

**Agency of Human Services  
DEPARTMENT OF CORRECTIONS  
103 South Main Street  
Waterbury, VT 05671-1001**

**SMOKING ISSUES AGREEMENT  
May 24, 2004**

The following agreement is reached by the Vermont State Employees' Association and the Vermont Department of Corrections, by and through its respective representatives, to resolve the pending dispute relating to compliance with all appendices relating to smoking policies in the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Bargaining Unit Agreements.

The Department of Corrections (hereinafter "department") shall comply with the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Unit Agreements (hereinafter "contracts") smoking policy appendices, and provisions of subsequent contract agreements, and with any policies and procedures not inconsistent with the contracts, Agency of Administration, or Agency of Human Services rules and regulations relating to any smoking policy.

The department shall not issue any internal policies or directives that are not fully compliant with the smoking policy provisions of the contract. To this end, the department agrees to modify Directive 408.02 by removing provisions related to employee smoking. The department agrees to subsequently revise its employee smoking policy (as may be reflected in Directive 408.02) in accordance with the provisions of the contract. The department shall provide the union with a preliminary draft of this revised directive prior to its issuance.

The VSEA and State of Vermont shall advise the department of the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. VSEA and the department will ensure timely appointment of their respective members to the local worksite committees.

In accordance with the contractual side letter, each local worksite committee(s) "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval."

VSEA and the Department of Corrections agree that, until such local worksite committees provide their specific proposals for local smoking policies, the Corrections, Non-Management, and Supervisory Bargaining Unit employees:

- (1) Will not smoke inside correctional facility buildings or inside the secure perimeter, or in the presence of inmates;
- (2) Shall be permitted to smoke on non-secure grounds, outside correctional facility buildings;
- (3) Will be required to secure tobacco products in a designated secure location or outside the secure perimeter;

Until such time as the local worksite committee(s) and other necessary processes have been completed, the foregoing shall be in effect and not be required to be approved through the process

Smoking Issues Agreement  
May 24, 2004

set forth in the "Smoking Policy" Appendices of the Corrections, Non-Management, and Supervisory contracts.

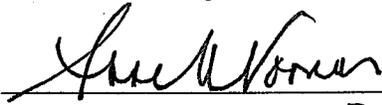
This agreement shall not be construed to diminish VSEA's right to bargain policies relating to smoking or the use of tobacco products in the future. The parties agree pursuant to policy 17.4 that the authority of the work site committees extends only to smoking, and not to the use of other tobacco products.

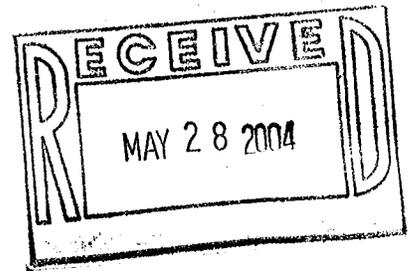
The department shall notify Corrections, Non-Management, and Supervisory Unit employees in the facilities that directive 408.02 has been modified and the nature of that modification effective immediately, by providing each employee with a copy or e-mail of this letter. The department shall also work in conjunction with the VSEA to establish the local worksite committees and a schedule for their meetings.

Steve Gold, Commissioner  
For the Department of Corrections

 5/25/04  
Date

Anne M. Noonan, Director  
For the VSEA

 5/28/04  
Date



**Agency of Human Services  
DEPARTMENT OF CORRECTIONS  
103 South Main Street  
Waterbury, VT 05671-1001**

**SMOKING ISSUES AGREEMENT  
May 24, 2004**

The following agreement is reached by the Vermont State Employees' Association and the Vermont Department of Corrections, by and through its respective representatives, to resolve the pending dispute relating to compliance with all appendices relating to smoking policies in the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Bargaining Unit Agreements.

The Department of Corrections (hereinafter "department") shall comply with the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Unit Agreements (hereinafter "contracts") smoking policy appendices, and provisions of subsequent contract agreements, and with any policies and procedures not inconsistent with the contracts, Agency of Administration, or Agency of Human Services rules and regulations relating to any smoking policy.

The department shall not issue any internal policies or directives that are not fully compliant with the smoking policy provisions of the contract. To this end, the department agrees to modify Directive 408.02 by removing provisions related to employee smoking. The department agrees to subsequently revise its employee smoking policy (as may be reflected in Directive 408.02) in accordance with the provisions of the contract. The department shall provide the union with a preliminary draft of this revised directive prior to its issuance.

The VSEA and State of Vermont shall advise the department of the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. VSEA and the department will ensure timely appointment of their respective members to the local worksite committees.

In accordance with the contractual side letter, each local worksite committee(s) "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval."

VSEA and the Department of Corrections agree that, until such local worksite committees provide their specific proposals for local smoking policies, the Corrections, Non-Management, and Supervisory Bargaining Unit employees:

- (1) Will not smoke inside correctional facility buildings or inside the secure perimeter, or in the presence of inmates;
- (2) Shall be permitted to smoke on non-secure grounds, outside correctional facility buildings;
- (3) Will be required to secure tobacco products in a designated secure location or outside the secure perimeter;

Until such time as the local worksite committee(s) and other necessary processes have been completed, the foregoing shall be in effect and not be required to be approved through the process

Smoking Issues Agreement  
May 24, 2004

set forth in the "Smoking Policy" Appendices of the Corrections, Non-Management, and Supervisory contracts.

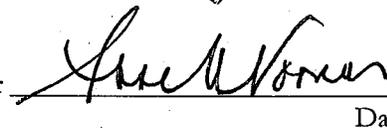
This agreement shall not be construed to diminish VSEA's right to bargain policies relating to smoking or the use of tobacco products in the future. The parties agree pursuant to policy 17.4 that the authority of the work site committees extends only to smoking, and not to the use of other tobacco products.

The department shall notify Corrections, Non-Management, and Supervisory Unit employees in the facilities that directive 408.02 has been modified and the nature of that modification effective immediately, by providing each employee with a copy or e-mail of this letter. The department shall also work in conjunction with the VSEA to establish the local worksite committees and a schedule for their meetings.

