

**City of St. Louis
Treasurer's Office**



**Request for Proposals
Financial Investment and Advisory Services
Proposals due no later than 3:00pm,
May 31, 2022**

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Notice of Request for Proposals

The St Louis Treasurer's Office, (STLTO) is accepting proposals for investment management services. The minimum requirements and scope of services are set out in this request for proposals. **All proposals should be marked "Proposal-Investment Management Services" and one original, and three hard copies mailed or delivered to the St Louis Treasurer's Office. Additionally, a complete electronic copy of the Proposal must be sent to Adam L. Layne, Treasurer, City of St Louis.** Original and electronic copies should be **received** no later than May 31, 2022.

The STLTO reserves the right to (1) reject any and all proposals, with or without cause; (2) to waive variations or formalities in the responses submitted; (3) request additional information as STLTO may feel necessary; and (4) to negotiate changes, additions, or deletions. The STLTO reserves the right to accept the proposal which it deems to be in the STLTO's best interest and will not necessarily be bound to accept the proposal that offers the lowest price. The STLTO also reserves the right to extend the time to submit proposals, as well as extend the time to open proposals. Any questions should be sent via email to Adam L. Layne at stltreasurer@stlouis-mo.gov.

The STLTO hereby notifies all bidders that it will affirmatively insure that in any contract entered pursuant to this advertisement; minority business enterprises will be afforded full opportunity to submit proposals in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for award.

Minimum Requirements

To be selected for this investment manager mandate, the firm must meet the following minimum requirements:

- The investment manager's firm must be a registered investment advisor under the Investment Company Act of 1940.
- The investment manager firms must agree to be, with respect to the STLTO, an "investment fiduciary" and to perform the investment fiduciary duties imposed under Missouri State Law as applicable to STLTO.
- The investment manager firm must have provided at least eight years of investment management services comparable to the scope of services contained in this RFP to at least three (3) government/municipal clients.
- The investment management firm must agree to enter into an investment management service agreement that may be terminated for any reason by either party with at least sixty (60) days' advance written notice.
- The individual assigned to STLTO as Portfolio Manager must have a minimum of eight (8) total years of experience as an investment manager to public or corporate funds, foundations, or endowments as of the date of this RFP. The term Portfolio Manager shall refer to the most portfolio manager assigned to the relationship to provide the investment management services contained in this RFP.

Scope of Services

STLTO will select two firms from the list of respondents and firms are encouraged to submit individually vs joint partnerships. The STLTO seeks experienced and qualified firms to provide investment management services to the STLTO and staff. STLTO is committed to inclusion and diversity in all its engagements and strongly encourages MBE/WBE firms to apply.

At a minimum, the firm/s selected shall provide the following services:

- Present written quarterly reports to the STLTO on the performance of the STLTO's portfolio, including but not limited to analyses of gains and losses, benchmarks, risk, and cures or recommendations to investment policy.
- Provide investment research findings, education, and training to STLTO and its staff as requested.

Term of Agreement

The STLTO is soliciting proposals for a three-year contract, subject to the timing of the candidate's selection by the Treasurer's Office and the provisions set out in the Minimum Requirements above. Upon expiration of the initial three-year term, the agreement shall automatically renew for successive one-year terms, unless either party shall give written notice at the last known business address of the other at least sixty (60) days before the start of the renewal period. **Please provide a sample contract with your proposal response.**

Description of Services

The STLTO is governed by specific provisions of Mo. Rev. Stat. § 95.530. As of December 31, 2021 St Louis, City Assets were valued at around \$490,600,611.

Approximately 44% of plan assets are invested in the Missouri Securities Investment Program, MOSIP. In addition, approximately 21% of portfolio is allocated to our Bond portfolio which consists of 29 accounts. None of the City's investments are managed in-house.

Relevant Statutes

The Missouri statutes cited in this section are especially relevant: Mo. Rev. Stat. § 95.530, , Mo. Rev. Stat. § 30.950, R.S.Mo. §§105.687 –105.690, and §169.450.8.

