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STATE OF MONTANA

BEFORE THE BOARD OF PERSONNEL APPEALS

IN THE MATTER OF UNIT DETERMINATION #5-80:

STATE OF MONTANA, DEPARTMENT OF	)	
INSTITUTIONS, EASTMONT HUMAN	)	
SERVICES CENTER	)	FINDINGS OF FACT,
	)	CONCLUSION OF LAW
Employer,	)	AND
	)	RECOMMENDED ORDER
-vs-	)	
	)	
MONTANA PUBLIC EMPLOYEES	)	
ASSOCIATION, INC.	)	
	)	
Petitioner.	)	

\* \* \* \* \*

The Petitioner, in the above captioned matter, filed a Petition for New Unit Determination and Election with this Board on February 14, 1980, for certain employees of the Eastmont Human Services Center in Glendive, Montana. The Petitioner proposed that the appropriate collective bargaining unit should consist of all cooks and food service workers and should exclude all supervisors.

On February 26, 1980, this Board received a counter-petition from the Employer. The Employer disagreed with the appropriateness of the Petitioner's proposed collective bargaining unit. The Employer contended that the proposed unit was overly narrow; that the proposed unit runs counter to the history of bargaining of the Department of Institutions and the State of Montana; and that the proposed collective bargaining unit would impose a hardship on the Employer.

A formal hearing in this matter was conducted on April 16, 1980, in the Conference Room, Eastmont Human Services Center, Glendive, Montana. The hearing was held under the authority of Section 39-31-207 MCA, and Title 2, Chapters 15 and 18 MCA, and in accordance with the Administrative Procedure Act (Title 2, Chapter 4 MCA). The purpose of the hearing was

1 to determine the appropriateness of the proposed collective  
2 bargaining unit.

3 Jean Moffatt, State Labor Relations Bureau, Department  
4 of Administration, represented the Employer. Jeff J.  
5 Minckler, Staff Representative, Montana Public Employees  
6 Association, Inc., represented the Petitioner.

#### 7 8 ISSUE

The issue was determined to be the following:

9 Employer contends that Petitioner's proposed  
10 bargaining unit is inappropriate because of:

- 11 1. integration of work function
- 12 2. interchange among employees
- 13 3. history of bargaining
- 14 4. community of interest because  
15 a larger bargaining unit is more  
16 appropriate.

17 A further issue raised at the hearing concerning the inclusion  
18 of an employee, Dean Towberman, was withdrawn by the Petitioner.  
19 The Petitioner found Mr. Towberman to be an employee of  
20 Action for Eastern Montana and not of Eastmont Human Services  
21 Center.

#### 22 FINDINGS OF FACT

23 After a thorough review of the record, including the  
24 testimony of witnesses, the demeanor of witnesses, the exhibits  
25 and the briefs submitted by both parties in this matter, I  
26 make the following Findings of Fact:

- 27 1. Eastmont Human Services Center, Department of Institutions,  
28 State of Montana, is an institution which provides medical care,  
29 nursing care and training to the developmentally disabled. The  
30 Center is located in Glendive, Montana.
- 31 2. The Center employs approximately 90 employees (see Joint  
32 Exhibit #1 - Organizational Chart) of which 80 employees are  
covered by the Public Employees Collective Bargaining Act  
(according to Employer's post-hearing brief). Upon examination  
of Joint Exhibit #1, I have no reason to doubt that approximately

1 80 employees are eligible to bargain collectively under the  
2 Act.

3 3. In addition to the 9 cooks and food service employees  
4 petitioned for by the Petitioner, the Center also employs  
5 maintenance, custodial, transportation and clerical employees;  
6 habilitation aides, teachers and teacher aides; recreation  
7 therapist, specialist and aides; speech pathologist, physical  
8 therapist, social worker and a nursing staff. (see Joint  
9 Exhibit #1 - Organization Chart).

10 4. The primary function of the cooks and food service  
11 employees is to prepare food for the residents of the Center.  
12 The food is placed on plates by the cooks and food service  
13 workers at cottage #3 (main cottage where kitchen and dining  
14 hall is located) to be served to the residents by the  
15 habilitation aides. The prepared food is delivered in bulk  
16 in carts to cottages #1 and #2 by the housekeeping staff or  
17 the food service workers to be served by the habilitation aides.  
18 Dirty dishes are washed nearly exclusively by the food service  
19 employees.

