

COMMITTEE ON LEGISLATIVE RESEARCH
OVERSIGHT DIVISION

FISCAL NOTE

L.R. No.: 2119-01
Bill No.: SB 459
Subject: Administrative Law; Administrative Rules; Business and Commerce; Fees
Type: Original
Date: March 27, 2015

Bill Summary: This proposal would modify procedures for rules which affect businesses.

FISCAL SUMMARY

ESTIMATED NET EFFECT ON GENERAL REVENUE FUND			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
General Revenue	(\$1,111,675)	(\$1,211,508)	(\$1,224,738)
Total Estimated Net Effect on General Revenue	(\$1,111,675)	(\$1,211,508)	(\$1,224,738)

ESTIMATED NET EFFECT ON OTHER STATE FUNDS			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
Total Estimated Net Effect on <u>Other</u> State Funds	\$0	\$0	\$0

Numbers within parentheses: () indicate costs or losses.

This fiscal note contains 17 pages.

ESTIMATED NET EFFECT ON FEDERAL FUNDS			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
Total Estimated Net Effect on <u>All</u> Federal Funds	\$0	\$0	\$0

ESTIMATED NET EFFECT ON FULL TIME EQUIVALENT (FTE)			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
General Revenue	20.5 FTE	20.5 FTE	20.5 FTE
Total Estimated Net Effect on FTE	20.5 FTE	20.5 FTE	20.5 FTE

Estimated Net Effect (expenditures or reduced revenues) expected to exceed \$100,000 in any of the three fiscal years after implementation of the act.

ESTIMATED NET EFFECT ON LOCAL FUNDS			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
Local Government	\$0	\$0	\$0

FISCAL ANALYSIS

ASSUMPTION

Officials from the **Office of Administration - Division of Budget and Planning (BAP)** noted this proposal would renew the expired provisions of the "Big Government Get Off My Back Act" (BGGOMBA) for an additional five years.

BAP officials assume Total State Revenue (TSR) and the calculation required under Section 18(e) of the state constitution would be impacted as the provisions had expired on August 28, 2014. The renewed provisions state no user fees imposed by the state could increase over this extended time frame, although exclusions would be provided to implement federal and General Assembly programs. BAP officials assume this could reduce TSR growth to the extent an agency intended to increase any of those fees.

BAP officials also noted the proposal includes provisions impacting the rule-making process in Chapter 537. The proposal would allow those financially impacted by a rule to provide a cost statement that would be published in the Missouri Register if certain requirements are met. If the adopting agency fails to publish regulations as and when required, the rule could be voided and no longer enforced. In addition, the proposal could delay implementation of new rules financially impacting existing businesses by one year for any penalties or fines. BAP officials assume this could also reduce TSR in the amount of any fines that otherwise would have been collected, but stated that penalties and fines do not impact the calculation required under Section 18(e) of the state constitution.

Officials from the **Department of Conservation** assume this proposal would have an unknown negative fiscal impact but likely more than \$100,000 due to the need for additional staff to collect and publish data, re-promulgate rules, as well as increased analysis for filing requirements and for the prevention of rule violations.

ASSUMPTION (continued)

Officials from the **Missouri Department of Agriculture (MDA)** assume this proposal would require the department to administer provisions related to the costs of regulations to small businesses affected by department rules.

MDA officials assume adding to the existing requirements for rulemaking would significantly increase the resources needed to comply with the requirements for as long as the provisions are in effect.

MDA officials assume one additional Planner III and associated expense and equipment costs would be needed to meet the additional requirements of the legislation.

The MDA estimate of cost to implement this proposal including one additional employee and related benefits, equipment, and expense totaled \$77,501 for FY 2016, \$86,655 for FY 2017, and \$87,674 for FY 2018.

Oversight assumes the MDA estimate of expense and equipment cost for the new FTE could be overstated. If MDA is able to use existing desks, file cabinets, chairs, etc., the estimate for equipment could be reduced by roughly \$6,000 per new employee.

