

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Reapplication of The Heart of)
America United Way, Inc., for an Order of the)
Commission Granting it Continuing Authority as an) Case No. TO-2007-0338
Information and Referral Provider for Purposes of)
211 Service.)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. The Heart of America United Way, Inc., (HAUW) filed a Reapplication on March 16, 2007, requesting continuing authority as an Information and Referral (I&R) provider, for purposes of 211 service, for the exchanges listed in Schedule 1 to the application. In Case No. AO-2004-0036, the Commission authorized HAUW to serve as the I&R provider for a period of three years in those exchanges.

2. In the attached Memorandum, labeled Appendix A, the Staff states that the application meets the requirements of the 211 Rule, 4 CSR 240-32.200, pertinent to reauthorization. The Staff further recommends that the Commission direct HAUW to include the following in its Rule 211 annual reports: status of its AIRS accreditation, status of its agreements with specialized information and referral systems, and status of its agreements with clearing house agencies that provide volunteer or donation management services.

WHEREFORE, the Staff recommends the Commission grant HAUW's Reapplication and direct HAUW to include the noted information in its annual report to be filed by August 1 of each year.

Respectfully submitted,

/s/ William K. Haas

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of May 2007.

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Company Name: The Heart of America United Way, Inc.
Case No. TO-2007-0338

From: Adam McKinnie
Telecommunications Department

Natelle Dietrich / 5-24-07
Utility Operations Division/Date

William Haas / 5-24-07
General Counsel's Office/Date

Subject: Recommendation for approval

Date: 5-24-07

Summary:

Staff recommends granting the reapplication of The Heart of America United Way, Inc. (HAUW) requesting to continue as the authorized Missouri I&R Provider in exchanges listed in Schedule 1 of the reapplication. Staff concludes HAUW and its Reapplication meet the pertinent requirements of 4 CSR 240-32.200 (211 Rule) and related requirements of 4 CSR 240-2.060. Notice has been issued and no other party has submitted an application to be a 211 provider in the requested exchanges. While one application for intervention has been filed by an incumbent local exchange carrier (ILEC) and granted by the Commission in the instant case, the intervener has not taken a position in opposition to the Reapplication.

Staff also recommends the commission direct HAUW to file updates in its annual reports to address continuing issues noted in this recommendation and summarized in the conclusion.

Body:

On March 16, 2007, HAUW filed a reapplication to continue to be designated as an Information and Referral Service (I&R) Provider and to continue to be assigned the abbreviated dialing code 211 for the exchanges referenced in the Reapplication.

HAUW was originally designated as a 211 provider effective June 18, 2004 in Case No. AO-2004-0036¹.

According to the annual report filed by HAUW on March 15, 2007 in accordance with Section 4 CSR 240-32.200(16), HAUW began providing 211 service "24 hours a day, 7 days a week" on March 9, 2006.

¹ *In the Matter of the Assignment of the 2-1-1 Abbreviated Dialing Code in the State of Missouri*

HAUW was designated as a 211 provider in exchanges listed in Schedule 1 attached to the Stipulation and Agreement approved by the Original Order. The Original Order stated HAUW “is entitled to use the three-digit 2-1-1 abbreviated dialing code to serve the community for a period of three years.” The initial three year period of authorization ends on June 14, 2007.

HAUW requests to be designated as the 211 provider for an additional three years in the exchanges listed on Schedule 1 of the reapplication. Notice has been served in the instant case and no other entity has requested to be designated as the 211 provider for those exchanges.

Staff notes that there are no overlapping exchanges between HAUW’s reapplication in the instant case and the Application of the United Way of Greater St. Louis, Inc. to be a 211 Provider in Case No. TO-2007-0312.

Section 4 CSR 240-32.200(8) of the 211 Rule states that if a 211 Provider seeks to continue providing 211 service beyond a three-year period, it must meet two standards. First, Subsection 4 CSR 240-32.200(8)(A) requires a Reapplication to be submitted at least 90 days prior to the expiration of a 211 provider’s authorization. Staff states this Reapplication has been filed in a timely manner.