20 5. The cooks and food service workers are primarily confined  
21 to the kitchen area and the preparation of food. Because of  
22 health rules, the cooks and food service workers are limited  
23 in cleaning duties, especially in the dining hall. House-  
24 keeping employees clean the floors in both the dining hall  
25 and the kitchen area while cooks and food service workers are  
26 limited to work table and dining table tops.

27 6. The cooks and food service workers take their coffee breaks  
28 during the designated times that the housekeeping staff cleans  
29 the kitchen floors which are at different times of other employees.  
30 The location where coffee breaks are taken differs between the  
31 food service staff and other employees. Lunch breaks for the  
32 cooks and food service workers are also at different times than

1 other employees.

2 7. There has been no history of collective bargaining at the  
3 Center except for a previous organizational attempt by another  
4 labor organization. The history of collective bargaining within  
5 the Department of Institutions was briefly described by Tom  
6 Gooch, Assistant to the Director of the Department of  
7 Institutions for Employer and Labor Relations. Bargaining  
8 units of state employees throughout the State are reported  
9 in Petitioner's Exhibit "A" - Labor Relations Status Report #14.  
10 Within the Department of Institutions, institutions such as Boulder  
11 River School and Hospital, Galen State Hospital, Warm Springs  
12 State Hospital and Montana State Prison have several bargaining  
13 units each. Some bargaining units have as few as one employee.  
14 Certainly, one could not consider these "wall-to-wall"  
15 bargaining units. However, these bargaining units were  
16 "Grandfathered" in at the implementation of the Collective  
17 Bargaining Act for Public Employees. Bargaining units formed  
18 after the implementation of the Act within the Department of  
19 Institutions are fewer in number. For example, the Center for  
20 the Aged has one bargaining unit consisting of professional,  
21 blue collar and white collar workers. Mountain View School  
22 and Pine Hills School each have two bargaining units. Twin  
23 Bridges and the Veterans' Home each have one. Upon examination  
24 of the kinds of employees in the more recent units, as indicated  
25 by Petitioner's Exhibit "A", no "wall-to-wall" have been  
26 formed. However, units consisting of more than one type of  
27 employee is common.

28 8. Rebecca Lee, Food Service Worker, testified that she and  
29 the other cooks and food service workers desired a bargaining  
30 unit only for themselves. Ms. Lee testified that the cooks  
31 and food service workers purposely did not inform other  
32 employees of a particular organizational meeting because

1 "We were greedy. . . We wanted to find out some information  
2 for ourselves and we got one set of problems; they've got  
3 another set. . .". I find that the cooks and food service  
4 workers do sincerely believe they have problems unique only  
5 to that group and that they wish to address those problems  
6 within the confines of that group.

7 9. The Policy and Procedure Manual of Eastmont Human  
8 Services Center (Joint Exhibit #1) is divided into seven  
9 sections. One section addresses Food Services in the areas  
10 of Menu Planning, Preparation and Serving, Diet Provisions,  
11 Sanitation, Storage, and Personnel. This is not unlike  
12 other sections of the manual that address Medical Services,  
13 Maintenance Services, Administrative Services, Community  
14 Services, Habilitation Services or Developmental Services.  
15 The only difference is the types of sub-sections addressed  
16 because of the different kinds of services. The testimony  
17 of Ms. Lee indicated that only that portion of the Manual  
18 which addresses Food Services was available in the kitchen  
19 area. Ms. Lee testified that neither she nor other food  
20 service employees had reason for access of other portions  
21 of the Manual except for possible job descriptions in other  
22 departments for purposes of bidding jobs. In my judgment,  
23 every employee at the Center should be, at least, aware  
24 of Section 1.0 - Administration Services and, of course, the  
25 section which addresses the employee's particular department.  
26 The Administration Services section addresses matters  
27 pertaining to all employees. The various other sections  
28 address matters unique to the particular departments. I  
29 find that the Food Services department is not governed by  
30 totally different personnel policies and procedures than  
31 other departments.  
32

