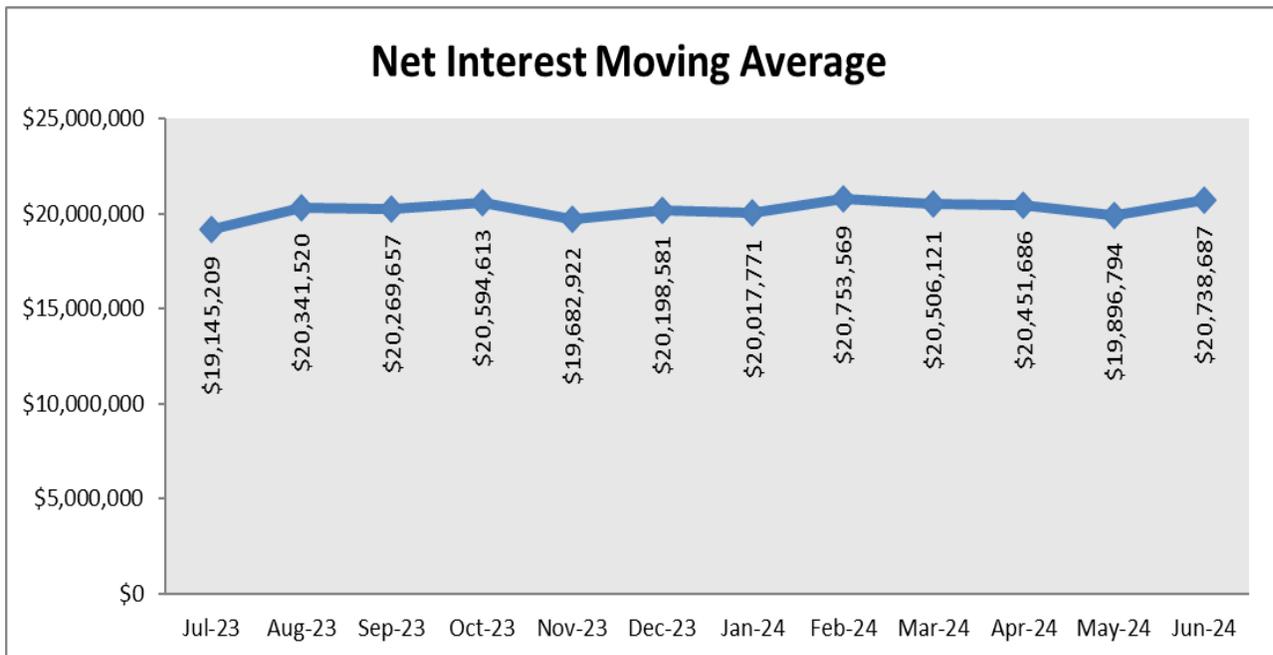
Fed Funds Target Rate (upper range)	5.50%
NY IOLA Benchmark Rate	3.30%
Platinum Partner Rate	3.30%
Gold Partner Rate	2.75%

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 \$18.9M in July 2023 to a high of over \$22.0M in August of 2023. June's earnings are the 4th highest in the past 12 months and are above the 12 month average of \$20.27M.

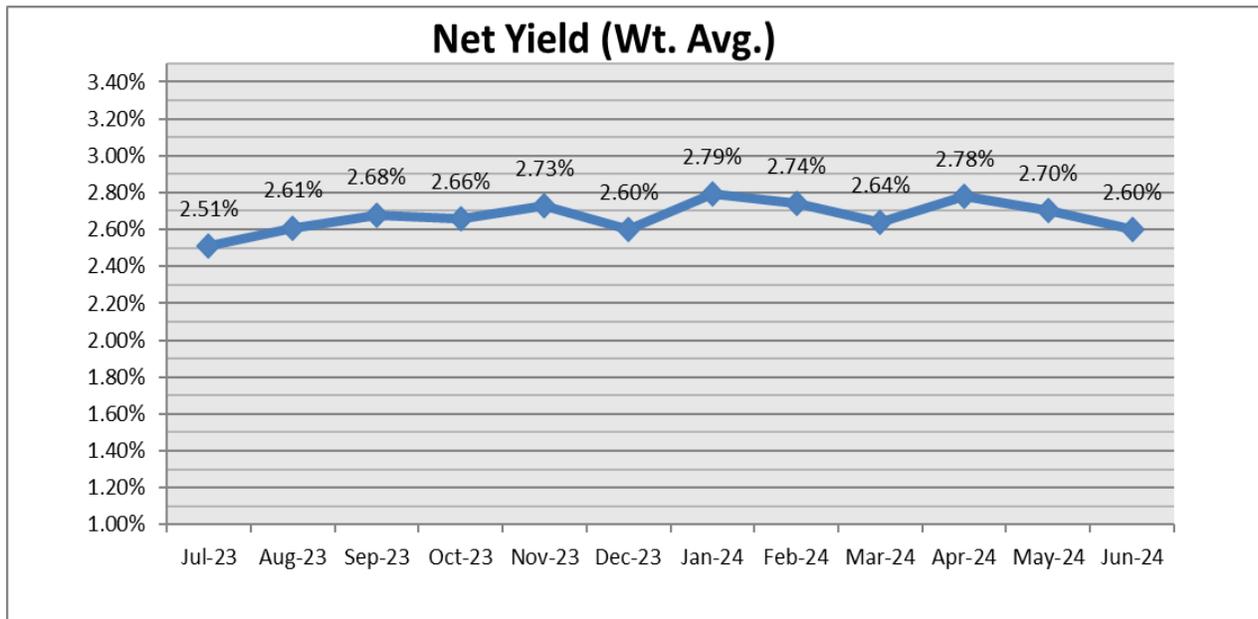


The chart below uses a three month moving average to smooth out the quarterly payments. As can be seen, the net interest moving average as of June is \$20.74M, up from May and still well above the first half of 2023. Balances have dropped somewhat from their high in June 2022 of \$10.7B to \$9.36B in June 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 as of June have been relatively flat over the last 12 months rising only 3 basis points since June 2023 they are also 19 bp below January's rates. This is consistent with cessation of the Fed Funds Target Rate increases in 2023. Yields should remain flat over the course of the next few months mainly due to the Fed's pause on rate increases. The market has priced in a .25 basis point drop in the FFTR as of September to 5.25%.



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 \$9.36B. June's number comes in at a 12 month high of \$9.36B, up from the previous month. This number is off the previous high set in June 2022 of \$10.74B.

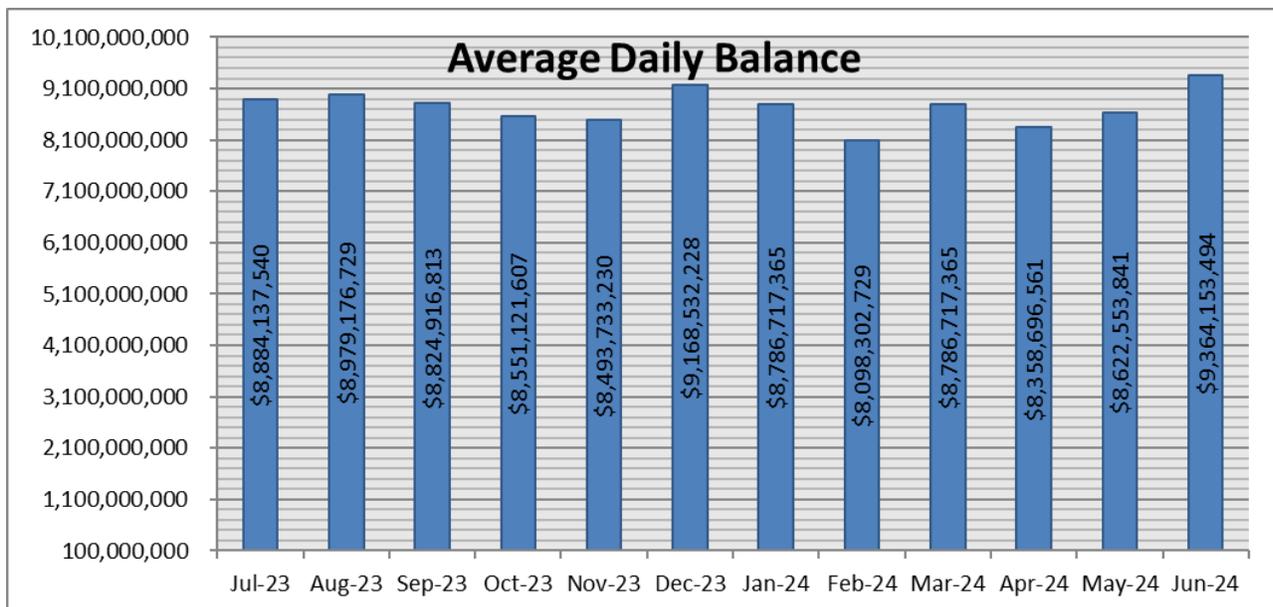


Exhibit 2a displays the historical balance detail for the 30 largest deposit holding IOLA institutions, along with its 12 month average balance and percentage of total deposits. Sorted by largest balances first, this chart shows the outsized impact the largest IOLA depositories will have on IOLA results. During June, balances were roughly in line for these large institutions. The top five institutions account for 64.8% of total IOLA balances, while the top ten institution's share held 77.3% 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 June, 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	5,737,060.36	49,714.99	5,687,345.37	2,695,037,944	10,376	2.59	2.57	548.13	267,616
Citibank	171	2,798,868.57	0.00	2,798,868.57	1,067,478,501	8,371	3.19	3.19	334.35	206,627
M&T Bank	152	1,841,742.14	0.00	1,841,742.14	679,061,826	2,491	3.30	3.30	739.36	272,592
Webster Bank	46	1,513,649.83	11,832.84	1,501,816.99	559,351,284	1,131	3.29	3.27	1327.87	493,424
flagstar	125	1,320,607.45	13,495.71	1,307,111.74	474,295,095	1,417	3.39	3.35	922.45	343,607
Esquire Bank	131	844,274.12	0.00	844,274.12	424,280,999	298	0.80	0.80	2,833.13	1,420,459
Bank of America	153	981,007.40	0.00	981,007.40	362,770,351	2,249	3.29	3.29	436.20	160,820
TD Bank, NA	118	809,603.88	0.00	809,603.88	317,747,767	2,610	3.00	3.00	310.19	121,742
Capital One	173	354,700.76	6,142.48	348,558.28	202,605,635	1,489	2.06	2.03	234.09	133,561
Key Bank Services Corp.	21	538,413.14	13,734.08	524,679.06	196,786,651	1,513	3.33	3.24	346.78	130,018
Dime Community Bank	149	75,943.29	3,225.00	72,718.29	195,616,998	407	0.47	0.45	178.67	504,492
Orange Bank & Trust Company	41	39,805.97	0.00	39,805.97	159,536,462	370	0.30	0.30	107.58	675,319
Valley National Bank	148	419,537.46	3,984.58	415,552.88	156,448,192	330	3.26	3.23	1,259.25	468,721
Citizens Bank, N.A.	90	310,727.04	0.00	310,727.04	119,051,682	845	3.18	3.18	367.72	137,661
HSBC	122	871,917.01	8,445.87	863,471.14	109,162,511	190	3.20	3.17	4,544.58	595,682
NBT Bank N.A.	135	263,384.40	-	263,384.40	97,163,390	395	3.30	3.30	666.8	245,839
Wells Fargo	141	235,440.72	0.00	235,440.72	86,993,579	469	3.29	3.29	502.01	185,083
City National Bank/California	185	257,993.51	470.69	257,522.82	76,895,124	94	4.71	4.70	2,739.60	879,889
Community Bank, N.A.	175	244,139.44	3,372.67	240,766.77	71,248,281	543	4.47	4.41	443.40	132,303
Bank United	77	186,130.04	0.00	186,130.04	69,645,285	100	3.25	3.25	1,861.30	686,237
Northfield Bank	48	66,283.53	1,880.44	64,403.09	66,598,355	444	1.21	1.18	145.05	139,718
First National Bank of Long Island	55	50,859.49	3,026.64	47,832.85	62,049,793	286	1	0.94	167.25	216,360
Northwest Savings Bank	40	7,039.83	336.71	6,703.12	61,181,032	277	0.14	0.13	24.20	226,673
Northwest Savings Bank	40	150,927.54	7,536.80	143,390.74	61,181,032	277	3.00	2.85	517.66	210,450
Tompkins Community Bank	224	45,023.28	0.00	45,023.28	54,787,793	234	1.00	1.00	192.41	224,931
East West Bank	161	147,038.66	0.00	147,038.66	54,755,276	90	3.27	3.27	1,633.76	611,426
Santander Bank	121	35,247.80	0.00	35,247.80	44,504,228	229	0.96	0.96	153.92	187,270
Canandaigua National Bank & Trust Co.	22	13,652.96	1,899.22	11,753.74	42,269,485	291	0.39	0.34	40.39	181433.29
ConnectOne Bank	200	73,874.64	0.00	73,874.64	39,940,333	59	2.25	2.25	1,252.11	686,218
Five Star Bank	39	103,266.53	2,803.47	100,463.06	38,179,286	163	3.29	3.20	616.34	233,577
	30	20,338,160.79	131,902.19	20,206,258.60	8,646,624,170.00	38,038	2.62%	2.60%		

EXHIBIT 1b

Monthly Banks Summary - All Banks, Alpha Sort

For Earnings Period of June, 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
1st Century Bank, a division of MidFirst Bank	215	100.63	0.00	100.63	37,705	1	3.25	3.25	100.63	37,101.00
Abacus Federal Savings Bank	19	82.66	0.00	82.66	223,080	5	0.15	0.15	16.53	44,206.40
ACCESS Federal Credit Union	98	368.93	0.00	368.93	448,870	8	1.00	1.00	46.12	56,108.00
Adirondack Bank	5	2,953.46	297.48	2,655.98	6,284,793	56	0.57	0.51	47.43	106,945.79
Adirondack Trust Company	64	674.55	100.00	574.55	7,538,651	67	0.11	0.09	8.58	122,492.96
Alden State Bank	9	161.40	39.61	121.79	1,437,759	12	0.05	0.03	10.15	107,895.67
Alma Bank	2	66,125.34	0.00	66,125.34	24,509,946	58	3.52	3.52	1,140.09	450,361.14
Alpine Capital Bank	47	8,120.87	0.00	8,120.87	2,990,688	1	3.30	3.30	8,120.87	2,994,058.00
Alternatives Federal Credit Union	29	5.45	0.00	5.45	42,798	9	0.05	0.05	0.61	4,857.67
Amalgamated Bank of New York	157	7,572.34	0.00	7,572.34	2,799,216	39	3.29	3.29	194.16	71,585.10
Amerasia Bank	172	623.39	0.00	623.39	3,740,329	11	0.20	0.20	56.67	344,753.55
AmeriCu Credit Union	142	353.26	0.00	353.26	930,592	9	0.15	0.15	39.25	104,957.22
Apple Bank For Savings	181	52,595.39	494.96	52,100.43	19,543,696	102	3.27	3.24	510.79	190,110.16
Ballston Spa National Bank	150	108.64	77.88	30.76	4,448,781	32	0.03	0.01	0.96	125,169.16
Banco Popular North America	76	52,267.93	0.00	52,267.93	17,994,848	80	3.53	3.53	653.35	244,813.11
Bank Hapoalim B.M.	206	1,380.38	0.00	1,380.38	2,218,807	3	0.25	0.25	460.13	738,225.00
Bank of America	153	981,007.40	0.00	981,007.40	362,770,351	2,249	3.29	3.29	436.20	160,820.18
Bank of Greene County	25	958.48	308.65	649.83	11,162,056	55	0.10	0.07	11.82	194,501.76
Bank of Holland	178	3,325.35	0.00	3,325.35	1,841,454	8	0.72	0.72	415.67	3,334,485.50
Bank of Hope	198	4,912.36	0.00	4,912.36	1,965,488	23	3.04	3.04	213.58	78,744.39
Bank of Millbrook	74	878.72	51.44	827.28	12,809,461	13	0.08	0.08	63.64	822,391.77
Bank of New York Mellon	166	10,090.39	27.61	10,062.78	3,781,751	6	3.25	3.24	1,677.13	630,153.00
Bank of Princeton, The	116	198.57	0.00	198.57	72,321	3	1.13	1.13	66.19	27,145.33
Bank of Richmondville	6	67.47	35.70	31.77	1,642,031	10	0.05	0.02	3.18	164,177.10
Bank of Utica	18	363.97	0.00	363.97	3,205,221	32	0.14	0.14	11.37	86,802.16
Bank on Buffalo, a division of CNB Bank	201	822.19	0.00	822.19	7,145,457	37	0.15	0.15	22.22	193,114.08
Bank United	77	186,130.04	0.00	186,130.04	69,645,285	100	3.25	3.25	1,861.30	686,237.02
BCB Community Bank	107	391.35	0.00	391.35	477,197	6	1.00	1.00	65.23	79,357.00
Berkshire Bank	97	178.58	0.00	178.58	470,474	19	0.46	0.46	9.40	22,870.79
Berkshire Bank (Massachusetts)	52	69,363.01	0.00	69,363.01	25,650,443	130	3.29	3.29	533.56	196,717.14
Bethpage FCU	54	22,621.88	0.00	22,621.88	13,925,914	137	1.98	1.98	165.12	101,362.20
Broadview Federal Credit Union	100	735.32	0.00	735.32	8,945,316	52	0.10	0.10	14.14	172,046.00
Brooklyn Cooperative Federal Credit Union	202	1.66	1.00	0.66	4,479	1	0.45	0.18	0.66	4,488.00

Canandaigua National Bank & Trust Co.	22	13,652.96	1,899.22	11,753.74	42,269,485	291	0.39	0.34	40.39	181,433.29
Capital One	173	354,700.76	6,142.48	348,558.28	202,605,635	1,489	2.06	2.03	234.09	133,560.88
Carthage Federal Savings	136	321.08	0.00	321.08	1,436,188	8	0.09	0.09	40.14	1,609,810.38
Carver Federal Savings Bank	11	878.53	0.00	878.53	535,568	37	2.00	2.00	23.74	57,777.16
Catskill Hudson Bank	127	152.73	0.00	152.73	3,140,826	24	0.06	0.06	6.36	131,360.92
Cattaraugus County Bank	69	24.11	7.15	16.96	588,715	7	0.05	0.04	2.42	83,811.00
Cayuga Lake National Bank	195	29.32	0.00	29.32	143,024	7	0.25	0.25	4.19	20,384.43
CFCU Community Credit Union	111	0.17	0.00	0.17	14,045	2	0.01	0.01	0.09	6,894.50
Champlain National Bank	189	62.83	23.93	38.90	603,388	11	0.04	0.03	3.54	45,820.18
Chemung Canal Trust Company	32	44,369.67	0.00	44,369.67	17,762,165	95	3.04	3.04	467.05	172,194.83
Citibank	171	2,798,868.57	0.00	2,798,868.57	1,067,478,501	8,371	3.19	3.19	334.35	206,627.07
Citizens and Northern Bank	43	927.88	20.00	907.88	407,557	2	2.77	2.71	453.94	179,193.50
Citizens Bank, N.A.	90	310,727.04	0.00	310,727.04	119,051,682	845	3.18	3.18	367.72	137,661.04
City National Bank/California	185	257,993.51	470.69	257,522.82	76,895,124	94	4.71	4.70	2,739.60	879,889.31
Community Bank, N.A.	175	244,139.44	3,372.67	240,766.77	71,248,281	543	4.47	4.41	443.40	132,302.86
ConnectOne Bank	200	73,874.64	0.00	73,874.64	39,940,333	59	2.25	2.25	1,252.11	686,217.88
Cross County Savings Bank	38	21,914.07	0.00	21,914.07	1,556,453	9	5.65	5.65	2,434.90	172,855.56
Customers Bank	129	19,945.72	0.00	19,945.72	4,794,594	26	1.67	1.67	767.14	205,133.46
Delaware National Bank of Delhi	1	196.78	8.72	188.06	1,085,847	16	0.22	0.21	11.75	83,130.44
Deutsche Bank	191	35.06	5.00	30.06	517,802	1	0.08	0.07	30.06	853,127.00
Dime Community Bank	149	75,943.29	3,225.00	72,718.29	195,616,998	407	0.47	0.45	178.67	504,491.77
East West Bank	161	147,038.66	0.00	147,038.66	54,755,276	90	3.27	3.27	1,633.76	611,425.68
Eastbank	8	8,319.69	323.78	7,995.91	1,080,623	6	3.09	2.97	1,332.65	179,990.33
Emigrant Savings Bank	156	183.65	0.00	183.65	297,254	4	0.25	0.25	45.91	74,729.75
Empire State Bank	151	6,606.06	339.36	6,266.70	18,768,381	70	0.43	0.41	89.52	256,858.16
Empower Federal Credit Union	124	1,058.33	0.00	1,058.33	599,286	21	2.15	2.15	50.40	39,815.52
ESL Federal Credit Union	217	1,365.24	0.00	1,365.24	4,480,668	40	0.37	0.37	34.13	118,491.78
Esquire Bank	131	844,274.12	0.00	844,274.12	424,280,999	298	0.80	0.80	2,833.13	1,420,458.98
Evans Bank, N.A.	154	34,391.18	0.00	34,391.18	12,975,762	64	3.22	3.22	537.36	198,118.42
Fieldpoint Private	204	22.54	0.00	22.54	65,282	1	0.42	0.42	22.54	60,941.00
First Central Savings Bank	174	1,193.86	0.00	1,193.86	9,775,733	30	0.05	0.05	39.80	319,237.20
First Citizens Community Bank	102	1,037.04	13.00	1,024.04	410,774	1	3.07	3.03	1,024.04	382,343.00
First Federal Savings of Middletown	146	12.11	0.00	12.11	211,191	2	0.07	0.07	6.06	105,241.50
First Heritage Federal Credit Union	51	0.00	0.00	-	2,592	1	-	-	-	-
First Horizon Bank	144	36,575.34	0.00	36,575.34	13,521,798	27	3.29	3.29	1,354.64	499,438.85
First National Bank of Dryden	57	453.53	0.00	453.53	2,207,105	6	0.25	0.25	75.59	459,829.00
First National Bank of Groton	188	4.07	0.00	4.07	99,091	3	0.05	0.05	1.36	33,012.33
First National Bank of Long Island	55	50,859.49	3,026.64	47,832.85	62,049,793	286	1.00	0.94	167.25	216,360.38
First National Bank of Scotia	176	111.49	20.14	91.35	2,720,426	17	0.05	0.04	5.37	159,583.82
Five Star Bank	39	103,266.53	2,803.47	100,463.06	38,179,286	163	3.29	3.20	616.34	233,576.77
flagstar	125	1,320,607.45	13,495.71	1,307,111.74	474,295,095	1,417	3.39	3.35	922.45	343,606.66
Flushing Bank	73	245,361.79	1,276.18	240,082.36	33,449,993	119	2.97	2.91	2,017.50	253,394.04
Fulton Savings Bank	58	17.05	0.00	17.05	403,480	5	0.06	0.06	3.41	88,903.40