§105.687 - Definitions

As used in sections 105.687 to 105.690, the following terms mean:

- (1) "Equity interests", limited partnership interests and other interests in which the liability of the investor is limited to the amount of the investment but does not include general partnership interests or other interests involving general liability of the investor.
- (2) "Invest" or "investment", utilization of money in the expectation of future returns in the form of income or capital gain.
- (3) "Investment fiduciary", a person who either exercises any discretionary authority or control in the investment of a public entity's assets or who renders for a fee advice for to a public entity.
- (4) "Small business", an independently owned and operated business as defined in Title 15 U.S.C. Section 632A and as described by Title 13 CFR Part 121*.
- (5) "Small business investment company", an incorporated body or a limited partnership under Section 301 of Title III of the Small Business Investment Act of 1958, 15 U.S.C. 681.

§105.688 – Investment Fiduciary Duties

The assets of a city government office may be invested, reinvested, and managed by an investment fiduciary subject to the terms, conditions and limitations provided in sections 105.687 to 105.689. An investment fiduciary shall discharge his or her duties in the interest of the participants in the system and their beneficiaries and shall:

- (1) Act with the same care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a similar capacity and familiar with those matters would use in the conduct of a similar enterprise with similar aims.
- (2) Act with due regard for the management, reputation, and stability of the issuer and the character of the investments being considered.
- (3) Make investments for the purposes of capital appreciation and of defraying reasonable expenses of investing the assets of the City.
- (4) Consider those facts and circumstances that the investment fiduciary knows or should know are relevant to the particular investment or investment course of action involved, including the role of the investment or investment course of action plays in that portion of the City's investments for which the investment fiduciary has responsibility. For purposes of this subdivision, "appropriate consideration" shall include, but is not necessarily limited to a determination by the investment fiduciary that a particular investment or investment course of action is reasonably designed, as part of the investments of the system, to further the purposes of the system, taking into consideration the risk of loss and the opportunity for gain or other return associated with the investment or

investment course of action; and consideration of the following factors as they relate to the investment or investment course of action:

- (a) The diversification of the investments of the City's aggregate portfolio.
 - (b) The liquidity and current return of the investments of the City relative to the anticipated cash flow requirements of the City; and
 - (c) The projected return of the investments of the City relative to the funding objectives of the City's capital.
- (5) Give appropriate consideration to investments which would enhance the general welfare of this state and its citizens if those investments offer the safety and rate of return comparable to other investments available to the investment fiduciary at the time the investment decision is made.

(L. 1987 S.B. 20 § 2)

§105.690 – Selection of Fiduciaries, Preference to Missouri Firms

When selection is made of a venture capital firm, a consultant or a fiduciary, preference must be given to a Missouri based company. (L. 1987 S.B. 20 § 4)

Investment and Operating Guidelines

Please see Appendix B of this RFP for the STLTO's Investment and Operating Guidelines

Proposal Requirements

- Your firm must submit a proposal cover letter signed by a person authorized to legally bind the company. The letter must include a brief description of the proposal and a statement that the proposal will remain valid until STLTO selects a firm to provide the services in this RFP or terminates its search for a vendor.
- Your firm must submit a Table of Contents as part of the proposal.
- Your firm must include a cost proposal as referenced in the Cost Proposal section of this RFP.
- Your firm must identify and provide relevant qualifications of any subcontractors you will utilize in conjunction with the STLTO account.
- Your firm must provide a copy of your firm's affirmative action program.
- Your firm must include a complete disclosure statement indicating if any member of your firm would have a conflict of interest, or the appearance of a conflict of interest, if your firm were selected. Describe the nature of any relationship or situation that might cause speculation as to the objectivity of the services to be performed.
- Your firm should provide additional information that would help the STLTO in evaluating your firm and its qualifications. Please focus on information that would distinguish your firm as being uniquely qualified for this project.

Proposal Content

Your firm's proposal must address and contain the following information in the order presented and in the outline format as provided:

I. Organization (The term “organization” includes subsidiaries, affiliates, and predecessors in interest.)

A. History and Structure

1. Name, address, and telephone number, and all prior names by which your organization has been known and the dates thereof. In addition, include the name, title, telephone number, e-mail address, and fax number (plus the address if different from above) of the person authorized to negotiate on behalf of and contractually bind your organization.
2. When was your organization founded? (Please include predecessors in interest.)
3. Explain your organization’s present ownership structure, including affiliates and subsidiaries. Explain changes in the ownership structure of your organization since its inception and any expected changes in the next one to two years.
4. Is your organization registered with the Securities and Exchange Commission (SEC) as an investment adviser under the Investment Advisors Act of 1940?
5. Please provide a copy of your organization’s Form ADV – Part II.