## DISCUSSION

1           This Board has established the practice of looking towards  
2 the National Labor Relations Board (NLRB) for guidance in  
3 matters dealing with collective bargaining. This practice of  
4 following NLRB precedent was affirmed by the Montana Supreme  
5 Court (see State Department of Highways v. Public Employees  
6 Craft Council, 87 LRRM 2101 (1974)). In 1974, the National  
7 Labor Relations Act (NLRA) was amended to cover nonprofit  
8 health care institutions. The amendment to the NLRA defined  
9 "health care institution" to include "any hospital, convales-  
10 cent hospital, health maintenance organization, health clinic,  
11 nursing home, extended care facility, or other institution  
12 devoted to the care of sick, infirm, or aged persons". Concern  
13 was expressed during the congressional hearings and debates on  
14 the amendment that bargaining unit fragmentation in the health  
15 care industry could increase labor disputes and adversely affect  
16 patient care. Congress acknowledged the concern and instructed  
17 the NLRB to prevent such fragmentation by stating, "Due  
18 consideration should be given by the Board to prevent  
19 proliferation of bargaining units in the health care industry".  
20 To comply with the Congressional directive, the NLRB devised a  
21 "basic six unit structure" guideline to determine bargaining  
22 units in the health care institutions to guard against  
23 fragmentation. The "basic six units", excluding guards, are:  
24 (1) physicians; (2) registered nurses; (3) other professionals;  
25 (4) technical employees; (5) business office clericals; and,  
26 (6) service and maintenance employees. Since the 1974  
27 amendment, circuit courts have addressed several NLRB bargaining  
28 unit determinations in the health care industry. In all of the  
29 following cases, the NLRB's order of an appropriate bargaining  
30 unit was denied enforcement by a circuit court: Memorial Hospital  
31 of Roxborough v. NLRB, 545 F 2d 351, 93 LRRM 2571 (CA 3, 1976);  
32 St. Vincent's Hospital v. NLRB, 567 F 2d 588, 97 LRRM 2119

1 (CA 3, 1977); NLRB v. West Suburban Hospital, 570 F 2d 213,  
2 97 LRRM 2929 (CA 7, 1978); NLRB v. Mercy Hospitals of  
3 Sacramento, Inc. \_\_\_ F 2d \_\_\_, 98 LRRM 2800 (CA 9, 1978);  
4 and, Allegheny General Hospital v. NLRB, \_\_\_ F 2d \_\_\_, 102  
5 LRRM 2784 (CA 3, 1979). The NLRB had, in all the above  
6 cases, determined appropriate bargaining units consisting of  
7 less than all eligible employees of a division within the  
8 "basic six unit structure". In their unit determinations,  
9 the NLRB had acknowledged the Congressional mandate concerning  
10 proliferation of bargaining units. However, the NLRB's  
11 general treatment of industrial bargaining units was engaged.  
12 The U.S. Court of Appeals, Seventh Circuit (Chicago), stated  
13 in NLRB v. West Suburban Hospital, supra., at 97 LRRM 2931:

14  
15 ...in view of the Board's (NLRB) mere lip-service  
16 mention of the Congressional admonition as a factor to  
17 be taken into account, without any indication from the  
18 Board (NLRB) as to the manner in which its unit determination  
19 in this case implemented or reflected that admonition  
we find that the Board's (NLRB's) decision violates the  
Congressional directive that "(d)ue consideration  
should be given by the Board (NLRB) to preventing  
proliferation of bargaining units in the health care  
field".

20 The Third Circuit (Philadelphia) stated in St. Vincent's  
21 Hospital v. NLRB, supra., at 97 LRRM 2122:

22 The Board (NLRB) seemingly was impressed by the facts  
23 that the boiler operators at St. Vincent's were licensed  
24 by the state, they spent most of their time in the  
25 boiler room where there was little contact with other  
26 hospital personnel and there was little interchange  
with other employees. The Board (NLRB) decided to  
apply traditional standards which recognize that units  
of licensed boilermen may constitute (a) separate  
appropriate unit.

27 The legislative history of the health care amendments,  
28 however, makes it quite clear that Congress directed  
29 the Board (NLRB) to apply a standard in this field that  
30 was not traditional. Proliferation of units in industrial  
31 settings has not been the subject of congressional  
32 attention but fragmentation in the health care field  
has aroused legislative apprehension. The Board  
[NLRB] therefore should recognize that the contours of  
a bargaining unit in other industries do not follow the  
blue print Congress desired in a hospital.