Geddes Federal Savings & Loan Association	26	3.36	0.00	3.36	41,301	8	0.10	0.10	0.42	4,945.13
Generations Bank, Inc.	95	477.28	19.70	457.58	600,595	18	0.97	0.93	25.42	92,173.11
Genesee Co-op FCU	108	143.22	0.00	143.22	17,408	1	3.30	3.30	143.22	17,408.00
Genesee Regional Bank	193	1,414.86	0.00	1,414.86	36,947,211	72	0.05	0.05	19.65	478,170.22
Glens Falls National Bank and Trust Company	114	33,294.46	403.00	32,891.46	12,291,895	95	3.30	3.26	346.23	129,212.94
Global Bank	158	115.02	0.00	115.02	749,687	6	0.19	0.19	19.17	116,617.67
Gouverneur Savings and Loan Assn.	180	2.16	0.00	2.16	46,915	1	0.05	0.05	2.16	50,865.00
Habib American Bank	168	12.87	0.00	12.87	25,008	3	0.57	0.57	4.29	7,935.00
Habib American Bank	168	12.48	0.00	12.48	25,008	3	0.61	0.61	4.16	8,463.67
Hana Bank USA, NA	84	1,718.93	0.00	1,718.93	4,778,146	27	0.44	0.44	63.66	193,644.96
Hanmi Bank	213	13.74	0.00	13.74	24,875	3	0.22	0.22	4.58	8,284.67
Hanover Community Bank	49	1,392.57	0.00	1,392.57	9,163,459	35	0.18	0.18	39.79	244,292.20
HSBC	122	871,917.01	8,445.87	863,471.14	109,162,511	190	3.20	3.17	4,544.58	595,682.11
Hudson Valley Credit Union	208	123.19	0.00	123.19	999,222	24	0.15	0.15	5.13	41,633.67
Industrial and Commercial Bank of China	203	35.50	0.00	35.50	863,953	2	0.05	0.05	17.75	431,916.50
Industrial Bank	226	181.26	0.00	181.26	23,178	1	3.14	3.14	181.26	23,080.00
Interaudi Bank	216	62.16	0.00	62.16	27,500	1	2.95	2.95	62.16	29,465.00
Israel Discount Bank of New York	91	15,667.90	0.00	15,667.90	14,184,541	24	1.34	1.34	652.83	591,502.13
J.P. Morgan Chase	62	5,737,060.36	49,714.99	5,687,345.37	2,695,037,944	10,376	2.59	2.57	548.13	267,615.84
Jeff Bank	101	725.29	210.88	514.41	7,307,945	45	0.12	0.09	11.43	196,096.91
Jovia Financial Federal Credit Union	211	66.01	0.00	66.01	161,030	9	0.50	0.50	7.33	17,847.22
Kearny Bank	138	228.38	0.00	228.38	91,251	13	3.05	3.05	17.57	6,476.92
Key Bank Services Corp.	21	538,413.14	13,734.08	524,679.06	196,786,651	1,513	3.33	3.24	346.78	130,018.27
Lake Shore Savings Bank	184	832.16	0.00	832.16	2,229,188	28	0.15	0.15	29.72	79,735.14
Lakeland Bank	209	650.04	22.18	627.86	590,167	4	1.34	1.29	156.97	142,655.75
Lyons National Bank	123	28,771.05	480.96	28,290.09	10,944,193	65	3.20	3.15	435.23	166,214.58
M&T Bank	152	1,841,742.14	0.00	1,841,742.14	679,061,826	2,491	3.30	3.30	739.36	272,591.78
M.Y. Safra Bank	210	0.00	0.00	-	0	1			-	-
Maple City Savings Bank FSB	103	382.39	0.00	382.39	929,765	10	0.48	0.48	38.24	90,046.80
Maspeth Federal S & L Association	162	998.45	0.00	998.45	2,619,291	18	0.46	0.46	55.47	137,730.22
Metro City Bank	30	539.95	0.00	539.95	350,156	6	1.88	1.88	89.99	59,215.83
Metropolitan Commercial Bank	155	71,082.11	0.00	71,082.11	10,876,576	32	2.62	2.62	2,221.32	269,990.00
Modern Bank NA	99	5,745.09	0.00	5,745.09	2,304,940	1	3.03	3.03	5,745.09	2,152,713.00
National Bank of Coxsackie	14	3,099.56	0.00	3,099.56	1,243,183	16	3.03	3.03	193.72	71,422.94
National Cooperative Bank, N.A.	143	20.76	0.00	20.76	10,095	2	2.50	2.50	10.38	5,052.00
NBT Bank N.A.	135	263,384.40	0.00	263,384.40	97,163,390	395	3.30	3.30	666.80	245,838.91
New Millennium Bank	212	3,312.74	0.00	3,312.74	1,721,929	9	2.34	2.34	368.08	187,251.22
New York Community Bank	66	75,727.97	1,991.18	73,736.79	28,061,840	311	3.28	3.20	237.10	89,774.63
NewBank	59	30,963.94	0.00	30,963.94	4,219,225	14	2.94	2.94	2,211.71	268,822.64
Newtek Bank	16	200.45	0.00	200.45	46,857	2	5.04	5.04	100.23	24,182.00
North Country Savings Bank	167	128.88	0.00	128.88	359,382	13	0.14	0.14	9.91	26,509.62
NorthEast Community Bank	159	166.37	0.00	166.37	18,265	11	3.69	3.69	15.12	1,858.73

Northern Trust	183	5,434.76	0.00	5,434.76	2,833,884	2	2.33	2.33	2,717.38	1,313,682.50
Northfield Bank	48	66,283.53	1,880.44	64,403.09	66,598,355	444	1.21	1.18	145.05	139,717.55
Northwest Savings Bank	40	7,039.83	336.71	6,703.12	61,181,032	277	0.14	0.13	24.20	226,672.75
Northwest Savings Bank	40	150,927.54	7,536.80	143,390.74	61,181,032	277	3.00	2.85	517.66	210,450.45
OceanFirst Bank	165	441.84	0.00	441.84	1,390,174	6	0.39	0.39	73.64	223,988.33
Orange Bank & Trust Company	41	39,805.97	0.00	39,805.97	159,536,462	370	0.30	0.30	107.58	675,319.06
Pathfinder Bank	28	34,873.11	138.13	34,734.98	13,797,150	34	3.08	3.06	1,021.62	378,154.62
Patriot Bank, N.A.	17	37.48	0.00	37.48	371,876	7	0.12	0.12	5.35	43,429.29
PCB Bank	205	329.95	0.00	329.95	136,122	2	0.97	0.97	164.98	66,243.50
PCSB	63	884.26	0.00	884.26	3,919,672	39	0.27	0.27	22.67	137,929.54
Peapack-Gladstone Bank	207	76.22	0.00	76.22	1,159,536	26	0.08	0.08	2.93	37,297.35
Peoples Security Bank	132	0.00	0.00	-	0	1			-	-
Piermont Bank	220	9.43	0.00	9.43	3,778	1	3.04	3.04	9.43	3,530.00
Pioneer Savings Bank	10	28,407.41	0.00	28,407.41	10,281,207	68	3.25	3.25	417.76	149,052.72
PNC Bank	34	40,269.79	0.00	40,269.79	18,041,461	97	2.72	2.72	415.15	180,393.62
Ponce Bank	78	1,824.02	0.00	1,824.02	3,784,683	27	0.19	0.19	67.56	135,483.81
Preferred Bank	83	0.01	0.00	0.01	348	1	0.03	0.03	0.01	243.00
Provident Bank	182	17,952.42	0.00	17,952.42	6,964,816	12	3.14	3.14	1,496.04	568,805.00
Putnam County National Bank	194	319.48	41.55	277.93	7,498,859	24	0.05	0.04	11.58	313,468.21
Reliant Community Credit Union	145	12.83	0.00	12.83	312,332	6	0.05	0.05	2.14	52,032.83
Republic Bank	219	446.37	0.00	446.37	223,412	12	2.43	2.43	37.20	17,959.17
Rhinebeck Savings Bank	160	3,297.39	0.00	3,297.39	21,413,791	65	0.19	0.19	50.73	336,034.00
Rondout Savings Bank	117	5,004.10	279.61	4,724.49	7,880,561	13	0.26	0.25	363.42	631,459.54
Royal Business Bank	92	3,781.91	0.00	3,781.91	1,666,275	16	2.96	2.96	236.37	93,371.00
Santander Bank	121	35,247.80	0.00	35,247.80	44,504,228	229	0.96	0.96	153.92	187,270.03
Saratoga National Bank and Trust Co.	94	25,303.97	0.00	25,177.75	9,342,822	57	3.30	3.28	441.71	163,670.93
Savannah Bank N.A.	68	3,383.69	0.00	3,383.69	413,309	7	3.28	3.28	483.38	58,752.86
Sawyer Savings Bank	140	69.79	36.39	33.40	1,803,400	11	0.04	0.02	3.04	140,349.09
Self Reliance (NY) Federal Credit Union	139	3.11	0.00	3.11	4,999	2	0.25	0.25	1.56	2,494.50
Seneca Savings	104	4.93	0.00	4.93	128,497	10	0.05	0.05	0.49	11,996.30
Shinhan Bank America	133	1,541.78	0.00	1,541.78	1,674,455	12	1.12	1.12	128.48	130,266.08
Solvay Bank	177	3,102.84	197.58	2,905.26	6,335,725	95	0.60	0.56	30.58	49,672.64
Southern Chautauqua Federal Credit Union	199	1.40	0.00	1.40	3,741	1	0.15	0.15	1.40	3,744.00
Spring Bank	33	8,406.65	0.00	8,406.65	1,087,184	8	3.10	3.10	1,050.83	127,723.25
Suma Yonkers Federal Credit Union	82	214.10	0.00	214.10	1,844,203	10	0.05	0.05	21.41	171,750.60
TD Bank, NA	118	809,603.88	0.00	809,603.88	317,747,767	2,610	3.00	3.00	310.19	121,742.44
The First Bank of Greenwich	218	76.86	0.00	76.86	1,003,034	18	0.09	0.09	4.27	51,951.61
Tioga State Bank	170	145.82	10.40	135.42	928,808	12	0.20	0.19	11.29	80,917.08
Tompkins Community Bank	224	45,023.28	0.00	45,023.28	54,787,793	234	1.00	1.00	192.41	224,931.40
Trustco	187	44.74	0.00	44.74	5,514,385	165	0.01	0.01	0.27	32,990.12
Ulster Savings Bank	50	5,516.58	0.00	5,516.58	6,752,155	48	0.99	0.99	114.93	142,683.67
United Orient Bank	128	2.27	0.00	2.27	13,370	1	0.21	0.21	2.27	13,809.00
Upstate National Bank	61	1.46	0.00	1.46	20,224	8	0.09	0.09	0.18	4,440.75
Valley National Bank	148	419,537.46	3,984.58	415,552.88	156,448,192	330	3.26	3.23	1,259.25	468,721.08

Walden Savings	67	7,483.51	0.00	7,483.51	5,970,130	31	0.51	0.51	241.40	195,805.10
WallKill Valley Federal Savings & Loan	12	243.33	0.00	243.33	405,057	10	0.24	0.24	24.33	59,452.90
Wayne Bank	126	8,275.34	0.00	8,275.34	7,263,907	29	1.39	1.39	285.36	239,933.93
Webster Bank	46	1,513,649.83	11,832.84	1,501,816.99	559,351,284	1,131	3.29	3.27	1,327.87	493,424.25
Wells Fargo	141	235,440.72	0.00	235,440.72	86,993,579	469	3.29	3.29	502.01	185,082.97
Western Alliance Bank	228	1,321.63	0.00	1,321.63	590,811	7	2.72	2.72	188.80	83,531.57
Woori America Bank	37	13,965.81	0.00	13,965.81	3,542,951.00	22	4.80	4.80	634.81	160,906.64
	169	21,572,960.57	139,205.34	21,429,625.76	9,279,787,687	41,682	2.62	2.60	445.83	252,992.74

EXHIBIT 2a

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

12 Month History of Average Daily Balance

Bank Name	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2025	Apr 2024	May 2024	Jun 2024	Average	% of Total Deposits
J.P. Morgan Chase	2,684,315,500	2,642,796,738	2,559,687,124	2,545,329,825	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	3,022,195,390	31.27%
Citibank	1,219,515,876	1,223,798,606	1,210,332,946	1,140,878,471	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	1,539,098,145	15.92%
M&T Bank	621,779,585	612,707,127	645,067,685	645,725,004	684,006,218	655,388,288	603,840,756	597,781,959	657,581,436	630,051,312	677,914,553	679,026,124	642,572,504	6.65%
Webster Bank	565,031,588	549,239,747	524,154,735	519,044,176	498,296,729	489,797,613	466,986,238	466,076,867	478,650,497	512,802,015	532,872,462	558,062,823	513,417,958	5.31%
flagstar	556,006,617	526,760,501	519,156,008	500,042,910	505,229,150	528,154,656	513,510,854	495,501,280	471,000,671	457,580,645	464,199,434	486,890,638	502,002,780	5.19%
Bank of America	414,528,743	442,106,518	-	399,488,310	396,429,750	402,164,939	361,726,759	361,354,867	365,002,540	369,130,888	365,919,686	361,684,584	353,294,799	3.66%
Esquire Bank	-	-	339,343,883	-	-	346,829,126	-	-	389,268,022	-	-	423,296,777	124,894,817	1.29%
TD Bank, NA	333,239,844	313,601,355	317,979,241	318,088,191	320,768,509	313,389,983	294,101,013	278,101,517	276,199,010	302,958,336	307,570,923	317,747,767	307,812,141	3.18%
Capital One	184,493,446	184,564,045	282,595,794	186,872,922	187,654,222	194,603,961	180,973,164	319,816,538	178,375,320	350,597,397	191,842,005	198,872,152	220,105,081	2.28%
Key Bank Services Corp.	198,356,832	203,022,571	205,396,790	202,104,522	206,273,537	205,740,387	183,970,457	174,946,205	179,993,198	188,010,808	194,966,145	196,717,647	194,958,258	2.02%
Orange Bank & Trust Company	201,917,823	175,223,902	162,035,629	153,440,258	158,860,030	141,514,416	172,625,444	146,194,460	201,497,322	211,451,618	211,583,460	249,868,051	182,184,368	1.88%
Dime Community Bank	169,856,221	161,596,971	161,605,706	157,376,385	186,144,137	155,816,177	150,383,243	179,689,946	152,295,063	174,025,557	183,647,619	205,328,151	169,813,765	1.76%
Valley National Bank	147,013,011	159,586,728	155,479,580	167,076,892	178,459,245	150,912,674	142,546,090	128,268,962	126,139,418	131,430,696	140,080,756	154,677,957	148,472,667	1.54%
HSBC	-	-	148,894,232	-	-	122,484,696	-	-	122,528,055	-	-	113,179,600	42,257,215	0.44%
Citizens Bank, N.A.	133,600,851	254,759,178	114,514,551	114,777,135	108,753,589	114,248,075	108,072,256	108,986,995	107,134,911	106,674,975	116,992,526	116,323,576	125,403,218	1.30%
Wells Fargo	98,529,651	94,151,147	109,730,523	94,644,321	98,873,139	92,185,059	86,329,149	96,981,294	88,188,939	88,789,189	88,022,491	86,803,913	93,602,401	0.97%
First Republic Bank	101,767,921	84,658,689	93,848,053	96,731,027	96,266,795	91,788,630	84,585,657	90,502,235	89,561,669	94,129,188	91,810,027	-	84,637,491	0.88%
NBT Bank N.A.	77,729,412	55,304,508	102,291,005	103,797,441	98,914,179	97,434,206	89,888,525	86,871,161	85,764,291	86,691,989	94,021,141	97,106,370	89,651,186	0.93%
City National Bank/California	66,094,072	99,496,243	62,811,029	75,664,167	71,897,868	72,314,280	71,045,259	65,715,631	73,138,695	81,495,567	74,999,183	82,709,595	74,781,799	0.77%
Northwest Savings Bank	60,364,163	62,442,694	68,919,538	70,127,476	75,077,061	76,149,972	74,561,867	72,551,020	67,231,037	55,640,022	61,256,251	121,083,126	72,117,019	0.75%
Northfield Bank	67,746,842	64,549,763	65,043,579	72,405,772	67,936,546	65,823,939	69,501,100	65,136,182	59,884,691	69,394,424	65,556,866	62,034,590	66,251,191	0.69%
Bank United	68,623,732	67,548,317	67,910,101	69,325,525	71,494,497	62,193,162	58,134,523	56,029,715	61,415,858	64,086,244	65,566,093	68,623,702	65,079,289	0.67%
Community Bank, N.A.	67,536,876	72,266,216	74,728,293	69,046,457	61,465,375	67,870,490	57,437,490	56,486,334	59,860,068	59,803,777	59,266,820	71,840,451	64,800,721	0.67%
East West Bank	66,300,192	70,617,565	58,100,061	73,187,992	66,226,158	62,842,390	55,985,476	64,367,482	51,368,184	53,556,863	56,327,937	55,028,311	61,159,051	0.63%
Canandaigua National Bank & Trust Co.	57,842,557	53,913,791	65,549,106	66,333,220	59,298,212	53,188,128	72,040,023	48,079,203	63,180,702	49,557,586	50,238,388	52,797,088	57,668,167	0.60%
First National Bank of Long Island	60,886,948	63,770,388	58,254,196	52,235,291	48,374,497	50,772,101	51,378,104	53,557,390	55,190,011	62,865,184	63,657,649	61,879,069	56,901,736	0.59%
Tompkins Community Bank	49,990,870	47,661,730	45,682,186	47,406,238	46,247,837	49,012,041	44,146,845	40,825,829	40,929,550	45,256,407	52,839,002	52,633,947	46,886,040	0.49%
Five Star Bank	41,409,625	39,778,281	43,252,797	43,956,807	42,353,420	41,124,445	37,803,058	34,586,249	35,620,223	36,275,126	39,077,640	38,073,013	39,442,557	0.41%
Santander Bank	34,302,449	31,753,044	28,850,624	31,749,897	29,597,074	29,631,210	28,436,983	28,974,870	32,069,005	33,153,776	34,379,986	42,884,837	32,148,646	0.33%
ConnectOne Bank	19,908,408	23,932,033	50,574,521	22,126,296	22,112,484	29,233,940	27,026,257	33,599,828	37,800,500	36,480,278	37,513,213	40,486,855	31,732,884	0.33%
Total (top 30 banks)	8,368,689,655	8,381,608,396	8,341,789,516	8,038,982,928	8,721,092,889	9,079,612,814	9,452,526,756	9,205,367,759	9,645,599,523	7,656,644,601	10,191,003,771	9,502,117,877	9,025,343,283	93.37%
Total (all banks)	8,970,196,852	8,977,256,035	9,018,729,790	8,580,908,999	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	9,665,738,031	100%

Top 5= 64.3%

Top 10= 76.8%

EXHIBIT 2b

All NY IOLTA Banks active in the past 12 months.