Steve Gold, Commissioner  
For the Department of Corrections

 5/25/04  
Date

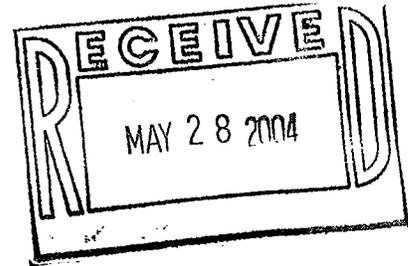
Anne M. Noonan, Director  
For the VSEA

 5/28/04  
Date

Kate  
File: DOC Smoking  
Agreement  
DZ, 1



Human Services  
OF CORRECTIONS  
100 North Main Street  
Montpelier, VT 05671-1001



SMOKING ISSUES AGREEMENT  
May 24, 2004

The following agreement is reached by the Vermont State Employees' Association and the Vermont Department of Corrections, by and through its respective representatives, to resolve the pending dispute relating to compliance with all appendices relating to smoking policies in the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Bargaining Unit Agreements.

The Department of Corrections (hereinafter "department") shall comply with the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Unit Agreements (hereinafter "contracts") smoking policy appendices, and provisions of subsequent contract agreements, and with any policies and procedures not inconsistent with the contracts, Agency of Administration, or Agency of Human Services rules and regulations relating to any smoking policy.

The department shall not issue any internal policies or directives that are not fully compliant with the smoking policy provisions of the contract. To this end, the department agrees to modify Directive 408.02 by removing provisions related to employee smoking. The department agrees to subsequently revise its employee smoking policy (as may be reflected in Directive 408.02) in accordance with the provisions of the contract. The department shall provide the union with a preliminary draft of this revised directive prior to its issuance.

The VSEA and State of Vermont shall advise the department of the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. VSEA and the department will ensure timely appointment of their respective members to the local worksite committees.

In accordance with the contractual side letter, each local worksite committee(s) "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval."

VSEA and the Department of Corrections agree that, until such local worksite committees provide their specific proposals for local smoking policies, the Corrections, Non-Management, and Supervisory Bargaining Unit employees:

- (1) Will not smoke inside correctional facility buildings or inside the secure perimeter, or in the presence of inmates;
- (2) Shall be permitted to smoke on non-secure grounds, outside correctional facility buildings;
- (3) Will be required to secure tobacco products in a designated secure location or outside the secure perimeter;

Until such time as the local worksite committee(s) and other necessary processes have been completed, the foregoing shall be in effect and not be required to be approved through the process

Smoking Issues Agreement  
May 24, 2004

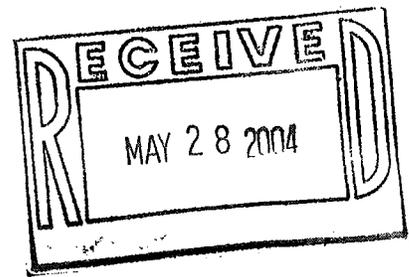
set forth in the "Smoking Policy" Appendices of the Corrections, Non-Management, and Supervisory contracts.

This agreement shall not be construed to diminish VSEA's right to bargain policies relating to smoking or the use of tobacco products in the future. The parties agree pursuant to policy 17.4 that the authority of the work site committees extends only to smoking, and not to the use of other tobacco products.

The department shall notify Corrections, Non-Management, and Supervisory Unit employees in the facilities that directive 408.02 has been modified and the nature of that modification effective immediately, by providing each employee with a copy or e-mail of this letter. The department shall also work in conjunction with the VSEA to establish the local worksite committees and a schedule for their meetings.

Steve Gold, Commissioner Steve Gold 5/25/04  
For the Department of Corrections Date

Anne M. Noonan, Director Anne M. Noonan 5/28/04  
For the VSEA Date



**Agency of Human Services  
DEPARTMENT OF CORRECTIONS  
103 South Main Street  
Waterbury, VT 05671-1001**

**SMOKING ISSUES AGREEMENT  
May 24, 2004**

The following agreement is reached by the Vermont State Employees' Association and the Vermont Department of Corrections, by and through its respective representatives, to resolve the pending dispute relating to compliance with all appendices relating to smoking policies in the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Bargaining Unit Agreements.

The Department of Corrections (hereinafter "department") shall comply with the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Unit Agreements (hereinafter "contracts") smoking policy appendices, and provisions of subsequent contract agreements, and with any policies and procedures not inconsistent with the contracts, Agency of Administration, or Agency of Human Services rules and regulations relating to any smoking policy.

The department shall not issue any internal policies or directives that are not fully compliant with the smoking policy provisions of the contract. To this end, the department agrees to modify Directive 408.02 by removing provisions related to employee smoking. The department agrees to subsequently revise its employee smoking policy (as may be reflected in Directive 408.02) in accordance with the provisions of the contract. The department shall provide the union with a preliminary draft of this revised directive prior to its issuance.

The VSEA and State of Vermont shall advise the department of the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. VSEA and the department will ensure timely appointment of their respective members to the local worksite committees.

In accordance with the contractual side letter, each local worksite committee(s) "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval."

VSEA and the Department of Corrections agree that, until such local worksite committees provide their specific proposals for local smoking policies, the Corrections, Non-Management, and Supervisory Bargaining Unit employees:

- (1) Will not smoke inside correctional facility buildings or inside the secure perimeter, or in the presence of inmates;
- (2) Shall be permitted to smoke on non-secure grounds, outside correctional facility buildings;
- (3) Will be required to secure tobacco products in a designated secure location or outside the secure perimeter;

Until such time as the local worksite committee(s) and other necessary processes have been completed, the foregoing shall be in effect and not be required to be approved through the process

Smoking Issues Agreement  
May 24, 2004

set forth in the "Smoking Policy" Appendices of the Corrections, Non-Management, and Supervisory contracts.

This agreement shall not be construed to diminish VSEA's right to bargain policies relating to smoking or the use of tobacco products in the future. The parties agree pursuant to policy 17.4 that the authority of the work site committees extends only to smoking, and not to the use of other tobacco products.

The department shall notify Corrections, Non-Management, and Supervisory Unit employees in the facilities that directive 408.02 has been modified and the nature of that modification effective immediately, by providing each employee with a copy or e-mail of this letter. The department shall also work in conjunction with the VSEA to establish the local worksite committees and a schedule for their meetings.