Oversight has, for fiscal note purposes only, changed the starting salary for the additional employee to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research. Oversight has also adjusted the MDA estimate of equipment and expense in accordance with OA budget guidelines. Finally, Oversight assumes a limited number of additional employees could be accommodated in existing office space.

Officials from the **Department of Elementary and Secondary Education (DESE)** stated that currently DESE doesn't experience many occasions when their rules would directly affect businesses in a significant way and noted the proposal would define the impact on businesses as "...an expenditure of money by or a reduction in income...." DESE officials also noted the proposal would require agencies to follow additional filing requirements when a rule "...would affect business...."

ASSUMPTION (continued)

DESE officials assume if it is determined that the proposed language would apply to any impact, direct or indirect, this would create a new level of detailed resource and data gathering not done in past years and stated their organization would be required to hire and train a staff person who would gather the required information to ensure that we identify any business impact to all of the "business entities of any kind or character."

The DESE response included one additional employee, a supervisor; the total DESE estimate of cost to implement this proposal including the additional employee, benefits, expense, and equipment totaled \$60,133 for FY 2016, \$72,882 for FY 2017, and \$73,610 for FY 2018.

Oversight assumes the DESE estimate of expense and equipment cost for the new FTE could be overstated. If DESE is able to use existing desks, file cabinets, chairs, etc., the estimate for equipment could be reduced by roughly \$6,000 per new employee.

Oversight has, for fiscal note purposes only, changed the starting salary for the additional employee to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research. Oversight has also adjusted the DESE estimate of equipment and expense in accordance with OA budget guidelines. Finally, Oversight assumes a limited number of additional employees could be accommodated in existing office space.

Officials from the **Department of Labor and Industrial Relations (DOLIR)** assume the proposal would require significantly more detailed forecasting of impact; repromulgation of any rule where the forecast fiscal impact was more than minimally incorrect; additional staff to address business concerns about rules; and a one year prohibition on enforcement of fines.

DOLIR officials stated over the past few years, the number of rules promulgated by the department has been limited. The additional time required by staff to perform the functions detailed above could be significant even for a limited number of rules with minimal fiscal impact. The proposed requirement to review all rules every five years would be expected to generate some changes to existing rules.

DOLIR officials noted the Division of Employment Security has forward the proposal to the US Department of Labor to confirm that the provisions for delayed implementation would not create a conformity issue for the Missouri Unemployment Insurance program.

ASSUMPTION (continued)

DOLIR officials estimate the department would need one additional staff to support the recordkeeping/reporting requirements for rules; as well as to provide affected businesses with the assistance specified in this legislation, with standard expense and equipment and minimal travel.

The DOLIR estimate of cost to implement this proposal including one additional employee and related benefits, equipment, and expense totaled \$65,220 for FY 2016, \$69,548 for FY 2017, and \$70,345 for FY 2018.

Oversight assumes the DOLIR estimate of expense and equipment cost for the new FTE could be overstated. If DOLIR is able to use existing desks, file cabinets, chairs, etc., the estimate for equipment could be reduced by roughly \$6,000 per new employee.

Oversight has, for fiscal note purposes only, changed the starting salary for the additional employee to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research. Oversight has also adjusted the DOLIR estimate of equipment and expense in accordance with OA budget guidelines. Finally, Oversight assumes a limited number of additional employees could be accommodated in existing office space.

Officials from the **Department of Social Services (DOSS)** noted this proposal would extend provisions of the "Big Government Get Off My Back Act" from their expiration date of August 28, 2014 to August 28, 2019.

DOSS officials stated that their organization must comply with federal regulations in order to receive funding for many federal programs. If the organization is unable to implement rules and regulations this could significantly reduce funding, or potentially eliminate federal funding for many of the programs and services provided to Missouri's citizens. DOSS officials assume this requirement could result in the loss of a portion of or all federal funding, and stated their organization is expected to receive \$4.605 billion dollars in FY 2015; using a 1% inflationary increase the impact as written would be:

FY 2016 (10 months):	\$3,874,883,280
FY 2017:	\$4,698,237,830
FY 2018:	\$4,745,220,208

ASSUMPTION (continued)

DOSS officials assume General Revenue funding would be requested in lieu of the lost federal dollars to continue vital programs such as Medicaid, TANF, etc. Further, if the SNAP program is discontinued Missourians would potentially lose \$1.4 billion in food stamp benefit issuances not included DSS's fiscal impact as this funding does not come through DSS appropriations.