12 Month History of Average Daily Balance

Bank Name	Jul 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024	Average	% of Total Deposits
J.P. Morgan Chase	2,684,315,500	2,642,796,738	2,559,687,124	2,545,329,825	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	3,022,195,390	31.49%
Citibank	1,219,515,876	1,223,798,606	1,210,332,946	1,140,878,471	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	1,539,098,145	16.04%
M&T Bank	621,779,585	612,707,127	645,067,685	645,725,004	684,006,218	655,388,288	603,840,756	597,781,959	657,581,436	630,051,312	677,914,553	679,026,124	642,572,504	6.70%
Webster Bank	565,031,588	549,239,747	524,154,735	519,044,176	498,296,729	489,797,613	466,986,238	466,076,867	478,650,497	512,802,015	532,872,462	558,062,823	513,417,958	5.35%
flagstar	556,006,617	526,760,501	519,156,008	500,042,910	505,229,150	528,154,656	513,510,854	495,501,280	471,000,671	457,580,645	464,199,434	486,890,638	502,002,780	5.23%
Bank of America	414,528,743	442,106,518	-	399,488,310	396,429,750	402,164,939	361,726,759	361,354,867	365,002,540	369,130,888	365,919,686	361,684,584	353,294,799	3.68%
Esquire Bank	-	-	339,343,883	-	-	346,829,126	-	-	389,268,022	-	-	423,296,777	124,894,817	1.30%
TD Bank, NA	333,239,844	313,601,355	317,979,241	318,088,191	320,768,509	313,389,983	294,101,013	278,101,517	276,199,010	302,958,336	307,570,923	317,747,767	307,812,141	3.21%
Capital One	184,493,446	184,564,045	282,595,794	186,872,922	187,654,222	194,603,961	180,973,164	319,816,538	178,375,320	350,597,397	191,842,005	198,872,152	220,105,081	2.29%
Key Bank Services Corp.	198,356,832	203,022,571	205,396,790	202,104,522	206,273,537	205,740,387	183,970,457	174,946,205	179,993,198	188,010,808	194,966,145	196,717,647	194,958,258	2.03%
Orange Bank & Trust Company	201,917,823	175,223,902	162,035,629	153,440,258	158,860,030	141,514,416	172,625,444	146,194,460	201,497,322	211,451,618	211,583,460	249,868,051	182,184,368	1.90%
Dime Community Bank	169,856,221	161,596,971	161,605,706	157,376,385	186,144,137	155,816,177	150,383,243	179,689,946	152,295,063	174,025,557	183,647,619	205,328,151	169,813,765	1.77%
Valley National Bank	147,013,011	159,586,728	155,479,580	167,076,892	178,459,245	150,912,674	142,546,090	128,268,962	126,139,418	131,430,696	140,080,756	154,677,957	148,472,667	1.55%
HSBC	-	-	148,894,232	-	-	122,484,696	-	-	122,528,055	-	-	113,179,600	42,257,215	0.44%
Citizens Bank, N.A.	133,600,851	254,759,178	114,514,551	114,777,135	108,753,589	114,248,075	108,072,256	108,986,995	107,134,911	106,674,975	116,992,526	116,323,576	125,403,218	1.31%
Wells Fargo	98,529,651	94,151,147	109,730,523	94,644,321	98,873,139	92,185,059	86,329,149	96,981,294	88,188,939	88,022,491	88,022,491	86,803,913	93,602,401	0.98%
First Republic Bank	101,767,921	84,658,689	93,848,053	96,731,027	96,266,795	91,788,630	84,585,657	90,502,235	89,561,669	94,129,188	91,810,027	-	84,637,491	0.88%
NBT Bank N.A.	77,729,412	55,304,508	102,291,005	103,797,441	98,914,179	97,434,206	89,888,525	86,871,161	85,764,291	86,691,989	94,021,141	97,106,370	89,651,186	0.93%
City National Bank/California	66,094,072	99,496,243	62,811,029	75,664,167	71,897,868	72,314,280	71,045,259	65,715,631	73,138,695	81,495,567	74,999,183	82,709,595	74,781,799	0.78%
Northwest Savings Bank	60,364,163	62,442,694	68,919,538	70,127,476	75,077,061	76,149,972	74,561,867	72,551,020	67,231,037	55,640,022	61,256,251	121,083,126	72,117,019	0.75%
Northfield Bank	67,746,842	64,549,763	65,043,579	72,405,772	67,936,546	65,823,939	69,501,100	65,136,182	59,884,691	69,394,424	65,556,866	62,034,590	66,251,191	0.69%
Bank United	68,623,732	67,548,317	67,910,101	69,325,525	71,494,497	62,193,162	58,134,523	56,029,715	61,415,858	64,086,244	65,566,093	68,623,702	65,079,289	0.68%
Community Bank, N.A.	67,536,876	72,266,216	74,728,293	69,046,457	61,465,375	67,870,490	57,437,490	56,486,334	59,860,068	59,803,777	59,266,820	71,840,451	64,800,721	0.68%
East West Bank	66,300,192	70,617,565	58,100,061	73,187,992	66,226,158	62,842,390	55,985,476	64,367,482	51,368,184	53,556,863	56,327,937	55,028,311	61,159,051	0.64%
Canandaigua National Bank & Trust Co.	57,842,557	53,913,791	65,549,106	66,333,220	59,298,212	53,188,128	72,040,023	48,079,203	63,180,702	49,557,586	50,238,388	52,797,088	57,668,167	0.60%
First National Bank of Long Island	60,886,948	63,770,388	58,254,196	52,235,291	48,374,497	50,772,101	51,378,104	53,557,390	55,190,011	62,865,184	63,657,649	61,879,069	56,901,736	0.59%
Tompkins Community Bank	49,990,870	47,661,730	45,682,186	47,406,238	46,247,837	49,012,041	44,146,845	40,825,829	40,929,550	45,256,407	52,839,002	52,633,947	46,886,040	0.49%
Five Star Bank	41,409,625	39,778,281	43,252,797	43,956,807	42,353,420	41,124,445	37,803,058	34,586,249	35,620,223	36,275,126	39,077,600	38,073,013	39,442,557	0.41%
Santander Bank	34,302,449	31,753,044	28,850,624	31,749,897	29,597,074	29,631,210	28,436,983	28,974,870	32,069,005	33,153,776	34,379,986	42,884,837	32,148,646	0.33%
ConnectOne Bank	19,908,408	23,932,033	50,574,521	22,126,296	22,112,484	29,233,940	27,026,257	33,599,828	37,800,500	36,480,278	37,513,213	40,486,855	31,732,884	0.33%
Flushing Bank	-	-	35,862,977	-	-	31,328,545	-	-	29,180,843	-	-	30,153,891	10,543,855	0.11%
Genesee Regional Bank	34,341,316	36,605,262	40,100,847	34,690,070	28,944,499	30,866,048	27,765,904	23,192,352	27,229,706	27,662,861	32,880,848	34,428,256	31,558,997	0.33%
New York Community Bank	33,894,518	32,260,253	50,066,276	26,709,410	29,979,412	35,343,261	30,828,433	27,717,726	25,126,579	27,159,933	24,456,354	27,919,910	30,955,172	0.32%
Salisbury Bank and Trust Company	27,464,417	33,230,148	-	-	-	-	-	-	-	-	-	-	5,057,880	0.05%
Apple Bank For Savings	48,258,347	23,085,684	22,848,505	25,789,908	24,343,220	22,964,821	21,266,490	21,399,547	20,638,778	20,260,080	19,502,985	19,391,236	24,145,800	0.25%
Alma Bank	20,515,828	22,741,222	24,393,273	24,745,637	26,640,219	22,639,660	21,465,360	21,010,415	23,564,507	22,734,797	22,583,922	26,120,946	23,262,982	0.24%
Banco Popular North America	27,542,218	26,833,819	25,311,530	20,737,748	21,620,463	13,696,512	20,812,592	23,608,227	21,955,590	22,937,801	16,475,007	19,585,049	21,759,713	0.23%
PNC Bank	21,185,931	21,552,440	19,655,471	20,591,085	21,610,002	23,327,390	27,254,792	20,492,000	19,451,740	22,183,531	20,290,828	17,498,181	21,257,783	0.22%
Rhinebeck Savings Bank	25,234,813	20,932,631	21,347,161	19,944,857	21,502,690	20,105,976	18,900,152	21,738,843	19,830,702	19,735,042	19,224,001	21,842,210	20,861,590	0.22%
Berkshire Bank (Massachusetts)	18,444,547	18,512,459	5,312,664	22,671,723	20,343,218	22,365,360	20,411,686	19,415,451	20,779,458	23,569,681	27,452,641	25,573,228	20,404,343	0.21%
Empire State Bank	20,414,387	21,071,609	17,686,344	19,322,768	16,723,302	17,015,217	20,738,929	21,784,477	17,835,179	22,157,555	20,590,247	17,980,071	19,443,340	0.20%
Chemung Canal Trust Company	13,350,050	13,366,809	14,944,804	8,709,627	18,065,809	17,457,896	17,909,077	16,407,636	15,946,414	16,654,792	17,024,254	16,358,509	15,516,306	0.16%
First Horizon Bank	11,955,218	11,545,556	11,890,686	14,400,889	12,894,782	17,974,365	18,943,129	14,453,939	13,434,498	14,606,674	14,393,039	13,484,849	14,164,802	0.15%
Carthage Federal Savings	-	-	16,704,304	-	-	14,511,527	-	-	11,728,933	-	-	12,878,483	4,651,937	0.05%
Israel Discount Bank of New York	14,422,625	13,634,241	13,364,239	13,338,030	14,352,731	13,931,183	13,708,337	13,322,331	13,798,317	14,409,899	14,615,623	14,196,051	13,924,467	0.15%
Bank of Greene County	12,358,124	20,265,800	14,665,817	13,426,929	12,556,370	12,570,095	12,440,867	12,423,501	10,970,723	10,194,763	12,366,643	10,697,597	12,911,436	0.13%
Pathfinder Bank	13,191,504	10,676,675	11,352,686	5,463,463	11,793,569	11,799,245	13,309,995	11,980,329	13,051,656	13,983,522	13,579,738	12,857,257	11,919,970	0.12%
Bethpage FCU	9,621,081	11,440,488	10,831,580	10,384,355	11,512,005	12,054,652	11,723,055	11,168,278	11,515,093	11,499,802	12,675,361	13,886,621	11,526,031	0.12%
Evans Bank, N.A.	9,780,116	10,226,828	9,214,061	9,601,381	10,639,261	8,220,482	11,411,412	10,968,263	12,229,720	12,961,222	12,066,383	12,679,579	10,833,226	0.11%
Hanover Community Bank	13,086,174	11,950,357	12,105,266	14,002,045	11,878,804	11,024,471	13,844,097	9,300,682	5,484,753	7,423,795	9,298,826	8,550,227	10,662,458	0.11%
First Central Savings Bank	-	-	15,130,203	-	-	8,941,785	-	-	6,135,267	-	-	9,577,116	3,315,364	0.03%
Saratoga National Bank and Trust Co.	8,331,711	8,066,953	10,212,907	10,759,196	10,759,257	11,581,089	10,180,479	9,892,320	9,709,880	10,116,307	9,483,911	9,329,243	9,868,604	0.10%
Pioneer Savings Bank	8,937,707	9,331,819	9,759,096	12,415,283	12,384,879	10,175,395	10							

Glens Falls National Bank and Trust Company	9,901,509	11,009,511	9,697,248	9,932,659	9,392,277	9,183,996	7,846,621	9,222,238	9,539,870	9,166,148	10,651,065	12,275,229	9,818,198	0.10%
Jeff Bank	9,568,769	10,887,714	9,958,901	11,195,964	10,252,000	9,132,892	9,311,381	8,558,496	7,845,146	8,769,369	8,662,862	8,824,361	9,413,988	0.10%
Rondout Savings Bank	-	-	9,287,298	-	-	8,781,965	-	-	10,156,499	-	-	8,208,974	3,036,228	0.03%
Bank of Holland	-	-	2,816,767	-	-	2,802,883	-	-	2,134,086	-	-	26,675,884	2,869,135	0.03%
Bank Leumi	6,567,653	7,280,442	11,712,607	-	-	-	-	-	-	-	-	-	2,130,059	0.02%
Adirondack Trust Company	11,486,193	12,651,132	11,037,719	8,744,929	7,754,669	10,464,013	5,548,239	5,989,146	6,767,571	5,573,674	5,884,859	8,207,028	8,342,431	0.09%
Putnam County National Bank	13,284,480	12,549,157	7,010,354	6,566,808	7,142,932	7,807,352	7,747,353	7,043,529	7,446,459	8,685,350	7,184,343	7,523,237	8,332,613	0.09%
Metropolitan Commercial Bank	-	-	7,191,175	-	-	7,380,557	-	-	8,490,821	-	-	8,639,680	2,641,853	0.03%
Bank of Millbrook	3,903,498	4,304,881	3,813,885	5,465,580	8,261,046	9,781,412	9,201,297	10,816,839	10,387,900	7,083,190	10,345,278	10,691,093	7,837,992	0.08%
Walden Savings	-	-	9,743,978	-	-	8,086,725	-	-	6,792,376	-	-	6,069,958	2,657,753	0.03%
Wayne Bank	6,731,543	7,048,034	7,542,116	8,942,263	8,124,901	7,512,964	6,836,888	5,842,435	6,861,136	7,522,992	7,252,860	6,958,084	7,264,685	0.08%
Solvay Bank	8,164,224	8,363,976	6,423,464	6,641,926	8,263,254	6,798,269	9,448,116	9,803,103	5,127,237	5,084,542	5,342,762	4,718,901	7,014,981	0.07%
Adirondack Bank	7,558,676	7,183,908	7,157,923	7,582,346	7,119,059	5,634,365	5,982,939	5,057,534	5,763,173	5,860,359	6,006,390	5,988,964	6,407,970	0.07%
Broadview Federal Credit Union	6,755,408	7,161,774	5,733,779	5,593,441	5,558,090	6,699,815	4,224,807	4,584,517	4,141,238	4,067,823	5,411,652	8,946,392	5,739,895	0.06%
Ulster Savings Bank	6,596,021	6,187,145	6,191,740	6,205,107	5,966,447	5,539,205	4,040,577	4,385,380	5,020,097	4,453,347	6,759,525	6,848,816	5,682,784	0.06%
Bank of Utica	8,496,850	8,181,960	7,821,182	8,814,056	8,587,709	4,582,262	3,941,994	3,494,200	2,790,176	3,498,184	3,503,297	2,777,669	5,540,795	0.06%
Bank on Buffalo, a division of CNB Bank	4,016,020	4,681,811	5,338,566	4,674,508	5,219,336	5,691,150	5,963,436	4,811,201	5,336,386	5,935,710	6,425,332	7,145,221	5,436,556	0.06%
Trustco	6,272,112	5,280,723	5,285,202	6,282,705	6,033,451	5,686,933	4,659,045	5,057,139	4,563,676	5,027,273	5,191,241	5,443,370	5,398,573	0.06%
Bank of Hope	1,757,773	10,826,171	9,100,867	8,555,867	6,976,915	6,087,497	6,551,902	5,426,380	1,795,587	1,714,914	1,683,006	1,811,121	5,190,667	0.05%
Bank of New York Mellon	8,132,780	4,001,974	4,251,961	3,743,247	2,903,971	2,906,046	14,759,127	3,255,619	3,244,362	3,285,049	3,647,918	3,780,918	4,826,081	0.05%
ESL Federal Credit Union	5,151,355	6,439,511	5,435,717	4,416,169	4,452,531	4,079,575	3,675,402	3,078,666	3,793,219	4,212,150	5,063,604	4,739,671	4,544,798	0.05%
Ballston Spa National Bank	4,453,415	4,584,877	5,910,169	5,411,034	5,457,570	4,141,383	4,996,976	4,092,203	3,287,482	3,801,531	3,651,787	4,005,413	4,482,820	0.05%
Customers Bank	-	-	3,991,370	-	-	3,522,177	-	-	4,676,252	-	-	5,333,470	1,460,272	0.02%
Hana Bank USA, NA	2,071,167	2,130,729	1,273,722	2,671,770	3,392,521	4,530,091	4,609,332	5,941,695	5,283,554	5,151,943	5,123,864	5,228,414	3,950,734	0.04%
Catskill Hudson Bank	3,642,227	3,444,185	4,028,625	4,231,410	4,007,212	3,845,547	3,476,042	3,965,159	3,317,831	3,302,485	3,074,878	3,152,662	3,624,022	0.04%
PCSB	2,379,506	2,554,118	3,098,731	3,583,065	3,858,422	2,998,950	4,252,840	3,333,836	2,909,230	2,528,056	4,439,460	5,379,252	3,442,956	0.04%
Provident Bank	5,082,818	2,970,322	2,268,354	2,185,006	2,155,123	2,656,577	2,492,766	2,602,266	3,628,040	3,446,726	4,509,739	6,825,660	3,401,950	0.04%
Modern Bank NA	3,382,235	3,360,470	3,133,337	3,032,419	2,562,804	3,073,143	4,072,455	2,820,712	2,663,144	4,349,624	5,495,339	2,152,713	3,341,533	0.03%
NewBank	-	-	1,335,920	-	-	4,066,882	-	-	3,924,500	-	-	3,763,517	1,090,902	0.01%
Ponce Bank	-	-	3,114,678	-	-	2,719,211	-	-	2,790,124	-	-	3,658,063	1,023,506	0.01%
Maspeth Federal S & L Association	2,659,201	2,795,146	5,056,914	4,190,218	2,744,551	2,399,124	3,389,212	2,618,239	1,880,170	2,812,263	2,696,146	2,479,144	2,976,694	0.03%
Woori America Bank	2,628,676	2,326,708	2,847,480	2,971,564	2,831,345	2,778,157	2,738,772	2,104,783	2,609,259	3,578,573	4,060,481	3,539,946	2,917,979	0.03%
Amalgamated Bank of New York	1,919,070	2,117,179	2,215,716	3,571,000	2,621,221	3,883,165	3,494,574	3,417,728	2,425,415	2,882,507	2,534,003	2,791,819	2,822,783	0.03%
Bank Hapoalim B.M.	-	-	3,887,187	-	-	2,631,254	-	-	2,538,154	-	-	2,214,675	939,273	0.01%
Northern Trust	2,066,922	2,253,348	1,849,580	1,847,842	3,176,685	2,574,753	2,251,982	2,733,311	2,734,639	2,115,711	5,972,812	2,627,365	2,683,746	0.03%
First National Bank of Scotia	1,881,987	1,779,786	1,822,810	1,935,206	1,967,594	2,100,750	1,520,988	3,009,363	3,178,324	3,795,272	2,973,688	2,712,925	2,389,891	0.02%
Hudson Valley Credit Union	3,560,358	3,241,827	3,240,064	3,427,623	3,572,053	1,950,671	1,492,732	601,032	533,998	4,832,600	936,047	999,208	2,365,684	0.02%
Alpine Capital Bank	-	-	-	-	-	-	-	-	-	1,321,204	2,649,604	2,994,058	580,406	0.01%
Lake Shore Savings Bank	-	-	1,933,823	-	-	2,406,195	-	-	2,309,635	-	-	2,232,584	740,186	0.01%
Amerasia Bank	1,721,153	1,800,450	1,944,659	1,793,741	1,845,380	2,438,436	2,027,810	2,027,388	1,648,741	1,649,862	3,247,322	3,792,289	2,161,436	0.02%
Republic Bank	4,147,436	4,474,016	4,559,478	4,520,496	2,576,023	1,371,711	578,998	655,431	484,134	520,796	911,790	215,510	2,084,652	0.02%
Tioga State Bank	1,871,125	1,378,852	1,230,163	2,220,591	3,258,598	3,163,812	3,102,162	2,894,123	1,409,976	1,801,299	1,576,770	971,005	2,073,206	0.02%
New Millennium Bank	2,950,202	2,511,208	1,442,949	-	4,213,412	2,019,044	1,890,716	1,428,588	1,502,448	1,602,863	1,499,521	1,685,261	1,895,518	0.02%
American Community Bank	-	1,399,065	-	-	1,730,457	-	-	1,683,878	-	-	3,109,262	-	660,222	0.01%
OceanFirst Bank	1,542,596	1,618,834	1,999,379	1,727,392	1,966,588	3,286,265	2,622,025	1,457,483	1,199,260	1,146,404	1,081,106	1,343,930	1,749,272	0.02%
Shinhan Bank America	2,492,293	2,609,467	2,238,939	1,505,979	1,276,415	1,058,774	1,675,861	2,226,049	1,023,000	1,515,988	1,467,467	1,563,193	1,721,119	0.02%
Cross County Savings Bank	-	-	1,822,199	-	-	1,729,138	-	-	1,242,768	-	-	1,555,700	529,150	0.01%
Delaware National Bank of Delhi	1,002,179	1,542,551	1,781,199	2,497,830	2,034,401	1,371,562	2,145,389	1,242,329	1,245,840	1,360,031	1,189,848	1,330,087	1,561,937	0.02%
First National Bank of Dryden	1,911,988	1,540,488	1,503,800	1,346,261	1,385,978	1,282,728	1,025,344	1,096,158	1,288,992	1,602,156	1,944,155	2,758,974	1,557,252	0.02%
Sawyer Savings Bank	1,560,317	1,640,616	1,646,975	1,339,064	1,238,881	1,380,674	1,126,192	1,237,477	1,681,265	1,463,768	1,379,458	1,543,840	1,436,544	0.01%
Alden State Bank	-	-	1,569,183	-	-	1,378,588	-	-	1,393,579	-	-	1,294,748	469,675	0.00%
Royal Business Bank	1,565,418	1,569,288	1,530,915	1,542,824	1,390,232	1,017,298	1,058,275	1,338,322	1,052,865	1,325,913	1,608,814	1,493,936	1,374,508	0.01%
National Bank of Coxsackie	1,529,393	1,241,806	1,455,802	2,014,100	1,522,657	1,422,594	1,446,182	1,367,071	965,868	1,062,437	859,105	1,142,767	1,335,815	0.01%
Bank of Richmondville	1,249,006	1,410,313	1,175,057	1,556,784	1,399,167	1,468,007	1,138,565	942,203	1,026,003	911,770	1,264,784	1,641,771	1,265,286	0.01%
Peapack-Gladstone Bank	762,838	1,558,907	1,114,206	1,422,178	1,332,646	1,075,937	1,711,802	1,526,716	1,300,096	961,332	985,703	969,731	1,226,841	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	715,129	0.01%
Suma Yonkers Federal Credit Union	-	-	850,053	-	-	770,547	-	-	1,198,163	-	-	1,717,506	378,022	0.00%
The First Bank of Greenwich	1,640,969	942,641	881,232	964,189	1,477,885	1,359,449	1,050,377	892,110	938,403	1,110,575	1,161,406	935,129	1,112,864	0.01%
Empower Federal Credit Union	1,831,881	1,626,368	1,617,148	1,054,271	963,024	983,773	655,426	720,796	655,035	678,158	1,047,246	836,126	1,055,771	0.01%