B. Investment Management

1. When did your organization begin providing investment management services?
2. Is providing investment management services your organization’s principal line of business?
3. What percentage of your organization’s revenues in the last fiscal year was attributable to the investment management practice?
4. Does any part of your organization provide brokerage services, soft-dollar services, directed brokerage, discount brokerage or commission recapture programs (collectively, “brokerage related services”)? If so:
 - a. What percentage of your organization’s last fiscal year’s revenues was received in soft dollars?
 - b. What percentage of your organization’s last fiscal year’s revenues was attributable to or compensation for brokerage-related services?
 - c. Identify all investment managers who traded through or are involved with your organization’s brokerage-related services.

C. Potential Conflicts of Interest

1. Does your organization provide investment advisory services? If so, please identify and explain all such services provided. Also state what percentage of last fiscal year’s revenues was attributable to such investment advisory services.
2. Please confirm that your organization will not accept any commissions or other remuneration from any service providers in exchange for placing or renewing STLTO business with that organization.
3. How does your firm identify and manage conflicts of interest?
4. Does your organization have any clients or associations that could present a conflict of interest and possibly compromise the objectivity of its advice to STLTO? If so, please explain.

5. Please provide a list of clients for last 3 years.

D. Fiduciary Status, Investment Advisory Status and Litigation

1. Will your organization agree expressly in writing to accept “investment fiduciary” responsibility consistent with the Missouri Revised Statutes definition with respect to its investment management & advisory services?
2. On how many current accounts does your organization contractually accept fiduciary responsibility for its advice to clients? Generally, describe the length and scope of your organization’s experience as a fiduciary.
3. Has your organization or a principal or employee or agent of your organization ever been investigated or charged by the SEC, the U.S. Departments of Justice or Labor, the Internal Revenue Service, or any other federal, state, or local regulatory agency for any purported or actual violation of applicable law? If yes, please explain.
4. Over the last five years, has your organization or any principal or employee or agent been named or threatened to be named as a party in any private or governmental litigation, arbitration, or other dispute resolution proceedings; been a target in any government or professional investigation; or settled any actual or threatened claim? If so, please provide details including a copy of all relevant complaints and communications, a list of all parties, and the results or status of such proceedings(s), investigation(s) or settlement(s).
5. Please provide a description of pending contingent liabilities against your organization.

E. Insurance

1. Does your organization carry a fidelity bond and/or fiduciary liability, professional liability or any other insurance that would be beneficial to STLTO? If so, please describe the insurer, the type of insurance coverage and the deductible amount under such coverage. Please also attach a copy of each such policy or an applicable certificate of insurance.
2. Is your organization currently aware of any claims that have been or are being made with respect to such bonds or policies? If so, please describe.
3. Is your organization currently aware of any notices to the insurer with respect to such policies? If so, please describe.

II. Staffing and Facilities

1. How is your organization organized to service your investment management accounts?
2. Please list the total number of professionals in the firm, in each of the following categories for the periods below as of December 31.

	2019	2020	2021
Lead Portfolio Manager			
Firm Management			
Traders			
Research/CFA’s			
Marketing/Client Service			

Other			
Total Professional Staff			

3. What is the average number of accounts handled per investment relationship manager?
4. Describe the qualification and expertise of your organization’s investment professional staff (both local and nationwide), including their years of service and experience in the public area, and their personal qualities and management skills to provide the required services.
5. Please list the name and location of the primary individuals who would be responsible for the STLTO account and provide detailed biographies of such persons, including their tenure with your organization, their qualifications, certifications, and expertise. With respect to the persons named, please also list the number of clients that are assigned to each, and other relevant information. Please describe the relationship among these individuals and indicate the percentage of STLTO work expected to be performed by each.
6. Provide an organizational chart and brief résumés for the individuals who would be assigned to the STLTO account.
7. Please list all investment managers who have left your organization’s staff during the past two years. Include their reasons for leaving Please describe the measures your organization takes to assure continuity of service.
8. Please provide a full disclosure of whether any of your organization’s professional staff has ever been suspended or disbarred from performing investment management or other professional services, has been subject to any disciplinary actions, or has committed any criminal offenses evidencing fraud, dishonesty, or breach of trust.
9. Please describe the size, organization, location(s), and capabilities of your organization’s computer/data processing staff. If any of the staff you have described are employed through outside consultants, please give the proportion of the staff that are employed in-house and the proportion that are employed through outside consultants?