Steve Gold, Commissioner  
For the Department of Corrections

 5/25/04  
Date

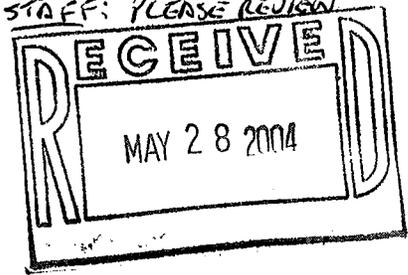
Anne M. Noonan, Director  
For the VSEA

 5/28/04  
Date



**Agency of Human Services  
DEPARTMENT OF CORRECTIONS  
103 South Main Street  
Waterbury, VT 05671-1001**

FIELD STAFF: PLEASE REVIEW



**SMOKING ISSUES AGREEMENT  
May 24, 2004**

The following agreement is reached by the Vermont State Employees' Association and the Vermont Department of Corrections, by and through its respective representatives, to resolve the pending dispute relating to compliance with all appendices relating to smoking policies in the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Bargaining Unit Agreements.

The Department of Corrections (hereinafter "department") shall comply with the 2003-2005 State of Vermont - VSEA Corrections, Non-Management, and Supervisory Unit Agreements (hereinafter "contracts") smoking policy appendices, and provisions of subsequent contract agreements, and with any policies and procedures not inconsistent with the contracts, Agency of Administration, or Agency of Human Services rules and regulations relating to any smoking policy.

The department shall not issue any internal policies or directives that are not fully compliant with the smoking policy provisions of the contract. To this end, the department agrees to modify Directive 408.02 by removing provisions related to employee smoking. The department agrees to subsequently revise its employee smoking policy (as may be reflected in Directive 408.02) in accordance with the provisions of the contract. The department shall provide the union with a preliminary draft of this revised directive prior to its issuance.

The VSEA and State of Vermont shall advise the department of the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. VSEA and the department will ensure timely appointment of their respective members to the local worksite committees.

In accordance with the contractual side letter, each local worksite committee(s) "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval."

VSEA and the Department of Corrections agree that, until such local worksite committees provide their specific proposals for local smoking policies, the Corrections, Non-Management, and Supervisory Bargaining Unit employees:

- (1) Will not smoke inside correctional facility buildings or inside the secure perimeter, or in the presence of inmates;
- (2) Shall be permitted to smoke on non-secure grounds, outside correctional facility buildings;
- (3) Will be required to secure tobacco products in a designated secure location or outside the secure perimeter;

Until such time as the local worksite committee(s) and other necessary processes have been completed, the foregoing shall be in effect and not be required to be approved through the process

Smoking Issues Agreement  
May 24, 2004

set forth in the "Smoking Policy" Appendices of the Corrections, Non-Management, and Supervisory contracts.

This agreement shall not be construed to diminish VSEA's right to bargain policies relating to smoking or the use of tobacco products in the future. The parties agree pursuant to policy 17.4 that the authority of the work site committees extends only to smoking, and not to the use of other tobacco products.

The department shall notify Corrections, Non-Management, and Supervisory Unit employees in the facilities that directive 408.02 has been modified and the nature of that modification effective immediately, by providing each employee with a copy or e-mail of this letter. The department shall also work in conjunction with the VSEA to establish the local worksite committees and a schedule for their meetings.

Steve Gold, Commissioner  
For the Department of Corrections

 5/25/04  
Date

Anne M. Noonan, Director  
For the VSEA

 5/28/04  
Date



# Memorandum

*Draft of re-write?*

**To:** Annie Noonan, Director, VSEA  
**From:** Steven M. Gold, Commissioner, DOC *St M Gold*  
**Re:** Directive #408.02, *Tobacco Products*  
**Date:** February 12, 2004

The following are the Department's terms for discussion regarding the above referenced directive.

*1. Remove refs. to stees*

1. Until such time as there is compliance with State Policy 17.4 regarding Statewide Smoking Committee, DOC will agree to modify those aspects of Directive 408.02 relating to employees if VSEA agrees to the following:
  - a. As a humane practice, there will be no smoking, or use of other tobacco products in front of inmates, including outside the secure perimeter;
  - b. No smoking, or use of other tobacco products inside the secure perimeter; i.e. the yards, bull pens, etc.; and
  - c. No carrying of tobacco products<sup>1</sup> inside the secure perimeter (as architecturally permitted. i.e. Rutland & St. Johnsbury)
2. This interim agreement should be approved by the procedure set out in State Policy 17.4 regarding Statewide Smoking Committee. If the interim agreement is not processed through the 17.4, then VSEA would have to agree not to commence an action based upon non-compliance with 17.4.
3. If DOC reissues Directive 408.02, a revised version will be processed through EMT, DOC's internal review process, and in compliance with Article 17. *(current smoky dir. executive mgmt team)*
4. VSEA will be advised that in order for DOC to come into compliance with 17.4, all local procedures will be forwarded to the Statewide Smoking Committee for acceptance and approval, as well as posted pursuant to Article 17.

*No*

*?*



<sup>1</sup> Tobacco products as defined in the Department's definition list and created with the assistance and cooperation of the VSEA.

**STATE OF VERMONT  
AGENCY OF HUMAN SERVICES  
DEPARTMENT OF CORRECTIONS**

**Directive: #408.02**

**Subject:** Tobacco Products

**Effective Date:**

**Review and Re-Issue Date:**

**Supersedes:**

New

**APA Rule Number:**

**Recommended for approval by:**  
Janice Ryan, Deputy Commissioner

**Authorized By:**  
Steven M. Gold, Commissioner of Corrections

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

**1. Authority:**

1.1 The authority for this directive is derived from Title 3, VSA, §3052, Title 28, VSA Chapters 1, 3, 5, 9, and 11.

**2. Purpose:**

- 2.1 The purpose of this directive is to define what tobacco-related products are, and to establish them as a contraband item for all correctional centers.
- 2.2 To insure a safe and healthy work environment for staff and a similar living environment for the inmate population. The Department will not permit any tobacco and tobacco-related products within the secure perimeter of its buildings or on the secured grounds of its correctional centers and in its state vehicles.

**3 Applicability/Accessibility:**

3.1 This directive applies to Department of Corrections (DOC) staff, inmates, volunteers and visitors to the correctional facilities. Anyone may have access to this directive.

