### BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

| In the Matter of the Reapplication of       | ) |          |  |
|---|---|----------|--|
| the United Way of Greater St. Louis, Inc.   | ) | Case No. |  |
| for an Order of the Commission              | ) |          |  |
| Granting it Authority as an Information and | ) |          |  |
| Referral Provider for purposes of           | ) |          |  |
| obtaining 2-1-1 service                     | ) |          |  |

# **REAPPLICATION FOR 2-1-1 AUTHORITY**

Comes now the United Way of Greater St. Louis, Inc. ("UWGSL" or "Applicant"), by and through its attorneys, pursuant to 4 CSR 4240-28.015(2) and respectfully submits this reapplication for an order granting UWGSL renewed authority as an Information and Referral Provider and assigning it the abbreviated dialing code 2-1-1 for the exchanges listed in this application. In support, UWGSL states the following to the Commission:

- 1. UWGSL is a nonprofit corporation organized and existing under the laws of the State of Missouri and as defined by section 501(c)(3). Attached as Exhibit 1 is a certificate of good standing for UWGSL issued by the Missouri Secretary of State. A copy of the tax exempt letter issued by the Internal Revenue Service is attached hereto as Exhibit 3. Verification of the application is supplied by Vander Corliss, Chief Financial Officer, and his affidavit is attached hereto as Exhibit 2.
  - 2. Questions or inquiries concerning this Application may be directed to:

Mark W. Comley Newman, Comley & Ruth P.C. 610 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 (573) 634-2266 (Tel) (573) 636-3306 (Fax)

and,

Regina L. Greer, Vice President – Community Response United Way of Greater St. Louis, Inc. 910 North 11<sup>th</sup> Street St. Louis, MO 63101 (314) 242-1880 (Tel) (314) 436-4295 (Fax)

- 3. Effective May 21, 2007, UWGSL was authorized by the Commission in Case No. TO-2007-0312 to serve as a Missouri Information and Referral (I&R) Provider for the exchanges listed on Exhibit 7 to this Application for a period of three years.
- 4. Effective April 7, 2011, UWGSL was re-authorized by the Commission in Case No. AO-2011-0155 to serve as a Missouri I & R provider for the exchanges listed on Exhibit 7 to this Application for another three-year period.
- 5. Effective April 18, 2014, UWGSL was re-authorized by the Commission in Case No. AO-2014-0208 to serve as a Missouri I & R provider for the exchanges listed on Exhibit 7 to this Application for another three-year period.
- 6. Effective April 17, 2017, UWGSL was re-authorized by the Commission in File No. AO-2017-0190 to serve as a Missouri I & R provider for the exchanges listed on Exhibit 7 to this Application for another three-year period.
- 7. Operating under its authority UWGSL has provided service as an I&R Provider in accord with all applicable Commission rules and Missouri statutes, and wishes to continue as the authorized Missouri I&R Provider in the exchanges herein identified.
- 8. Rule 4 CSR 240-28.090(3) provides that reapplication for this authority must be submitted at least 90 days prior to expiration of UWGSL's three year authorization.

### **Judgments, Annual Reports**

- 9. Applicant does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the application.
- 10. All annual reports have been submitted in accordance with Commission requirements since the last renewal. UWGSL has no overdue assessment fees.

## **Monitoring and Personnel**

- 11. Applicant's 2-1-1 telephone line is and will continue to be monitored by trained Information and Referral Specialists 24 hours a day, 365 days per year. Applicant's employees or qualified and trained volunteers shall be I&R Specialists.
- 12. 2-1-1 calls are never forwarded to an answering service or machine. Calls wait in queue for the next available I&R Specialist. This queue is monitored by a call center supervisor at all times to ensure appropriate response time; additional call center agents are made available during crises or peak periods, or when the average wait time is excessive. In addition, inquirers are also able to submit inquiries via web chat and email. These options are also queued and monitored at all times for appropriate response times.

### Accreditation

13. UWGSL adheres to the current version of the Standards for Professional Information & Referral (version 8.0) which were revised by the Alliance of Information and Referral Systems, Inc. (AIRS) in January 2016. A copy of the current AIRS standards is attached as Exhibit 4. UWGSL received its initial full accreditation in October 2012 with a 100% pass rate for each of its 28 standards. UWGSL's initial accreditation obtained in October 2012 expired in 2017.