Division of Legal Services (DLS)

DLS officials stated the Department of Social Services has approximately 500 existing regulations, and noted that those regulations are all currently under review and many are in the process of amendment or rescission.

If this proposal is implemented, individuals and/or businesses would have the option of filing cost statements that could result in the need to repromulgate rules, amendments and rescissions that are found to exceed the cost projected in the fiscal note prepared when the rule, amendment or rescission was originally promulgated.

DLS officials stated the drafting and promulgation of regulations for complex programs require a significant amount of legal research, drafting and review by lawyers. DLS attorneys can spend 50 hours per regulation on the regulation promulgation process. Assuming that individuals and/or businesses file actual cost statements on just 50 regulations per year, DLS officials estimated that one additional attorney would be required based on (50 hours x 50 regulations = 2,500 hours, with average FTE workload at about 1,800 hours) and stated the additional workload could not be absorbed with current staff. DLS officials also estimated an additional 15 hours for DLS administrative staff time would be required for each promulgated regulation, amendment and rescission but assumed this workload could be absorbed with current administrative staff.

ASSUMPTION (continued)

Division of Youth Services (DYS)

DYS works with support from the Division of Legal Services works to draft and promulgate rules governing the division's programs and activities. DYS officials assume adoption of this proposal would create substantial new work and activity related to the division's rule-making process. DYS officials estimated it would need one additional Program Development Specialist and one half-time Office Support Assistant and assume this staffing would create the needed capacity to research and create rules effectively, and would provide adequate responsiveness to the proposed new processes centered on cost-evaluation and re-promulgation of rules that are challenged.

Children's Division (CD)

CD officials stated this proposal would have an impact on the rule promulgation process and would likely have a fiscal impact to the Children's Division.

CD officials stated it is difficult to determine how many statements of actual costs might be filed by individuals, businesses, etc. in response to this bill but noted CD currently has approximately 185 rules in the state code of regulations. The CD, on an annual basis, amends, modifies or rescinds approximately ten (10) percent (10% of 185 = 18.5) of the rules already promulgated. In addition, the CD develops approximately ten (10) new rules annually for an approximated total of 29 rules per year (18.5 plus 10 = 28.5 or 29 rounded up). If the CD receives statements of actual cost which compiled exceed five hundred dollars or ten percent of the estimated fiscal note cost in response to as many as twenty-nine (29) rules per year, is required to publish the original estimated fiscal note cost of as many as 29 rules in the Missouri Register, void or no longer enforce as many as 29 rules, or repromulgate as many as 29 rules the CD would expect to need to employ one additional staff person to meet these requirements. The CD would expect this staff position to be filled at the Program Development Specialist level.

In response to this bill, the CD would expect to dedicate approximately 75 hours per rule compiling statements, promulgating or repromulgating rules, consulting with other professionals, educating or providing training to business employees, providing ombudsman services, etc. (75 hours times 29 rules = 2,175 hours per year. One full-time staff person at the program development specialist level is calculated at 2,080 hours per year.

ASSUMPTION (continued)

Family Services Division (FSD)

FSD officials assume that non-compliance with federal regulations could result in the loss of federal funding for FSD programs. In order to continue these programs in Missouri, any loss of federal funding would have to be replaced with general revenue. DFS officials assume their organization would require four additional full-time program development specialists.

Rehabilitation Services for the Blind -	1 FTE
Child Support -	1 FTE
Income Maintenance (excluding Mo HealthNet Program) -	1 FTE
Income Maintenance Mo HealthNet Program -	1 FTE

Mo Health Net Division (MHD)

MHD officials noted the programs administered by their organization must comply with federal regulations, and noted the division promulgates rules for each program administered by MHD. MHD officials assume the proposal could place MHD in a perpetual rule revision cycle and stated if MHD is unable to fully promulgate its rules each year, Missouri could have non-compliant state plans. MHD officials assume their organization would require five additional full-time program development specialists.

