



# State Administration and Veterans' Affairs Interim Committee

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## 69th Montana Legislature

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Name	City/State	Representing	Time & Date	Subject	Comment
Shelley Turner	Helena, MT	Montana Association of School Business Officials	2:03 PM 11/14/2025	Shifting General Election Dates and the Effect on School Elections	Again, I want to share my apologies that I am unable to attend this meeting. Please feel free to reach out with any questions or concerns you have that I can address. Thank you. Shelley Turner, MASBO. See Attachment 3
Shelley Turner	Helena, MT	Montana Association of School Business Officials	12:55 PM 9/25/2025	MASBO and school election guidelines	My sincere apologies that I missed the September 25th meeting. I was away at an out of state conference. Please feel free to reach out to me any time regarding school elections and concerns with school policies and guidelines. Thank you, Shelley Turner sturner@masbo.com

### Attachment 3



November 17, 2029

To: **Members of the State Administration and  
Veterans' Affairs Interim Committee (SAVA)**

My name is Shelley Turner, and I am submitting this testimony in my capacity as Executive Director of the Montana Association of School Business Officials (MASBO) and on behalf of MASBO as an organization. I was unable to attend the September meeting due to other professional obligations and will be out of state for the upcoming November 17 meeting; however, I want the committee to know that I am monitoring these discussions closely and am available at any time to assist the committee with questions or concerns related to school election administration.

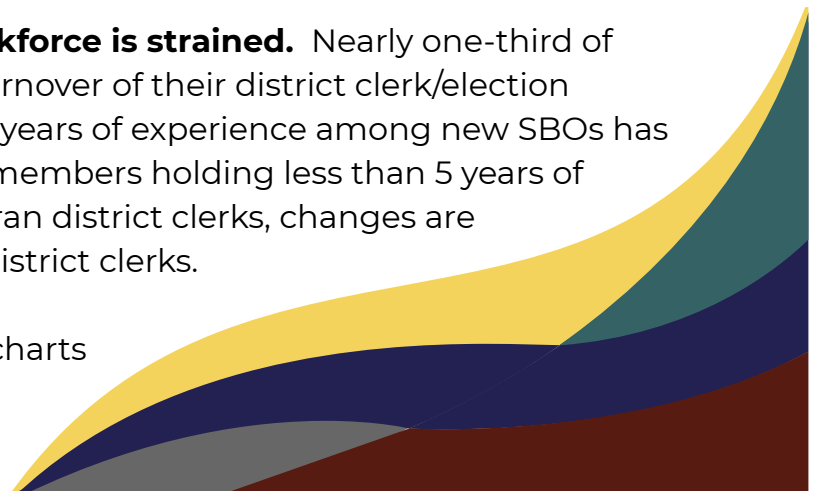
I would also like to express MASBO's appreciation for the testimony provided by Lance Melton of the Montana School Boards Association (MTSBA) at the prior meeting. His remarks accurately reflected the interconnected nature of school governance structures, trustee timelines, and election processes, and MASBO strongly supports and aligns with his perspective. School Business Officials (SBOs) serve as the clerks to Montana's school boards, and MASBO works closely with MTSBA to ensure the lawful operation of local school governance systems.

**School elections cannot absorb unexamined changes.** They operate on one of the most compressed and intricate statutory timelines in Montana law. Even a small modification to statewide election timelines has significant ripple effects.

**A holistic review would be required before altering any timelines.** Before modifying any election date or process that intersects with school calendar requirements, Montana would need a full review of trustee election laws, levy timelines, SBO staffing capacity, county coordination, publication requirements, leadership transitions, budget adoption cycles, and more.

**The school finance and election workforce is strained.** Nearly one-third of Montana districts have experienced turnover of their district clerk/election administrator this year alone. Average years of experience among new SBOs has dropped sharply with over half of our members holding less than 5 years of experience. Changes are hard for veteran district clerks, changes are unsurmountable mountains for new district clerks.

Please see accompanying tables and charts on the last pages of this document.





### **MASBO's statewide coordination with OPI and county election**

**administrators.** Last week MASBO partnered with OPI to host a statewide webinar reviewing legislative changes affecting school elections. Over 150 SBOs and county election administrators attended, underscoring the need for coordinated guidance. MASBO continues to also partner with MTSBA throughout the year to share important dates and deadlines with our public schools.