1 In Allegheny General Hospital (II), 239 NLRB No. 104, 100  
2 LRRM 1030 (1978), the NLRB reaffirmed its earlier decision  
3 in Allegheny General Hospital, 230 NLRB 954, 96 LRRM 1022  
4 (1977) which determined a appropriate bargaining unit  
5 limited only to the hospital's maintenance department  
6 employees. The NLRB indicated in Allegheny II, supra., that  
7 the 1974 amendments and the legislative history advocating  
8 the prevention of unit fragmentation did not preclude the  
9 NLRB from finding appropriate bargaining units that are  
10 limited only to hospital maintenance department employees.  
11 The NLRB contended that the 1974 amendments intended that  
12 the NLRB should rely on its traditional community-of-interest  
13 criteria in making unit determinations in the health care  
14 industry. It was suggested by the NLRB that the decisions  
15 of the third circuit court in Memorial Hospital, supra., and  
16 St. Vincent's Hospital, supra., were in error. The circuit  
17 court had, in these two cases, denied enforcement of NLRB's  
18 unit determination orders because the NLRB had failed to  
19 adhere to the non-fragmentation congressional mandate. In  
20 Allegheny General Hospital v. HRLB, supra., the court soundly  
21 admonished the NLRB:

22  
23 A decision by this court, not overruled by the United  
24 States Supreme Court, is a decision of the court of  
25 last resort in this federal judicial circuit. Thus our  
26 judgments in Memorial Hospital and St. Vincent's  
27 Hospital are binding on all inferior courts and litigants  
28 in the Third Judicial Circuit, and also on administrative  
29 agencies when they deal with matters pertaining thereto.  
30 We express no personal criticism of an independent  
31 federal agency that refuses to accept a judicial determination  
32 of this court. We attribute no ulterior motives to the  
distinguished members of the Board who have publicly,  
although respectfully, expressed disagreement with this  
court. But the Board is not a court nor is it equal to  
this court in matters of statutory interpretation.  
Thus, a disagreement by the NLRB with a decision of  
this court is simply an academic exercise that possesses  
no authoritative effect. It is in the court of appeals  
and not in an administrative agency that Congress has  
vested the power and authority to enforce orders of the  
NLRB. 29 U.S.C. 160(e). It is in this court that

1 Congress has vested the power to modify or set aside an  
2 order of the NLRB. 29 U.S.C. 160(f). In 1803, Chief  
3 Justice John Marshall, speaking for a unanimous Court,  
4 concisely stated the fundamental principle on which we  
5 rely: "It is emphatically the province and duty of the  
6 judicial department to say what the law is. Those who  
7 apply the rule to particular cases, must of necessity  
8 expound and interpret that rule. If two laws conflict  
9 with each other, the courts must decide on the operation  
10 of each" Marbury v. Madison, 5 U.S. (1 Cranch) 137,  
11 177 (1803). Thus, it is in this court by virtue of its  
12 responsibility as the statutory court of review of NLRB  
13 orders that Congress has vested a superior power for  
14 the interpretation of the Congressional mandate.  
15 Congress has not given to the NLRB the power or authority  
16 to disagree, respectfully or otherwise, with decisions  
17 of this court. See Volkswagenwerk Aktiengesellschaft  
18 v. FMC, 390 U.S. 261, 272 (1968). For the Board to  
19 predicate an order on its disagreement with this court's  
20 interpretation of a statute is for it to operate outside  
21 the law. Such an order will not be enforced.

22 I cannot ignore the strong adherence the courts have  
23 taken to the congressional directive of preventing proliferation  
24 of bargaining units in the health care industry. Without  
25 much question, the "basic six unit structure" and the congressional  
26 mandate replace the traditional methods of determining  
27 bargaining units in the health care industry. This Board,  
28 in Teamsters Local #45 v. Liberty County Nursing Home, Unit  
29 Determination No. 24-1978, utilized the "basic six unit  
30 structure" in determining an appropriate bargaining unit.  
31 As the NLRB found in Appalachian Regional Hospitals, Inc.,  
32 233 NLRB No. 85, 96 LRRM 1528 (1977), this board in Liberty  
found an appropriate unit consisting of a combination of the  
"basic six". In both cases, it was found that the strict  
application of the "basic six unit structure" would leave  
units so small that possibly the collective bargaining  
rights of employees might be jeopardized.

