COMMITTEE ON LEGISLATIVE RESEARCH **OVERSIGHT DIVISION**

FISCAL NOTE

L.R. No.: 3105H.03I Bill No.: HB 1478

Banks and Financial Institutions; Business and Commerce; Credit Unions Subject:

Type: Original

January 26, 2024 Date:

Bill Summary: This proposal establishes provisions relating to money transmission.

FISCAL SUMMARY

ESTIMATED NET EFFECT ON GENERAL REVENUE FUND					
FUND AFFECTED	FY 2025	FY 2026	FY 2027		
General Revenue	(\$24,223)	(\$59,297)	(\$60,483)		
Total Estimated Net					
Effect on General					
Revenue	(\$24,223)	(\$59,297)	(\$60,483)		

ESTIMATED NET EFFECT ON OTHER STATE FUNDS					
FUND AFFECTED	FY 2025	FY 2026	FY 2027		
Division of Finance	Unknown, Less than	Unknown, Less than	Unknown, Less than		
Fund (0550)	\$680,533	\$694,144	\$708,028		
Total Estimated Net					
Effect on Other State	Unknown, Less than	Unknown, Less than	Unknown, Less than		
Funds	\$680,533	\$694,144	\$708,028		

Numbers within parentheses: () indicate costs or losses.

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ESTIMATED NET EFFECT ON FEDERAL FUNDS						
FUND AFFECTED	FY 2025	FY 2026	FY 2027			
Total Estimated Net						
Effect on All Federal						
Funds	\$0	\$0	\$0			

ESTIMATED NET EFFECT ON FULL TIME EQUIVALENT (FTE)						
FUND AFFECTED	FY 2025	FY 2026	FY 2027			
Total Estimated Net						
Effect on FTE	0	0	0			

- ☐ Estimated Net Effect (expenditures or reduced revenues) expected to exceed \$250,000 in any of the three fiscal years after implementation of the act or at full implementation of the act.
- ⊠ Estimated Net Effect (savings or increased revenues) expected to exceed \$250,000 in any of the three fiscal years after implementation of the act or at full implementation of the act.

ESTIMATED NET EFFECT ON LOCAL FUNDS						
FUND AFFECTED FY 2025 FY 2026 FY 2027						
Local Government \$0 \$0 \$0						

FISCAL ANALYSIS

ASSUMPTION

Sections 361.800 – 361.840 – Money Transmitter

Officials from the **Department of Commerce and Insurance (DCI) – Division of Finance (DOF)** assume the following:

DOF assumes these sections authorize the director of the Division of Finance to administer, interpret, and enforce Sections 361.800-361.840. It provides rulemaking authority for DOF and addresses confidentiality of information submitted by licensees and applicants. It further permits the director to enforce sections and regulations pertaining to money transmitters including the federal Bank Secrecy Act and the USA Patriot Act; and outlines required submissions by applicants for a money transmitter license.

All revenue and expenses would be deposited and deducted from the Division of Finance Fund (0550).

Revenue Estimate

Money transmitter companies are currently licensed under Sections 361.700-361.727. If passed these sections would be repealed and replaced by Sections 361.900-361.1035. For the purposes of this estimate, DOF assumes all of the 171 entities currently licensed under 361.700-361.727 would convert their license to that which is authorized by Sections 361.900-361.1035.

Section 361.921

This section allows DOF to charge each money transmitter licensed under these sections for costs associated with their annual examinations. DOF assumes the commissioner will set licensure and renewal fees at a level to sustain the program without charging for licensee examinations.

Section 361.936

An Initial Application Fee and a License Fee set by the commissioner is required with the submission of an application for license. The fee would be set based on the cost to sustain operation of the licensure program. Licenses would be effective on the date of issuance by DOF and would expire on December 31 of each year. Annual renewal fees would be set by the commissioner based on the total operating expenses of the program.

Section 361.951

A fee set by the commissioner is required to accompany a request to acquire control of a licensee along with an application for acquisition. DOF estimates that 10%, or 9 such transactions would take place each year. The fee would be set at an amount sufficient to sustain operation of the program based on estimated operating costs.

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Section 361.1026

This section authorizes the director to assess civil penalties for violations of 361.900-361.1035.