AmeriCu Credit Union	-	-	1,154,932	-	-	1,149,882	-	-	962,771	-	-	944,615	351,017	0.00%
Carver Federal Savings Bank	679,890	728,754	657,779	520,585	434,251	559,137	591,157	576,702	837,216	852,200	2,027,068	2,137,755	883,541	0.01%
Maple City Savings Bank FSB	768,495	1,118,809	1,101,734	1,027,377	1,437,583	713,380	796,455	720,863	602,225	589,041	737,153	900,468	876,132	0.01%
Eastbank	-	-	886,151	-	-	583,230	-	-	908,828	-	-	1,079,942	288,179	0.00%
Cattaraugus County Bank	1,176,477	801,822	1,346,119	1,539,828	921,016	1,077,338	768,383	512,260	617,910	377,410	390,196	586,677	842,953	0.01%
Fulton Savings Bank	1,003,396	850,802	775,059	1,203,359	707,126	738,559	904,314	1,156,169	730,503	1,018,123	471,673	444,517	833,633	0.01%
Spring Bank	-	-	694,185	-	-	650,943	-	-	759,059	-	-	1,021,786	260,498	0.00%
WallKill Valley Federal	-	-	848,228	-	-	809,188	-	-	571,963	-	-	594,529	235,326	0.00%
Savings & Loan Global Bank	1,121,904	705,038	511,608	446,006	486,666	806,532	813,478	492,436	696,796	924,727	572,226	699,706	689,760	0.01%
Generations Bank, Inc.	646,975	811,342	505,646	477,025	514,686	551,101	597,828	690,083	482,172	493,202	473,627	1,659,116	658,567	0.01%
Champlain National Bank	-	-	678,503	-	-	605,503	-	-	607,827	-	-	504,022	199,655	0.00%
Deutsche Bank	577,877	436,587	505,647	516,652	522,193	519,948	501,345	496,148	502,523	506,133	505,584	853,127	536,980	0.01%
Savannah Bank N.A.	-	-	659,798	-	-	581,207	-	-	474,667	-	-	411,270	177,245	0.00%
Berkshire Bank	819,876	600,718	347,154	335,957	463,550	1,193,196	1,026,709	214,266	449,398	30,996	418,265	434,545	527,886	0.01%
Citizens and Northern Bank	591,506	458,319	420,364	794,314	323,603	308,700	545,493	359,266	461,108	437,988	313,867	358,387	447,743	0.00%
Lakeland Bank	62,931	237,866	1,288,187	262,585	31,418	23,611	303,426	145,152	337,945	958,439	611,424	570,623	402,801	0.00%
BCB Community Bank	344,277	1,071,138	1,171,934	51,100	118,057	209,620	228,498	460,865	309,369	199,168	174,988	476,142	401,263	0.00%
Reliant Community Credit Union	668,068	387,370	384,223	176,614	352,346	415,630	420,811	353,924	371,122	388,117	442,239	312,197	389,388	0.00%
First Citizens Community Bank	239,057	338,583	386,104	313,772	401,006	435,624	233,557	552,203	411,415	413,910	397,279	382,343	375,404	0.00%
Metro City Bank	266,715	613,519	807,215	599,604	274,954	271,223	364,084	259,251	213,826	194,519	189,279	355,295	367,457	0.00%
North Country Savings Bank	-	-	305,382	-	-	386,635	-	-	429,498	-	-	344,625	122,178	0.00%
First Federal Savings of Middletown	648,994	414,452	306,768	297,019	196,614	125,023	155,733	169,830	341,506	648,939	169,077	210,483	307,037	0.00%
Western Alliance Bank	159,999	175,496	159,998	5,857	28,032	-	-	125,771	263,105	747,953	532,164	584,721	231,925	0.00%
ACCESS Federal Credit Union	344,090	339,109	360,985	267,192	201,248	268,699	412,486	93,114	119,096	178,606	213,043	448,864	270,544	0.00%
Abacus Federal Savings Bank	-	-	222,358	-	-	222,412	-	-	224,856	-	-	221,032	74,222	0.00%
Newtek Bank	753,023	682,934	608,948	87,238	46,004	44,378	52,157	44,469	50,827	47,536	45,581	48,364	209,288	0.00%
Emigrant Savings Bank	-	-	345,741	-	-	46,175	-	-	73,273	-	-	298,919	63,676	0.00%
Cayuga Lake National Bank	45,778	91,038	359,161	202,987	199,972	272,926	147,318	101,142	292,000	203,281	97,254	142,691	179,629	0.00%
Seneca Savings	265,391	281,639	206,833	182,500	186,149	185,797	129,516	173,691	93,959	145,026	120,804	119,963	174,272	0.00%
Gouverneur Savings and Loan Assn.	164,980	218,294	312,723	304,481	150,239	201,480	181,359	183,960	60,666	48,363	56,386	50,865	161,150	0.00%
Patriot Bank, N.A.	24,804	37,206	57,184	216,487	205,130	100,786	77,395	173,774	160,285	137,970	140,426	304,005	136,288	0.00%
PCB Bank	-	-	146,583	-	-	194,973	-	-	50,368	-	-	132,487	43,701	0.00%
Kearny Bank	161,116	159,493	165,774	179,709	177,984	171,908	149,940	73,448	67,482	78,945	82,573	84,200	129,381	0.00%
Jovia Financial Federal Credit Union	128,927	135,284	208,416	148,023	190,629	119,672	81,617	93,363	99,703	99,013	80,064	160,625	128,778	0.00%
First National Bank of Groton	107,380	107,851	137,727	107,380	138,943	109,971	93,251	138,449	90,425	90,763	99,609	99,037	110,066	0.00%
Interaudi Bank	113,657	117,237	121,281	113,569	117,238	125,317	110,131	117,235	125,322	28,586	27,496	29,465	95,545	0.00%
Geddes Federal Savings & Loan Association	56,331	47,332	64,757	77,744	124,805	64,727	438,243	46,861	40,905	39,541	39,914	39,561	90,060	0.00%
Bank of Princeton, The	-	-	66,353	-	-	66,348	-	-	71,456	-	-	81,436	23,799	0.00%
Fieldpoint Private	-	-	-	-	-	-	-	-	-	-	33,857	60,941	7,900	0.00%
Upstate National Bank	45,590	26,845	26,086	26,892	15,524	9,749	9,796	9,767	76,572	165,467	31,123	35,526	39,911	0.00%
Radius Bank	72,960	43,038	53,499	46,766	35,254	8,243	48	-	-	-	-	-	21,651	0.00%
Hanmi Bank	-	-	44,224	-	-	44,210	-	-	32,127	-	-	24,854	12,118	0.00%
Alternatives Federal Credit Union	-	-	26,978	-	-	23,010	-	-	36,902	-	-	43,719	10,884	0.00%
1st Century Bank, a division of MidFirst Bank	22,435	23,830	28,053	28,048	28,039	28,033	28,169	32,579	32,579	32,566	32,557	37,101	29,499	0.00%
Habib American Bank	25,340	25,360	25,351	25,360	25,331	25,360	25,360	25,362	25,360	25,391	-	49,196	25,231	0.00%
Industrial Bank	-	-	20,567	-	-	23,200	-	-	23,087	-	-	23,080	7,495	0.00%
National Cooperative Bank, N.A.	14,536	15,332	18,423	14,532	16,920	17,452	32,779	59,211	13,503	8,804	8,265	10,104	19,155	0.00%
CFCU Community Credit Union	14,129	14,129	13,789	14,129	13,789	14,129	14,129	14,264	14,129	13,789	14,129	13,789	14,027	0.00%
NorthEast Community Bank	-	-	12,126	-	-	10,608	-	-	12,305	-	-	20,446	4,624	0.00%
United Orient Bank	1,648	7,418	13,809	12,481	14,235	12,952	12,481	15,229	12,481	12,897	13,776	13,809	11,935	0.00%
First Heritage Federal Credit Union	-	-	6,681	-	-	-	-	-	-	-	-	-	557	0.00%
Genesee Co-op FCU	-	-	2,022	-	-	2,023	-	-	2,023	-	-	17,408	1,956	0.00%
Piermont Bank	3,783	3,782	3,654	3,905	3,781	3,536	23,411	3,780	3,536	4,036	3,782	3,530	5,376	0.00%
Self Reliance (NY) Federal Credit Union	-	-	4,999	-	-	4,999	-	-	4,989	-	-	4,989	1,665	0.00%
Southern Chautauqua Federal Credit Union	-	-	3,756	-	-	3,756	24	-	3,744	-	-	3,744	1,250	0.00%

Brooklyn Cooperative Federal Credit Union	2,512	2,512	2,514	2,512	2,514	2,512	2,512	2,517	2,512	2,514	2,512	4,488	2,678	0.00%
Preferred Bank	235	471	243	471	243	235	487	252	471	243	471	243	339	0.00%
Countryside Federal Credit Union	-	-	-	-	-	-	-	-	-	-	-	-	0	0.00%
M.Y. Safra Bank	-	-	-	-	-	-	-	-	-	-	-	-	0	0.00%
Peoples Security Bank	-	-	-	-	-	-	-	-	-	-	-	-	0	0.00%
Peoples Security Bank	-	-	-	-	-	-	-	-	-	-	-	-	0	0.00%
Totals	8,621,849,136	9,705,935,874	9,383,766,552	8,970,196,852	8,977,256,035	9,018,729,790	8,580,908,999	9,324,885,435	9,710,807,796	8,197,851,703	8,098,302,729	8,786,717,365	9,596,725,073	100.00%

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 Report on Phase 1 Activities (January – August 2024)

Executive Summary

The New York Interest on Lawyer Account Fund (IOLA) has completed Phase 1 of its Justice Infrastructure Project (the JIP or the Project). IOLA undertook an extraordinarily broad and comprehensive approach to listening and learning and has appreciated and embraced the potential for transformative change within New York's civil justice ecosystem. Phase 1 of the JIP included significant stakeholder engagement in communities across New York, engagement with national and local leaders in access to justice, and quantitative analyses of resident survey responses as well as data from the New York State Courts, IOLA grantees, LawHelp New York and 2-1-1.

Key observations and findings from Phase 1 include:

Challenges Identified that Inhibit Access to Clear and Timely Access to High Quality Legal Information, Advice, and Representation

- Residents experience "**life issues**" – not "**legal issues**"
- New Yorkers least likely to seek legal assistance are **those with the lowest incomes**.
- Many New Yorkers seek help from **trusted sources** first (family, friends, community organizations)
- Seeking help is typically **frustrating, time consuming, inefficient, and uncoordinated**
- Civil legal services providers and other community organizations **spend significant time referring people** to other organizations or resources
- Civil legal services providers dedicate significant resources to certain activities that could be coordinated to reduce **duplication of effort**
- Changes in laws, processes, technology and other factors have left IOLA grantees **in need of coordinated infrastructure support**

Opportunities to Invest in Infrastructure that Can Improve Access to High Quality Legal Information, Advice, and Representation

- Amplify the capabilities of local organizations that are **important community connectors**
- Invest in **more efficient and effective coordination of, and access to, resources**
- Develop a **single, consistent, comprehensive, updated tool for referral and legal information**
- **Leverage new technologies** to enable more effective referral and access to information
- Enable people to securely **store and share information**
- **Integrate and coordinate** with other social care platforms
- Invest in **consistent, coordinated outreach**
- Assist civil legal services providers with **statewide support functions**

Background

Due to recent historic revenue growth, IOLA found itself with a generational opportunity to enhance the delivery system of civil legal aid in New York.

In March 2023, the IOLA Board of Trustees approved the development of a plan that would increase coordination, innovation, and capacity in the sector, known as the Justice Infrastructure Project (the JIP or the Project). Consistent with the IOLA Fund's mission, this Project seeks to ensure that every New Yorker with a legal problem has clear and timely access to high quality legal information, advice, and representation.

The JIP also happens at a time of great change and opportunity in the civil justice ecosystem, both locally and nationally. New insights emerged from the unprecedented challenges and response to the COVID-19 pandemic. New technologies have been developed and proven effective, but not yet scaled and integrated. New York City's historic eviction right to counsel continues to be implemented while statewide expansion is considered. New judicial leadership and investments in e-filing, justice navigators, virtual kiosks and other access to justice initiatives by the courts provide valuable contributions to the justice ecosystem. And recent pilots and other programs are exploring the potential for coordinated intake, triage, screening, information and referral. In addition, numerous innovations across the country have demonstrated the transformative potential for the use of artificial intelligence both as an internal resource for legal services organizations and as a public-facing tool to assist those seeking help.

The combination of funding, inspiring leadership in the grantee community and courts, and advancements in technology present a generational opportunity to make transformative investments in civil justice infrastructure in New York.

Phase 1 Activities

The IOLA Fund, with the assistance of its project management firm, Stout Risius Ross (Stout), and technical advisor, Just-Tech, initially worked to more fully define the steps necessary to achieve the Project goal. It was apparent from the outset of the Project that it would be essential to genuinely and authentically listen to grantees, community-based organizations, and individuals who have interacted with the justice system across the state in order to understand the challenges that exist in our communities and the opportunities to develop scalable, sustainable, impactful and useful innovations to improve access to justice. The specific deliverables for achieving the goal were left open to slowly evolve but contemplated investments in the infrastructure of IOLA grantee organizations as well as investments in public facing tools.

As IOLA sought feedback from New York communities certain guiding principles included:

- Learning about the *public's experience* interacting with the justice system
- The Project should consider how to *amplify existing infrastructure* while also seeking ways to *develop new infrastructure*
- Remaining mindful that the public often experiences *life issues*, which are not always understood as legal issues
- Maintaining a focus on the design and development of innovations that will be *useful and used*
- The Project should consider ideas that are both *practical and innovative*
- Opportunities to invest in the infrastructure of the justice system will exist *within grantee*

organization and external to grantee organizations

- The Project should remain open-minded to potential areas of ***coordination, innovation, and capacity building***
- An adequate amount of time will be necessary to gather feedback, synthesize feedback, engage in continued dialogue, design, develop and implement new innovations – a ***multi-year*** commitment will be necessary
- ***Stakeholders should have an ongoing role*** in providing feedback and participating in the design and development of new innovations – and should be compensated for significant contributions

From January through July 2024 IOLA engaged in an extensive, comprehensive, humble and genuine process to listen to New York residents, community organizations, grantees and other stakeholders. This has included:

- **In-Person Listening Sessions** – With the assistance of its grantees throughout the state, IOLA conducted listening sessions in each of IOLA’s 7 geographic units across the state. These listening sessions were conducted in Rochester, Hempstead, White Plains, Syracuse, Buffalo, Albany, and New York City. Over 1,000 people were invited to these listening sessions from over 500 organizations. Over 250 people attended these sessions representing a broad cross-section of organizations including:
 - IOLA Grantee Organizations
 - Non-IOLA Grantee Legal Services Organizations
 - Child & Adult Literacy Centers
 - Deaf and Hard of Hearing Community Stakeholders
 - Domestic Violence CBOs
 - Faith Based Institutions
 - Family and Child Services CBOs
 - Foundations
 - Health and Welfare CBOs
 - Housing and Homelessness CBOs
 - Immigrant and Refugee CBOs
 - Medical-Legal Partnerships
 - Rural Housing and Transportation CBOs
 - Tenants’ Rights Organizers
 - Bar Associations
 - Judges and other Local Courthouse Representatives
 - Law Library Help Centers
 - Mediation Groups
 - Public Libraries
 - Reentry Task Forces and Community-Based Organizations
 - State and Local Government Agency Representatives
 - United Way Representatives
 - Academic Community

Cognizant that some individuals may not have been able to attend local listening sessions or other feedback opportunities, IOLA created and distributed a website where any individual could provide feedback or request a meeting for further discussion.

- **Subject Matter Focus Groups** – IOLA conducted virtual focus groups with grantees and other organizations with expertise in matters involving: Housing, Consumer Debts, Family Law, Immigration, and Income Maintenance matters. Approximately 150 people from grantee and other local and national organizations participated. These focus groups were designed to learn more about particular nuances related to the law, process and resources associated with these matter types, which represent an overwhelming majority

of the civil legal issues the public faces.

- **Client Focus Group Discussions** - With the assistance of its grantees, IOLA observed focus groups of grantee clients in 4 upstate regions. These focus groups were conducted in-person and facilitated by a local trusted person. IOLA observed these focus groups remotely.
- **New York Resident Survey** – Using an online survey tool, IOLA conducted a survey of 1,000 New Yorkers over the age of 18 who had experienced a civil or administrative legal issue in the last year. Survey responses were collected from all regions of New York and across major demographic factors (age, gender, race / ethnicity, sexual orientation, education, disability and household income). This survey asked respondents about the nature of the issue they experienced, whether they sought help, from whom they sought help, how many attempts to seek help they completed, whether the sources of assistance were helpful or effective, and whether the respondent was satisfied with the outcome of the issue.
- **NYC Community Organization Survey** – With the assistance of the New York Community Trust, New York Council of Nonprofits, and Nonprofit New York, distributed a web-based survey to hundreds of community-based organizations in New York City requesting information and feedback regarding how members of the community diagnosis life issue that may be legal issues, how they respond to such issues, and what opportunities may exist to enhance coordination and collaboration related to resources responsive to civil legal issued experienced by persons in their community. This survey had a very low response rate, generating fewer than 10 responses. IOLA also sought feedback from the New York Community Trust, New York Council of Nonprofits, and Nonprofit New York directly based on their expertise with the NYC non-profit community. IOLA met with the New York Community Trust and Nonprofit New York to collect this additional feedback, as well as discuss improvements to our engagement with the New York City non-profit community, as the Project moves forward.
- **Engagement with New York State and National Justice Stakeholders** – In addition to grantees and community-based organizations throughout the state, IOLA also sought feedback from organizations or agencies that operate in New York on matters involving civil justice as well as national experts, including, New York 2-1-1, Legal Services Corporation, New York Permanent Commission on Access to Justice, Center for Justice Innovation, Family Legal Care, NYC Mayor’s Office of Immigrant Affairs, New York Office of Justice Initiatives of the New York Courts, Immigrant ARC, the New York State Office of Court Administration’s Office of Alternative Dispute Resolution Programs, InformUSA, and FindHelp.¹
- **Research** – IOLA conducted research regarding coordinated intake models, justice infrastructure investments, justice innovations, technology grants / initiatives, statewide platforms for information and referral and innovative research regarding how persons with low incomes diagnose issues that arise in their life and how / whether they seek assistance with those issues, including issues that may be understood as legal issues. This

¹ Family Legal Care and Immigrant ARC are current IOLA grantees.

included meetings with at least 12 local and national leaders who worked on large collaboration projects as well as review of numerous reports, webinars, conference presentations, scholarly research and other materials.

- **Quantitative Analysis** – IOLA received data from LawHelpNY, 2-1-1 of New York, and the Office of Court Administration (OCA) to assist with quantitative analysis. IOLA also incorporated data from its Grantee Annual Reports (GAR) to provide further quantitative analysis and comparison. This analysis was intended to provide measurements associated with the frequency of certain needs (civil legal filings and otherwise) and preliminary indications about certain ways in which people seek help.
- **Cybersecurity Improvement and Technical Assistance Project** - In March 2024, IOLA released an RFP for technology consulting services in relation to the JIP. Following the RFP process, IOLA engaged Just-Tech LLC to provide technology consulting services for the Project. As part of these services, Just-Tech LLC is currently training, managing, and facilitating cohorts of IOLA grantees in implementing cybersecurity best practices and technology, such as multi-factor authentication (MFA). Just-Tech LLC will continue to work with IOLA grantees as part of the JIP to strengthen grantee cybersecurity practices and policies.

IOLA remains committed to continued dialogue with stakeholders across the state to refine and synthesize findings and observations from this process.