Without question, appropriate bargaining units within  
the health care industry demand to be broad and within the  
confines of the "basic six unit structure." I adopt that  
philosophy.

1           In this instant matter, the Employer does advocate that  
2 a broader unit is appropriate and that the smaller unit  
3 petitioned for is inappropriate. The Petitioner argues that  
4 "larger does not negate smaller." The Petitioner makes a  
5 sound argument, with cases cited, that the "...existence of  
6 a larger unit appropriate for collective bargaining does not  
7 negate the appropriateness of a smaller unit." However,  
8 traditional methods of determining appropriate bargaining  
9 units do not apply in the health care industry. Seemingly,  
10 the courts in addressing units in the health care industry,  
11 have tended to reverse the above quote. Within the confines  
12 of the "basic six unit structure" smaller units were found to  
13 be inappropriate because a larger appropriate unit existed.  
14 Because I am addressing an appropriate unit question in the  
15 health care field, I must disregard Petitioner' argument.

16           Both the Petitioner and the Employer present arguments  
17 concerning the appropriateness of the petitioned unit  
18 relating to the criteria outlined in the Collective Bargaining  
19 Act. In review of the Findings of Fact, I do not find any  
20 factor that would over-shadow the application of the "basic  
21 six unit structure." In applying that structure, it is  
22 quite clear that the petitioned unit (cooks and food service  
23 workers) would comprise only a portion of a unit labeled  
24 "service and maintenance employees". Testimony and evidence  
25 indicated that other employees, such as housekeepers,  
26 custodial workers and maintenance workers, are employed by  
27 Eastmont Human Services Center and accordingly would be  
28 appropriately included in the "service and maintenance"  
29 unit. To allow a unit of only cooks and food service workers  
30 would be a blatant contradiction of NLRB precedent, congressional  
31 mandate and court rulings.

1 One last argument made by the Employer is the following:

2 One non-traditional factor that must be considered in  
3 determining the appropriateness of this unit is the  
4 great distance from Helena to Glendive. The negotiation  
5 and administration of a labor contract involves the  
6 participation of numerous people in Helena; from the  
7 central office of the Department of Institutions, from  
8 the Labor Relations Bureau, and from the Board of  
9 Personnel Appeals. Each negotiating session, each  
10 grievance, and each planning or training session involves  
11 a round trip of 850 miles. It is one thing to have an  
12 agency with multiple bargaining units in Helena (or  
13 even the Deer Lodge Valley), and quite another to have  
14 the same situation in Glendive. All state agencies are  
15 under increasingly strict travel restrictions. The  
16 creation of multiple units in distant agencies creates  
17 new travel and energy demands that will be next to  
18 impossible to meet.

11 The Collective Bargaining Act for Public Employees  
12 makes absolutely no provision for the consideration of state  
13 travel policy, travel distance or energy demands as factors  
14 in the determination of appropriate bargaining units. To  
15 the contrary, if I, as Hearing Examiner, should consider  
16 such factors, I may be violating the rights of public employees  
17 under the Act. To suggest that public employees in Glendive  
18 or in another location of great distance from Helena should  
19 be less entitled to the rights and privileges under Act than  
20 employees close to Helena would be unquestionably discriminatory  
21 and unlawful.

#### 22 CONCLUSIONS OF LAW

23 A unit consisting of all cooks and food service workers,  
24 excluding supervisors, employed by Eastmont Human Services  
25 Center is not an appropriate unit for purposes of collective  
26 bargaining under Section 39-31-103(2) MCA and Section 39-31-  
27 202 MCA.

#### 28 RECOMMENDED ORDER

29 It is ordered that the Petition for New Unit Determination  
30 and Election (UD #5-80) be dismissed.

#### 31 SPECIAL NOTE

32 In accordance with Board's Rule ARM 24.26.107(2), the

1 above RECOMMENDED ORDER shall become the FINAL ORDER of this  
2 Board unless written exceptions are filed with this Board  
3 within 20 days after service of these FINDINGS OF FACT,  
4 CONCLUSIONS OF LAW, AND RECOMMENDED ORDER upon the parties.