### **Request to the Committee:**

1. Any proposed changes to statewide election law should be carefully evaluated for school-district impact before advancing.
2. The existing school election timeline must be protected unless a comprehensive study is completed.
3. Stakeholders including MASBO, OPI, MTSBA, and county election administrators must be included in discussions.

### **Closing:**

Thank you for your time and your willingness to consider the operational realities of Montana's public schools.

Respectfully submitted,

Shelley Turner, Executive Director  
Montana Association of School Business Officials (MASBO)



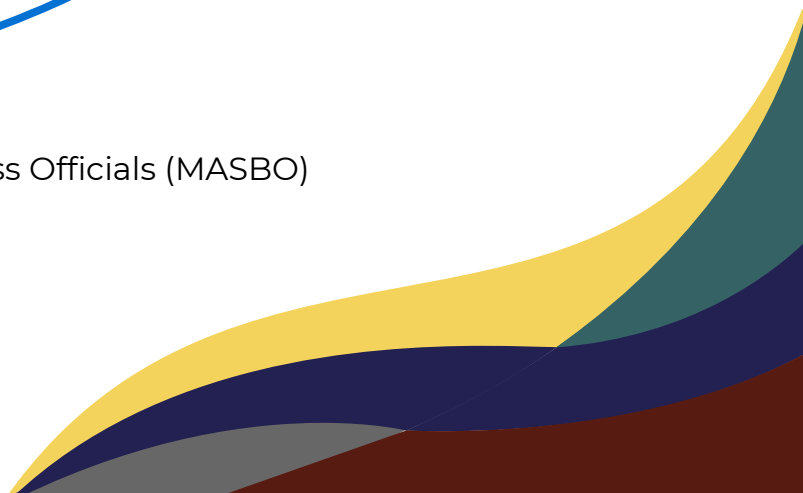
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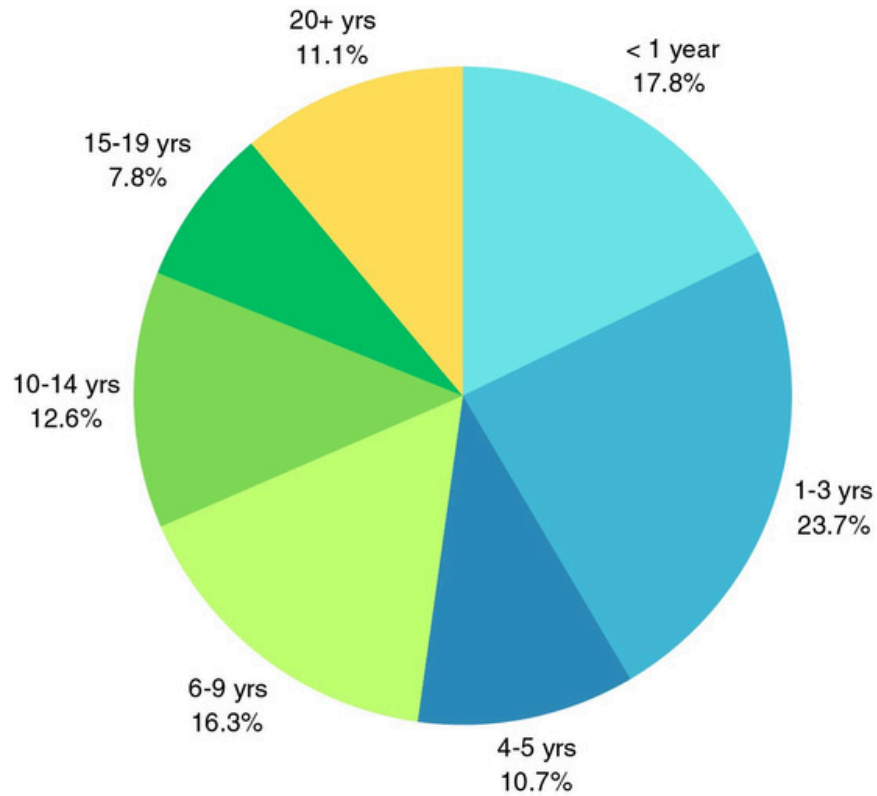
2047 N. Last Chance Gulch  
#437, Helena, MT 59601