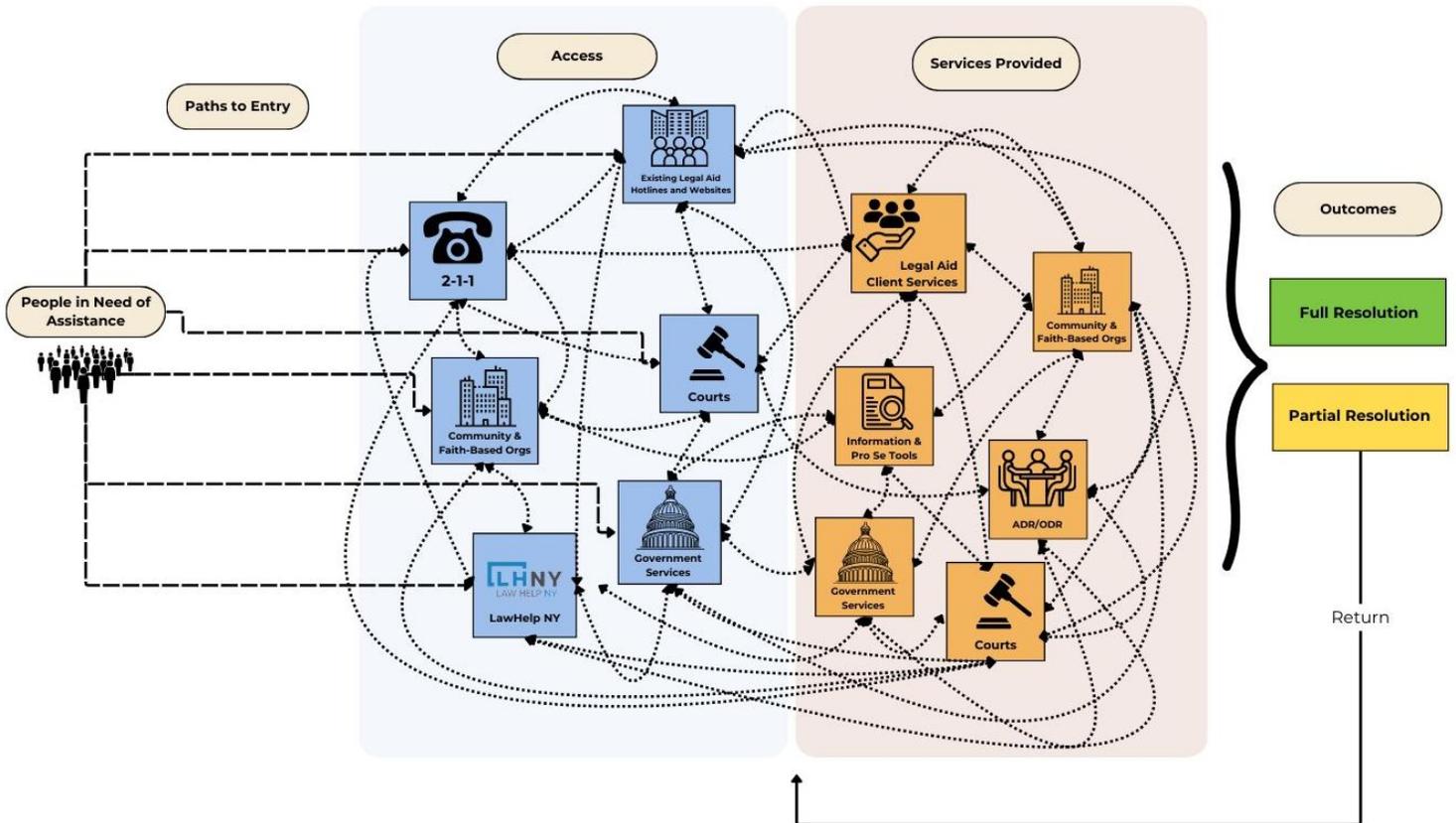
Synthesis of Key Themes and Observations

Provided below is a listing of consistently shared ideas for improvement that were received from across many of the feedback mechanisms described above:

- Coordinated or centralized intake, triage, screening, information and referral – a centralized, easily accessible resource for information, referral, call center contact, live chat, automated forms, artificial intelligence-enabled guidance and information, etc.
- Real-time provider availability for referring entities and people seeking help
- A means for people to collect and store information, including data personal to them
- Expanded, efficient, reliable access to culturally-competent, plain language, information and videos that empower people to understand and navigate legal processes, especially when they cannot access a lawyer
- Tools to support people that often serve as trusted, credible sources of information and assistance within the community (e.g., navigators, community justice workers, etc.)
- Improved language access and access for those with a disability
- Improved rural access (e.g., where transportation and broadband access are unreliable or nonexistent)
- Secure technology tools for those who can access technology (which some cannot)
- Convenient place-based technology resources and assistance (e.g., kiosks, privacy rooms or spaces with technology to enable access to the justice system or other resources, etc.)
- AI tools -- for increased provider efficiency and for improved public access to services
- Tools to assist with provider knowledge management and collaboration
- Data, information sharing, and strategies to empower advocates to pursue systemic change

Through these various forms of engagement IOLA came to appreciate the current challenges faced by New Yorkers seeking help. We consistently heard that the process of seeking help is typically frustrating, time consuming, inefficient, and uncoordinated – both for New York residents and the organizations working to help them. A visual illustration of the process for seeking help that many New Yorkers must endure is presented below:

CURRENT ACCESS AND DELIVERY SYSTEM FOR NEW YORK CIVIL LEGAL SERVICES



The current statewide and local ecosystems and resources reflect decades of under-investment in system infrastructure. Local organizations, including IOLA grantees, have adapted processes, systems, and relationships in a tireless effort to maintain awareness of ever-changing program criteria and contact information. We consistently heard that these efforts to maintain ad-hoc referral directories are resource intensive and constantly at-risk when staff turnover. As discussed in the observations detailed below, , when invited to imagine what would dramatically improve the ecosystem, stakeholders repeatedly emphasized that they wanted an ability to easily provide consistent, reliable and effective legal information and referral.

Key Observations From Each Source of Feedback

From each of the sources of feedback described above, certain key findings were observed.

In-Person Listening Sessions

- **Legal Services Program Tools (Internal)**
 - The opportunity for better coordination and referral across civil legal services programs – reducing the resources required, and client frustration associated with, having to refer someone to a different organization
 - The need to reduce duplication of effort related to the development of materials, intake, triage, referral and other activities
 - The importance of and need for effective knowledge transfer, knowledge management, upskilling, and collaboration across the legal services community
 - The importance of call center operations and the opportunity to develop and implement effective strategies for both call center technology and call center agents (human contact)
 - The need for technology support, training and assistance with the adoption of new (and established) technologies (including AI)
 - The importance of holistic, case management approaches to helping clients with life issues
- **Consumer Tools / Resources (Public-facing)**
 - Public-facing, humble, empathetic generative AI tools for life problems faced by New Yorkers, including those understood to be legal issues
 - Tools to assist clients in maintaining, organizing, sharing and filing documents and information related to civil legal issues and / or other life issues
 - The importance of simple, brief, accessible video content to convey legal processes, risks and resources
 - Acknowledgment of the digital divide and limited access to technology and limited technology literacy for some people seeking assistance (and the need for alternative means of seeking assistance)
 - Acknowledgment that public-facing technology needs to be:
 - Mobile-enabled
 - Adequately staffed and maintained
 - Accessible and accommodating to persons with a broad spectrum of needs and capabilities
 - Accessible in multiple languages
- **Outreach and Communication Tools**
 - The importance of multi-channel outreach to develop a pervasive sense of awareness of the tools and resources available in the community
 - The need to ensure that the source of information is perceived to be credible, reliable and trustworthy
 - The opportunity for place-based justice access (e.g., community centers, kiosks, privacy pods, technology pods, etc.)
 - The importance of WhatsApp for client communication
 - The importance of simple, plain language, diverse language, and culturally-competent language and outreach strategies
 - The importance of access for persons with disabilities, including but not limited to the deaf community, the blind community, and the intellectually impaired

- community
 - The opportunity to create consistent, short video content for civil legal topics to assist those with low levels of literacy and to broaden access to effective information about civil legal topics
 - The need to acknowledge that for many the issues are not “legal” but rather “life issues” (and that using the word “law” or “legal” may impede the ability to engage the public)
- **Ecosystem Tools / Resources (Coordinated)**
 - The opportunity to amplify or enhance platforms that currently exist (such as 2-1-1 and LawHelpNY)
 - The opportunity to engage and enable individuals or organizations in the community that are trusted by those in need to help them navigate complex circumstances and processes
 - The opportunity to learn from private industry (e.g., the healthcare industry) regarding outreach, communication, technology, and service delivery models
 - Acknowledgment of justice-adjacent needs (e.g., mental health, substance abuse, household budgeting, employment barriers, access to financial supports, access to safe and stable and affordable housing, etc.)
 - The importance of partnership with the courts in the design, development and implementation of justice initiatives
 - The importance of unique and complex access to justice barriers that arise in rural communities (e.g., lack of broadband access and lack of transportation)
 - The importance of comprehensive, coordinated data collection to assist with evaluation, reporting, and strategic decision-making, and impact advocacy

Client Focus Group Discussions

- The importance of trust and credibility in communications and outreach
- The need to have a single trusted source for information (one phone number, one website, one app – all integrated)
- The need for greater coordination among community resources
- The value of having a secure place to store information related to civil legal issues (and other life issues)
- The need to have tools and materials for people with the ability to use them, but more intensive services for people with more complex circumstances
- The value of short, simple videos to explain civil legal processes
- The importance of language access, translation and interpretation, and culturally competent outreach and services
- The importance of supporting and enabling trusted individuals and organizations in the community that are often the first place people go to for help

New York Resident Survey

- **Consumer debt was the most frequently identified matter type for respondents who did not seek assistance from anyone.**
- **In aggregate, family law (including child support, custody, divorce, and paternity) was the most frequently identified matter type for respondents who did seek assistance from someone other than a lawyer.**
 - 740 respondents indicated they experienced a civil or administrative legal issue and sought help; 235 respondents indicated they experienced a civil or administrative legal issue and did not seek assistance.
 - The most prominent matter type respondents who did not seek assistance were involved in was consumer debt (94, 40%). Taken in combination, family law matters (child support, custody, divorce and paternity, combined) were the second most prominent selection (85, 36.2%).
 - The most prominent matter type respondents who sought assistance from someone other than a lawyer were involved in was consumer debt (264, 35.7%), followed by motor vehicle (194, 26.2%), public benefits/ fair hearing (143, 19.3%), eviction (123, 16.6%), child support (114, 15.4%) and SSI / SSD reconsideration (109, 14.7%). When taken in combination, family law matters (child support, custody, divorce and paternity) was the most prominent selection (287).
 - The prominence of consumer debt for those who sought assistance and did not seek assistance from anyone owes partially to the fact that there are simply more consumer debt filings than any other matter type.
 - It is notable that a greater proportion of consumer debt issues were identified by people who did not seek help than those who were seeking help from someone other than a lawyer.
 - It is also notable that eviction was more prominent than child support for matters where individuals sought assistance from someone other than a lawyer than for those who did not seek assistance, likely due to the complexities of the eviction process and the risks and circumstances faced by eviction defendants.
 - Of respondents who sought assistance, ONYC respondents were more likely than NYC respondents to seek help with family law matters (68% v. 42%).
 - The sources of assistance for which respondents made the *fewest attempts* for assistance were:
 - Pro Bono Clinic – 2.5 attempts on average
 - Legal Hand – 2.6 attempts
 - Pro Bono / Non-Profit Lawyer – 2.6 attempts
 - Courts / court help center- 2.9 attempts
 - LawHelpNY – 2.9 attempts
 - 2-1-1 / 3-1-1 – 3 attempts
 - Church / Faith Community – 3 attempts
 - Public School – 3.2 attempts
 - Private / paid lawyer – 3.3 attempts

- Public Library – 3.3 attempts
 - Family / friends – 3.5 attempts
 - Online / Google search – 7.4 attempts
- The sources of assistance respondents indicated were *most helpful* were:
 - Family / friends – 303 (33%)
 - Private / paid lawyer – 160 (18%)
 - Online / Google search – 93 (10%)
 - Pro Bono / Non-Profit lawyer – 84 (9%)
 - Courts / court help center – 56 (6%)
 - LawHelpNY – 54 (6%)
 - Legal Hand – 46 (5%)
 - Church / Faith Community – 41 (5%)
 - 2-1-1 / 3-1-1 – 23 (3%)
 - Pro Bono Clinic – 19 (2%)
 - Public Library – 19 (2%)
 - Other – 11 (1%)
 - Public School – 6 (1%)
- Respondents with higher household incomes were more likely to consider LawHelpNY the most helpful source of assistance (54 responses).
- Private and paid lawyers were more likely to be indicated as the most helpful source for households ONYC and households with higher incomes.
- LawHelpNY was more likely to be indicated as a source of assistance as well as the most helpful source of assistance for households ONYC than households in NYC.
- **Respondents who did not seek assistance were those with the lowest household income.**
 - 47% of respondents who did not seek assistance had annual household income of \$50,000 or less.
 - The distribution of household income for those who sought assistance was nearly uniform across all income categories; however, *those who did not seek assistance were overwhelmingly those respondents with the lowest household income.*
- **Local community stakeholders and organizations are important for people who have low incomes, may not understand legal paperwork, and may have certain disabilities.**
 - Online Search / Google Search was among the top 5 sources of help for each demographic group. Those with particularly low incomes, those who don't understand legal paperwork, and those who have certain disabilities such as blindness or difficulty making decisions will sometimes also turn to the Church / Faith Communities, demonstrating the importance of local community stakeholders as credible sources of information and potential sources of assistance within the community.
- **People may not identify the issue(s) that they are experiencing as a legal issue.**
 - Of the people who sought assistance, approximately 16% did not seek help from a

- lawyer because they did not think their issue was a legal issue.
- 32% did not seek help from a lawyer because they could not afford a lawyer.
 - For those who did not think the issue was a legal issue, and the matter they identified was a civil legal issue, nearly all instances involved consumer debt cases (with a few immigration and family law matters). This finding reinforces that people often experience life issues which are not identified as legal issues.
- **When asked what would be helpful, most respondents indicated that information and resources that could be provided by people other than lawyers would empower them to advocate for themselves and resolve the circumstances.**
 - The 5 most frequently identified things respondents thought would be more helpful were:
 - Help with my finances / budget – 122 (22%)
 - Clear and simple instructions – 83 (15%)
 - A lawyer to help me – 83 (15%)
 - An easy way to know who in my community could help me – 77 (14%)
 - Help talking to the other side – 60 (11%)

See **Exhibit A** for detailed metrics related to the New York Resident Survey.

Quantitative Analysis

- **NYC grantees handle more Family Law and Consumer Debt cases as a percentage of Family Law and Consumer Debt case filings than Outside NYC (ONYC) grantees.**
 - The data demonstrates a significant gap between the number of people facing civil legal issues and the number of people served by grantees. The data also indicates significant requests for assistance related to issues adjacent to civil legal issues. The frequency and concentration of issues does appear to vary geographically and by matter / issue type across the state.
 - There is a disproportionate gap between case filings and grantee cases in Family Law and Consumer Debt matters between NYC and ONYC.
 - NYC grantee cases as a % of Family Law case filings was 12.7%, and ONYC grantee cases as a % of Family Law case filings was 5.2%, indicating that NYC grantees are providing services more than twice as frequently in Family Law matters than ONYC grantees.

A similar geographic difference was observed in Consumer Debt. NYC grantee cases as a % of Consumer Debt case filings was 18.7%, and ONYC grantee cases as a % of Consumer Debt case filings was 11.6%.

- **New Yorkers are often seeking assistance with life issues rather than legal issues as evidenced by a significant number of Landlord-Tenant case filings compared to a nominal number of 2-1-1 requests for assistance in Landlord-Tenant matters.**
 - Statewide, approximately 93.2% (194,330) of Housing case filings were for Landlord-Tenant matters.

- ONYC, there were 116,640 2-1-1 requests for assistance related to Housing. Of these, only 6,610 (5.7%) were for Landlord-Tenant issues, which may be indicative of New Yorkers seeking assistance for *life issues* rather than *legal issues*. This notion is further demonstrated by the approximately 44,000 2-1-1 requests for assistance related to Shelters and approximately 39,400 requests for assistance related to Rent Assistance.
- **New Yorkers are seeking assistance with Family-Support issues from online legal resources; IOLA grantees close few family support cases.**
 - There were 539,509 Family Law case filings statewide. Of the Family Law case filings, the most common type of filing was Family-Support (approximately 32.3% of Family Law case filings).
 - However, Family-Support was the least frequent sub-category in the Family area of need for IOLA grantee cases (534 cases in statewide).
 - After “Other Family Matters,” Family-Support was the most frequent sub-category for LawHelpNY (LHNY) page views (4,861 page views) and LHNY page visitors (2,638).
- **Administrative proceedings, such as those related to public benefits matters, can be complex and require the specialized knowledge of a paralegal or attorney.**
 - Income Maintenance was the second most frequent IOLA grantee case type (after Housing) with 51,779 IOLA grantee matters and the fourth most frequent 2-1-1 request for assistance (74,330 requests). The magnitude and frequency of Income Maintenance requests for assistance and IOLA grantee cases may be a function of the complex nature of these administrative proceedings.

See **Appendix B** for additional observations from the Quantitative Analysis.

Subject Matter Focus Groups

Many observations from the Subject Matter Focus Groups were consistent with the key observations noted above. Provided below are observations from the Subject Matter Focus Groups that were particularly unique to the particular subject matter discussed.

- **Housing**
 - The opportunity to develop tools, resources and information to assist individuals prior to a housing case being filed to assist with pre-filing resolution, when possible
 - The importance of informing the public about changes to housing laws with reliable, credible and consistent information
 - The importance of partnership and collaboration with and among government services that respond to housing instability, including those providing rental assistance
 - The opportunity for technology tools to assist tenants in filing cases for claims of substandard housing conditions
 - The value of housing court decisions and the opportunity to develop tools that can promptly inform attorneys across the state regarding recent, relevant housing court decisions

- The opportunity to develop tools, technology or processes to assist with the recertification process for subsidized housing
- The opportunity to leverage and scale recently-developed tools and technology designed for elements of housing cases or housing instability (such as [JustFix](#) and [Heat Seek](#))
- Consumer Debt
 - The opportunity to assist legal services providers with investments in certain case management platforms and software licenses, particularly for consumer bankruptcy matters
 - Recognizing the significant rates of default in consumer debt cases (for example, estimated to be 90% in Rochester City Court), the importance of providing clearer information to defendants regarding the necessary steps in the court process (especially the need to file answers) and the consequences of inaction
- Family
 - The opportunity to learn from the current use of guided forms in family law matters and seek expansion of the use of guided forms in other family law matters
 - The importance of partnership with the family courts to develop effective responses for the variety of family law matters and client needs
 - The importance of appreciation that family law clients may be involved in several matters that will require coordinated responses
- Immigration
 - The opportunity for technology tools to assist individuals in filing immigration documents
 - The opportunity to develop training tools and materials to enable more certifications for civil surgeons as well as for persons certified to complete forensic psychiatric evaluations
 - The opportunity to develop training, tools and resources related to Special Immigrant Juveniles (SIJ) in partnership with the Family Court
 - The opportunity to develop technology training to assist clients as they learn to use technology platforms required to interact with various social systems (legal, government, education, healthcare, etc.)
 - The opportunity to coordinate materials and information used in advocacy (such as country conditions reports)
 - The opportunity to create tools to enable pro se clients to effectively conduct FOIA requests
 - The importance of having technology and processes that enable rapid response to urgently changing circumstances
 - The importance of WhatsApp as a tool for communicating with clients
- Income Maintenance
 - The opportunity to improve access to medical records for SSI and SSD applications
 - The opportunity to invest in privacy pods enabled with technology, placed in the community and with grantees, to provide safe and secure places with human assistance for clients to access the courts using technology (Social Security and OTDA hearings are now primarily conducted remotely).

Engagement with New York State and National Justice Stakeholders

- The opportunity to create a single common organization or resource that you can call, chat, or email that is also mobile-enabled and can provide both information and referral (based on available capacity)
 - While also the need to appreciate that a single point of entry for all users is not feasible; instead ensuring that all points of entry have the necessary information to assist people navigate to consistent, reliable, effective information
 - The importance of adequate staffing to ensure information collection can be timely, comprehensive and accurate, even when systems of data collection are developed and implemented
 - The importance of shared and clear responsibility and accountability for stakeholders involved in coordinated systems of information and referral
- The opportunity to use journey mapping methodologies in the design and development of tools that may be valuable throughout various civil legal processes
- The importance of user-centered design techniques to develop civil justice innovations
- The importance of comprehensive, strategic data collection to continue to inform iterative design and refinement (as well as strategic advocacy for other supportive resources)
- The opportunities associated with generative AI to assist with civil legal issues
- The importance of plain, simple language in all forms and content
- The importance of appreciating that New Yorkers view legal assistance as an extension of social services
- The importance of enabling trusted community members and organizations who are often the initial places where people go to seek help
- The need for more coordination of resources and organizations
- The opportunity to use place-based, assisted justice access points and technology (e.g., kiosks, privacy pods, technology pods, etc.)
- The importance of allocating sufficient time and resources to ensure an effective user experience
- The importance of access to court files and documents to empower people to navigate civil legal issues
- The value of having a resource people can use to securely store information related to their civil legal and other life issues
- The importance of developing a pervasive sense of awareness of a single organization or resource that can provide effective assistance and referral (based on available capacity)
- The importance of institutional protection for client data even if / when consent is requested and provided

Appendix A

Detailed metrics from the New York Resident Survey conducted in June 2024 (as well as the survey instrument).

- 740 respondents indicated they experienced a civil or administrative legal issue and sought help; 235 respondents indicated they experienced a civil or administrative legal issue and did not seek assistance.
 - Respondents that Did Not Seek Assistance
 - 139 respondents (59%) were between the age of 18 and 44 and 96 (41%) were over the age of 44.
 - Matter types among respondents who did not seek assistance:
 - Consumer debt (94, 40%)
 - Motor vehicle (44, 18.7%)
 - Public benefits / fair hearing (43, 18.3%)
 - Child support (40, 17%)
 - SSI / SSD reconsideration (36, 15.3%)
 - Eviction (32, 13.6%)
 - 70% of respondents had annual household income of \$50,000 or less.
 - Respondents that Sought Assistance
 - 500 respondents (68%) were between the age of 18 and 44 and 240 (32%) were over the age of 44.
 - Of respondents who sought help, 63% resided ONYC and 37% resided in NYC.
 - 68% of ONYC respondents sought help with family law matters compared to 42% of NYC respondents.
 - Matter types among respondents who sought assistance
 - Consumer debt (264, 35.7%)
 - Motor vehicle (194, 26.2%)
 - Public benefits / fair hearing (143, 19.3%)
 - Eviction (123, 16.6%)
 - Child support (114, 15.4%)
 - SSI / SSD reconsideration (109, 14.7%)
 - Disputes with government offices (ONYC and NYC) – Of those respondents who sought assistance with a dispute involving a government office:
 - 61% of respondents living in NYC sought help with Public Benefits / Fair Hearings compared to 41% of respondents living ONYC.
 - 25% of respondents living in NYC sought help with SSI / SSD Reconsideration compared to 47% of respondents living ONYC.
 - 24% of respondents living in NYC sought help with Employment Complaints compared to 32% of respondents living ONYC.
 - 15% of respondents living in NYC sought help with Public Accommodations compared to 21% of respondents living ONYC.

- 47% of respondents had annual household income of \$50,000 or less.
- Sources where respondents *sought* assistance:
 - Family / friends – 494 (29.9%)
 - Online / Google search – 243 (14.7%)
 - Private / paid lawyer - 184 (11.1%)
 - Courts / court help center – 135 (8.2%)
 - Pro Bono / Non-Profit lawyer – 125 (7.6%)
 - LawHelpNY – 99 (6%)
 - Legal Hand – 81 (4.9%)
 - Church / Faith Community – 76 (4.6%)
 - Public Library – 59 (3.6%)
 - 2-1-1 / 3-1-1 – 54 (3.3%)
- Sources of assistance and geography
 - Family / Friends - 68% NYC respondents and 66% ONYC respondents
 - Online Search / Google - 30% NYC respondents and 36% ONYC respondents
 - Courts / Help Center - 19% NYC respondents and 19% ONYC respondents
 - Private / Paid Lawyer - 17% NYC respondents and 29% ONYC respondents
 - Pro bono / Non-profit Lawyer - 13% NYC respondents and 20% ONYC respondents
 - 211 / 311 - 11% NYC respondents and 6% ONYC respondents
 - Legal Hand - 9% NYC respondents and 12% ONYC respondents
 - LawHelpNY - 8% NYC respondents and 17% ONYC respondents
 - Public School - 1% NYC respondents and 6% ONYC respondents
- Sources of assistance respondents identified as requiring the *fewest attempts*:
 - Pro Bono Clinic – 2.5 attempts on average
 - Legal Hand – 2.6 attempts
 - Pro Bono / Non-Profit Lawyer – 2.6 attempts
 - Courts / court help center- 2.9 attempts
 - LawHelpNY – 2.9 attempts
 - 2-1-1 / 3-1-1 – 3 attempts
 - Church / Faith Community – 3 attempts
 - Public School – 3.2 attempts
 - Private / paid lawyer – 3.3 attempts
 - Public Library – 3.3 attempts
 - Family / friends – 3.5 attempts
 - Online / Google search – 7.4 attempts

- Sources of assistance respondents identified as *most helpful*:
 - Family / friends – 303 (33%)
 - Private / paid lawyer – 160 (18%)
 - Online / Google search – 93 (10%)
 - Pro Bono / Non-Profit lawyer – 84 (9%)
 - Courts / court help center – 56 (6%)
 - LawHelpNY – 54 (6%)
 - Legal Hand – 46 (5%)
 - Church / Faith Community – 41 (5%)
 - 2-1-1 / 3-1-1 – 23 (3%)
 - Pro Bono Clinic – 19 (2%)
 - Public Library – 19 (2%)
 - Other – 11 (1%)
 - Public School – 6 (1%)

- Most helpful sources of assistance and geography
 - Family / Friends - 52% NYC respondents and 45% ONYC respondents
 - Private / Paid Lawyer - 18% NYC respondents and 29% ONYC respondents
 - The frequency of this response is correlated to household income (more frequent for higher income levels)
 - Households with annual incomes of \$80,001 - \$100,000 identified Private / Paid Lawyer as the most helpful source of assistance
 - Online Search / Google - 16% NYC respondents and 14% ONYC respondents
 - Pro bono / Non-profit Lawyer - 10% NYC respondents and 15% ONYC respondents
 - Courts / Help Center - 7% NYC respondents and 10% ONYC respondents
 - Legal Hand - 6% NYC respondents and 8% ONYC respondents
 - 211 / 311 - 5% NYC respondents and 3% ONYC respondents
 - LawHelpNY - 5% NYC respondents and 10% ONYC respondents

- For respondents who indicated LawHelpNY was most helpful (54 responses), the distribution of household income:
 - 3% of households with no income
 - 2% of households with \$1 - \$10,000 in annual income
 - 0% of households with \$10,001 - \$20,000 in annual income
 - 2% of households with \$20,001 - \$30,000 in annual income
 - 2% of households with \$30,001 - \$40,000 in annual income
 - 7% of households with \$40,001 - \$50,000 in annual income
 - 8% of households with \$50,001 - \$60,000 in annual income
 - 10% of households with \$60,001 - \$70,000 in annual income
 - 12% of households with \$70,001 - \$80,000 in annual income
 - 20% of households with \$80,001 - \$100,000 in annual income

- The reasons respondents indicated they did not seek help from a lawyer included:
 - I could not afford a lawyer – 236 (41.9%)
 - It did not seem like a legal issue – 123 (21.8%)
 - I was not aware that there could be free lawyers – 100 (17.8%)
 - I've had bad experiences with lawyers in the past – 39 (6.9%)
 - I do not trust lawyers – 33 (5.9%)
 - Other – 32 (5.7%)

- The things respondents thought would be more helpful were:
 - Help with my finances / budget – 122 (22%)
 - A lawyer to help me – 83 (15%)
 - Clear and simple instructions – 83 (15%)
 - An easy way to know who in my community could help me – 77 (14%)
 - Help talking to the other side – 60 (11%)
 - Help with transportation to the courts or other appointments – 42 (8%)
 - A person to come with me to the court – 38 (7%)
 - Something that would help me create the forms I needed to provide – 27 (5%)
 - Help with childcare for my appointments – 15 (3%)
 - Other – 12 (2%)

- 86% of respondents indicate they can understand the language used in legal paperwork and meetings “Very well” or “Somewhat well.”

New York Resident Survey Instrument

Screening Questions²

1. In the last year have you been involved in one of these matters? (Select All)
 - Eviction
 - Foreclosure
 - Consumer Debt (such as credit card collections)
 - Immigration
 - Child Support
 - Custody
 - Paternity
 - Divorce
 - Guardianship
 - Motor Vehicle (such as disputed traffic tickets or license suspension)
 - Other (Please Describe)
 - Was not involved in any of these types of issues in the last year
2. Were you helped by a lawyer or legal services organization?
 - Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - I was not helped by a lawyer
3. In the last year have you been involved in a dispute involving a government office (see listing)? (Select All)
 - Public Benefits / Fair Hearing
 - SSI / SSD Reconsideration
 - Employment Complaint
 - Public Accommodation
 - Other (Please Describe)
 - Was not involved in any disputes with a government office in the last year
4. Were you helped by a lawyer or legal services organization?
 - Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - I was not helped by a lawyer

Substantive Questions

5. Did you seek help with the issue(s) you identified in the last year (even if you didn't receive help)? (Select All)
 - Yes
 - No³
6. If not, why not? (Select All)
 - I thought I could take care of it myself

² If a respondent did not experience any of the matters listed in Questions 1 or 3 or if they experienced a matter listed in Questions 1 or 3 and were assisted by a lawyer, the respondent exited the survey. The remaining respondents were people who experienced a matter listed in Questions 1 or 3 and were not assisted by a lawyer.

³ The survey limited the number of “No” responses to this question to 235.

- I did not trust others to help me
 - I could not afford any assistance
 - I was not aware of any free assistance
 - Other (Please Describe)
7. If so, from who did you seek help? (Select All)
- Family / Friends
 - Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - Online Search / Google Search
 - LawHelpNY
 - 2-1-1 / 3-1-1
 - Public Library
 - Church / Faith Community
 - Public School
 - Courts / Court Help Center
 - Legal Hand
 - Pro Bono Clinic
 - Other (Please Describe)
8. Of those, which were able to help you with your problem? (Select All)
- Family / Friends
 - Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - LawHelpNY
 - 2-1-1 / 3-1-1
 - Public Library
 - Church / Faith Community
 - Public School
 - Courts / Court Help Center
 - Legal Hand
 - Pro Bono Clinic
 - Other (Please Describe)
9. For each, how many attempts did you make to seek help?
- Family / Friends
 - Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - LawHelpNY
 - 2-1-1 / 3-1-1
 - Public Library
 - Church / Faith Community
 - Public School
 - Courts / Court Help Center
 - Legal Hand
 - Pro Bono Clinic
 - Other (Please Describe)
10. Which were most helpful?
- Family / Friends

- Private / Paid Lawyer
 - Pro Bono / Non-Profit Lawyer
 - LawHelpNY
 - 2-1-1 / 3-1-1
 - Public Library
 - Church / Faith Community
 - Public School
 - Courts / Court Help Center
 - Legal Hand
 - Pro Bono Clinic
 - Other (Please Describe)
11. If you did not seek help from a lawyer, why not? (Select All)
- It did not seem like a legal issue
 - I do not trust lawyers
 - I could not afford a lawyer
 - I was not aware that there could be free lawyers
 - I've had bad experiences with lawyers in the past
12. Were you satisfied with the outcome?
- Yes
 - Not exactly what I was hoping for, but I'm ok with the outcome
 - No
 - Other (Please Describe)
13. If not, what would have been helpful? (Select All)
- A lawyer to help me
 - Clear and simple instructions on what I needed to do
 - Something that would help me create the forms I needed to provide
 - An easy way to know who in my community could help me
 - Help with my finances / budget
 - Help with transportation to the courts or other appointments
 - Help with child care for my appointments
 - Help talking to the other side
 - A person to come with me to court
 - Other (Please Describe)

Demographic Questions

14. Zip Code of Residence (Numerical 5 Digits)
15. Age (Numerical; Minium of 18)
16. Gender
- Man
 - Woman
 - Transgender Man
 - Transgender Woman
 - Agender / I don't identify with any gender
 - Non-Binary
 - Gender Not Listed

- Prefer not to answer
17. Race / Ethnicity (Select All)
- American Indian/Alaskan Native
 - Asian
 - Black or African American
 - Native Hawaiian or Other Pacific Islander
 - White
 - Two or More Races
 - Ethnicity - Hispanic/Latino/Latina/Latine/Latinx
 - Prefer not to answer
18. Sexual Orientation
- Straight or heterosexual
 - Lesbian, gay, or homosexual
 - Bisexual
 - Queer
 - Asexual
 - Don't know
 - Another
 - Prefer not to answer
19. Education
- No Schooling Completed
 - Did Not Complete High School
 - Completed High School; No Further Education
 - Completed Some Education After High School
 - Completed an Education Program Other than a College Degree
 - Completed a Bachelor Degree Program in College
 - Some Education After College
 - Completed a Master's or Doctorate Degree Program
20. Disability (Select All)
- Blind
 - Deaf
 - Physical, mental, or emotional condition, causing serious difficulty concentrating, remembering, or making decisions
 - Serious difficulty walking or climbing stairs
 - Difficulty dressing or bathing
 - Physical, mental, or emotional condition, causing difficulty doing errands alone such as visiting a doctor's office or shopping
21. Annual Household Income
- \$0 (No Income)
 - \$1 - \$10,000
 - \$10,001 - \$20,000
 - \$20,001 - \$30,000
 - \$30,001 - \$40,000
 - \$40,001 - \$50,000
 - \$50,001 - \$60,000
 - \$60,001 - \$70,000

- \$70,001 - \$80,000
- \$80,001 - \$90,000
- \$90,001 - \$100,000
- \$100,000+

22. How well can you understand the language used in legal paperwork and meetings?

- Very well
- Somewhat well
- Not very well
- Not at all

Appendix B

Provided below is a brief summary of each data source reviewed and analyzed for the quantitative analysis:

- GAR – IOLA Grantee Data
 - IOLA Grantee Intakes Completed / Rejected / No Legal Benefit / Hotline Calls / Cases Closed
 - Data range – 2023
 - Geography – by county and each of the 7 geographic IOLA units
 - General description – Count of intakes completed by legal services organizations, cases rejected for service, clients for whom there was no legal benefit attained, the number of calls to legal aid hotlines, by geographic area, and cases closed

- LawHelpNY (LHNY)
 - LawHelpNY Website and Live Chat Data
 - Data range – 2023
 - Geography – by county in New York
 - General description – number of website views and unique users accessing information by legal topic area as well as number of chats by legal topic area

- OCA – Civil Court Filings
 - Data range analyzed – 2023
 - Geography – by county in New York
 - General description – number of civil legal filings by matter type and by court

- 2-1-1 Contacts
 - 2-1-1 Contact Counts
 - Data range – monthly, January 2019 to March 2024
 - Geography – statewide outside NYC
 - General description – number of calls to 2-1-1 by need/problem

- Housing Matters
 - 208,412 - court filings
 - 194,330 of these filings were for Landlord-Tenant cases
 - 99,383 - IOLA grantee cases
 - 43,212 - LHNY page views
 - 25,809 - LHNY page visitors
 - 170 – LHNY live chats
 - 116,640 - 2-1-1 requests for assistance (excluding NYC)
 - Approximately 44,000 requests for assistance related to Shelters
 - Approximately 39,400 requests for rent assistance
 - 6,610 requests related to Landlord-Tenant issues

- Family Matters
 - 539,509 court filings
 - 174,780 for Family – Support
 - 152,630 for Custody / Visitation
 - 67,721 for Family Offense
 - 48,526 for Divorce
 - 40,084 IOLA grantee cases
 - 534 IOLA grantee Family – Support cases
 - 5,852 IOLA grantee – Custody / Visitation cases
 - 33,303 LHNY page views
 - 4,861 LHNY page views for Family – Support
 - 4,578 LHNY page views for Custody / Visitation
 - 20,312 LHNY page visitors
 - 2,638 LHNY page visitors for Family – Support
 - 2,592 LHNY page visitors for Custody / Visitation
 - 486 LHNY live chats

- Consumer Matters
 - 97,278 court filings
 - 15,570 IOLA grantee cases
 - 12,002 LHNY page views
 - 7,070 LHNY page visitors

- Income Maintenance Matters
 - 74,330 requests for assistance from 2-1-1
 - 51,779 IOLA grantee cases

- Other Significant ONYC 2-1-1 Requests for Assistance
 - Education – 76,325
 - 11,600 IOLA grantee Education cases ONYC
 - 6,638 IOLA grantee Educations cases in NYC
 - Healthcare – 70,305
 - Employment – 10,490

Figure 1 - IOLA Grantee Cases by Case Type - 2023

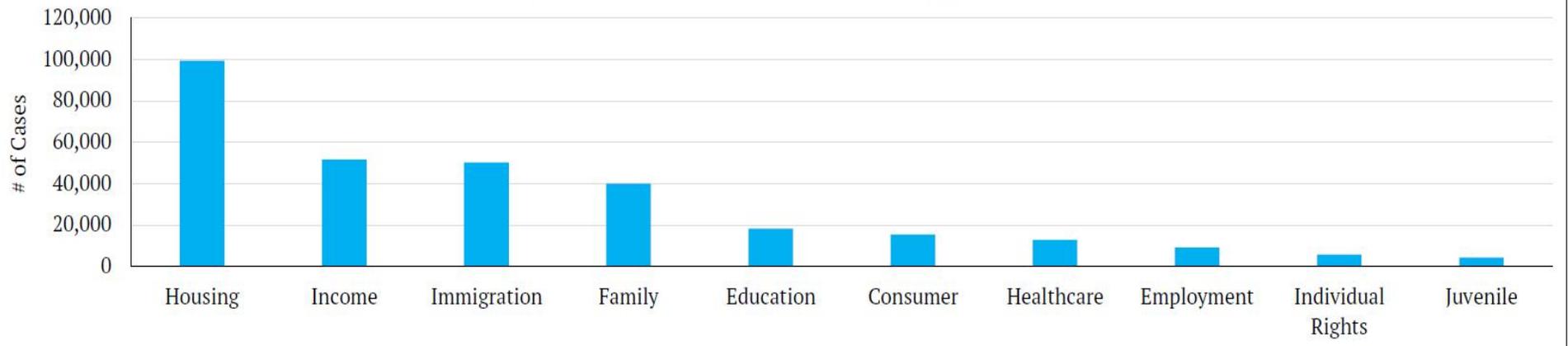
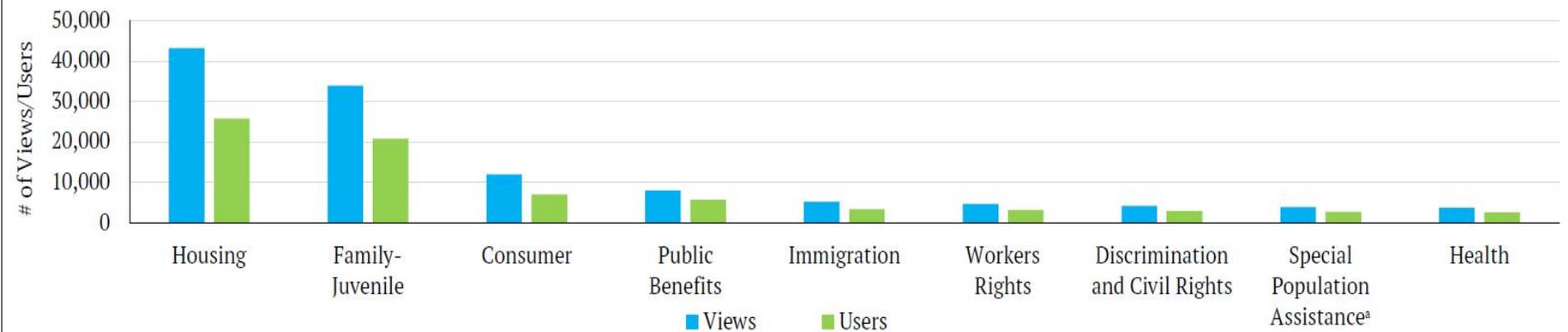


Figure 2 - Website Views and Users by Case Type - LHNY - 2023



[a] Special Population Assistance includes helping seniors, veterans, crime victims, and people with physical and mental health disabilities connect to services, advocacy and support groups.