III. Clients

1. Please list the number of public sector institutional clients the firm served as of March 31, 2022 in an investment manager capacity by asset size.
2. Please provide the number of public sector institutional clients that have terminated your organization’s investment managing services during the past three years and indicate their stated reasons for terminating your organization’s services.
3. Please state the total number of new investment management clients that your organization has gained in the last three years.

IV. Services

A. Investment Philosophy and Process

1. Please describe your investment philosophy and process
2. Please describe your research capabilities

3. Please describe your firm's portfolio construction
4. Please Describe your firm's sell discipline

B. Compliance and Operations

1. Please describe the roles and responsibilities of your personnel in charge of compliance and operations (for outsource, indicated the firm and the scope of their relationship/services to your firm) Please provide bios and highlight previous regulatory audit experience for all relevant personnel (at this firm or a previous firm).
2. What regulatory entities have oversight over your firm or perform audits of your firm? Since when? Has the firm previously been regulated by any other regulatory entities? If so, which entities, when, and why did that oversight cease?
3. Is your firm currently registered with the SEC, the CFTC, or any other U.S.-based regulatory organizations? If yes, since when? If not, has it ever been previously, or do you have plans to do so in the near future?
4. Please provide full details on any previous fines, disbarments, negative regulatory reviews, investigations, or any penalties, whether legal or by an industry actor, for the principals, or any other key person in the firm (as it relates to the financial industry/professional activity) and subsequent outcomes, remedies, changes or improvements made at the firm.
5. Please list all types of insurance coverage maintained by the firm. Please include type, amount and carrier.
6. Please discuss the firm's compliance policies and procedures relating to the following:
 - a. Anti-fraud
 - b. Insider trading
 - c. Outside business activities (especially as it may pertain to investment activities of advisory firm's personnel
 - d. Disaster recovery procedures
 - e. Best execution and directed brokerage
 - f. Soft dollar arrangements
 - g. Fees paid to consultants for conferences, performance data or other services
 - h. Third-Party Marketing arrangements
 - i. Proxy voting
 - j. ERISA concerns

C. General Investment Advice

Please confirm your organizations intent to comply with each of the requirements in the Scope of Services. Please detail any deviations

1. Present Written Quarterly Reports to STLTO on the performance of the city's portfolio, including but not limited to analyses of gains and losses, benchmarks and risk.
2. Provide investment research findings, education, and training to STLTO and staff as requested. Please provide written examples of your firm's response to requests for research findings, education, and training from STLTO and staff.

D. Performance Measurement and Evaluation

1. Specify the investment data audits your organization normally requires.

2. Is your organization's performance reporting software generated in-house or purchased? If purchased, please identify the software that your organization uses.
3. Are you able to present rates of return on both a gross and a net of fee basis?

E. Risk Control

1. Please explain whether and how your organization measures and analyzes relevant financial characteristics regarding the whole portfolio in order to detect and control risk.
2. Have your organization's services ever been subject to fiduciary audit, evaluation, or similar assessment by any other company? If so, state when and by whom, and please provide a copy of the report.
3. Has your organization ever been audited by the SEC? If so, please provide a copy of the report.
4. Does your firm have a disaster recovery plan in place to protect client records and information? Please describe your firm's disaster recovery provisions and policies for protecting client records and information.

References

Provide a list of five (5) current and two (2) former public sector clients. These clients should have received from your firm services like those requested in this RFP. Include name, contact person, telephone number, asset value, number of years that they have been a client of the firm and services provided.

Evaluation and Selection Process

A committee of the Treasurer's Office is responsible for the evaluation process and making award recommendations to the Treasurer. The Treasury Committee is ultimately responsible for final selection decisions.

The Treasury Committee may conduct finalist interviews prior to making a final decision. The individual(s) with primary responsibility for the prospective City of St Louis account should attend any interviews on behalf of the firm.

The Treasurer's Office reserves the right to select more than one firm to provide the services described herein and give special consideration to the proposals of firms that include minority participation.