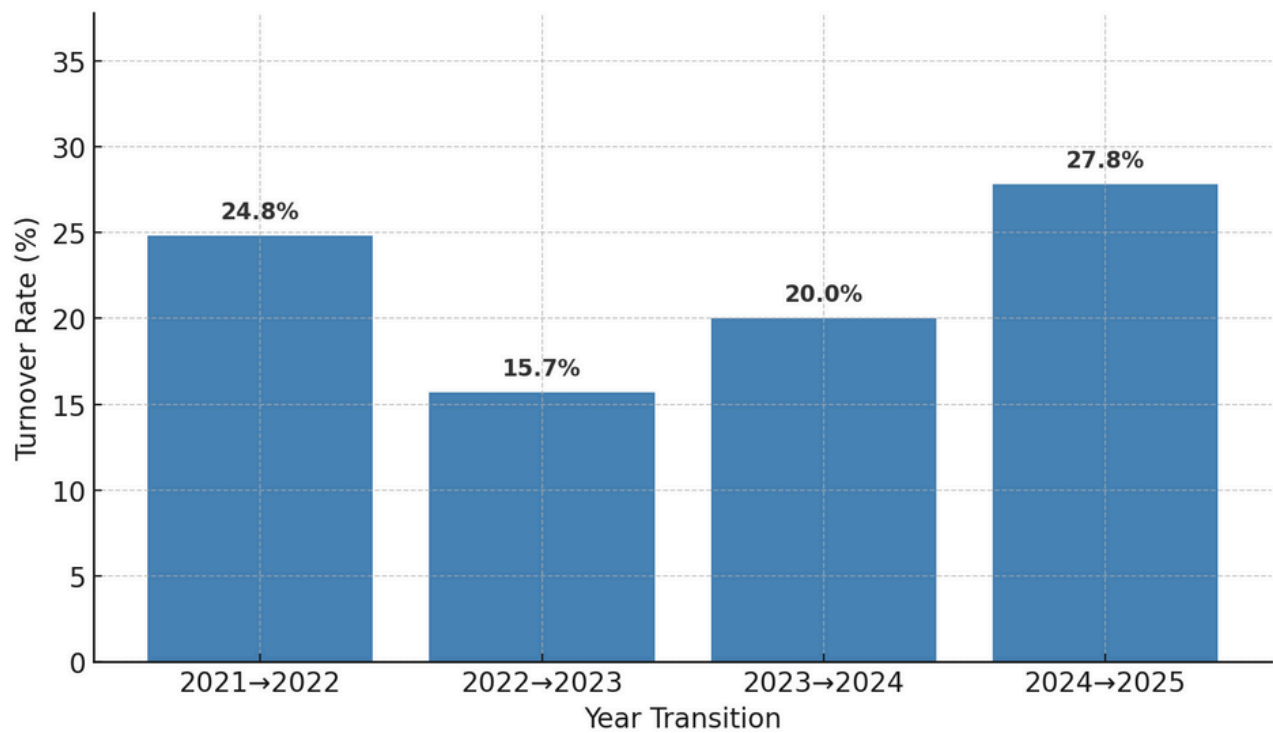


## MASBO District Clerk Experience Levels

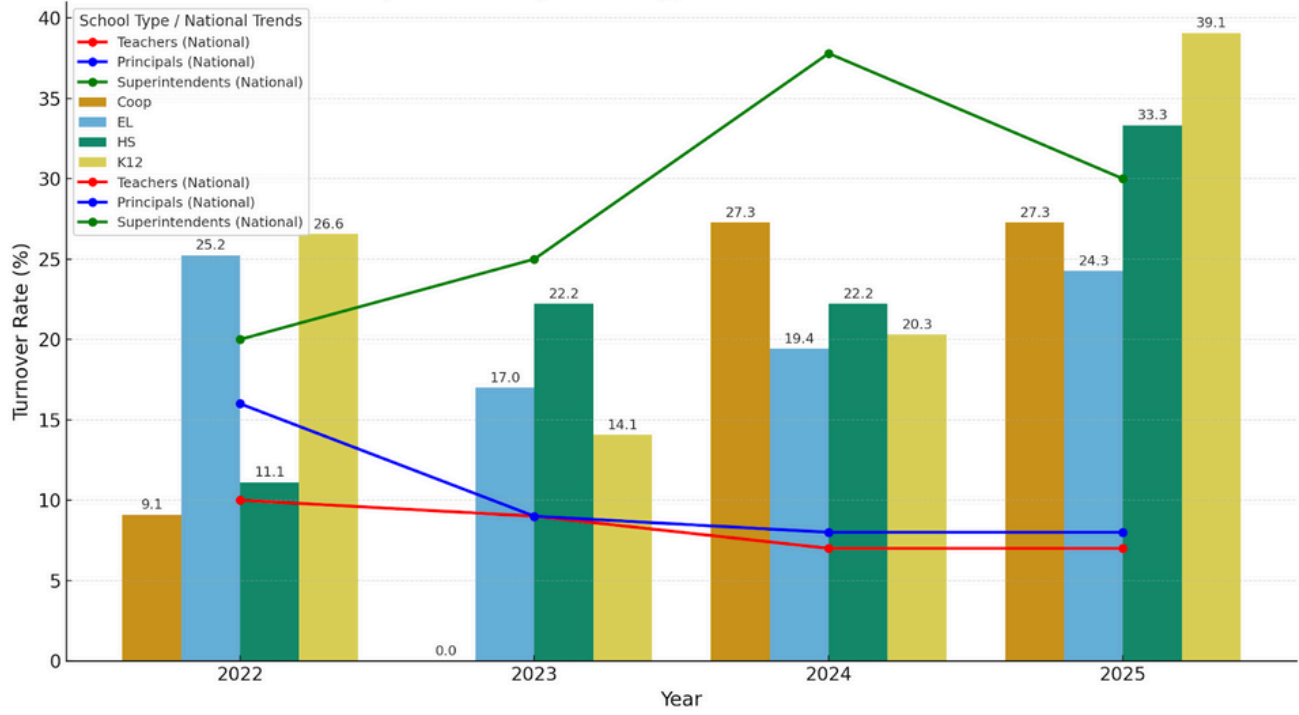
November 2025



## District Clerk Turnover Rates (2021-2025)



Leadership Turnover by School Type vs National Trends (2022-2025)



Public Comment submitted by Kevin Nelson at the November 17, 2025 SAVA Meeting

October 27, 2025

The Honorable Greg Gianforte  
Governor of Montana  
Montana State Capitol  
P.O. Box 200801  
Helena, MT 59620-0801

Dear Governor Gianforte,

## Subject: Compliance with Article VIII, Section 15 — Retirement Mills and TIF Districts

I am writing as a concerned citizen to address the diversion of mills levied for public employee retirement into tax increment financing (TIF) districts—a practice that may conflict with Article VIII, Section 15 of the Montana Constitution.

### Constitutional Requirements

Article VIII, Section 15 of the Montana Constitution establishes strict requirements for the management of public retirement system assets. These systems must be funded on an actuarially sound basis, and all assets—including income and required contributions—must remain unencumbered. The Constitution prohibits the diversion, reduction, or termination of these assets. Funds must be held in trust solely for the benefit of system members and beneficiaries, as well as for covering administrative expenses.

### Legal and Ethical Responsibilities

The State of Montana carries both legal and ethical responsibilities in overseeing public retirement funds. It is imperative that constitutional directives be strictly followed. Diverting mills designated for retirement purposes undermines these obligations. Immediate corrective action is required to address such diversions and to restore public trust in the management of these critical funds.

### Statutory Restrictions

Montana statutes reinforce these constitutional principles:

- **MCA 7-1-111 Powers Denied:** Local government units with self-government powers are prohibited from exercising any authority that affects a public employee's pension.

- MCA 19-2-504 (6): Restrictions on Use of Money: The assets of the retirement system may not be used for, or diverted to, any purpose other than for the exclusive benefit of members and their beneficiaries, and for the reasonable costs of administering the retirement system.
- MCA 20-9-212: The county treasurer is responsible for receiving and holding all school money, including the county tax supporting elementary and high school district retirement obligations.