Second, Subsection 4 CSR 240-32.200(8)(B) requires the Reapplication to include various items. HAUW has included a discussion of all of these items in their reapplication. However, Staff presents a discussion of a select list of those items which required further clarification.

Paragraph 4 CSR 240-32.200(3)(A)5 of the 211 rule requires that an application for 211 include a statement that the applicant will adhere to standards set forth by the Alliance of Information and Referral Systems (AIRS) and requires the entity to either be already accredited by AIRS or to seek AIRS accreditation. HAUW states, in paragraph 9, beginning on page 2 of the reapplication, that it has not yet applied for AIRS accreditation as it (1) must be operational for at least one year before applying, and (2) must complete a self assessment tool provided by AIRS. HAUW expects to file for accreditation on or before June 1, 2007. HAUW expects to be finally accredited by December, 2008. Staff recommends the Commission direct HAUW to update the status of AIRS accreditation in its annual reports due August 1 of each year.

Paragraph 4 CSR 240-32.200(3)(A)8 of the 211 Rule requires that an application for 211 include a statement that the applicant works collaboratively and has written agreements in place with specialized information and referral systems. HAUW states, in paragraph 12, page 4 of its Reapplication, that it expects to have those agreements in place or near conclusion by June 30, 2007.

Staff submitted Data Requests to HAUW to inquire as to why formal agreements of these types have not been reached. In responses, HAUW states they “currently have informal verbal agreements with specialized information and referral systems” which have “established initial protocols for appropriate referral by HAUW to these organizations”. Further in the response, HAUW states that it had questions about certain specifics that could only be answered after observing its actual operations. HAUW states, “[a]n analysis of first year data is being completed at this time and the results of that analysis will be used to memorialize in the written memoranda of understanding”. HAUW expects the written version of the agreement to be completed by June 30, 2007.

Staff recommends the Commission direct HAUW to update the status of the agreements with specialized information and referral systems in the annual reports to be filed August 1 of each year.

Paragraph 4 CSR 240-32.200(3)(A)17 of the 211 Rule requires that an application for 211 include a statement that the applicant has formal agreements “with clearinghouse agencies that provide volunteer or donation management services.” On page 5, in paragraph 20, of its Reapplication, HAUW states it expects to have agreements in place with two clearinghouse agencies by June, 2007.

Staff submitted Data Requests to HAUW to inquire as to why formal agreements with clearinghouse agencies have not been reached. In responses, HAUW stated that it has “relied to date on collaborative relationships with two clearinghouse agencies”. Similar to the situation with the specialized information and referral systems, the “implementation of 2-1-1 generated questions which could only be answered as operations progressed”. Similarly, “an analysis of first year operational data is being completed at this time, and the results of that analysis will be used to determine the terms and conditions to include in a written memoranda of understanding or contract that should be finalized by June 30, 2007.”

Staff recommends the Commission direct HAUW to update the status of the formal agreements with clearinghouse agencies in the annual reports to be filed on August 1 of each year.

Staff has analyzed the Reapplication and finds that HAUW meets the requirements of the 211 Rule pertinent to a reauthorization of 211 service.

Conclusion:

Staff recommends the Commission grant the reapplication of HAUW authorizing it as the I&R provider in the exchanges listed in Schedule 1 of the Reapplication.

Staff further recommends the Commission direct HAUW to provide the following in the annual reports to be filed under Section 4 CSR 240-32.200(16):

- status of its AIRS accreditation
- status of its agreements with specialized information and referral systems
- status of its agreements with clearinghouse agencies that provide volunteer or donation management services

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Heart of America United Way for an Order)
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Authority as an Information and Referral)
Provider for purposes of 211 service)

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Subscribed and affirmed before me this 25th day of May 2007.
I am commissioned as a notary public within the County of Callaway,
State of Missouri and my commission expires on 9-21-10