Revenue Loss

Since all of those currently licensed under Sections 361.700-361.727 are assumed to transition to these new licenses, DOF expects a loss of revenue from renewals under 361.700-361.727. The fee for renewals is \$400 annually, resulting in a revenue loss of an estimated \$68,400.

Expense Estimate

Expense estimates include a 2% annual inflation rate.

Section 361.921.1(1)

DOF assumes this section authorizes examinations of licensees which would be conducted by a Senior Consumer Credit Examiner. Regular examinations would take place biennially, with half of the licensees examined each year. This would require an estimated 86 examinations be performed each year. It is estimated that a Senior Consumer Credit Examiner would spend an average of forty hours to complete an examination. Completed examinations would be submitted to the central office of the Division for compilation and formatting by an Administrative Office Support Assistant (AOSA). Examinations would be reviewed and approved by the Supervisor of Consumer Credit, estimated to take three hours for each examination.

Based on the average salaries of \$53.15 for a Senior Consumer Credit Examiner; \$19.91 per hour for an AOSA; and \$64.46 for the Supervisor of Consumer Credit. The personal service cost for each examination is estimated at \$2,339. Travel expenses are estimated at \$500 - \$2,500 per examination depending on the location of the licensee. For this estimate, the median of \$1,500 per exam was used.

Applications submitted pursuant to Section 361.936 would be reviewed by a Senior Consumer Credit Examiner, requiring an estimated 8 hours each; the Supervisor of Consumer Credit would spend an average of 1 hour reviewing recommendations of the Senior Consumer Credit Examiner regarding licensure approval or denial. It would take an average of 1 hour for the AOSA to process the approval or denial of each application.

Renewal of licenses for money transmitters would be completed on an annual basis, beginning January 1 after of the date of original issuance. Because the number of money transmitters has been fairly stable, it is estimated that ten would opt not to renew their licenses in FYs 2026 and 2027, but would be replaced by new licensees. Renewal requests would be reviewed by a Senior Consumer Credit Examiner, taking an average of 6 hours each. Review of the recommendation for approval or denial would be handled by the Supervisor of Consumer Credit taking approximately one hour. The AOSA would then process the renewal license or denial at one hour per license.

Those entities seeking to acquire control of a money transmitter license are required to submit an application for acquisition. DOF assumes approximately 10% of licenses would have an

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acquisition application filed each year. For these 9 applications, an average of eight hours would be required for review by a Senior Consumer Credit Examiner, one hour of review of the recommendation of approval or denial by the Supervisor of Consumer Credit, and one hour to process the approval or denial of the acquisition.

Sections 361.957 – 361.963

DOF assumes these sections require money transmitters to submit several reports to the Division including financial statements, reports of condition, and special events that affect the licensee. DOF estimates it would take a Senior Consumer Credit Examiner six hours to review each report and the Supervisor of Consumer Credit an average of one hour each to address any concerns identified by the Examiner.

Fringe Benefits are estimated at the standard rate.

Supplies and expenses for employees assigned to this program are estimated at \$11,261 per FTE annually. Because the majority of Consumer Credit examination staff are telecommuters, rent and janitorial expenses would only be necessary for the AOSA and Supervisor positions.

DOF administrative support services, including general administration, training, human resources, accounting, budget, legal, and information technology services are covered in a 15% administrative overhead rate. This includes promulgation of rules and development of forms and websites to support these sections.

Cost Savings

Since those currently licensed under Sections 361.700-361.727 would transition to these new licenses, DOF expects that 171 renewals will not be processed, saving an estimated \$68,400.

DOF assumes that this workload would be picked up by existing staff since repealed Sections 361.700-361.727 would eliminate some existing workload.

Because the commissioner determines the fees associated with licensures and renewals under 361.900-361.1035, DOF assumes the fees would be set at a level sufficient to sustain the operations of the program. Therefore, the <u>net effect on the Division of Finance Fund (0550)</u> would be \$0.

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Listed below is a summary revenue and expenses expected by DCI-DOF as a result of this proposal.