**4 Directive:**

**4.1 Implementation**

- 4.1.1 Each facility superintendent will be responsible for putting together an Implementation Committee of staff that will have responsibility for implementing of this ban on tobacco products at each correctional facility.
- 4.1.2 Plans for implementation of this ban will include cessation classes for both the staff and inmates. <sup>voluntary</sup>
- 4.1.3 The Implementation Committee will also recommend to the facility superintendent any other activities or articles which will assist both groups with complying with this ban. <sup>directive</sup>

## Directive 408.02 Tobacco Products

- 4.1.4 The Implementation Committee will make recommendations to the facility superintendent about activities for the inmate population that will assist them in complying with this ban. The committee will also insure that the local sites are in compliance with letters of agreement concerning smoking signed between the ~~Vermont Department of Corrections~~, the Department of Personnel and the VSEA. Local smoking committees will also insure that their respective sites meet these same criteria.
- 4.1.5 Cessation classes should be conducted in November and December of 2003 so as to prepare inmates for this ban. Classes should continue through January and February of 2004 for those who couldn't or didn't attend them prior to the ban and to assist newly admitted inmates with the ban.
- 4.1.6 Canteen purchases of cigarettes will cease on December 15, 2003.
- 4.1.7 A total ban on tobacco products will commence on January 5, 2004.

### 4.2 Tobacco Products as Contraband

- 4.2.1 Each facility superintendent will insure that all tobacco products are put on the facility list of contraband.
- 4.2.2 Each facility superintendent will insure that there is adequate notification to law enforcement and the public about the status of tobacco products in the correctional facilities. There should be adequate signs at the entryway of each site to conform to this notification requirement.
- 4.2.3 As contraband, the possession of tobacco products in violation of this directive will subject the carrier to Disciplinary Sanctions contained in Directive 410.01 for the inmate population. The Facility Work Rule #1 will be applied for staff violations. The introduction of any contraband to a correctional facility will be handled as a serious matter by the administration.

### 4.3 Breaks

- 4.3.1 Correctional Facility Superintendents will insure that any and all break practices conform to this directive and do not conflict with the required amount of daily work hours.

## 5 Training Method:

- 5.1 The Director of Security and Supervision will conduct training with all site managers.

## 6 Quality Assurance Processes:

- 6.1 Site visits will be conducted as well as review of local procedures will be conducted.

## 7 Financial Impact:

- 7.1 There is an anticipated reduction in canteen sales. There should be an anticipated reduction in medical costs.

## 8 Responsible Director and Draft Participants:

Directive 408.02 Tobacco Products

Lawrence McLiverty is the author and responsible director of this directive.

Smoking.



**Number 17.4**

**Effective Date:** March 1, 1996

**Subject:** STATEWIDE SMOKING POLICY

**Replaces Statewide Smoking Policy Dated November 1, 1993**

**Applicable To:** All classified employees, as well as exempt, appointed, and temporary, with the Executive Branch of the State of Vermont.

**Issued By:** Department of Personnel

**Approved By:** William Sorrell, Secretary of Administration

**PURPOSE AND POLICY STATEMENT**

The State of Vermont and the Vermont State Employees' Association, Inc., (VSEA) in order to comply with the provisions of 18 VSA 1421, et seq., jointly establish this policy to protect workers by prohibiting smoking in the workplace except in designated areas.

It shall be the goal of the State to provide healthy and safe work environments for all Vermont State employees, to ensure that the health hazard created by second hand smoke is removed from the workplace, and to guarantee that regulations restricting workplace smoking are implemented in a timely manner.

**DEFINITIONS**

**SMOKING AREA** - an area that non-smoking employees are not required to visit on a regular basis where smoking is permitted pursuant to a policy established under 18 VSA 1421. Up to thirty (30) percent of employee cafeteria and lounge areas may be designated as a smoking area.

**SMOKING POLICY** - a written policy that shall prohibit smoking throughout the workplace or restrict smoking to designated enclosed smoking areas and defines where those areas are located.

**WORKPLACE** - means an enclosed structure where employees perform services for an employer, or in the case of an employer who assigns employees to departments, divisions or similar organizational units, the enclosed portion of a structure where the unit to which the employee assigned is located. Except for schools, workplace does not include areas commonly open to the public nor any portion of a structure which also serves as the employee's or employer's personal residence.

**GENERAL PROCEDURES**

STATEWIDE SMOKING COMMITTEE: The State and the VSEA shall establish a Statewide Smoking Committee comprised of an equal number of representatives, not to exceed four (4) members each, who shall be responsible to:

analyze the requirements of 18 VSA 1421, et seq., and 18 VSA 1741, et. seq. in relation to the State worksites;

- establish, publish, and distribute this smoking policy and guidelines for its implementation, which includes the establishment of local worksite committees; and provide on-going administration and application of the Statewide Smoking Policy;
- instruct and assist local worksite committees in the development and implementation of local policy;
- review and approve any and all local policies to ensure that the local policies comply with the Statewide Smoking Policy and the requirements of 18 VSA 1421, et seq. and 18 VSA 1741, et. seq.;
- mediate disputes at local worksites regarding the formation of a local policy by sending a representative of the State and VSEA to the worksite to assist the local committee;
- advise the Commissioner of Personnel and the Executive Director of VSEA of any problems regarding the establishment of a Smoking Policy and/or problems in local worksites;
- perform other related duties as agreed upon by the Commissioner of Personnel and VSEA.

LOCAL WORKSITE COMMITTEES: A Local Worksite Committee (LWC), consisting of fair representation among management, VSEA members, smokers, and non-smokers, shall be established in each worksite. Volunteers from both smoking and non-smoking populations shall be solicited, and the group shall select a chairperson from among its members. The Secretary of Administration or his or her designee shall determine which buildings, or portions of buildings, shall constitute one worksite for these purposes (See Attachment A).

The role of the LWC shall be to propose a smoking policy for the worksite. The LWC will have the option of recommending that smoking be prohibited in the worksite, or recommending a designated smoking area which is consistent with the requirements of the statute and this policy.

The LWC shall review the LWC implementation guidelines (See Attachment B) in relation to the physical setting of the involved worksite, any existing worksite smoking policy, and any other factors outlined in this policy.

The LWC shall consult with and coordinate its proposed smoking policy with other State offices which share space and/or may be affected by the proposed smoking policy.

The LWC should consult with representatives of the Buildings Department if questions about the physical office setting, ventilation, etc., arise. The LWC should determine whether the air in the building is re-circulated as this may affect the establishment of any smoking areas. The

LWC shall call upon the Statewide Smoking Committee for other assistance if necessary.

The LWC shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Personnel and the Executive Director of the VSEA, for review and approval.

Any employee may propose a change to a local smoking policy through the LWC. The LWC shall attempt to reach consensus on the proposed change. Any proposal by the LWC to change a local policy must be submitted in writing to the Commissioner of Personnel and the Executive Director of the VSEA. If the LWC is unable to resolve the issue, it shall follow the mediation process outlined below. If the issue is not resolved after 45 days of review and discussion by the LWC, the Commissioner of Personnel may decide to implement the change, provided (s)he first notifies the VSEA, and that said change does not violate this policy or the law. The LWC and the Statewide Smoking Committee shall be encouraged to thereafter continue their efforts to establish, by consensus, a resolution to the issue.

**WORKSITE MEDIATION:** The LWC shall immediately notify the Commissioner of Personnel and the Executive Director of the VSEA if it is unable to reach consensus on an appropriate smoking policy. The State and VSEA shall each appoint one representative from the Statewide Smoking Committee to meet with the LWC to attempt to mediate the dispute and facilitate the formation of a policy.

Any dispute over the meaning of this policy or statute shall be submitted to the Statewide Smoking Committee for clarification and resolution.

If mediation does not result in consensus on an appropriate local smoking policy, the State and VSEA representatives shall outline the unresolved issues to the Statewide Smoking Committee for resolution.

**EMPLOYEE AND EMPLOYER COMPLIANCE:** Employees and employers are expected to comply with the smoking policy established in their workplace. The employer is required to post a copy of the smoking policy in a conspicuous location at the workplace. Each employee shall receive a written copy of the policy which shall include the expectations of compliance. Management shall utilize progressive discipline in the case of an employee who fails to comply with the smoking policy. If an employer fails to adhere to the smoking policy, an employee may grieve starting at Step II. If a designated smoking area is established, employees who are smokers shall be permitted a reasonable amount of time during the work day to smoke. The State will not discriminate against smokers who utilize authorized smoking break time. The employee is expected to fulfill his or her job duties even though (s)he may be absent from the work area on authorized smoke breaks.

Any compliance problems under the smoking policy which cannot be resolved by the employees themselves should be referred to the appropriate supervisor and, if necessary, to the department head or commissioner for review.

**EXPENDITURE OF MONIES:** Neither the Statewide Smoking Committee nor the Local Worksite Committee shall have the authority to require the State to expend monies in connection with the requirements of 18 VSA 1421.

**GRIEVANCES:** The VSEA or an employee shall have the right to grieve the State's failure to

follow this policy or the process for revising it as outlined herein and under the State/VSEA contract. An employee aggrieved by the State's failure to comply with 18 VSA 1421 shall file said complaint with the Vermont Department of Health in accordance with the provisions of that Statute.

## ATTACHMENT A

### WORKPLACE DESIGNATIONS

The Statewide Smoking Policy requires the Secretary of Administration to designate worksites so that committees can form to determine local smoking policies. Following are the designated worksites as well as general guidance on smoking in areas not assigned to an agency or department.

#### DESIGNATED WORKSITES:

To ensure consistency of policy and to avoid later conflicts among employees, a general rule has been established that **each building is a worksite**. This will allow for more efficient use of common areas such as cafeterias and any rooms that may be designated for smoking. When more than one agency shares a building, the Local Worksite Smoking Committee (LWC) should include representatives from every affected agency/department.

The following Montpelier buildings are designated as worksites. For each building, a single building-wide smoking policy must be adopted by the LWC. The lead agency listed should impanel the worksite committee:

- 109 State Street (Excepting Attorney General if (s)he desires to be excluded), link to 111 State Street, and that part of 111 State Street assigned to the Department of Libraries - Commissioner of Finance and Management
- 120 State Street - Commissioner of Education
- 133 State Street (Except Treasurer if (s)he desires to be excluded) - Secretary of Transportation

#### DELEGATION OF AUTHORITY:

For buildings not listed above, if the building is occupied by a single agency, that agency's secretary or commissioner should impanel the committee called for in the Statewide Smoking Policy. In a building or worksite assigned to two or more agencies, any secretary involved should impanel the committee. If two commissioners are involved, the commissioner with longest tenure in office should impanel the committee.

When a worksite is occupied by executive branch employees and employees of the judicial or legislative branches, the appointing authority outside the executive branch should be invited to join the worksite committee, but (s)he retains the right to form a separate worksite committee.

When a department has sole occupancy of more than one building, the commissioner or secretary may create a combined smoking committee to apply to all such buildings.

### COMMON AREAS:

Many buildings have hallways, attics and odd spaces which are not formally assigned to a specific department but which may be used to varying degrees. If a department has sole control over such space, it should be included in that department's policy.

A new law that became effective on July 1, 1993, 18 V.S.A. 1741, prohibits the possession of lighted tobacco products in any form in the common areas of all enclosed indoor places of public access and publicly owned buildings and offices. These common areas include lobbies, hallways, elevators, rest rooms and cafeterias. Smoking will not be allowed in any of these areas.

## ATTACHMENT B

### LOCAL WORKSITE COMMITTEE IMPLEMENTATION GUIDELINES

This document is intended to assist in the interpretation of 18 VSA 1421, and 18 VSA 1741, relating to smoking in the workplace. The law provides that a smoking policy establish either a smoking ban in the worksite, or a designated smoking area consistent with the parameters set forth in the law.

If a Local Worksite Committee (LWC) considers establishing a smoking area, the law outlines three possible avenues for doing so.

1. The law allows for designated enclosed smoking areas. These areas may include a room with floor to ceiling partitions which is not a common work area, or a private office, provided that the room has a floor to ceiling partition. The LWC should consider whether the designated enclosed smoking area is sufficiently enclosed or ventilated to ensure that smoke will not affect nearby non-smoking areas.

If a private office is a designated smoking area, smoking shall not be permitted during meetings with other people in that setting unless the others present consent. A private office may not be designated a smoking area unless it can be established that the smoke can be confined to and ventilated from that area.

In buildings where the heating/cooling/ventilation system recirculates the air within the building, it is inconsistent with the overall purpose of the law to permit smoking in a designated area unless that area has a ventilation capability which will ensure that smoke does not affect non-smoking areas in the building.