These laws reinforce the commitment to safeguarding the integrity and stability of public retirement systems. They require that all retirement assets be held in trust, strictly prohibit misuse or diversion of funds, and ensure the long-term financial health of the system through actuarial soundness and fiduciary oversight.

### Requested Actions

1. Initiate an audit of all retirement mills diverted through TIF districts and make the results publicly available.
2. Direct the appropriate state agency and governing boards to recover any improperly diverted retirement mills and return those funds to their proper accounts in compliance with the law.
3. Provide written confirmation that all retirement mills within TIF districts will be managed as required by Article VIII, Section 15 of the Montana Constitution.
4. Establish transparent oversight mechanisms to ensure ongoing compliance and protect the integrity of Montana's retirement systems.

I respectfully request your prompt response confirming receipt of this letter and outlining the steps your office intends to take to address these concerns.

Thank you for your attention to this important matter.

Sincerely,

Kevin Nelson  
PO Box 23107  
Billings, MT 59104  
[geo59101@gmail.com](mailto:geo59101@gmail.com)

## Relevant Constitutional Text

Montana Code Annotated 2023

THE CONSTITUTION OF THE STATE OF MONTANA

ARTICLE VIII. REVENUE AND FINANCE

### Section 15. Public retirement system assets.

Public retirement systems shall be funded on an actuarially sound basis. Public retirement system assets, including income and actuarially required contributions, shall not be encumbered, diverted, reduced, or terminated and shall be held in trust to provide benefits to participants and their beneficiaries and to defray administrative expenses.

(2) The governing boards of public retirement systems shall administer the system, including actuarial determinations, as fiduciaries of system participants and their beneficiaries.

History: En. Sec. 2, Const. Amend. No. 25, approved Nov. 8, 1994.

### Section 12. Strict accountability.

The legislature shall by law insure strict accountability of all revenue received, and money spent by the state and counties, cities, towns, and all other local governmental entities.

## Relevant Statutory Text

7-1-111. Powers denied. A local government unit with self-government powers is prohibited from exercising the following:

(10) any power that applies to or affects a public employee's pension

19-2-504. Investment of pension trust funds.

(6) The separate accounts maintained by the group trust for retirement systems or plans pursuant to subsection (7) may not be used for or diverted to any purpose other than for the exclusive benefit of the members and beneficiaries of those retirement systems or plans.

20-9-212. Duties of county treasurer. The county treasurer of each county must receive and shall hold all school money,

(d) including the county tax in support of the elementary and high school district retirement obligations.

Public Comment submitted by Lisa Bennett at the November 17, 2025 SAVA Meeting

## Overview

Montana currently delegates investment and proxy-voting authority through the Montana Board of Investments (BOI) and uses external asset managers for equity portfolios. The attached draft "Montana Pension Investment Transparency and Accountability Act" addresses transparency, limits ESG voting by managers, prioritizes financial return, and creates reporting and enforcement mechanisms. Below I compare Montana's current approach to widely recognized transparency best practices for state pensions, list concrete steps Montana should take to reach best-practice levels, and give a focused critique of the bill with suggested improvements you can use for amendment language or talking points.

What best-practice transparency looks like for state pensions

Key features common to the most transparent state pension systems:

- Public, searchable, machine-readable proxy vote database that links each vote to the specific security, resolution text, issuer, date, and vote rationale, posted within 30 days.
- Clear public policy on proxy voting that explains fiduciary standard, voting principles, and how votes relate to financial materiality.
- Identification of who voted (in-house staff or named external manager) and the authority chain for each vote.
- Publication of proxy voting guidelines, engagement policies, and records of engagement and stewardship activity (letters, meetings, requests to issuers).
- Contract clauses requiring external managers to report votes and conflicts, plus audits of manager compliance.
- Regular independent verification (annual thirdparty compliance review) and legislative or independent oversight with enforcement remedies scaled to severity.
- Periodic public performance reporting tying stewardship activity to realized financial outcomes where possible.