Missouri Medicaid Audit and Compliance (MMAC)

MMAC officials noted their organization currently spends approximately 2,600 hours drafting and promulgating regulations, and assume adoption of this proposal would create substantial new work and activity related to the rule-making process. MMAC officials estimate it would need one new Program Development Specialist to implement this proposal.

Overall, the Department of Social Services response included and additional thirteen full-time employees and one half-time employee. The total cost including the employees, benefits, equipment, and expense totaled \$804,906 for FY 2016, \$884,361 for FY 2017, and \$894,128 for FY 2018.

Oversight assumes this proposal could be implemented in a manner to maintain program compliance with federal program requirements and will not include the potential loss of federal funding in this fiscal note.

ASSUMPTION (continued)

Oversight assumes the DOSS estimate of expense and equipment cost for the new FTE could be overstated. If DOSS is able to use existing desks, file cabinets, chairs, etc., the estimate for equipment could be reduced by roughly \$6,000 per new employee.

Oversight has, for fiscal note purposes only, changed the starting salary for the additional employee to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research. Oversight has also adjusted the DOSS estimate of equipment and expense in accordance with OA budget guidelines.

Officials from the **Department of Revenue (DOR)** assume this proposal would allow any person or business entity financially impacted by a rule to, within a year of the creation of that rule, file a statement of actual cost with the state agency that created the rule and with the Joint Committee on Administrative Rules (JCAR). The state agency would compile the statements of actual cost received. If after the first full fiscal year of implementation, the rule costs 10 percent more than the estimated cost, or exceeds \$500 if an affidavit was filed stating the proposed change would cost less than \$500, the agency would be required to publish in the Missouri Register the original estimated cost together with the actual cost within 90 days after the close of the fiscal year. If the adopting agency failed to publish the costs, the rule would be void.

Administrative Impact

DOR officials assume Personal Tax would require one additional Revenue Processing Technician I (Range 10, Step L) for processing and compiling the required reports, Business Tax would require one additional Revenue Processing Technician I (Range 10, Step L) for processing and compiling the required reports, the Motor Vehicle Bureau would require one additional Revenue Processing Technician I (Range 10, Step L) for processing and compiling the required reports, and the Drivers License Bureau would require one additional Revenue Processing Technician I (Range 10, Step L) for processing and compiling the required reports.

The DOR estimate of cost to implement this proposal, including four additional employees and their benefits, equipment, and expense, totaled \$63,361 for FY 2016, \$168,172 for FY 2017, and \$169,922 for FY 2018.

ASSUMPTION (continued)

Oversight assumes the DOR estimate of expense and equipment cost for the new FTE could be overstated. If DOR is able to use existing desks, file cabinets, chairs, etc., the estimate for equipment could be reduced by roughly \$6,000 per new employee.

Oversight has, for fiscal note purposes only, changed the starting salary for the additional employee to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research. Oversight has also adjusted the DOR estimate of equipment and expense in accordance with OA budget guidelines. Finally, Oversight assumes a limited number of additional employees could be accommodated in existing office space.

Officials from the **Missouri Senate** and the **Joint Committee on Administrative Rules** assume this proposal would not have a fiscal impact to their organization in excess of existing resources.

Officials from the **Office of the Attorney General** assume that any potential costs arising from this proposal could be absorbed with existing resources.

Officials from the **Department of Natural Resources** stated their organization would not expect a direct fiscal impact from this proposal.