	FY 2025	FY 2026	FY 2027
Revenue – Money Transmitter Fees	\$680,533	\$694,144	\$708,028
Cost Avoidance	\$68,400	\$68,400	\$68,400
FTE Expense	(\$680,533)	(\$694,144)	(\$708,028)
Licensing Fees Loss	(\$68,400)	(\$68,400)	(\$68,400)
Total	\$0	\$0	\$0

Oversight notes the cost related to the FTE expense provided by DOF is for existing staff and not additional FTE. Oversight assumes DOF will have some additional expense related to the proposal, however, Oversight also assumes DCI is provided with core funding to handle a certain amount of activity each year. Therefore, Oversight will reflect the fiscal estimate to the Division of Finance Fund (0550) as a net revenue of Unknown.

Officials from the **Department of Corrections (DOC)** assume this proposal creates new provisions relating to money transmission.

Section 361.981 requires an authorized delegate who holds money in trust for the benefit of a licensee to remit certain amounts of money. Depending on the amount, the failure to remit this money could result in a class A misdemeanor or a class E felony.

Section 361.1023 creates two new class E felonies, one for intentional misrepresentation and one for knowingly engaging in certain activities without a license, and one new class A misdemeanor.

As misdemeanors fall outside the purview of the Department of Corrections, DOC will not be analyzing their projected impact. Thus, as it relates to DOC, the intent of the bill is to create three new class E felony offenses.

For each new nonviolent class E felony, the department estimates one person could be sentenced to prison and two to probation. The average sentence for a nonviolent class E felony offense is 3.4 years, of which 2.1 years will be served in prison with 1.4 years to first release. The remaining 1.3 years will be on parole. Probation sentences will be 3 years.

The combined cumulative estimated impact on the department is 6 additional offenders in prison and 21 additional offenders on field supervision by FY 2027.

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Change in prison admissions and probation openings with legislation

	FY2025	FY2026	FY2027	FY2028	FY2029	FY2030	FY2031	FY2032	FY2033	FY2034
New Admissions										
Current Law	0	0	0	0	0	0	0	0	0	0
After Legislation	3	3	3	3	3	3	3	3	3	3
Probation										
Current Law	0	0	0	0	0	0	0	0	0	0
After Legislation	6	6	6	6	6	6	6	6	6	6
Change (After Legislation	- Current La	w)								
Admissions	3	3	3	3	3	3	3	3	3	3
Probations	6	6	6	6	6	6	6	6	6	6
Cumulative Populations										
Prison	3	6	6	6	6	6	6	6	6	6
Parole	0	0	3	3	3	3	3	3	3	3
Probation	6	12	18	18	18	18	18	18	18	18
Impact										
Prison Population	3	6	6	6	6	6	6	6	6	6
Field Population	6	12	21	21	21	21	21	21	21	21
Population Change	9	18	27	27	27	27	27	27	27	27

^{*} If this impact statement has changed from statements submitted in previous years, it could be due to an increase/decrease in the number of offenders, a change in the cost per day for institutional offenders, and/or an increase in staff salaries.

If the projected impact of legislation is less than 1,500 offenders added to or subtracted from the department's institutional caseload, the marginal cost of incarceration will be utilized. This cost of incarceration is \$26.545 per day or an annual cost of \$9,689 per offender and includes such costs as medical, food, and operational E&E. However, if the projected impact of legislation is 1,500 or more offenders added or removed to the department's institutional caseload, the full cost of incarceration will be used, which includes fixed costs. This cost is \$99.90 per day or an annual cost of \$36,464 per offender and includes personal services, all institutional E&E, medical and mental health, fringe, and miscellaneous expenses. None of these costs include construction to increase institutional capacity.

DOC's cost of probation or parole is determined by the number of P&P Officer II positions that are needed to cover its caseload. The DOC average district caseload across the state is 51 offender cases per officer. An increase/decrease of 51 cases would result in a cost/cost avoidance equal to the salary, fringe, and equipment and expenses of one P&P Officer II. Increases/decreases smaller than 51 offender cases are assumed to be absorbable.

In instances where the proposed legislation would only affect a specific caseload, such as sex offenders, the DOC will use the average caseload figure for that specific type of offender to calculate cost increases/decreases.