The smoking area must be an area that non-smoking employees are not required to visit on a regular basis. Those areas which employees are "required to visit on a regular basis" include, but are not limited to: (a) any work area that has commonly used equipment, such as a photocopying room, a computer room, a file room; (b) an area, or private office space to which employees must normally report in order to review and/or discuss work assignments with their supervisor; (c) other areas which an employee can demonstrate must be visited on a regular basis. Smoking is not permitted in meetings at which non-smokers are present, nor if the meeting area is a non-smoking area.

2. The law allows for designated unenclosed smoking areas if: (a) the layout of the

workplace is such that smoking will not be a physical irritation to any non-smoking employee in the workplace; and (b) three-fourths of the employees in the workplace agree. This narrow exception outlines two criteria which must be met. With regard to the physical irritation to non-smokers, the law provides that if any reasonable claim of physical irritation resulting from smoke in an area designated as a "smoking area" is established, then the area may not be designated as a smoking area. There is no question but that the law requires regulation in favor of the non-smoking employee.

3. Up to 30% of an employee cafeteria or lounge area may be designated as a smoking area. In the case of the cafeteria setting, it will be imperative to discuss this matter with representatives from the Buildings Department. Wherever possible, the LWC should devise methods to physically separate and ventilate the smoking and non-smoking areas. This may be easier to achieve in the cafeteria setting than in a lounge area. Since an employee lounge area is generally small, the LWC should consider whether the area is, or could be, sufficiently ventilated to ensure that smoke does not affect nearby non-smoking areas and non-smokers using the lounge. If a cafeteria or lounge area is so small that smoking in 30% of the area would, as a practical matter, preclude non-smokers from comfortably using the area, it may not be appropriate to approve smoking there. However, if it is the only area in the worksite which would permit you to designate a smoking area, that consideration may favor allowing smoking in the area.

#### WORKPLACE AND PUBLIC AREA:

The term "workplace", as defined in 18 VSA 1421, describes two types of physical settings. One, "an enclosed structure", references a building setting in which employees work in a layout similar to a factory floor or a large clerical-pool room. This section of the definition encompasses those situations in which the workplace is not divided into separated, sub-unit settings.

"A structure where the unit to which employee assigned is located" references situations similar to many State office buildings. For example, in the AHS complex in Waterbury, a single building houses many separate employee "units". The first floor of the Osgood Building, for example, has the Office on Aging, Corrections, Office of Economic Opportunity, etc. The law contemplates smoking policy development by employees in the "workplace", which, in many State work settings, will be smaller work areas housing a specific group (department or "unit") of State employees, setting smoking policies which comply with the law, but reflect the sentiments of the employees in that work setting.

#### AREAS OPEN TO THE PUBLIC:

A place of public access includes buildings and offices that the general public has access to or which the general public uses. The public would not have access to a State office beyond the lobby/reception area unless as an invitee to the office, and, therefore, these areas should not be considered commonly open to the public. The fact that the public may frequently be invited into the workplace as clients of a department does not transform the inner-office area to one which is commonly open to the public.

An area is not a "workplace" if the area is commonly open to the public. As stated previously, smoking is prohibited in all common areas of enclosed indoor places of public access.



**Hoadley, Gary**

**From:** Hoadley, Gary  
**Sent:** Thursday, October 16, 2003 8:59 AM  
**To:** Stewart, David; Partlow, Kathi; Kirk, Lucinda; Canales, Peter; Raymond, Marty  
**Cc:** Hoadley, Gary  
**Subject:** FYI: DOC draft tobacco ban directive

October 16, 2003

Steven M. Gold, Commissioner  
Department of Corrections  
103 South Main Street  
Waterbury, VT 05671-1001

RE: Draft Directive 408.02

Dear Commissioner Gold,

On September 18, 2003, representatives of the VSEA met with Department of Corrections representatives to discuss the Department's intention to establish a new directive in reference to "Tobacco Products." In fact, prior to this meeting, the VSEA was informed by VSEA Corrections Bargaining Unit members that the Department had circulated a Draft Directive numbered 408.02 that effectively prohibits any tobacco and tobacco-related products for both offenders and VSEA represented staff. During this meeting, Director Lawrence McLiverty stated that the draft directive circulated by him was not for debate and to be implemented. I responded by clearly placing the Department on notice that the VSEA demands that Corrections comply with the negotiated Corrections Bargaining Unit Agreement that states in pertinent part; "Appendix C Smoking Policy - The parties agree that the side-letter of agreement regarding smoking policy and changes shall continue in force for the term of the Agreement unless amended by mutual agreement of the State and the VSEA."

Therefore, once again, please be advised that the VSEA has not entered into any mutual agreement, whatsoever, to modify Appendix C and has not entered into any mutual agreement, whatsoever, to accept draft Directive 408.02; and that any implementation of said directive would violate the collective bargaining agreement and potentially violate the State Employees' Labor Relations Act.

Please contact me with any questions or concerns at (802) 223-5247.

Sincerely,

Gary L. Hoadley  
Senior Field Rep.

cc: Anne Noonan, VSEA Director  
David Stewart, VSEA General Counsel  
David Bellini, VSEA Corrections Unit Chair  
Lawrence McLiverty, Corrections Director



**Personnel Unit**

1 North, Waterbury Complex  
103 South Main Street  
Waterbury, VT 05671-0202

[phone] 802-241-2783  
[fax] 802-241-2797

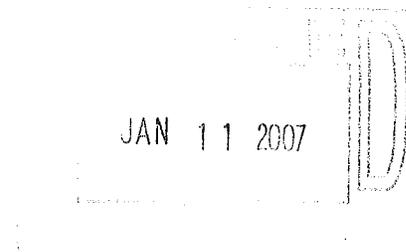
*Agency of Human Services*

Memo to: Linda McIntire, DHR Commissioner  
Anne Noonan, VSEA Director

From: Gail Rushford, Chair *Gail*  
Waterbury Complex Local Worksite Smoking Committee

Date: January 9, 2007

Subj: Proposed local smoking policy enclosed



Under the provisions of Personnel Policy 17.4, I am submitting this to you for review and approval.

A new local worksite smoking policy committee was formed in the Waterbury complex last fall. The smoking policies for the AHS occupants of the complex are all outdated. In correcting this, we are working to establish a single policy for the majority of the complex. This primarily impacts the connected workspaces shared by AHS, ANR and DHR. The goal is to establish clear expectations and deal more consistently with those areas where smoke from outside intrudes into the buildings, resulting in complaints and indoor air quality issues.