- 14. Re-accreditation commenced in October, 2017 and UWGSL was granted a year to complete the process. However, UWGSL sought and was approved for a six month extension and was not required to submit its renewal application until April, 2018. UWGSL filed for renewal of its accreditation in February, 2018 and once again received full accreditation with a 100% pass rate in September, 2019. Note that at no time was UWGSL 2-1-1 classified as unaccredited during the application / review period.
- 15. UWGSL provides comprehensive services pursuant to the AIRS standards. The inquirer has one-to-one human contact with a trained, paid staff Call Specialist who: assesses the needs of the inquirer, identifies appropriate resources, provides appropriate referral(s), helps inquirers for whom services are unavailable by locating alternative resources, and when necessary, actively participates in linking the inquirer to needed services. Inquirers who desire, may also access and search for resources using UWGSL's website, <a href="www.211helps.org">www.211helps.org</a>, web chat or using a mobile app designed for Android and iPhone users. In the near future, UWGSL 2-1-1 will also offer text capabilities. As a multi-channel contact and navigation center, UWGSL 2-1-1 recognizes the need to connect to Missourians how they prefer to interact and communicate and is proud to bring these services to all counties included in this application.
- 16. Through 2-1-1, UWGSL will continue to provide comprehensive I&R and navigation services, pursuant to the AIRS Standards, collecting, maintaining and disseminating information about a full range of human services, including but not limited to health, behavioral or mental health, basic needs services such as housing, food, clothing and financial assistance, youth development programs, services for older Americans, persons with disabilities and families, and resources for individual household, employment, homeless coordinated entry, and community-wide disaster recovery.

# **Resource Sharing and Collaboration**

- 17. UWGSL shares, and will continue to share, its resource database with other Missouri I&R providers. A United Way 2-1-1 web site (www.211helps.org) contains a searchable version of the database, and is accessible to any Missouri I&R provider, as well as the general public. The mobile apps are also available to be leveraged by individuals, providers and other stakeholders statewide. In addition, "2-1-1 Counts" (located on the 2-1-1 website) also provides statewide data on needs and trends based on 2-1-1 callers and their requests. This powerful output displays data for Missourians and their identified needs by region, zip code, legislative district and more.
- 18. This database is actively updated in compliance with AIRS standards, which requires formal verification of each organization's profile on an annual basis at a minimum. Food and financial assistance programs for housing or utilities are updated on a weekly basis. Agencies listed in the database commit to immediate notification of changes in contact information or programs. Interim changes are verified, made immediately and reflected in the web site, and other tools, in real time.
- 19. The UWGSL works, and will continue to work, collaboratively with other independent local United Ways in Missouri and with other specialized I&R providers across the state to develop Memoranda of Understanding and host informational meetings. Each entity also has its own network of partners measuring needs, serving its own local area and making the 2-1-1 network stronger throughout the state. In its own local region UWGSL has historically worked collaboratively with local area agencies on aging, centers for independent living, child care resource and referral providers, and emergency responders among others to identify and service community needs.

20. UWGSL works, and will continue to work, collaboratively with The United Way of Greater Kansas City, Inc.,<sup>1</sup> the other 2-1-1 operator in Missouri, to consistently measure and evaluate 2-1-1 outcomes. Both 2-1-1s offer mutual aid support to the other for periods of emergency or excessive call volumes. This is made easier with merged databases since 2013 and a combined telephony platform since 2019. Together these 2-1-1s offer the public a complete statewide database of resources, and they have a strengthened ability to respond to any Missouri call. As I&R Providers with authority to accept 2-1-1 calls UWGSL and the United Way of Greater Kansas City take seriously their duties and responsibilities generated from the expanded reach provided by the abbreviated dialing code feature which are additional to those responsibilities for their service areas as individual United Ways.

# **Call Tracking System**

- 21. UWGSL uses an automated call distribution system that enables the call center manager and supervisors to monitor, in real time, the number of incoming calls, emails and chats in queue and staff accordingly. The system generates data on call volume, the number of calls abandoned in queue, the average speed of answering, and the average length of each call. Call activity data is compiled and analyzed on a daily, weekly and monthly basis.
- 22. Data is collected for each 2-1-1 call and entered by the I&R Specialist into a database at the time of the call. Call documentation includes, for the person needing the service:
- I&R specialist who handled the call
- Date, time and length of call
- Zip code
- Relationship to the person needing service, if other than "self"
- Type(s) of service(s) requested
- Gender
- Language requirements, if other than English
- Accessibility requirements such as ramps, TTY, etc.

<sup>&</sup>lt;sup>1</sup> f/k/a The Heart of America United Way, Inc.

- Call resolution, including organization(s) to which the caller was referred
  - o Indirect referral; caller was provided full contact information for appropriate service providers.
  - O Direct referral; the caller was connected directly with the service provider.
  - o Caller requested/received information only.
  - O No referral available; documentation of service gap, including reason, if known.
- How the caller learned of 2-1-1
- Whether the caller has used 2-1-1 before
- Narrative description of call

Optional Data: (as callers have the right to remain anonymous)

- Caller name
- Caller telephone number(s)
- 23. This information is aggregated, analyzed, and published in the form of quarterly reports to the community on the United Way 2-1-1 web site or via the 211 counts dashboard.

### **Other Terms and Benefits**

- 24. UWGSL removes and excludes human services entities from its resource database for failure to deliver services, fraud, misrepresentation, and failure to update annual profiles after multiple attempts or discrimination. Attached hereto as Exhibit 5 is the 2-1-1 Database Inclusion/Exclusion Policy.
- 25. UWGSL has maintained a computerized database of human services since 1985. This database currently includes information on any services available to residents of metropolitan St. Louis and the State of Missouri for the 99 counties within 2-1-1's service area, regardless of location, including local, state and federal health and human service providers. The database also includes information on agencies providing emergency assistance households throughout the AmerenMO service area and the State of Missouri. Agencies must opt-in to be listed. At the time of this application, the database houses more than 30,000 programs and services across the 99 counties served by UWGSL's 2-1-1.