A summary of DOC cost is provided in the table below:

	# to prison	Cost per year	Total Costs for prison	# to probation & parole	Cost per year	Total cost for probation and parole	Grand Total - Prison and Probation (includes 2% inflation)
Year 1	3	(\$9,499)	(\$24,223)	0	absorbed	\$0	(\$24,223)
Year 2	6	(\$9,499)	(\$59,297)	0	absorbed	\$0	(\$59,297)
Year 3	6	(\$9,499)	(\$60,483)	0	absorbed	\$0	(\$60,483)
Year 4	6	(\$9,499)	(\$61,692)	0	absorbed	\$0	(\$61,692)
Year 5	6	(\$9,499)	(\$62,926)	0	absorbed	\$0	(\$62,926)
Year 6	6	(\$9,499)	(\$64,185)	0	absorbed	\$0	(\$64,185)
Year 7	6	(\$9,499)	(\$65,468)	0	absorbed	\$0	(\$65,468)
Year 8	6	(\$9,499)	(\$66,778)	0	absorbed	\$0	(\$66,778)
Year 9	6	(\$9,499)	(\$68,113)	0	absorbed	\$0	(\$68,113)
Year 10	6	(\$9,499)	(\$69,476)	0	absorbed	\$0	(\$69,476)

Oversight does not have any information to the contrary. Therefore, Oversight will reflect estimate provided by DOC to the General Revenue Fund for FY 2025, FY 2026 and FY 2027.

Officials from the **Office of the State Public Defender (SPD)** state per the recently released National Public Defense Workload Study, the new charge contemplated by this changes to Sections 361.939, 361.984, and 361.1023 would take approximately twenty-two hours of SPD work for reasonably effective representation. If one hundred cases were filed under this section in a fiscal year, representation would result in a need for an additional attorney. Because the number of cases that will be filed under this statute is unknown, the exact additional number of attorneys necessary is unknown. Each case would also result in unknown increased costs in the need for core staff, travel and litigation expenses.

Oversight assumes this proposal will create a minimal number of new cases and that the SPD can absorb the additional caseload required by this proposal with current staff and resources. Therefore, Oversight will reflect no fiscal impact to the SPD for fiscal note purposes. However, if multiple bills pass which require additional staffing and duties, the SPD may request funding through the appropriation process.

In response to a similar proposal from this year (SB 737), officials from the **Office of the State Courts Administrator (OSCA)** assumed there may be some impact but there is no way to quantify that currently. Any significant changes will be reflected in future budget requests.

Oversight does not have any information to the contrary. Therefore, Oversight will reflect a zero impact in the fiscal note.

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Officials from the **Office of Budget & Planning** state this proposal creates new class E felonies and class A misdemeanors. To the extent that any related fines are deposited into the state treasury, this proposal could increase total state revenue by an unknown amount.

DOF has previously assumed that all of the entities currently licensed would convert their license to that which is authorized under the new sections. Because the commissioner determines the fees associated with licensures and renewals under this legislation, DOF has previously assumed the fees would be set at a level sufficient to sustain the operations of the program and furthermore assumed the net effect on the fund balance would be \$0. B&P notes that TSR may be impacted if fees and revenues are set at a level where the net impact on the fund is not \$0.

Officials from the **Missouri Sheriffs' Retirement System** state that this legislation may have a negative impact if this legislation passes. The Retirement System hires investment managers to invest its assets based on the investment policy. Setting constraints on investment guidelines has a potential of limiting investment earnings used to finance the retirement system. At the time the negative impact is unknown.

Oversight assumes because the potential of limiting investment earnings is speculative that the Missouri Sheriffs' Retirement System will not incur significant cost related to this proposal. Therefore, Oversight will reflect a zero impact in the fiscal note.

Rule Promulgation

Officials from the **Joint Committee on Administrative Rules** assume this proposal is not anticipated to cause a fiscal impact beyond its current appropriation.

Officials from the **Office of the Secretary of State (SOS)** note many bills considered by the General Assembly include provisions allowing or requiring agencies to submit rules and regulations to implement the act. The SOS is provided with core funding to handle a certain amount of normal activity resulting from each year's legislative session. The fiscal impact for this fiscal note to the SOS for Administrative Rules is less than \$5,000. The SOS recognizes that this is a small amount and does not expect that additional funding would be required to meet these costs. However, the SOS also recognizes that many such bills may be passed by the General Assembly in a given year and that collectively the costs may be in excess of what the office can sustain with its core budget. Therefore, the SOS reserves the right to request funding for the cost of supporting administrative rules requirements should the need arise based on a review of the finally approved bills signed by the governor.