Officials from the **Office of the Governor**, the **Office of the Lieutenant Governor**, the **Office of the State Auditor**, the **Office of the State Treasurer**, the **Missouri House of Representatives**, the **Office of State Courts Administrator**, the **Office of Administration - Divisions of Accounting, Facilities Management, Design, and Construction**, **General Services**, **Personnel**, and the **Information Technology Services Division**, the **Department of Corrections**, the **Department of Economic Development**, the **Department of Health and Senior Services**, the **Department of Higher Education**, the **Department of Mental Health**, the **Department of Public Safety - Divisions of Alcohol and Tobacco Control, Fire Safety, Capitol Police**, the **Missouri Gaming Commission**, the **Missouri Highway Patrol**, and **Missouri Veterans Commission**, the **Administrative Hearing Commission**, the **Missouri Ethics Commission**, the **Missouri Lottery Commission**, the **Missouri Consolidated Health Care Plan**, the **MoDot and Patrol Employees' Retirement System**, the **Office of Prosecution Services**, the **Office of State Public Defender**, and the **Legislative Research Division** assume this proposal would not have a fiscal impact on their organizations.

ASSUMPTION (continued)

Officials from the **Office of the Secretary of State (SOS)** assume 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 Secretary of State's Office for Administrative Rules is less than \$2,500. The SOS recognizes that this is a small amount and does not expect that additional funding would be required to meet these costs. However, we also recognize that many such bills may be passed by the General Assembly in a given year and that collectively the costs may be greater than our office can sustain with our core budget. Therefore, we reserve 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 **Joint Committee on Public Retirement** assume this proposal would not affect retirement plan benefits.

Oversight assumptions

Oversight notes this proposal would extend the current prohibition on additional fees and fines; any anticipated additional revenues from fees and fines would not be available to state agencies. This would be primarily applicable to agencies which have dedicated revenue sources. Oversight assumes these agencies would adjust their expenditures based on actual funds and appropriations available. Because these changes in revenues and expenditures are prospective, Oversight will not include them in this fiscal note.

<u>FISCAL IMPACT - State Government</u>	FY 2016 (10 Mo.)	FY 2017	FY 2018
GENERAL REVENUE FUND			
<u>Cost - Department of Agriculture</u>			
Salaries	(\$37,630)	(\$45,156)	(\$45,608)
Benefits	(\$19,193)	(\$23,032)	(\$23,262)
Equipment and expense	<u>(\$6,484)</u>	<u>(\$610)</u>	<u>(\$625)</u>
<u>Total cost - MDA</u>	(\$63,307)	(\$68,798)	(\$69,495)
FTE change - MDA	1 FTE	1 FTE	1 FTE
<u>Cost - Department of Elementary and Secondary Education</u>			
Salaries	(\$34,950)	(\$41,940)	(\$42,359)
Benefits	(\$17,826)	(\$21,391)	(\$21,605)
Equipment and expense	<u>(\$6,484)</u>	<u>(\$610)</u>	<u>(\$625)</u>
<u>Total cost - DESE</u>	(\$59,260)	(\$63,941)	(\$64,589)
FTE change - DESE	1 FTE	1 FTE	1 FTE
<u>Cost - Department of Labor and Industrial Relations</u>			
Salaries	(\$29,120)	(\$34,944)	(\$35,293)
Benefits	(\$14,853)	(\$17,823)	(\$18,001)
Equipment and expense	<u>(\$6,484)</u>	<u>(\$610)</u>	<u>(\$625)</u>
<u>Total cost - DOLIR</u>	(\$50,457)	(\$53,377)	(\$53,919)
FTE change - DOLIR	1 FTE	1 FTE	1 FTE
<u>Cost - Department of Social Services</u>			
Salaries	(\$447,100)	(\$536,520)	(\$541,886)
Benefits	(\$228,043)	(\$273,652)	(\$276,389)
Equipment and expense	<u>(\$121,208)</u>	<u>(\$69,990)</u>	<u>(\$71,741)</u>
<u>Total cost - DOSS</u>	(\$796,351)	(\$880,162)	(\$890,016)
FTE change - DOSS	13.5 FTE	13.5 FTE	13.5 FTE