Statement of Interest and Questions about the RFP

You may obtain most public information about the City's Investment Reports from the website, [Quarterly Reports – St. Louis Treasurers Office \(stltreasurer.org\)](http://stltreasurer.org).

Your firm should submit a Statement of Interest form (Appendix A) and any questions about this RFP to Adam L. Layne, stltreasurer@stlouis-mo.gov, no later than May 6, 2022. If your firm fails to submit a Statement of Interest form by this deadline, your firm will not be sent the responses to questions or any amendments regarding this RFP. All questions about this RFP must be submitted in writing to Adam Layne, stltreasurer.org. Responses to the questions will be provided to all firms submitting a Statement of Interest form by the May 6, 2022 deadline. Answers will be provided by May 10, 2022.

The State of Missouri is in the Central Time Zone. Please make note of this to assure compliance with the deadlines referenced in this RFP.

Firms intending to submit a proposal **shall not** contact members of the Treasury staff during the RFP period, excluding any services provided to the Treasury staff under an existing agreement.

Important Dates and Deadlines

Release of Request for Proposals (RFP)	April 26, 2022
Statement of Interest Form and Questions Submission Deadline.....	May 6, 2022
Responses to RFP Questions.....	May 10, 2022
Proposal Submission Deadline.....	May 31, 2022
Tentative Finalist Meetings.....	June 13, 2022
Proposed Contract Start.....	July 5, 2022

Cost Proposal

We are requesting that firms submit their cost proposals on a fixed fee for service basis with a not to exceed maximum. In this regard, your cost proposal should itemize the cost for each service category described in the Scope of Services section outlined in this RFP, including a not to exceed maximum cost for each service category. Treasurer's Office shall not reimburse the selected firms for travel expenses incurred as a result of providing the services described in this RFP.

If there should be a material change in the Scope of Services, or if this RFP results in the opportunity for an ongoing consulting relationship, additional pricing would be mutually negotiated.

Letter of Agreement

Treasurer's Office will execute a letter of agreement with the selected firm, which will incorporate the terms of the contract and the firm's proposal by reference. The relationship will be a non-exclusive arrangement.

In the event either party shall materially default in the performance of any of its covenants, or undertakings under said contract, and such default shall not be cured within thirty (30) days after the receipt from the other of written notice of said default specifying the default and requesting correction thereof, the non-breaching party may terminate the contract by delivering written notice to such effect to the other party at its last known business address. Such notice of termination shall be effective immediately.

General Information

The Treasurer's Office reserves the right to reject any or all proposals without prejudice for any reason, in its sole and unfettered discretion; to select more than one firm to provide the services described herein; to void this RFP and the review process and/or terminate negotiations at any time; to revise any conditions and stipulations contained herein, as convenient or necessary; to further negotiate financial or other arrangements; to establish further criteria for selection; to ask respondents to submit additional information with respect to any aspect of respondent's submission whatsoever; to negotiate with respondents as to any aspect of the respondent's proposal whatsoever; and to otherwise amend this RFP.

The Treasurer's Office reserves the right to waive technical defects, irregularities, and omissions in proposals if it determines that doing so would be in the best interest of the City of St Louis.

By accepting this RFP and/or submitting a proposal in response thereto, each respondent agrees for itself, its successors and assigns, to hold the Treasurer's Office and all of their various agents, directors, attorneys, officers and employees harmless from and against any and all claims and demands of whatever nature or type, which any such respondent, its representatives, agents, contractors, successors or assigns may have against any of them as a result of issuing this RFP, revising this RFP, conducting the selection process and subsequent negotiations, making a final recommendation, selecting an accounting firm and/or negotiating or executing an agreement incorporating the commitments of the selected accounting firm.

Respondents shall carefully examine this RFP and shall make all necessary investigations to fully inform themselves as to the local conditions and requirements under which work is to be performed. Respondents shall familiarize themselves with all applicable federal, state, and local

statutes, rules, regulations, and ordinances relating to the conduct of work pursuant to this RFP, and shall comply with all applicable federal, state, and local statutes, rules, regulations, and ordinances. No pleas of ignorance of the applicable federal, state, and local statutes, rules, regulations, and ordinances will be accepted as an excuse for any failure or omission on the part of the respondent to fulfill every requirement of the RFP and to perform as described in such respondent's proposal.

