BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the application 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 211 service)	

APPLICATION

Comes now the United Way of Greater St. Louis, Inc. ("UWGSL" or "Applicant") by and through its attorneys, pursuant to 4 CSR 240-2.060 and 4 CSR 240-32.200 and respectfully requests the Commission's order granting it authority as an Information and Referral Provider and assigning it the abbreviated dialing code 211 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 Cheryl Polk, Executive Vice President & Chief Operating Officer of UWGSL and her 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,

Cheryl Polk, Executive Vice President & Chief Operating Officer United Way of Greater St. Louis, Inc. 910 North 11th Street St. Louis, MO 63101 (314) 539-4015 (Tel) (314) 621-5240 (Fax)

- 3. 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.
 - 4. No annual report or assessment fees from the applicant are overdue.

Monitoring and Personnel

- 5. The 211 line will be monitored by trained Information and Referral (I&R) Specialists 24 hours a day, 365 days per year. From 7:30 a.m. to 11:30 p.m., seven days a week, calls will be answered by I&R Specialists employed by the Applicant. Between the hours of 11:30 p.m. and 7:30 a.m., calls will be answered under subcontract by Life Crisis Services, a program of Provident Counseling, Inc., a United Way-funded crisis hotline whose personnel have been cross-trained in information and referral, as well as mental health crisis response.
- 6. 211 calls will never be forwarded to an answering service or machine. Calls will wait in queue for the next available I&R specialist. This queue will be monitored by a call center supervisor at all times to ensure appropriate response time; additional call center agents will be made available during crises or peak periods, or when the average wait time is excessive.

Accreditation

7. UWGSL will adhere to the Standards for Professional Information & Referral, version 5.1, revised June 2006. UWGSL will complete the written application process for AIRS accreditation by January 31, 2008, and will complete the on site accreditation process by October

- 31, 2008. Attached hereto as Exhibit 4 are the revised Standards for Professional Information & Referral, Version 5.1, June 2006. The AIRS Standards have been revised since the Commission's promulgation of 4 CSR 240-32.200. Version 5.1 (attached) encompasses all of the Standards of previous editions, and includes additional standards related to crisis assessment and disaster preparedness. The revised Standards will form the basis of AIRS Accreditation.
- 8. Through 211, USGSL will continue to provide comprehensive I&R 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 and community-wide disaster recovery.

Resource Sharing and Collaboration

- 9. UWGSL will share its resource database with other Missouri I&R providers. A United Way 211 web site will contain a searchable version of the database, and will be accessible to any Missouri I&R provider, as well as the general public.
- 10. This database will be actively updated in compliance with AIRS standards, which requires formal verification of each organization's profile on an annual basis. Food and financial assistance programs for housing or utilities will be updated on a monthly basis. Agencies listed in the data base commit to immediate notification of changes in contact information or programs. Interim changes will be verified, made immediately and reflected in the web site in real time.
- 11. UWGSL has historically worked collaboratively with local area agencies on aging, centers for independent living, child care resource and referral providers, and emergency responders in its traditional service area. The UWGSL will work collaboratively with local

United Ways in Missouri to host informational meetings and develop Memoranda of Understanding with specialized I&R providers across the state.

12. UWGSL will work collaboratively with Heart of America United Way, the other 211 operator in Missouri, to consistently measure and evaluate 211 outcomes.

Call Tracking System

- 13. UWGSL will use an automated call distribution system that enables the call center manager and supervisors to monitor, in real time, the number of incoming calls in queue and staff accordingly. The system will generate 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 will be compiled and analyzed on a monthly basis.
- 14. Data will be collected for each 211 call and entered by the I&R Specialist into a database at the time of the call. Call documentation will include, 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.
- ? 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 211
- ? Whether the caller has used 211 before
- ? Narrative description of call

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

- ? Caller name
- ? Caller telephone number(s)
- 15. This information will be aggregated, analyzed, and published in the form of quarterly reports to the community on the United Way 211 web site.

Other Terms and Benefits

- 16. UWGSL will remove or exclude human services entities from its resource database for failure to deliver services, fraud, misrepresentation or discrimination. Attached hereto as Exhibit 5 is the 211 Database Inclusion/Exclusion Policy.
- 17. 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, regardless of location, including local, state and federal health and human service providers. The database also includes information on agencies providing emergency assistance for low income households throughout the AmerenUE service area.
- 18. UWGSL will work 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 211 prior to launch. Programs will be catalogued according to the AIRS Taxonomy of Human Services and regularly maintained according to AIRS Standards by a team of four Resource Specialists working in local communities under the leadership of a 211 Resource Manager. Each Resource Specialist will focus on local resources within an assigned region of the proposed 211 service area. Resource Specialists will be able to 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 211 Call Center.

- 19. Caller information will be maintained by I&R Specialists in the 211 Call Center.

 The entity providing overnight coverage will utilize the same system for call documentation.
- 20. UWGSL will ensure the quality of 211 service and caller and customer satisfaction through follow up and written outcome evaluations. Attached hereto as Exhibit 6 is the 211 Evaluation Plan.
- 21. UWGSL will publicize the 211 services through a written public awareness, marketing, advertising and education plan to inform the public regarding available services, described as follows:

211 Marketing Plan Overview

Objective(s):

- ? Missourians are aware that they can call United Way 211 to connect to community service and volunteer opportunities.
- ? 211 is promoted appropriately and consistently throughout the targeted service area.