These elements allow pension members, legislators, and the public to trace stewardship decisions to fiduciary rationale and outcomes.

How Montana (as described in the attachment) compares to best practices

Strengths in the draft bill:

- Requires public disclosure of proxy votes and a searchable archive (aligns with best-practice transparency goals).
- Sets a 30day publication timeline and a 7year retention minimum.
- Requires written BOI guidelines and an annual report reconciling votes and manager performance.
- Creates enforcement mechanisms and financial penalties for noncompliance.

Gaps versus best practice:



- The bill requires a “statement justifying how the vote aligns with prioritization of financial returns,” but does not require publication of the actual resolution text, issuer, CUSIP/ticker, or a link to the full proxy — all important for independent review.
- It disallows external-manager ESG voting unless authorized, but lacks a clear, evidence-based standard for when ESG considerations are “demonstrably justified as enhancing financial returns.” That invites legal and operational uncertainty.
- Manager contract obligations are implied but not spelled out (reporting format, timing, audit rights, indemnities, remedies short of termination).
- The bill centralizes authorization in BOI public meetings but does not set timelines or criteria for emergency/fast-turnaround votes (e.g., contested votes where timely action matters).
- No explicit requirement for machine-readable data formats or openAPI access to enable civic tech, researcher, and pensioner use.
- Enforcement penalties are blunt (flat fines and possible suspension) and tied to legislative notice rather than an independent compliance unit or inspector—creates potential politicization and delay.
- No requirement for independent verification or periodic thirdparty audit of proxy vote data or of the “financial return” justifications.
- The bill forbids access via FOIA only implicitly (saying archive accessible “without the need for a FOIA request”) but should be explicit that records are proactively published, not merely available upon request.

Specific, prioritized changes Montana should adopt to reach best-practice transparency

1. Make disclosures granular and machinereadable
  - Require each published vote include: security name; issuer; ticker/CUSIP; full text or link to shareholder resolution; meeting date; BOI portfolio account; vote (for/against/abstain); manager who cast the vote; and the manager’s and BOI’s written rationale.
  - Require machine-readable formats (CSV/JSON) and an open API or data feed for thirdparty use.
2. Clarify and operationalize “financial returns” standard
  - Define a presumption that fiduciary duty requires consideration only of financially material factors. Provide objective criteria (e.g., reference to SEC guidance, ERISA or state fiduciary law principles) and an internal process to document materiality analysis for ESG-related items.
  - Require the BOI to publish a short methodology describing how it tests whether a nonfinancial factor is “material” to longterm return.
3. Strengthen manager contract language

- Require all external managers to: (a) deliver proxy votes and rationales within 15 business days of cast votes in the required data format; (b) permit independent audit of voting records; (c) include liquidated-damage provisions for late or false reporting; (d) disclose any conflicts of interest on each vote.
  - Give the BOI express authority to enforce contractual remedies short of termination (fines, reduced mandates, remedial training).
4. Build independent verification and oversight
- Require an annual independent thirdparty review of proxy vote records, BOI approvals, and compliance with published guidelines; publish the reviewer's report.
  - Establish an internal compliance officer or unit empowered to investigate irregularities and to trigger audits without legislative initiation.
5. Create expedited processes and thresholds
- For time-sensitive votes, allow a written expedited authorization path that includes the BOI chair and two other public board members, followed by public disclosure within a specified short timeframe.
  - Define materiality thresholds (e.g., percentage holdings, dollar exposure, issuer criticality) that trigger full BOI review versus manager discretion.
6. Improve transparency of deliberation and rationale
- Require BOI meeting minutes to include the record of the vote authorization, summaries of the financial-return justification accepted, and any dissents, with redactions limited to narrowly defined legal exceptions.
7. Calibrate enforcement to be proportional and nonpolitical
- Replace or supplement legislative notice/fines with a graduated enforcement ladder administered by the BOI compliance unit and subject to independent review: warning → remedial plan → contractual remedies/fines → audit suspension/termination.
  - Preserve legislative oversight but avoid giving the Legislature sole initial enforcement control (to limit politicization).
8. Public education and UX
- Publish an annual public-friendly summary and FAQs explaining proxy votes and how they relate to fund performance, plus interactive dashboards for members.