Officials from the **Department of Public Safety - Missouri Highway Patrol** and the **Missouri Office of Prosecution Services** each assume the proposal will have no fiscal impact on their respective organizations. **Oversight** does not have any information to the contrary. Therefore, Oversight will reflect a zero impact in the fiscal note for these agencies.

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Officials from the **Missouri Department of Agriculture** defer to the Office of Administration for the potential fiscal impact of this proposal.

Officials from the Attorney General's Office, the Department of Economic Development, the Department of Elementary and Secondary Education, the Department of Higher Education and Workforce Development, the Department of Health and Senior Services, the Department of Mental Health, the Department of Natural Resources, the Department of Labor and Industrial Relations, the Department of Revenue, the Department of Public Safety (Office of the Director, Capitol Police, Alcohol & Tobacco Control, Fire Safety, Gaming Commission, Missouri Highway Patrol, Missouri National Guard, State Emergency Management Agency and Veterans Commission), the Department of Social Services, the Office of the Governor, the Joint Committee on Public Employee Retirement, the Missouri Lottery Commission, the Missouri Consolidated Health Care Plan, the Missouri Department of Conservation, the Missouri Ethics Commission, the Missouri House of Representatives, the Department of Transportation, the Office of Prosecution Services, the Office of Administration (Administrative Hearing Commission), the Office of the State Courts Administrator, the Office of the State Auditor, the Missouri Senate, the Office of the State Public Defender, the Office of the State Treasurer, the State Tax Commission, the Kansas City Civilian Police Employees' Retirement, the Kansas City Police Retirement System, the Kansas City Public School Retirement System, the Metro St. Louis Sewer District Employees Pension Plan, the Public Education Employees' Retirement System and Kansas City each assume the proposal will have no fiscal impact on their respective organizations for this proposal.

Oversight notes that the above mentioned agencies have stated the proposal would not have a direct fiscal impact on their organization. Oversight does not have any information to the contrary. Therefore, Oversight will reflect a zero impact on the fiscal note.

FISCAL IMPACT – State	FY 2025	FY 2026	FY 2027
Government	(10 Mo.)		
GENERAL REVENUE			
FUND			
<u>Cost</u> – DOC			
Incarceration Cost	(\$24,223)	(\$59,297)	(\$60,483)
ESTIMATED NET EFFECT			
TO THE GENERAL			
REVENUE FUND	<u>(\$24,223)</u>	<u>(\$59,297)</u>	<u>(\$60,483)</u>

DIVISION OF FINANCE			
FUND (0550)			
Revenue – DOF	\$680,533	\$694,144	\$708,028
Application, Licensing &			
Acquisitions			
Savings – DOF	\$68,400	\$68,400	\$68,400
Processing Fees			
-			
Cost – DOF			
FTE additional workload	(Unknown)	(Unknown)	(Unknown)
<u>Loss</u> – DOF			
Transition to new licenses	(\$68,400)	(\$68,400)	(\$68,400)
	,		
ESTIMATED NET EFFECT			
TO THE DIVISION OF	<u>Unknown, Less</u>	Unknown, Less	Unknown, Less
FINANCE FUND	<u>than \$680,533</u>	than \$694,144	than \$708,028

FISCAL IMPACT – Local Government	FY 2025	FY 2026	FY 2027
	(10 Mo.)		
	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>

FISCAL IMPACT – Small Business

A direct fiscal impact to small businesses that act as a money transmitter would be expected as a result of this proposal.

FISCAL DESCRIPTION

This act repeals the Sale of Checks Law and creates in its stead the "Money Transmission Modernization Act of 2024". The act regulates money transmission, defined as any of the following:

- · Selling or issuing payment instruments to a person located in Missouri;
- · Selling or issuing stored value to a person located in Missouri;
- · Receiving money for transmission from a person located in Missouri; or
- · Payroll processing services.

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Money transmission does not include the provision solely of online or telecommunications services or network access.

The Director of the Division of Finance within the Department of Commerce and Insurance is responsible for administering this act.

LICENSURE OF MONEY TRANSMITTERS

The act prohibits any person from engaging in the business of money transmission or advertising, soliciting, or holding itself out as providing money transmission unless the person has been licensed pursuant to this act. Licenses last for no more than one calendar year and are not transferable or assignable. Applications must be on forms required by the Director and shall be accompanied by an application fee, as determined by the Director.

Additionally, certain individuals in control of a licensee, seeking to control a licensee, and any key individual, as that term is defined in the act, are required to furnish background materials to the Director, including fingerprints, criminal background checks, and employment history, among other things listed in the act.

The Director is permitted to implement the licensure process in such a way as to make it consistent with other states and nationwide protocols, to the extent consistent with this act. The Director is additionally permitted to collaborate with the Nationwide Multistate Licensing System and Registry developed by the Conference of State Bank Supervisors (NMLS) as provided in the act.

CONFIDENTIALITY OF INFORMATION

The act provides that all information provided to the Director is considered confidential except basic identifying information of the licensee as detailed in the act. Exceptions are included with respect to disclosures to certain government agencies.

ACQUISITION OF CONTROL

Any person, or group of persons acting in concert, seeking to acquire control of a licensee shall obtain the written approval of the Director prior to acquiring control. An application must be submitted in a form prescribed by the Director along with a fee, as determined by the Director.

PRUDENTIAL STANDARDS

Licensees are required to maintain at all times a tangible net worth more than \$100,000, or 3% of total assets for the first \$100,000,000, 2% of additional assets between \$100,000,000 and \$1 billion, and 0.5% of additional assets over \$1 billion. Additionally, licensees shall maintain security consisting of a surety bond in an amount based on the licensee's average daily money transmission liability and tangible net worth.

The act establishes requirements for permissible investments of a licensee.

ADMINISTRATIVE, CRIMINAL, AND CIVIL ENFORCEMENT MECHANISMS

The act allows the Director to suspend or revoke licenses and designations of authorized delegates under circumstances and using procedures as described in the act. The Director is also

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permitted to issue cease and desist orders and enter into consent decrees for the resolution of matters arising under this act.

The act creates the following criminal penalties associated with money transmission:

- · A person that intentionally makes a false statement, misrepresentation, or false certification in a record filed or required to be maintained pursuant to this act or that intentionally makes a false entry or omits a material entry in such a record is guilty of a class E felony;
- · A person that knowingly engages in an activity for which a license is required pursuant to this act without being licensed and who receives more than \$500 in compensation within a 30-day period from this activity is guilty of a class E felony;
- · A person that knowingly engages in an activity for which a license is required pursuant to this act without being licensed and who receives no more than \$500 in compensation within a 30-day period from this activity is guilty of a Class A misdemeanor.

The Director is also permitted to assess civil penalties not to exceed \$1,000 per day for each violation of this act.

This legislation is not federally mandated, would not duplicate any other program and would not require additional capital improvements or rental space.

SOURCES OF INFORMATION

Attorney General's Office

Department of Commerce and Insurance

Department of Economic Development

Department of Elementary and Secondary Education

Department of Higher Education and Workforce Development

Department of Health and Senior Services

Department of Mental Health

Department of Natural Resources

Department of Corrections

Department of Labor and Industrial Relations

Department of Revenue

Department of Public Safety

Office of the Director

Division of Alcohol and Tobacco Control

Capitol Police

Fire Safety

Missouri Gaming Commission

Missouri Highway Patrol

Missouri National Guard

State Emergency Management Agency

Missouri Veterans Commission

Department of Social Services

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Office of the Governor

Joint Committee on Public Employee Retirement

Joint Committee on Administrative Rules

Missouri Lottery Commission

Legislative Research

Oversight Division

Local Government Employees Retirement System

Missouri Consolidated Health Care Plan

Missouri Department of Agriculture

Missouri Department of Conservation

Missouri Ethics Commission

Missouri House of Representatives

Missouri Department of Transportation

Missouri State Employee's Retirement System

MoDOT & Patrol Employees' Retirement System

Missouri Office of Prosecution Services

Office of Administration

Administrative Hearing Commission

Budget and Planning

Facilities Management, Design and Construction

Office of the State Auditor

Missouri Senate

Office of the Secretary of State

Office of the State Public Defender

Office of the State Treasurer

Office of the State Courts Administrator

Public Schools and Education Employee Retirement Systems

State Tax Commission

Kansas City Civilian Police Employees' Retirement

Kansas City Police Retirement System

Kansas City Public School Retirement System

Metro St. Louis Sewer District Employees Pension Plan

Public Education Employees' Retirement System

Kansas City

Julie Morff Director

January 26, 2024

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Ross Strope Assistant Director January 26, 2024