Figure 3 - LiveHelp Chats - LHNY - 2023

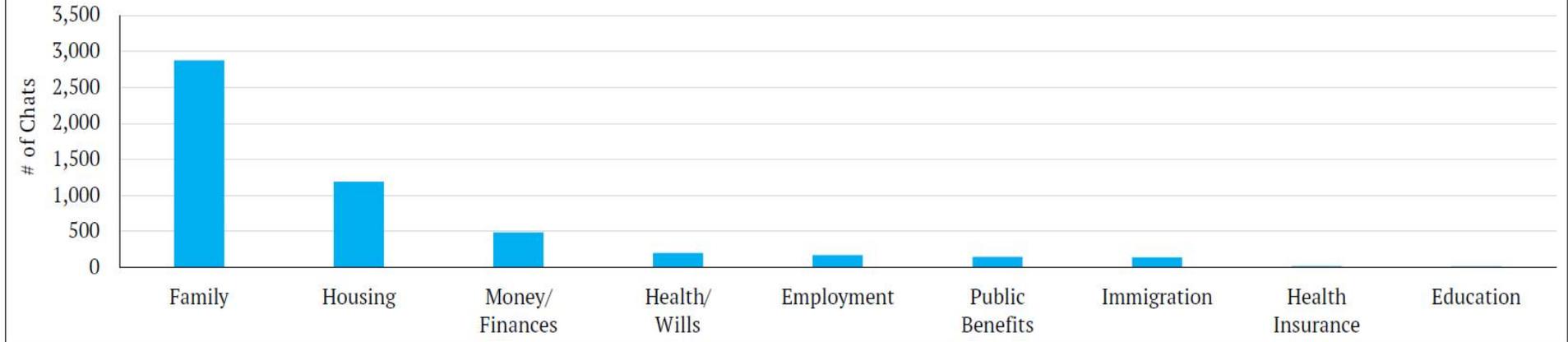
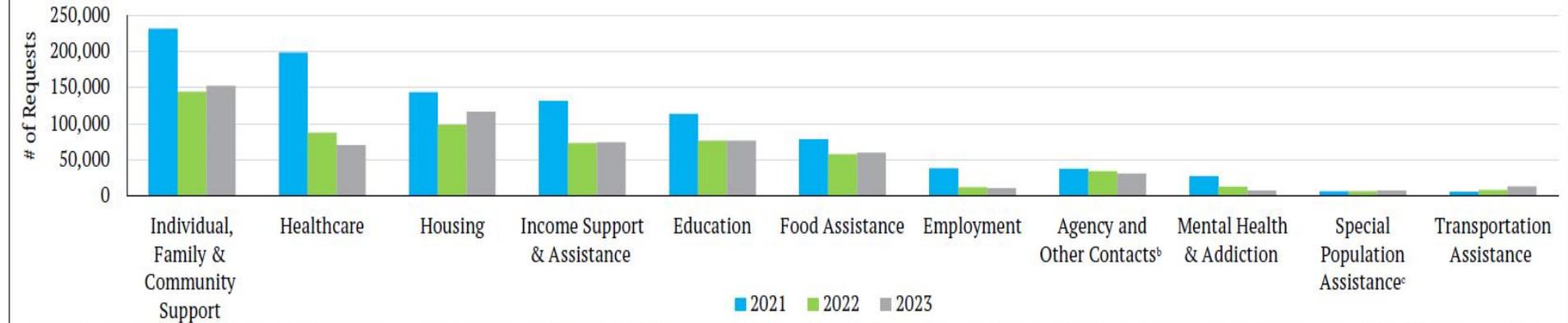


Figure 4 - 211 Requests by Area of Need by Year - 2021 - 2023^a

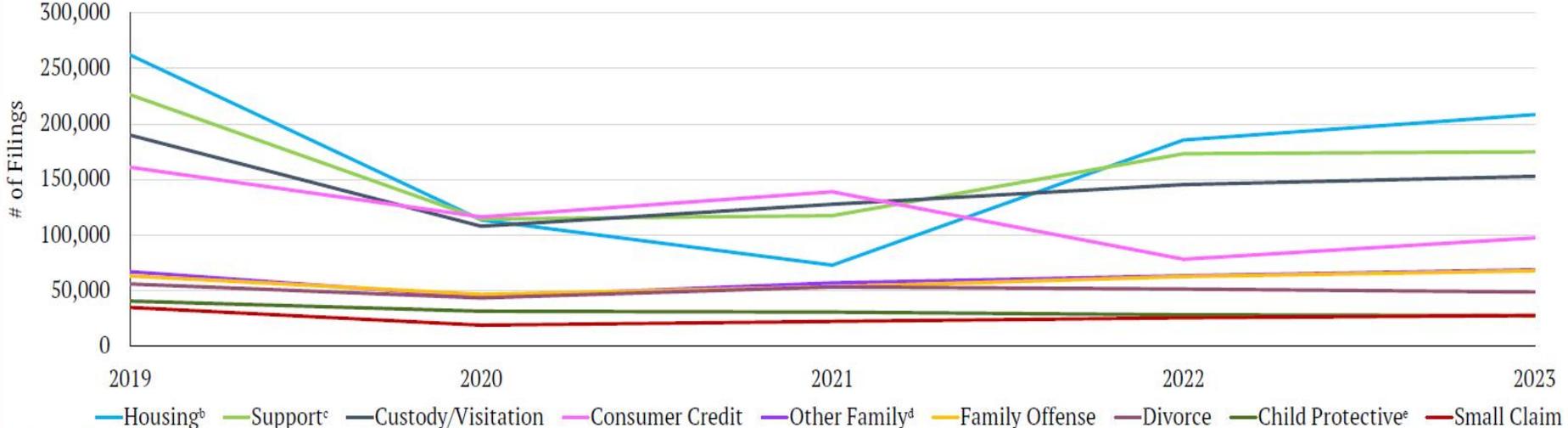


[a] 211 Requests do not include New York City 311 contacts. Refer to "Aggregated Analysis of GAR, 211, LawHelpNY, and OCA Filing Data - Statewide - 2023" for the number 211 requests for Family Law, Child and Family Support Services, and Immigration.

[b] 211 Requests for Agency and Other Contacts includes assists with reaching agencies, getting contact information for government services and legal organizations.

[c] 211 Requests for Special Population Assistance includes helping seniors, veterans, crime victims, and people with physical and mental health disabilities connect to services, advocacy and support groups.

Figure 5 - Case Filings by Case Type by Year - 2019 - 2023^a



[a] New York State Unified Court System Caseloads Trends Dashboard.

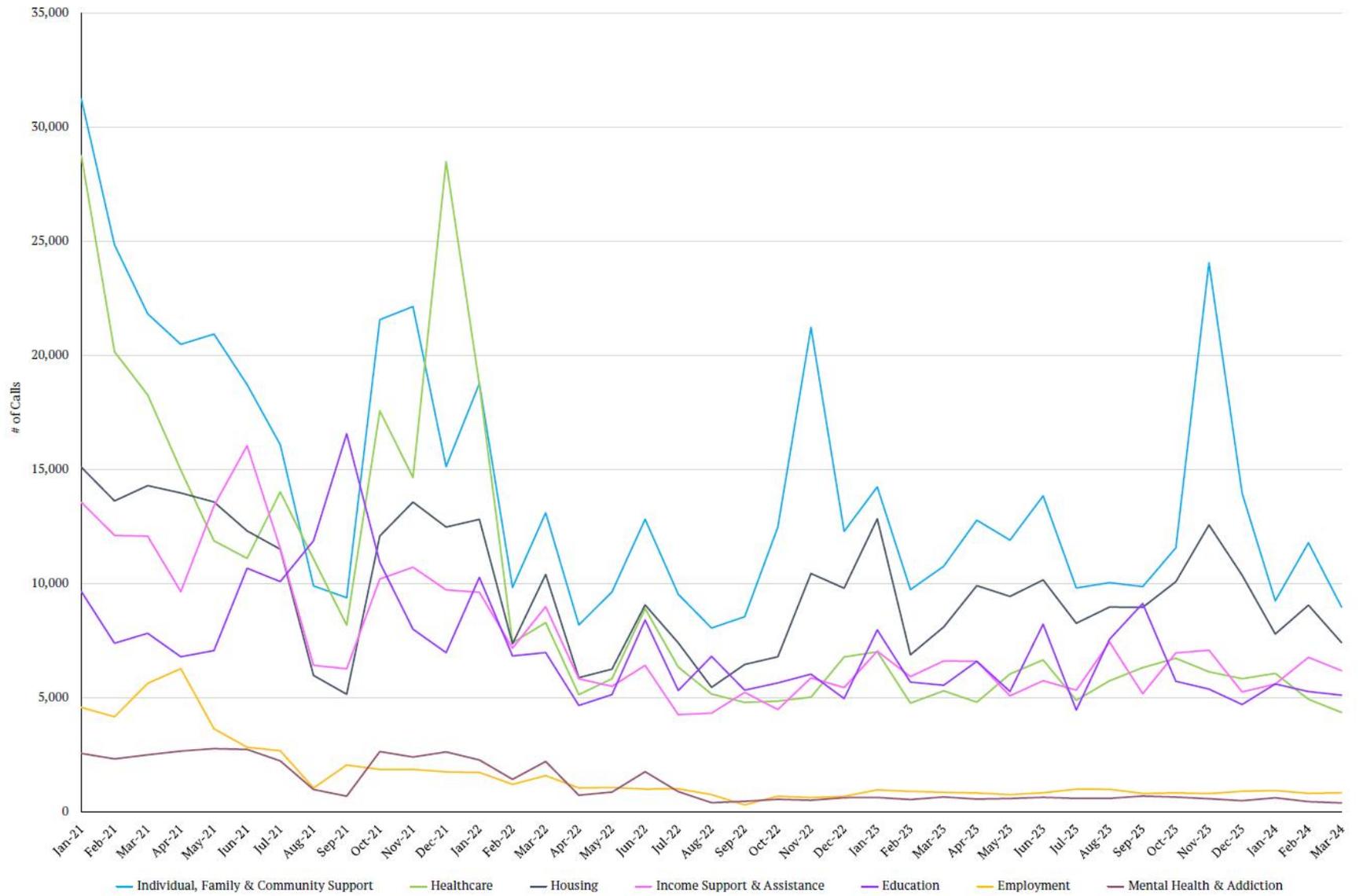
[b] Housing cases include evictions and "other housing" cases.

[c] Support cases include Paternity, Support, and Uniform Interstate Family Support cases.

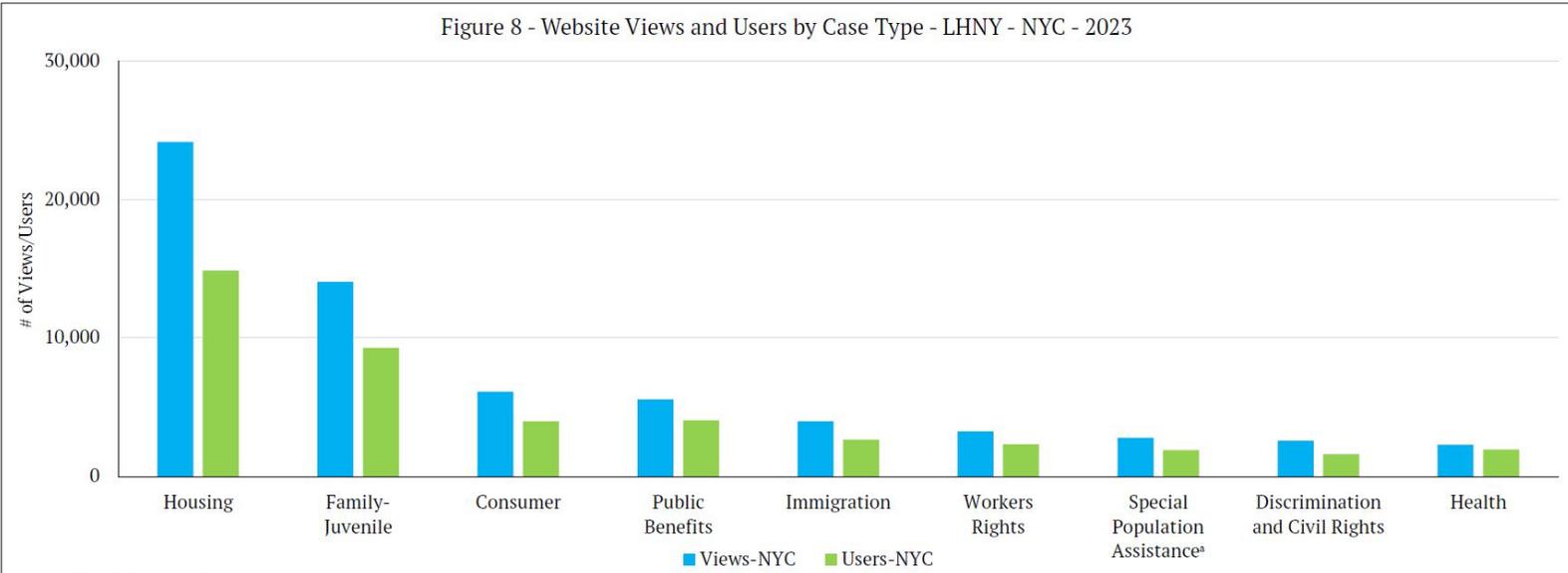
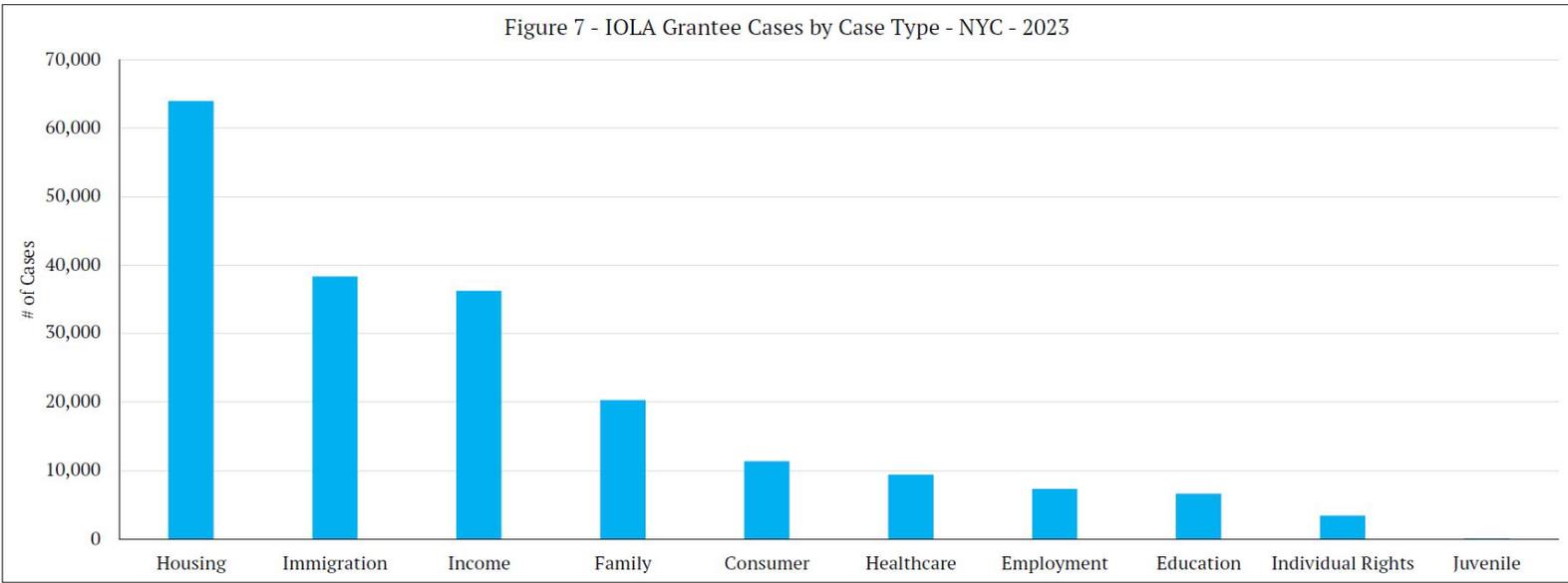
[d] Other Family cases include Adoption, Foster Care, Guardianship, Juvenile, Permanency Hearings, Termination of Parental Rights, and "Other Family" cases.

[e] Child Protective cases include abuse and neglect cases.

Figure 6 - 211 Requests by Area of Need by Month - January 2021 - March 2024^a

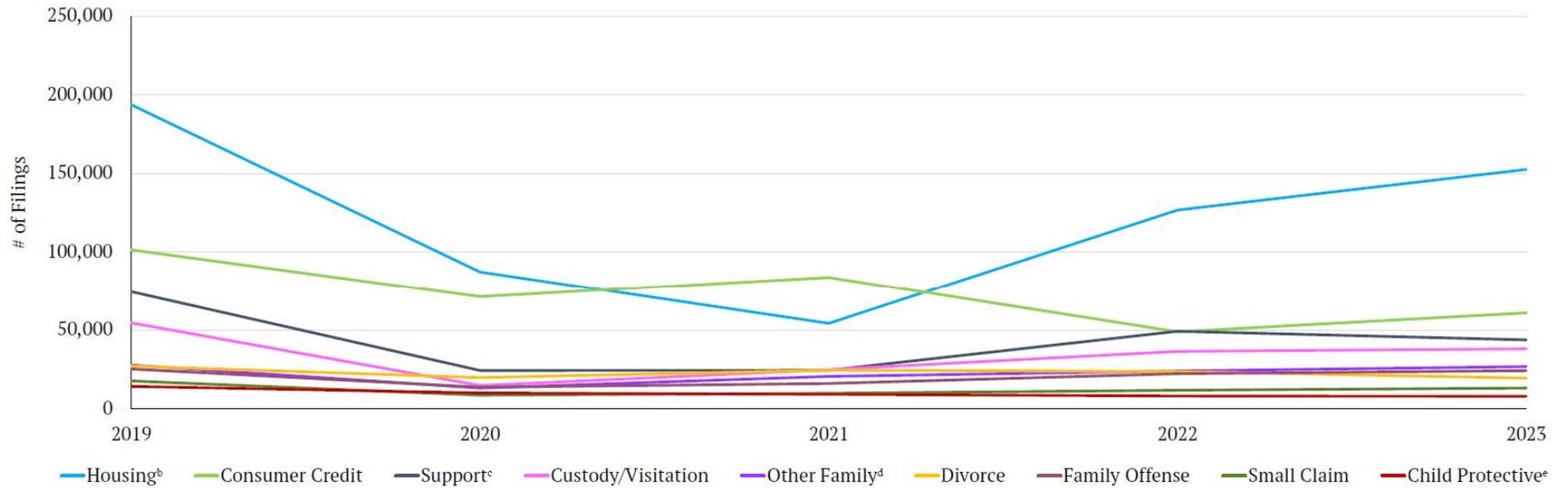


[a] There is no monthly 211 Request data for Special Population Assistance, Transportation Assistance, Family Law, Immigration, Child and Family Support, Food Assistance, and Agency and Other Contacts.



[a] Special Population Assistance includes helping seniors, veterans, crime victims, and people with physical and mental health disabilities connect to services, advocacy and support groups.

Figure 9 - Case Filings by Case Type by Year - NYC - 2019 - 2023^a



[a] New York State Unified Court System Caseloads Trends Dashboard.

[b] Housing cases include evictions and "other housing" cases.

[c] Support cases include Paternity, Support, and Uniform Interstate Family Support cases.

[d] Other Family cases include Adoption, Foster Care, Guardianship, Juvenile, Permanency Hearings, Termination of Parental Rights, and "Other Family" cases.

[e] Child Protective cases include abuse and neglect cases.

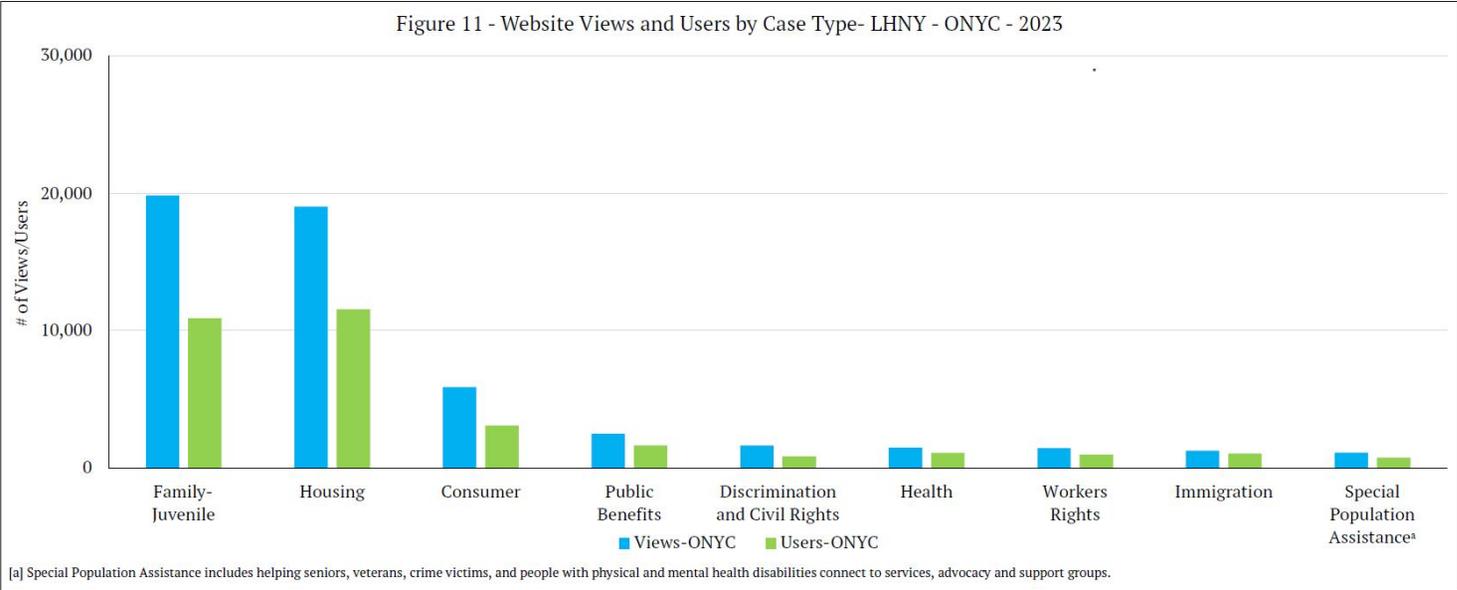
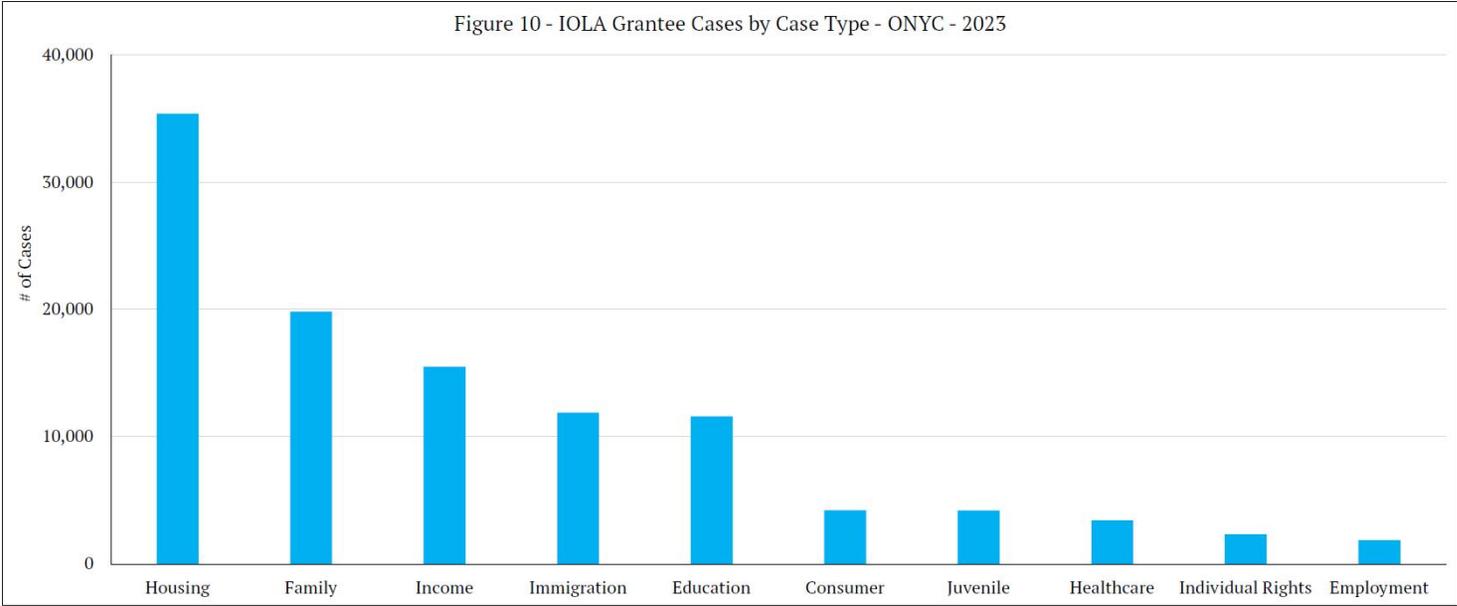
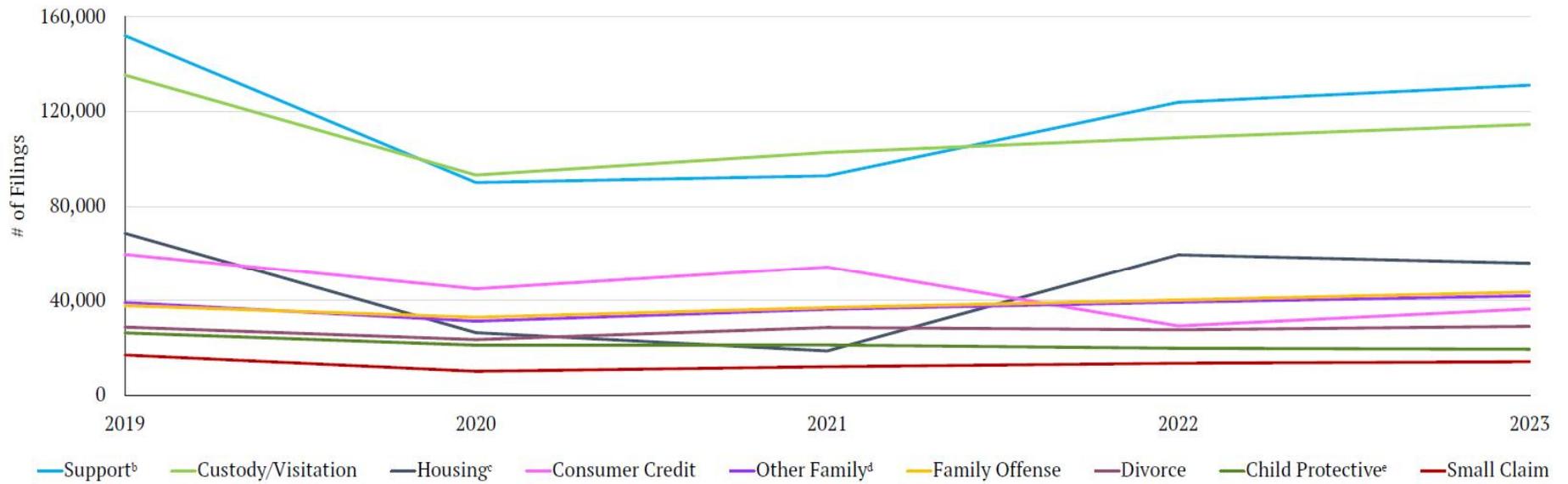


