



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3314		DATE: 3/9/2026	
COMMITTEE: Insurance			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: ARNIE C. "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCAT		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: In-Person		SUBMIT DATE: 3/9/2026 11:59 PM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

I am in Support of most of this Bill, but am not in favor of the Liability Maximum \$300,000-Cap.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3314		DATE: 3/9/2026	
COMMITTEE: Insurance			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: HAMPTON WILLIAMS		PHONE NUMBER: 573-893-4241	
REPRESENTING: MISSOURI INSURANCE COALITION		TITLE:	
ADDRESS: 220 EAST HIGH STREET, SUITE B			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL:	ATTENDANCE:	SUBMIT DATE: 3/9/2026 12:00 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3314		DATE: 3/9/2026	
COMMITTEE: Insurance			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: TAMARA W. KOPP		PHONE NUMBER: 573-634-8455	
BUSINESS/ORGANIZATION NAME: MISSOURI PROPERTY & CASUALTY INSURANCE GUARANTY ASSOCIATION; MISSOURI LIFE & HEALTH INSURANCE GUARANTY ASSOCIATIONS (AKA MISSOURI INSURANCE GUARANTY ASSOCIATIONS)		TITLE: EXECUTIVE DIRECTOR	
ADDRESS: 630 BOLIVAR STREET, SUITE 204			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL: tkopp@moiga.org	ATTENDANCE: Written	SUBMIT DATE: 3/9/2026 8:55 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3314		DATE: 3/9/2026	
COMMITTEE: Insurance			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 3/9/2026 9:51 AM	

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This notice is submitted to preserve the legislative record regarding structural and due process concerns arising from House Bill 3314.

HB 3314 substantially expands the authority of the Director of the Department of Commerce and Insurance to disclose confidential insurer examination materials, enterprise-risk filings, preliminary examination findings, and related privileged regulatory information to guaranty associations and affiliated interstate organizations prior to the commencement of any formal delinquency proceeding.

The triggering standard for such disclosures is that the Director determines an insurer “may be subject to a future delinquency proceeding.”
 This threshold is undefined, predictive, and discretionary.

The bill does not require:

- a formal insolvency determination
- a rehabilitation or liquidation filing
- judicial authorization
- objective statutory criteria governing when the threshold is met

Instead, the legislation authorizes the circulation of confidential regulatory information based on an internal administrative determination regarding a potential future regulatory event.

HB 3314 therefore expands pre-insolvency coordination authority while simultaneously expanding the number of entities permitted to receive privileged regulatory materials, including guaranty associations in other states and organizations composed of multiple state associations.

Although the bill requires written confidentiality agreements, the practical effect of the legislation is to broaden the circulation of proprietary insurer information before formal insolvency proceedings have begun.

When statutes authorize the dissemination of confidential regulatory information prior to formal proceedings, precision and objective statutory guardrails are essential to ensure that such authority is not exercised arbitrarily or inconsistently.

The absence of clear statutory thresholds raises legitimate concerns regarding:

- administrative overreach

- due process implications for affected insurers
- the integrity of confidential regulatory information
- and the potential for consequential regulatory coordination occurring outside formal judicial oversight

HB 3314 also introduces a new statutory limitation on guaranty association liability for cybersecurity insurance claims arising from a single insured event, capping total exposure at three hundred thousand dollars regardless of the number of claimants. This represents a substantive narrowing of guaranty protection in an area of rapidly expanding risk exposure.

While the bill may be intended to facilitate regulatory preparedness for potential insurer insolvency, legislation authorizing expanded confidential information sharing and pre-liquidation coordination must be accompanied by clear statutory limits and accountability mechanisms.

As currently drafted, HB 3314 relies heavily on discretionary determinations without sufficiently defined statutory standards.

This notice is submitted to preserve the legislative record regarding these concerns.