Assumptions:

- ? I&R/211 providers generally measure public awareness of the service by the extent of market penetration; the annual number of calls generated by 211 as a percentage of the population of the service area.
- ? The combined population of the proposed service area is approximately 4.3 million individuals.
- ? Based on the experience of 211 providers in other states, the target penetration for 211 is between 4-5% of the population.
- ? The percentage is often higher when the service is first launched, presumably due to the intensity of marketing efforts when the service is new.
- ? 211 will be implemented in phases, based on exchange carrier.
- ? Launch promotion will occur in communities targeted based on population/media market over the implementation period.

- ? 211 implementation will provide an enhanced I&R service in communities with a history of I&R, and will be a new service in communities not currently served by I&R (residents have no history of using telephone I&R.)
- ? Anticipated 211 call volume ranges from between 172,000-215,000 calls per year once 211 is fully implemented in the proposed areas.

Marketing Strategy:

United Way's in Missouri will work collaboratively to promote 211 in their media market. The United Way of Greater St. Louis will serve as the lead agency in the production of marketing materials, the timeline, key tools and tactics, including model PR stories, web content, radio spots, television Public Service Announcements (PSA), print media advertising, and recommendations for any special events as a "template" for other United Way organizations to localize.

Specific Tactics:

- ? Launch events, including press conferences, in targeted cities
- ? Media interviews as implementation unfolds
- ? Paid and pro bono radio spots
- ? Pro bono TV PSA's
- ? Paid and pro bono newspaper advertising
- ? Web site announcements
- ? 211 Web Site launch announcement
- ? Brochure template (for local use)

Marketing Evaluation:

- ? Increase over baseline the number of people randomly surveyed who identify 211 as the number they would call if they needed a specific service or wanted to volunteer.
- ? Analyze the number of calls from specific zip codes/counties to identify areas of marketing focus.
- 22. 211 will be accessible to hearing impaired callers via TTY. Callers whose primary language is other than English will be served by initiating a 3-way call with an interpreter contracted through AT&T.
- 23. The UWGSL's Volunteer Center is affiliated with the Points of Light Foundation, as are the volunteer centers in Cape Girardeau and Columbia. As such, they have committed to

work collaboratively and cross-refer when appropriate. There are eleven other volunteer matching entities in Missouri with whom the UWGSL has regular contact. The UWGSL Volunteer Center will work to formalize these relationships in writing prior to the launch of 211 in those communities.

- 24. Applicant possesses sufficient technical, financial and managerial resources and abilities to become the 211 provider for the telephone exchanges within the counties identified in this application
- 25. Applicant is ready and willing to abide by Commission rules, regulations and policies.
- 26. UWGSL proposes to provide 211 service for all Missouri Counties not currently served by the Heart of America United Way. This includes exchanges serving the following counties:

Hickory County Perry County Adair 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 Reynolds County **Butler County** Laclede County Ripley County Callaway MO Lawrence County Camden County Lewis County St. Charles County Cape Girardeau County Lincoln County St. Clair County Ste. Genevieve County **Carroll County** Linn County **Carter County Livingston County** St. Francois County Cedar County McDonald County St. Louis County **Chariton County** Macon County Schuyler County **Scotland County** Christian County **Madison County** Clark County Maries County **Scott County** Cole County Marion County **Shannon County** Cooper County Mercer County **Shelby County** Crawford County **Stoddard County** Miller County **Dade County** Mississippi County **Stone County**

Dallas County Moniteau County **Sullivan County** Monroe County Taney County **Daviess 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.

211 Implementation Sequence

- 27. UWGSL proposes that 211 be implemented in phases, with full coverage of proposed service area achieved by the end of 2007. Pending approval from the Commission, UWGSL hopes to have a "soft launch" of in AT&T exchanges by July 2007, with other exchange carriers implemented in phases in between July and December.
- 1) The Start Up Phase encompasses the following tasks: (January-June 2007)
 - ? Engagement of Key Stakeholders: A series of local and regional meetings, co-hosted by local United Ways, held throughout the State to share information and answer questions;
 - ? Formalization of Relationships: Establish or revise Memoranda of Understanding with n-1-1's and specialized I&R providers to address 211 operation;
 - ? Technology Enhancement: Implementation of telephone system solutions and web-based application for resource and inquirer data of a scale appropriate for 211;
 - ? Personnel Expansion: Engage and train of additional I&R Specialists;
 - ? Resource Data Collection: Using data gathered from local United Ways, specialized I&R providers, the IRS Database of Nonprofit Agencies, and other materials, expand the existing resource database to comprehensively inventory health and human service providers in all proposed counties.
- 2) AT&T exchanges ("Soft Launch" July 2007)
- 3) CenturyTel exchanges (by October 2007)

- 4) All other Missouri local exchange carriers (by December 2007)
 - 28. UWGSL submits that grant of the authority sought herein is in the public interest.

WHEREFORE, United Way of Greater St. Louis respectfully requests the Commission to enter an order granting it 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

Mark W. Comley #28847 Newman, Comley & Ruth P.C. 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102 (573) 634-2266 (573) 636-3306 FAX

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 23rd day of February, 2007, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley