

Timeline for roll-out of ILS-195

October 31, 2018

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Introduction

In the fall of 2018, ILS will release new data requirements for providers of indigent legal services. Pursuant to its new authority under County Law §722-f, these will include plans for a new annual statistical report required from all providers known as the ILS-195. This will replace the older report, the UCS-195, which will be progressively eliminated as the ILS-195 is introduced. This memo lays out the timetable for that transition.

The new form will include three parts. The requirement to fill out these parts of the form will be rolled out in sequence over three years, as the UCS-195 is eliminated. The three parts of the new form cover the following areas:

- Part 1:** Program expenditures, staffing and salaries, distinguishing family court and criminal court activities.
- Part 2:** Program caseloads, and (for assigned counsel programs only) average time expended per case.
- Part 3:** Case processing and case outcomes, including arraignments, case dispositions, rates of conflict, and other matters.

Data requirements timeline

Beginning in 2020 the UCS-195 will be progressively eliminated and replaced by the ILS-195. The complete timeline for the roll-out of the new form is illustrated in Table 1.

Table 1: Roll-Out of Data Requirements for Statewide Expansion Counties & NYC

	2019	2020	2021 *	2022	2023	2024
UCS-195 §5-6						
UCS-195 §§1-4						
New form part 1						
New form part 2						
New form part 3						

* ILS caseload counting definitions required beginning 2021.

Legend:

Required	Not required	Not acceptable
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In 2019, providers will be required to submit a UCS-195 form which will be unchanged from the form they have filled out in prior years.

In 2020, Sections 5 and 6 of the UCS-195 (dealing primarily with staffing and expenditures) will be eliminated. They will be replaced instead with 'Part 1' of the ILS-195.

In 2021, Sections 1 through 4 of the UCS-195 (dealing primarily with caseloads and case outcomes) will also be eliminated. They will be replaced with 'Part 2' of the ILS-195. Notably, beginning this year, caseload data providers submit must comply with ILS' *Definitions for Reporting Counts of Criminal Cases to the Office of Indigent Legal Services*.

In 2022, 'Part III' will be introduced, dealing primarily with case processing and case outcomes.

Recognizing that the five counties included in the 2015 Hurrell-Harring settlement are already subject to significant data demands, those counties will not be required to transition to submission of the ILS-195 until 2024. However, the requirement to submit the UCS-195 in these counties will remain in place for all intervening years.

Provider data collection improvements timeline

Both the UCS-195 and the planned new form require providers to report data on their previous year's activities. (Thus, for example, while Part 1 is required in 2020, the data that will be reported at that time will refer to the previous year, 2019.) The deadlines laid out in above therefore require significant planning by providers for compliance. Providers should consider the following schedule of milestones that will need to be met *prior* to the reporting deadlines to assure they will be able to comply with the new requirements.

2018

- ILS data requirements (annual reporting form, definitions) are released in fall.
- Counties should plan to appoint Data Officers in consultation with ILS.
- Counties should begin considering case management and other technology, staffing, or training needs related to data reporting abilities.

2019

- UCS-195 form due in April, reporting data for 2018.
- Providers must begin data collection to be able to report answers to Part 1 of the form (concerning expenditures and staffing) in early 2020.
- Counties must appoint Data Officers.
- Counties should determine all needed technology needs for data tracking and reporting, and finalize all needed purchases.
- Data Officers should prepare to begin collecting data for questions 8 through 10 of the form (concerning caseloads and, in assigned counsel providers, hours per case) in the year 2020.

2020

- UCS-195 form sections 1-4 and ILS-195 Part 1 due in April, reporting data for 2019.
- County Data Officers oversee first year of collection of caseload counts compliant with ILS case counting definitions, due for reporting in early 2021.

2021

- ILS-195 Parts 1 and 2 due in April, reporting data for 2020.

- Providers must report caseload counts and hours-per-case counts fully, including accurately quantifying newly opened cases in accordance with ILS definitions.
- Target year for ILS study of progress toward compliance caseload standards.

2022

- Complete ILS-195 (Parts 1, 2 and 3) due in April, reporting data for 2021.

2023

- Complete ILS-195 due in April, reporting data for 2022.

2024

- Complete ILS-195 due in April, reporting data for 2023.