Figure 12 - Case Filings by Case Type by Year - ONYC - 2019 - 2023^a



[a] New York State Unified Court System Caseloads Trends Dashboard.

[b] Support cases include Paternity, Support, and Uniform Interstate Family Support cases.

[c] Housing cases include evictions and "other housing" cases.

[d] Other Family cases include Adoption, Foster Care, Guardianship, Juvenile, Permanency Hearings, Termination of Parental Rights, and "Other Family" cases.

[e] Child Protective cases include abuse and neglect cases.

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 **Preliminary Description of Project Vision (September 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, review information and analyze data.

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

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, integrated model that can continually evolve into a single-stop resource for critical and complex life problems, including legal problems. It will seek to amplify current resources, integrate platforms, enhance functionality, and coordinate among stakeholders. IOLA is mindful that various information and referral mechanisms for legal and social organizations have been developed and launched in recent years. 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 this function as the first action step. Grantees would be encouraged to direct clients to it for intake, screening and referral services, thus serving as a statewide, centralized intake for participating grantee organizations.

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 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:

- 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

JOE

Scenario

Joe has received an eviction complaint from his landlord, and does not know what to do next. He has never sought legal services before, and he cannot afford an attorney.

User Actions & Expectations

- Call 211 to ask for help finding a housing lawyer
- Get referred to a legal service provider
- Get help from a legal advocate

Calling 211

1. Joe searches the internet for “eviction help late rent” and sees that he can call 211.
2. Joe calls 211 and explains his problem.
3. The 211 operator asks Joe to hold while they connect him to an intake specialist with coordinated screening and intake.

Coordinated Screening and Intake Process

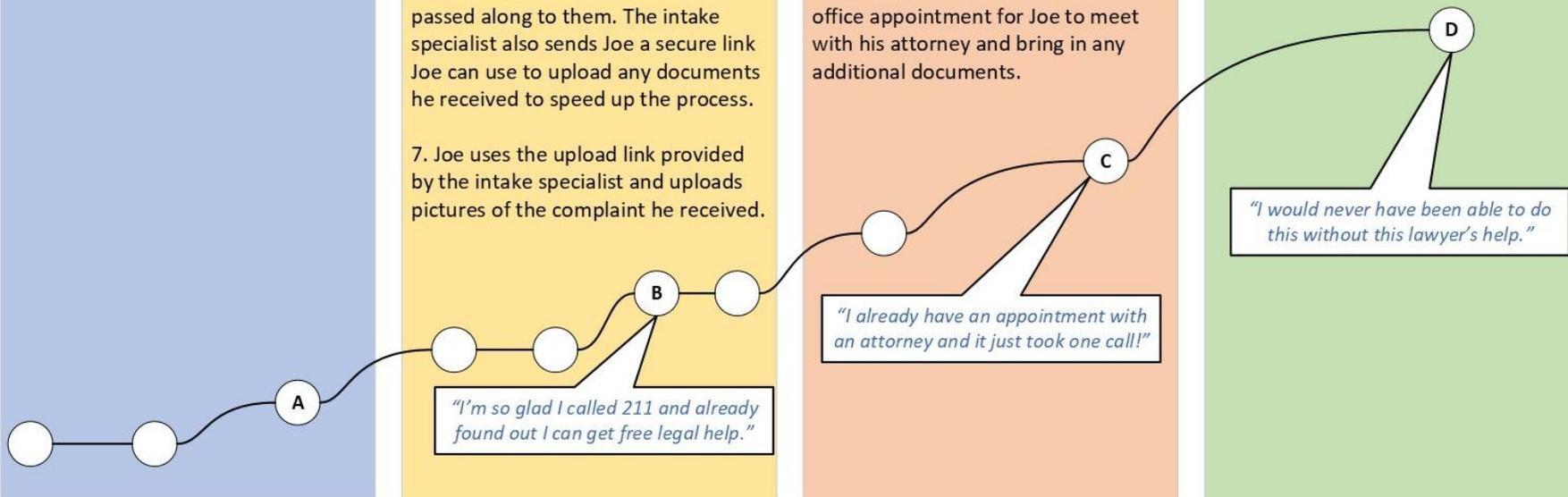
4. The 211 operator tells Joe that they have an intake specialist on the line and hands off the call.
5. The intake specialist asks Joe questions about his situation and creates an intake for Joe in a case management system.
6. The intake specialist tells Joe that an LSO in his area is taking eviction cases and that his information will be passed along to them. The intake specialist also sends Joe a secure link Joe can use to upload any documents he received to speed up the process.
7. Joe uses the upload link provided by the intake specialist and uploads pictures of the complaint he received.

E-Transfer and Case Acceptance

8. The next day Joe is contacted by a paralegal from an LSO that received his intake from coordinated screening and intake.
9. The paralegal asks Joe some questions to determine eligibility for their services and also supplementary questions about his situation. Because Joe meets the eligibility criteria, the paralegal tells Joe that they will be able to take his case and schedules an office appointment for Joe to meet with his attorney and bring in any additional documents.

Legal Help

10. Joe goes to the LSO’s office and meets with his attorney. The attorney gathers information about the case, makes copies of all the relevant documents, and tells Joe that he will prepare an answer to the complaint.



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

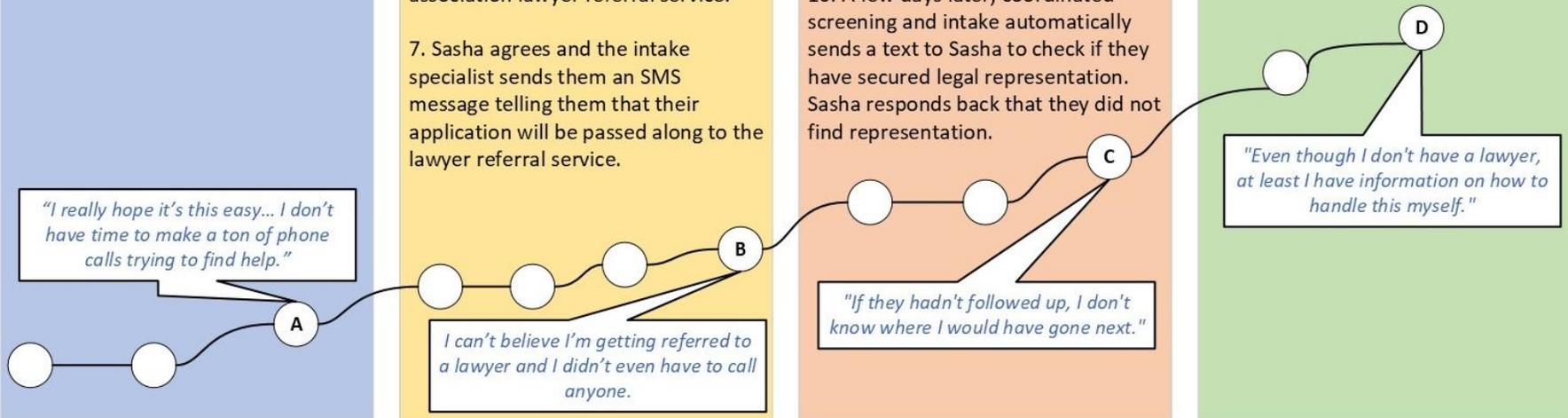
8. The next day Sasha is contacted via text message by the lawyer referral service to set up a screening call.
9. During the screening call, the referral service explains that it charges a \$100 screening fee in order to meet with an attorney. Sasha explains that they don't have \$100 to pay an attorney. 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

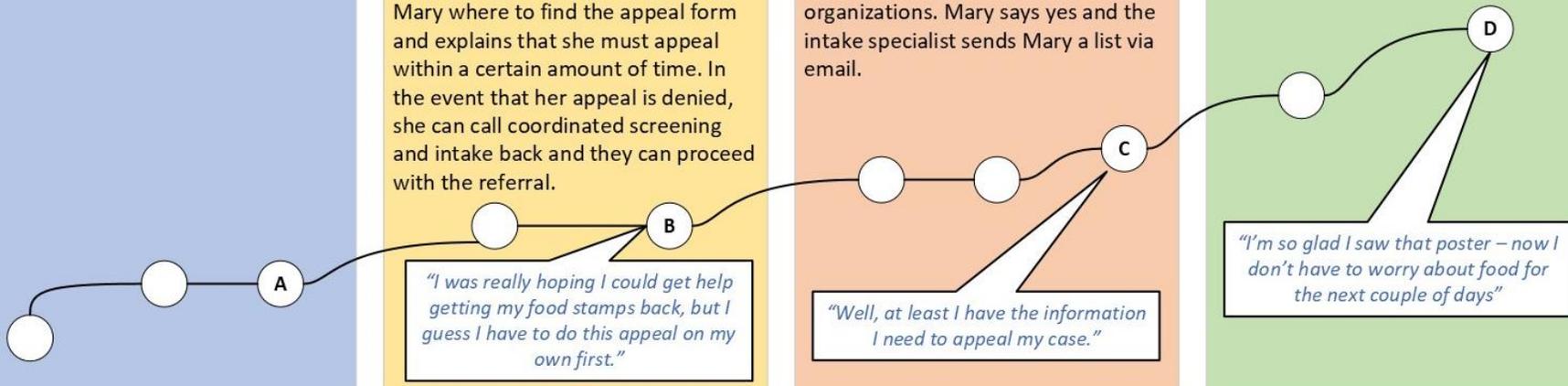
4. The intake specialist asks Mary questions about her situation and creates a pre-screen in the case management system to record her information. The intake specialist lets Mary know that if she needs to call back, all of the information Mary has shared, as well as any referrals made, will be stored 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

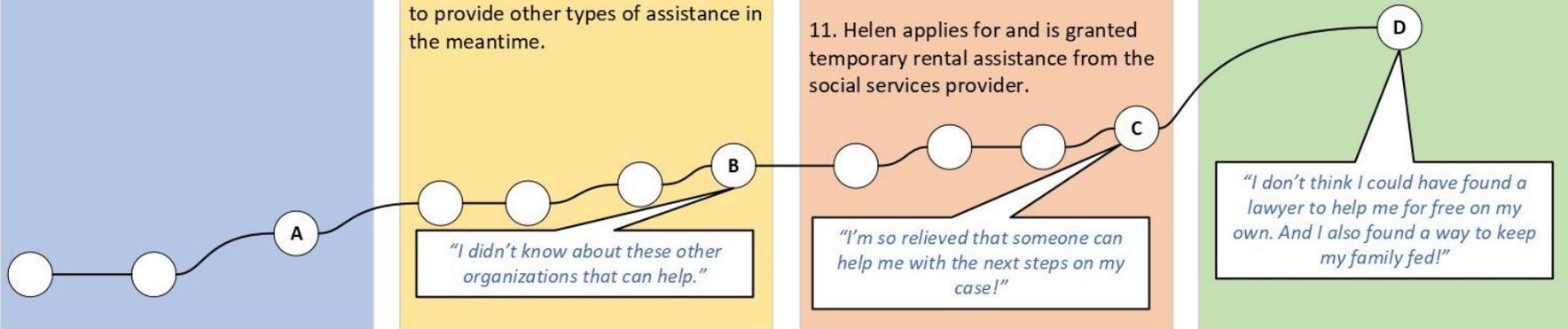
8. The next day Helen is contacted by a paralegal from an LSO that received her intake from coordinated screening and intake.
9. The paralegal asks Helen some questions to determine eligibility for their services. Because Helen meets the eligibility criteria, the paralegal tells her that they will be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



Interest on Lawyer Account Fund of the State of New York

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Justice Infrastructure Project Planned Activities for Phase 2 (September 2024 – March 2025)

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

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

1. Vision Presentation and Feedback (September - October 2024)

The preliminary observations and vision of the JIP will be made, initially, at the NYSBA Partnership Conference (September 25-26, 2024 in Albany, New York). At these presentations, IOLA will seek feedback from participants at the Partnership Conference regarding its preliminary observations and vision for the project. A recording of the presentation at the Partnership Conference will be available on IOLA’s website with an open invitation for further comment.

To further advance an inclusive process of continued dialogue and feedback, IOLA will host virtual feedback sessions, inviting its grantees, community-based organizations and all other stakeholders that participated in any of the JIP listening sessions, in-person or virtually.

During Phase 2 IOLA will continue to seek feedback from New York residents that have been involved in the civil justice system. IOLA will be intentional about seeking opportunities for residents to participate in the design and development elements of Phase 2 and will seek feedback from residents regarding relevant elements of Phase 2 (and later phases). As in Phase 1, Residents who provide feedback or participate in design and development will be offered compensation for their time and contribution.

2. Stakeholder Engagement (October - November 2024)

IOLA will seek feedback from targeted stakeholders regarding elements of the design of the vision for the project. This will include engagement with stakeholders that have completed projects with materially similar elements – such as coordinated intake, online scheduling, capacity-based referral, statewide call center operations, lawyer referral, public-facing generative AI, coordinated knowledge management, coordinated outreach, etc.

IOLA will also seek to engage with significant government funders (e.g., OCA, OTDA, ILS, etc.) to discuss potential data integrations, process integrations, or other shared objectives.

3. Advisory Committee Development (October 2024 – March 2025)

IOLA seeks continued involvement from stakeholders to inform the design and development of elements of the vision IOLA has developed through advisory committees. IOLA has identified a preliminary list of areas where experience and expertise from grantees, community-based organizations and other stakeholders may be particularly helpful. IOLA expects that these needs

will evolve over time as the project develops, with new areas for involvement added.

Advisory committees will function for defined time periods based on the design and development needs of the project. For each advisory committee, the scope will be defined, including the purpose of the committee, the expected time period for participation, the expected number of hours (per week) expected for active participation, and a description of the expected activities and deliverables (if any) of the committee. Members of each advisory committee will be compensated for their involvement, based on the specific needs of each advisory committee.

- **Preliminary List of Expected Advisory Committees**
 - Statewide Support Functions (Outreach Materials, Training, Knowledge Management)
 - Data Strategies (Security, Privacy, Resiliency, Standards, Definitions)
 - User Interface (User Accounts, Language Access, Scheduling, Live Chat, AI)
 - External Inputs (Capacity-Based Referral, Data Integrations)
 - Function Integration (Call Center Operations, Mobile App)

During Phase 2, IOLA will identify and solicit participants for the expected Advisory Committees. As needed, IOLA will also develop guidance and materials to Advisory Committees when they are launched (expected in Phase 3).

4. Vision Refinement (November – December 2024)

Based on feedback from participants at the NYSBA Partnership Conference, virtual feedback sessions, survey responses, Advisory Committees and continued stakeholder engagement, IOLA will further revise and refine the JIP vision. IOLA plans to present the refined JIP vision to the IOLA Board at its December 2024 Board Meeting.

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

Based on feedback of listening session participants, residents, continued stakeholder engagement, and the input of the Advisory Committees, and subject to the direction of the IOLA Board, IOLA will engage non-profit and/or for-profit vendor(s) that can assist with the initial development of the refined vision. If necessary, IOLA will gather information about the proposed design elements or other key elements via New York State procurement tools. IOLA expects that its initial activities in Phase 2 will pertain to the development of Function A, the statewide support function (see accompanying *Preliminary Description of Project Vision*).

While elements of the statewide support function are being developed, IOLA may also seek vendors to assist with the preliminary phases of Function B, the statewide information and referral function, which may include a detailed assessment of the technical capabilities of certain existing platforms, such as 2-1-1, LawHelpNY, FindHelp, CareSuite, etc. Such assessments will identify integration opportunities as well as where additional investment would expand current functionality to achieve the vision of the JIP, which may lead to additional vendor engagement based on the identified needs.

2024 SCHEDULE

BOARD OF TRUSTEES MEETINGS

1st Quarter 2024

March 13, 2024

12:00 PM

IOLA Fund, NYC

2nd Quarter 2024

June 5, 2024

12:00 PM

IOLA Fund, NYC

3rd Quarter 2024

September 27, 2024

12:00 PM

IOLA Fund, NYC

4th Quarter 2024

December 17, 2024

4:00 PM

IOLA Fund, NYC

2024

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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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		

March

Su	M	Tu	W	Th	F	Sa
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10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

April

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21	22	23	24	25	26	27
28	29	30				

May

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

June

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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						

July

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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			

August

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

September

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					

October

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		

November

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

December

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				

- Jan 01** New Year's Day
- Jan 15** Martin Luther King Day
- Feb 10** Chinese New Year
- Feb 14** Valentine's Day
- Feb 14** Ash Wednesday
- Feb 19** President's Day
- Mar 11** Ramadan, 1st day
- Mar 17** St. Patrick's Day
- Mar 20** March equinox (GMT)
- Mar 31** Easter
- Apr 01** April Fool's Day
- Apr 22** Earth Day
- Apr 23** Passover
- Apr 24** Admin Assistants Day
- May 05** Cinco de Mayo
- May 12** Mother's Day
- May 19** Pentecost
- May 27** Memorial Day
- Jun 14** Flag Day
- Jun 16** Father's Day
- Jun 19** Juneteenth
- Jun 20** June Solstice (GMT)
- Jul 04** Independence Day
- Sep 02** Labor Day
- Sep 22** September equinox (GMT)
- Oct 03** Rosh Hashanah
- Oct 14** Federal Holiday
- Oct 31** Halloween
- Nov 11** Veterans Day
- Nov 28** Thanksgiving
- Dec 21** December Solstice (GMT)
- Dec 25** Hanukkah begins
- 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
September 27, 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 the financial history of a particular corporation and discussing proposed litigation.

Seconded by: _____

Vote:

Yea ___ Nay ___ Abstain ___

Vote Recorded by: _____

New York, New York
September 27, 2024