The committee's policy recommendation is to designate specific outdoor areas for smoking. Our rationale is that designated areas will be at a reasonable distance from entrances and operable windows, clearly identified, and unambiguous. We have identified a number of areas on the campus for this purpose. In doing so, we have tried to utilize appropriate areas where smokers currently smoke outdoors and establish reasonable alternatives to areas where smoking should not be taking place. We shared the draft policy and location map with employees at the Complex and received their input.

What we would like from the Statewide Smoking Committee is to approve the local smoking policy with the concept of designated smoking areas, but agree that the specific designated areas will be treated as procedural – so that we can make changes as appropriate (in response to complaints or other needs) without the need for a full policy review process.

I would be glad to answer any questions or concerns or to meet with the Statewide Committee if needed.

Thank you for your time and consideration of our request.

Committee Members:

Gail Rushford

Anne Jerman/Dena Weidman

Peter Garon

Ellie Breitmaier

Bob Butts

Marian Perras

Candi Young

Clayton Marshia

Cindy Chaffee

Gloria Abbiatti

Barb Morway

Sarah Sanders

Joe Raymond/ Kendel Stafford

Jim Billado

Barry Cahoon

Suzanne Pickett

Buffy Placey



**Personnel Unit**

1 North, Waterbury Complex  
103 South Main Street  
Waterbury, VT 05671-0202

[phone] 802-241-2783  
[fax] 802-241-2797

*Agency of Human Services*

Memo to: Linda McIntire, DHR Commissioner  
Anne Noonan, VSEA Director

From: Gail Rushford, Chair *Mail*  
Waterbury Complex Local Worksite Smoking Committee

Date: January 9, 2007

Subj: Proposed local smoking policy enclosed

Under the provisions of Personnel Policy 17.4, I am submitting this to you for review and approval.

A new local worksite smoking policy committee was formed in the Waterbury complex last fall. The smoking policies for the AHS occupants of the complex are all outdated. In correcting this, we are working to establish a single policy for the majority of the complex. This primarily impacts the connected workspaces shared by AHS, ANR and DHR. The goal is to establish clear expectations and deal more consistently with those areas where smoke from outside intrudes into the buildings, resulting in complaints and indoor air quality issues.

The committee's policy recommendation is to designate specific outdoor areas for smoking. Our rationale is that designated areas will be at a reasonable distance from entrances and operable windows, clearly identified, and unambiguous. We have identified a number of areas on the campus for this purpose. In doing so, we have tried to utilize appropriate areas where smokers currently smoke outdoors and establish reasonable alternatives to areas where smoking should not be taking place. We shared the draft policy and location map with employees at the Complex and received their input.

What we would like from the Statewide Smoking Committee is to approve the local smoking policy with the concept of designated smoking areas, but agree that the specific designated areas will be treated as procedural – so that we can make changes as appropriate (in response to complaints or other needs) without the need for a full policy review process.

I would be glad to answer any questions or concerns or to meet with the Statewide Committee if needed.

Waterbury State Office Complex  
Local Worksite Smoking Policy

**Introduction**

This policy is applicable to the worksite formed by the connected buildings of the Waterbury State Office Complex at 103 South Main Street. Multiple workplaces are included in this worksite. As such, the policy is adopted by the Agency of Human Services, the Agency of Natural Resources, the Department of Human Resources, and the Department of Buildings and General Services for all employees and visitors at this worksite.

This policy is implemented in accordance with Personnel Policy 17.4 and in compliance with the provisions of State law (18 VSA Sec. 1421 et seq.). The definitions and requirements of those documents, if more restrictive, shall therefore be applied to and supersede any related provisions of this local worksite policy.

**Policy Statement**

There are no enclosed designated smoking areas established at the Waterbury State Office Complex.

Smoking is permitted on the grounds of the complex in the specific areas designated on the attached location map. These areas have been determined to be a reasonable distance from doorways and operable windows. Cigarettes and matches must be properly disposed of prior to entering the buildings. "Butt cans" are provided in the designated areas for this purpose. If BGS determines that additional "Butt cans" must be placed in other locations for sanitation purposes, this is not to be construed as establishing a new designated smoking area.

Unless specifically designated under this policy, smoking is prohibited within fifty (50) feet of doorways and operable windows.

Pursuant to state law, an exception is permitted for "designated unenclosed smoking areas if the layout of the workplace is such that smoking will not be a physical irritation to any nonsmoking employee in the workplace and three-fourths of the employees in the workplace agree." Under the law, a workplace is the "enclosed portion of a structure where the unit to which the employee is assigned is located." Only employees assigned to the applicable workplace will be covered where this exception is implemented.

This local worksite policy prevails in all workplaces only when there is not a more restrictive state or federal law or department policy.

This is an employee policy and not intended to apply to patients or inmates of facilities located in the Waterbury State Office Complex.

A copy of this policy and the location map illustrating the designated outdoor smoking areas will be posted in all workplaces of the Waterbury State Office Complex.

Non-smokers may choose to utilize designated smoking areas for work breaks; however, such use will not give rise to valid complaints about smoking in the area. On occasion, some designated smoking areas may be reserved for temporary use for an employer sponsored function, such as a picnic or ice cream social. On those occasions, smoking will not be permitted in the area while the organized work activity is underway.





**State of Vermont**  
**Department of Labor**  
Employment Security Board  
5 Green Mountain Drive  
P.O. Box 488  
Montpelier, VT 05601-0488  
**www.labor.vermont.gov**

[phone] 802-828-4390  
[fax] 802-828-4046

Effective \_\_\_\_\_, 2007

### **VDOL Smoking Policy**

In accordance with 18 V.S.A. § 1422, Personnel Policy 17.4, and the Smoking Policy provisions of the applicable collective bargaining agreements, the following smoking policy applies to the Central Office of the Vermont Department of Labor, located at 5 Green Mountain Drive, Montpelier.

Smoking is prohibited in all areas of the Central Office at all times, with the exception of the area within, and immediately adjacent to, the designated smoking shelter located on the northeastern (rear) side of the building.

VDOL district offices fall under the jurisdiction of their local work site smoking committee. Accordingly, employees and visitors must abide by the smoking policy in place at those work sites.