<u>FISCAL IMPACT - State Government</u> (Continued)	FY 2016 (10 Mo.)	FY 2017	FY 2018
<u>Cost - Department of Revenue</u>			
Salaries	(\$78,600)	(\$94,560)	(\$95,506)
Benefits	(\$40,192)	(\$48,230)	(\$48,713)
Equipment and expense	<u>(\$23,508)</u>	<u>(\$2,440)</u>	<u>(\$2,500)</u>
<u>Total cost - DOR</u>	(\$142,300)	(\$145,230)	(\$146,719)
FTE change - DOR	4 FTE	4 FTE	4 FTE

ESTIMATED NET EFFECT ON GENERAL REVENUE FUND	<u>(\$1,111,675)</u>	<u>(\$1,211,508)</u>	<u>(\$1,224,738)</u>
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Estimated Net FTE Effect on General Revenue Fund	20.5 FTE	20.5 FTE	20.5 FTE
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<u>FISCAL IMPACT - Local Government</u>	FY 2016 (10 Mo.)	FY 2017	FY 2018
	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>

FISCAL IMPACT - Small Business

This proposal could have a direct fiscal impact to small businesses through the prohibition on increased fees; in addition, there could be potential compliance cost reductions as a result of this proposal.

FISCAL DESCRIPTION

The proposed legislation would change several provisions related to state agency fees and rule-making.

This proposal would extend the currently expired prohibition on increases on user fees imposed by the state shall increase for ten years beginning on August 28, 2009.

The proposal would also require that within one year after the implementation of an administrative rule which affects the expenditures or income of a business entity of any kind and is estimated to cost more than five hundred dollars, a business entity impacted by the adopted or amended rule may file a statement of the actual cost of the business entity with the state agency who promulgated the rule and with the Joint Committee on Administrative Rules. After the agency has compiled all such statements filed by business entities, if the cost to all affected entities has exceeded by ten percent or more the estimated cost in the fiscal note, or has exceeded five hundred dollars when an affidavit was filed stating the rule adoption or amendment would cost less than five hundred dollars, the original estimated cost and the actual cost shall be published by the agency in the Missouri Register. If the agency fails to publish these figures then the rule shall be void and have no force or effect.

A new rule, amendment, or rescission would expire one year after its cost statement is published in the Missouri Register. If a state agency desires for such rule to remain in effect then the proposal would require that the rule be repromulgated.

When a state agency files a notice of proposed rulemaking which would affect business, the proposal would provide additional requirements the agency would be required to meet including examples of fiscal impact on business, a statement whether additional training of employees would be required for implementation of the rule; the proposal would add provisions delaying implementation for business entities currently in existence.

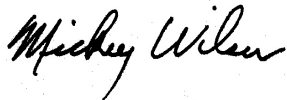
This legislation is not federally mandated, would not duplicate any other program and would not require additional capital improvements or rental space.

SOURCES OF INFORMATION

Office of the Governor
Office of the Lieutenant Governor
Office of the Secretary of State
Office of the State Auditor
Office of the Attorney General
Office of the State Treasurer
Office of State Courts Administrator
Missouri Senate
Missouri House of Representatives
Office of Administration
 Division of Accounting
 Division of Budget and Planning
 Division of Facilities Management, Design, and Construction
 Division of General Services
 Division of Personnel
 Information Technology Services Division
Department of Agriculture
Department of Conservation
Department of Corrections
Department of Economic Development
Department of Elementary and Secondary Education
Department of Health and Senior Services
Department of Higher Education
Department of Labor and Industrial Relations
Department of Mental Health
Department of Natural Resources
Department of Public Safety
 Division of Alcohol and Tobacco Control
 Division of Fire Safety
 Capitol Police
 Missouri Gaming Commission
 Missouri Highway Patrol
 Missouri Veterans Commission

SOURCES OF INFORMATION (continued)

Department of Revenue
Department of Social Services
Missouri Ethics Commission
Missouri Lottery Commission
MoDot and Patrol Employees' Retirement System
Office of State Public Defender
Office of Prosecution Services
Administrative Hearing Commission
Joint Committee on Administrative Rules
Joint Committee on Public Retirement
Legislative Research
Missouri Consolidated Health Care Plan



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March 27, 2015

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March 27, 2015