Line-by-line practical edits and recommended language for the attached bill (high-priority)

- Section 3 (Transparency)
  - Add required fields: "Each published record must include issuer name; ticker/CUSIP; full text or link to the shareholder resolution; meeting date; BOI

account or mandate; vote cast; name of external manager; manager and BOI written rationale; and link to supporting analysis if any."

- Add: "All records shall be provided in machine-readable formats (CSV and JSON) and via an open API."
- Section 4 (Restrictions on ESG Voting)
  - Replace absolute prohibition with a clear materiality test: "External asset managers may vote on resolutions involving ESG factors only when the manager documents and forwards a materiality analysis showing a reasonable expectation that the vote will materially affect the financial return of the relevant portfolio within a defined time horizon, and the BOI authorizes such vote in accordance with the process below."
  - Require timebound BOI actions: "The BOI shall respond to authorization requests within 10 business days. For urgent votes where issuer deadlines prevent a 10-day review, an expedited authorization procedure is available as defined in BOI policy."
- Section 5 (Prioritization of Financial Returns)
  - Add cross-reference to published methodology: "The BOI shall publish a Financial Materiality and Stewardship Methodology that defines metrics, time horizons, and evidentiary standards for concluding a non-financial factor is material to returns."
- Section 6 (Annual Reporting)
  - Require publication of the independent reviewer's report and machine-readable vote data along with the annual narrative.
  - Require linkage of stewardship outcomes to portfolio performance where feasible (e.g., case studies demonstrating impact).
- Section 7 (Compliance and Enforcement)
  - Add graduated enforcement language and give the BOI compliance officer authority to impose interim contractual remedies prior to legislative action.
  - Require independent audit triggered automatically if noncompliance exceeds X days (e.g., 45 days) rather than waiting for 90 days and legislative initiation.
- New provision (Manager Contracts)
- Insert a clause mandating standard contract terms (reporting timeline, audit rights, conflict disclosures, liquidated damages).

Why these changes matter (brief rationale)

- Granular, machine-readable data enables independent verification, researcher analysis, and civic scrutiny without forcing FOIA burdens on pensioners or advocates.

- A clear materiality test reduces legal risk and operational uncertainty by anchoring “ESG” decisions to fiduciary financial standards rather than political judgments.
- Contractual clarity aligns incentives for external managers and provides practical tools to enforce compliance short of terminating long-term manager relationships.
- Independent audits reduce the risk of selective enforcement or political interference and build public trust.
- Proportional, timely enforcement balances accountability with operational continuity of investments.

Quick recommended next steps for Montana lawmakers or advocates

1. Pass the enclosed bill.
2. Draft a BOI Financial Materiality and Stewardship Methodology and publish it alongside the bill's enactment.
3. Insert mandatory standard contract language for managers and require new or renewed contracts to conform within 180 days of the law's effective date.
4. Fund an independent annual review/audit line item in the BOI budget to operationalize verification.
5. Provide an accelerated public education rollout (dashboard, onepage member guide) when the database goes live.

#### Quick summary of what the revised Act achieves

- Establishes proactive, timely publication of every proxy vote within 30 days and a 10year public archive.
- Requires granular vote-level disclosures and mandates machinereadable formats (CSV/JSON) plus an open API.
- Creates and requires a published Financial Materiality and Stewardship Methodology that anchors ESG decisions to fiduciary financial tests.
- Defines manager authorization processes, including a 10businessday review and an expedited 48hour disclosure path for urgent votes.
- Inserts clear manager contract standards (reporting timelines, audit access, conflict disclosure, liquidated damages) with a 180day compliance timeline for contracts.
- Establishes internal compliance unit authority and an annual independent thirdparty audit with published reports.
- Replaces blunt legislative-only enforcement with a graduated enforcement ladder combining BOI compliance actions, administrative fines, and legislative backstops.
- Requires memberfacing materials (onepage FAQ, annual stewardship report with case studies) to explain votes and connect stewardship to outcomes.

Net effect: the Act shifts Montana from adhoc disclosure to a documented, auditable stewardship regime that follows the core elements of best practice used by leading systems (e.g., CA, NY).