5 Dated this 23<sup>rd</sup> day of July, 1980.

6  
7  
8 BOARD OF PERSONNEL APPEALS

9 By 

10 Stan Gerke

11 Hearing Examiner

12  
13 CERTIFICATE OF MAILING

14 I, , do hereby certify and state  
15 that on the 23<sup>rd</sup> day of July, 1980, that I mailed a true and  
16 correct copy of the above FINDINGS OF FACT, CONCLUSIONS OF LAW,  
17 AND RECOMMENDED ORDER to the following:

18  
19 Jeff Minckler  
20 Montana Public Employees Association, Inc.  
21 502 Nelson Drive  
Billings, MT 59102

22 LeRoy Schramm, Chief  
23 Labor Relations Bureau  
Personnel Division  
24 Department of Administration  
Room 130, Mitchell Building  
Helena, MT 59601

25 Gerald F. Butcher  
26 Superintendent  
Eastmont Human Service Center  
27 East Little Street  
Glendive, MT 59330

28  
29 PAD3:F12



STATE OF MONTANA  
BEFORE THE BOARD OF PERSONNEL APPEALS

IN THE MATTER OF UNIT DETERMINATION #5-80:

STATE OF MONTANA, DEPARTMENT )  
OF INSTITUTIONS, EASTMONT )  
HUMAN SERVICES CENTER, )  
Employer, )  
- vs - )  
MONTANA PUBLIC EMPLOYEES )  
ASSOCIATION, INC., )  
Petitioner. )

ORDER

\* \* \* \* \*

Exceptions were filed to the hearing examiner's Findings of Fact, Conclusions of Law and Recommended Order which was issued on July 23, 1980. The Montana Public Employees Association, Inc., argued that the hearing examiner placed too much emphasis on the Congressional mandate and National Labor Relations Board's policy of establishing six bargaining units for health care facilities.

Section 39-31-202, MCA provides that in determining what is an appropriate unit this Board shall consider such factors as and then lists the factors to be considered. Likewise, this Board's rule ARM 24.26.511 states that the Board shall consider such facts as and lists the same factors as is listed in 39-31-202, MCA. The phrase "such factors as" used in both the statute and the rule clearly shows that this Board may consider other factors than those listed in the statute and the rule. This Board shall continue to apply the statutory criteria in determining appropriate units. This Board, however, does recognize that it must consider other factors which are unique to the bargaining unit in question. Certainly, with certain petitioned for bargaining units in the Department of Institutions the type of service being given at the particular institution

1 and the necessity for establishing the most stable of labor  
2 relations would be of concern to this Board. For that reason,  
3 the hearing examiner was not in error in considering the  
4 Congressional mandate and federal court decisions in the area  
5 of health care facilities. We believe, however, the hearing  
6 examiner placed too much emphasis on the Congressional mandate  
7 and the federal court decisions interpreting that mandate and  
8 not enough emphasis on that statutory criteria set out in  
9 39-31-202, MCA.

10 IT IS THEREFORE ORDERED, that this matter is remanded to  
11 the hearing examiner to reconsider the matter in view of this  
12 Order. Specifically, the hearing examiner is directed to  
13 apply the statutory criteria as set out in Section 39-31-202,  
14 MCA and ARm 24.26.511. Applying that criteria, the hearing  
15 examiner is to keep in mind the services being offered at  
16 Eastmont Human Services Center and be aware that in that type  
17 of institution the greatest amount of labor stability is  
18 essential.

19 DATED this 30th day of October, 1980.

20 BOARD OF PERSONNEL APPEALS

21  
22 By Brent Cromley  
23 Brent Cromley  
24 Chairman

\*\*\*\*\*

25 CERTIFICATE OF MAILING

26 I, Jennifer Jacobson, do hereby certify and state that I  
27 mailed a true and correct copy of the above ORDER to the  
following persons on the 31 day of October, 1980:

28 Dave Stiteler Gerald F. Butcher  
29 Montana Public Employees Association Superintendent  
1426 Cedar Street Eastmont Human Service  
P.O. Box 5600 Center  
30 Helena, MT 59601 East Little Street  
Glendive, MT 59330  
31 LeRoy Schramm, Chief  
Labor Relations Bureau  
32 Personnel Division  
Department of Administration  
Room 130 - Mitchell Building  
Helena, MT 59601

Jennifer Jacobson