- 26. UWGSL works with local United Ways throughout the state, state associations and local, specialized I&R providers to expand its existing base of information about health and human service providers in the regions served by 2-1-1 prior to launch. Programs are catalogued according to the AIRS Taxonomy of Human Services and regularly maintained according to AIRS Standards by a team of five Resource Specialists working in regional hubs under the leadership of a 2-1-1 Resource Manager. Each Resource Specialist focuses on local resources within an assigned region of the proposed 2-1-1 service area. Resource Specialists add, change or delete agency and program information remotely using an internet-based application and assigned user identification to facilitate access to timely information in the 2-1-1 Call Center.
- 27. Caller information is maintained by I&R Specialists in the 2-1-1 Call Center. The entity providing overnight coverage utilizes the same system for call documentation.
- 28. UWGSL ensures the quality of 2-1-1 service and caller and customer satisfaction through follow up and written outcome evaluations. Attached hereto as Exhibit 6 is the "Care Quality Monitoring Program."
- 29. 2-1-1 is accessible to hearing impaired callers via TTY. Callers whose primary language is other than English are served by initiating a 3-way call with an interpreter contracted through Optimal Phone Interpreters. 2-1-1 has the ability to connect with callers in more than 150 languages.
- 30. 2-1-1 offers the ability to capture and match volunteer opportunities in their service area with potential volunteers via the UWGSL Volunteer Center and the use of a statewide volunteer portal that can be leverage during emergency and non-emergency periods. The UWGSL's Volunteer Center is affiliated with the Hands On Network, as are the volunteer centers

in Cape Girardeau and Columbia. As such, they have committed to work collaboratively and cross-refer when appropriate.

- 31. Applicant is legally qualified to provide the service and possesses sufficient technical, financial and managerial resources and abilities to remain the 2-1-1 provider for the telephone exchanges within the counties identified in this application
- 32. Applicant is ready and willing to comply, and will comply, with Commission rules, regulations and policies.
- 33. UWGSL seeks renewed authority to provide 2-1-1 service for all Missouri Counties not currently served by the United Way of Greater Kansas City. This includes exchanges serving the following counties:

Adair County **Hickory County** Perry County **Atchison County Holt County** Phelps County Audrain County **Howard County** Pike County Barry County Howell County Polk County **Barton County** Iron County Pulaski County Benton County Jasper County Putnam County Jefferson County Bollinger County Ralls County **Boone County Knox County** Randolph County **Butler County** Laclede County Reynolds County Callaway MO Lawrence County Ripley County Camden County St. Charles County Lewis County Cape Girardeau County Lincoln County St. Clair County Ste. Genevieve County Carroll County Linn County Carter County **Livingston County** St. François County Cedar County McDonald County St. Louis County Chariton County Macon County Schuyler County **Christian County Madison County** Scotland County Clark County Maries County **Scott County** Cole County Marion County Shannon County Mercer County Shelby County Cooper County Stoddard County Crawford County Miller County Dade County Mississippi County Stone County Moniteau County Dallas County Sullivan County Daviess County Monroe County **Taney County Dent County** Montgomery County Texas County **Douglas County** Morgan County Vernon County

Dunklin County New Madrid County Warren County Franklin County Newton County Washington County Gasconade County **Nodaway County** Wayne County Gentry County Oregon County Webster County Greene County Osage County Worth County **Grundy County** Ozark County Wright County Harrison County Pemiscot County St. Louis City

The exchanges included in these counties are provided in Exhibit 7 attached hereto.

34. UWGSL submits that approval of this reapplication is in the public interest.

WHEREFORE, United Way of Greater St. Louis, Inc. respectfully requests the Commission to enter an order granting it renewed authority as a Missouri Information and Referral Provider in the telephone exchanges within the counties described herein, together with such other relief and authority the Commission deems just.

Respectfully submitted,

### /s/ Mark W. Comley

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Attorneys for United Way of Greater St. Louis, Inc.

# Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 10th day of January, 2019, to General Counsel's Office at staffcounselservice@psc.mo.gov; and Office of Public Counsel at <a href="mailto:opecarrice@ded.mo.gov">opecarrice@ded.mo.gov</a>.

### /s/ Mark W. Comley

# **EXHIBIT LIST**

| Exhibit 1 | Certificate of good standing for UWGSL  |
|-----------|---|
| Exhibit 2 | Verification and Affidavit of Vander Corliss Chief Financial Officer of UWGSL   |
| Exhibit 3 | Tax exempt letter issued by the Internal Revenue Service                        |
| Exhibit 4 | AIRS Standards and Quality Indicators for Professional Information and Referral |
| Exhibit 5 | 211 Database Inclusion/Exclusion Policy   |
| Exhibit 6 | Care Quality Monitoring Program   |
| Exhibit 7 | Exchanges   |