By submitting a response to this RFP, each respondent acknowledges having read this RFP in its entirety and agrees to all terms and conditions set out in this RFP. Any misrepresentations or false statements contained in a response to this RFP, whether intentional or unintentional, shall be sufficient grounds for the Treasurer's Office to remove respondents from competition for selection at any time.

Responses to this RFP are not to be construed as commitments of any kind. Respondent acknowledges that this RFP is not a contract or commitment of any kind by the Treasurer's Office and does not commit the City of St Louis to award a contract, nor will responses commit the Treasurer's Office to pay any costs incurred in the preparation or submission of proposals. Unless otherwise agreed to in writing, the successful firm will not be compensated for any costs incurred prior to the execution of a letter of agreement.

No proposal received after the specified date and time will be considered, unless the specified date and time included in this document is extended or all proposals are rejected, and a subsequent RFP is issued.

All proposals and other materials submitted in response to this RFP will become the property of Treasurer's Office and will not be returned, which means the Treasurer's Office will own and may use any ideas presented in response to this RFP. All submitted materials may become public documents subject to disclosure under the Missouri Sunshine Law at any time during the selection process and will become public documents subject to disclosure under the Missouri Sunshine Law once a contract is executed or all proposals are rejected. The Treasurer's Office does not guarantee nor assume any responsibility whatsoever if such information is used or copied by any individual or organization. Therefore, the respondent must submit its proposal based on such conditions without reservations.

Subcontracting of any services in this RFP shall be prohibited unless the Treasurer's Office grants permission in writing.

By submitting a response to the RFP, each respondent expressly waives any and all rights that it may have to object to, protest or judicially challenge (1) any part of this solicitation and RFP process, including but not limited to the selection procedure sections of the RFP; and (2) the invitation, evaluation and award process, including but not limited to the review and analysis of qualifications of the respondents, evaluation of proposals, tentative or final selection of successful respondents, evaluation of proposals, or other aspects of the respondent selection and award.

By signing the required proposal cover letter referred to in the **Proposal Requirements** section, the individual represents that he/she is entitled to represent the firm, empowered to submit the bid, and authorized to sign a contract with the Treasurer's Office.

RFP Documents

The RFP documents referenced herein are available in the Appendix of this RFP as indicated or on the website [Request for Proposals – St. Louis Treasurers Office \(stltreasurer.org\)](http://stltreasurer.org)

- RFP
- Statement of Interest Form (Appendix A)
- Investment Policies (Appendix B)
- Missouri State Public Fund Investment Guide (Appendix C)

APPENDIX A

STATEMENT OF INTEREST FORM

REQUEST FOR PROPOSALS (RFP)

INVESTMENT MANAGEMENT SERVICES

In acknowledgement of this RFP, the undersigned understands that a copy of the RFP and its attachments can be accessed on-line at the [Request For Proposals – St. Louis Treasurers Office \(stltreasurer.org\)](http://Request For Proposals – St. Louis Treasurers Office (stltreasurer.org)) website; beginning April 26, 2022, and that the proposal is due in the STLTO's office no later than the deadline of May 31, 2022.

This form should be completed, signed, and returned along with any questions, by the deadline of May 6, 2022. Only firms that return this form by the deadline will receive copies of the responses to written questions from the firms interested in this RFP, as well as any RFP amendments.

FIRM: _____

REPRESENTED BY: _____

TITLE: _____

ADDRESS: _____

CITY: _____ STATE _____ ZIP CODE: _____

FAX NUMBER: _____ PHONE NUMBER: _____

EMAIL: _____

SIGNATURE: _____ DATE: _____

The above name, address, fax number and e-mail address will be used for all correspondence related to this RFP.

The firm is or is not (circle one) interested in responding to this RFP.

Please return interest forms via email, treasurer@stltreasurer.org by May 6, 2022.

Contact Information:

Adam L. Layne, stltreasurer@stlouis-mo.gov

Appendix B

Investment Policies, Mo. Rev. Stat. § 30.950

See <https://www.stltreasurer.org/treasury-operations/> for Treasurer's Office Investment Guidelines
June 23, 2016

Appendix C

Missouri State Public Fund Investment Guide -See [Investment Guide.pdf \(mo.gov\)](#)