



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3470		DATE: 3/31/2026	
COMMITTEE: Children and Families			
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: ARNIE C. A.C. "HONEST ABE" DIENOFF		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME: STATE PUBLIC ADVOCACY		TITLE: STATE PUBLIC ADVOCATE	
ADDRESS: PO BOX 1935			
CITY: O'FALLON		STATE: MO	ZIP: 63366
EMAIL:	ATTENDANCE:	SUBMIT DATE: 3/31/2026 12:00 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 3/31/2026 5:35 AM	

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HB 3470 establishes a broad interagency assistance program intended to promote self-sufficiency through coordinated services. While the objective is policy-driven and facially permissible, the bill raises several constitutional and structural concerns that warrant legislative refinement.

First, the bill vests significant operational authority in the executive branch by allowing the governor to direct participation by state agencies without clear statutory limits. This raises separation of powers concerns under the Missouri Constitution, as the legislature has not provided sufficient standards to guide or constrain that authority.

Second, the program delegates substantial discretion to the Department of Social Services, in consultation with the governor, to define and expand program operations. The absence of clear limiting principles or measurable criteria increases the risk of inconsistent or arbitrary implementation, implicating nondelegation and due process concerns.

Third, the inclusion of faith-based organizations within the program’s partner network, without explicit safeguards ensuring religious neutrality and voluntary participation free from coercion, raises potential concerns under the Establishment Clause of the United States Constitution and its Missouri counterpart.

Additionally, the bill restricts eligibility to U.S. citizens and permanent residents. While such limitations may be permissible in certain contexts, the absence of a clearly articulated justification tied to program objectives may invite equal protection challenges.

Finally, the bill does not establish procedural protections for participants, including clear eligibility standards, appeal mechanisms, or transparency requirements in program administration. This lack of structure increases the likelihood of inconsistent application across agencies.

For these reasons, HB 3470 presents identifiable legal and structural vulnerabilities.

This analysis is based solely on statutory language and established constitutional doctrine and should not be interpreted as endorsement of any policy position.

This assessment is limited to constitutional structure and does not evaluate policy desirability.

The General Assembly is hereby placed on notice that enactment of this provision may give rise to

constitutional challenges under the issues identified above.