#### VDOL Local Work Site Smoking Committee:

Dirk Anderson	Judy Bourbeau	Sherrie Brewster
Tina Bielenberg	Linda Brownell	Michele Davis
Tracy Downing	Kristine Murphy	



## STIPULATION AND AGREEMENT

NOW COME the State of Vermont and the Vermont State Employees' Association ("VSEA") (collectively known as "the Parties") and enter a Stipulation and Agreement as set forth below:

- I. WHEREAS on March 1, 2006, The Department of Buildings and General Services issued BGS Administrative Policy 39 – Smoking Policy (see copy attached and incorporated herein by reference);
- II. WHEREAS on March 2, 2006, The Department of Human Resources issued a memorandum establishing a smoking work rule for all departments of State Government which directed the establishment and posting of the smoking work rules in certain buildings listed in the work rule (see copy attached and incorporated by reference);
- III. WHEREAS the VSEA filed both an unfair labor practice complaint and a grievance against the State on or about May 5, 2006 (VSEA v. State of Vermont, VLRB Docket numbers 2006 -19 and 2006 - 18, respectively ) in response to the smoking policy issued by the Department of Buildings and General Services on March 1, 2006, and the smoking work rule established by the Department of Human Resources on March 2, 2006;
- IV. WHEREAS the Parties desire to enter into a settlement and compromise of all claims and concerns described above;
- V. WHEREAS this agreement is entered into for the convenience of the parties in recognition of the costs and risks associated with litigation;
- VI. WHEREAS the Parties agree that this agreement is for their mutual convenience and does not constitute an admission of fact, wrongdoing or statutory or contractual violation by either party and shall not be offered as evidence or constitute a precedent for any pending or future employment related matter, except for an alleged breach hereof;
- VII. WHEREAS the Parties agree that this agreement is supported by good and binding consideration in the form of the promises and obligations set forth below:

NOW THEREFORE:

1. The State of Vermont shall comply with the 2005-2007 State of Vermont – VSEA Corrections, Non-Management, State Police, and Supervisory Unit Agreements

(hereinafter "contracts"), smoking policy appendices, and provisions of subsequent contract agreements;

2. The State shall not issue any policies or directives that are not fully compliant with the smoking policy provisions of the contract;
3. The VSEA shall immediately withdraw, with prejudice, the above-referenced unfair labor practice charge and grievance against the State, VLRB Docket numbers 2006-19 and 2006-18;
4. The VSEA and the State of Vermont shall adhere to the requirements of the contract specific to the side-letter of agreement regarding smoking, and in establishing the local worksite committees as required by the side-letter. The State and VSEA will establish the local worksite committees at the buildings listed in Appendix A to this agreement in accordance with the provisions of the side letter of agreement regarding smoking, and a schedule for their meetings no later than March 1, 2007. The local worksite committees at the buildings listed in Appendix A shall meet for the purpose of revising the local smoking policies in accordance with this stipulation and agreement.;
5. The VSEA and the State agree that, in developing their specific proposals for local smoking policies, the local worksite committees at the worksites listed in Appendix A to this agreement shall not designate smoking areas within fifty (50) feet of an entrance, exit, operable window, or air intake to any State building listed in Appendix A;
6. The local worksite committee at each building listed in Appendix A "shall submit its proposed local smoking policy, in writing, to the Statewide Smoking Committee, through the Commissioner of Human Resources and the Executive Director of the VSEA, for review and approval" no later than April 1, 2007. Once local smoking policies for the buildings listed in Appendix A have been implemented, the State shall rescind the following policy & work rules as they pertain to bargaining unit employees: 1) BGS Administrative Policy 39 – Smoking Policy, established on March 1, 2006; 2) Commissioner McIntire's March 2, 2006 memorandum which established the statewide work rule on smoking and 3) any resulting smoking work rules implemented by agencies or departments in response to the March 2, 2006 memorandum;
7. The policies and work rules listed in paragraph 6 shall remain in effect and not be required to be approved through the process set forth in the "Smoking Policy" Appendices of the contracts until such time as the Appendix A local worksite committee(s) smoking policies have been approved and implemented, or until May 1, 2007, whichever is sooner;
8. In the event that the Appendix A local worksite committee(s) smoking policies have not been approved and implemented by May 1, 2007, the State shall rescind the policies and work rules listed in paragraph 6, as they pertain to bargaining unit employees. However, bargaining unit employees will not be permitted to smoke within fifty (50) feet of an entrance, exit, operable window, or air intake to any state building listed in Appendix A;
9. The State shall notify all Corrections, Non-Management, State Police, and Supervisory Unit employees at the worksites listed in Appendix A of this agreement. Notification may be by letter or e-mail. The notice shall state the following: "Pursuant to a settlement



## APPENDIX A

5 Perry Street, McFarland House, Barre, VT  
162 North Main Street, Barre, VT  
255 North Main Street, Barre, VT  
1 Veterans Memorial Drive, Bennington, VT  
324 Main Street, formerly BENCO building, Bennington, VT  
28 Vernon Street, Brattleboro, VT  
41 Springtree Road, Brattleboro, VT  
232 Main Street, Brattleboro State Office Building, Brattleboro, VT  
1205 North Avenue, Burlington, VT  
32 Cherry Street, Costello Court House, Burlington, VT (Child support)  
50 Cherry Street, Burlington, VT  
108 Cherry Street, Zampieri Office Building, Burlington, VT  
1193 North Avenue, Burlington, VT  
26 Woodside Drive East, (Woodside Juvenile Facility), Essex, VT  
252 Main Street (Former KenGar), Hyde Park, VT  
282 Boardman Street, Middlebury, VT  
700 Exchange Street (Carbro Building), Middlebury, VT  
12 ½ Main Street, Montpelier, VT  
155 Elm Street, Montpelier, VT  
Professional Drive, Morrisville, VT  
96 Western Ave, Newport, VT  
100 Main Street, Newport State Office Building, Newport, VT  
35 Ayers Brook Road, Randolph, VT  
88 Merchants Row, Asa Bloomer Building, Rutland, VT  
Strongs Ave- Howe Center, Rutland, VT  
1 Scale Ave, Rutland, VT  
67 Eastern Ave, St. Johnsbury, VT  
7290 Route 131, Weathersfield, VT  
#1, # 4, # 3 Gillman Office Building, White River Junction, VT  
2 East Street, Winooski, VT  
100 Mineral Street, Springfield State Office Building, Springfield, VT  
20 Houghton Street, St. Albans State Office Building, St. Albans, VT  
121 South Main Street, Waterbury, VT