#### What deficiencies in the original draft the revised Act fixes

- **Machinereadability:** The original bill lacked explicit data format and API requirements; the revision mandates CSV/JSON and an open API.
- **Vote granularity:** The revision adds required fields (issuer identifiers, CUSIP/ISIN/ticker, full resolution text or link, manager and BOI rationale, conflicts) for independent verification.
- **Materiality standard:** The revision requires a published Financial Materiality and Stewardship Methodology, reducing legal vagueness around “ESG” justifications.
- **Manager accountability:** The revision makes reporting and audit rights explicit and adds liquidated damages and stepwise remedies.
- **Timeliness and emergency handling:** The revision defines timelines (10 business days) and a documented expedited authorization path for timesensitive votes.
- **Independent verification:** The revision mandates annual thirdparty review and publishes the auditor’s report, improving public trust and limiting politicized enforcement.
- **Proportional enforcement:** The revision creates a graduated enforcement ladder and gives BOI compliance authority while preserving legislative oversight as a backstop.

#### Remaining gaps, ambiguities, and implementation risks to address now

- Methodology detail and defensibility: The Act requires a Methodology but does not itself prescribe specific tests, metrics, or default time horizons. The Methodology must be robust, legally defensible, and publicly specific (examples, thresholds) to avoid appeals and inconsistency.
- Resource and staffing needs: The compliance unit, API maintenance, data publication, and independent audits require budget and staff. If unfunded, compliance will lag.
- Data quality and vendor alignment: Existing managers and legacy systems may struggle to deliver full data fields and CUSIPs/ISINs promptly; the BOI must provide sample schemas, validation tools, and a transition sandbox.
- Enforcement calibration: Liquidated damages language and monthly fine caps must be calibrated to avoid perverse incentives (e.g., overlitigation or vendor exit).
- Confidentiality and legal redaction: The Act limits redaction but practical legal exceptions (pending litigation, trade secrets) will arise. Clear redaction rules and an independent review path are needed to avoid overredaction or needless secrecy.
- Timely BOI decisions: A tenbusinessday default may be too long for proxy seasons; the BOI must staff an effective expedited process and preapprove categories to reduce workloads.
- Linking stewardship to outcomes: The Act asks for case studies tying stewardship to returns “where feasible.” BOI should set realistic standards for causation and avoid overstated claims.

#### Prioritized next actions to operationalize the law successfully

1. Publish the Methodology within the statutory 120 days with clear tests, time horizons, and sample justifications (include examples for common ESG resolutions).
2. Fund and staff the BOI Compliance Unit, provide an FY budget line for API/data engineering, and specify an annual audit budget before contract updates.
3. Release a Data Dictionary, sample CSV/JSON files, and a transition sandbox for managers within 45 days of enactment.
4. Roll out standard contract amendment language and require managers to sign updated terms within 180 days; provide a remediation window for smaller managers.
5. Adopt clear redaction rules and an independent redaction appeal process to limit overuse of confidentiality claims.
6. Develop a workflow and staffing plan for expedited authorizations during proxy season (preapproval categories, rotating rapidresponse subcommittee).
7. Publish the first annual stewardship report with case studies and the independent auditor’s report promptly (by the first March 31 deadline postenactment) and release the onepage FAQ and dashboard at launch.

#### Short recommended legislative/BOI drafting fixes to consider now

- Include minimum staffing/funding language or require the Legislature to appropriate specified startup funds for compliance, API, and audit costs.
- Spell out a small number of initial materiality tests and numeric thresholds (e.g., holdings > X% of market cap or > \$Y exposure) as presumptive triggers while Methodology is finalized.
- Limit liquidated damages to clear reporting failures (not discretionary authorization disagreements) and set caps by mandate size to avoid chilling manager participation.
- Require a published transition timeline with validation checkpoints (Data Dictionary release → sandbox → first CSV/JSON bulk upload → live API).

#### Closing assessment

The revised Act meaningfully upgrades Montana's pension stewardship transparency and aligns the state with leading practices. Its combination of machine-readable disclosures, an explicit materiality framework, manager contract standards, compliance infrastructure, and independent audits addresses the most important weaknesses in the original draft. For the law to deliver the intended accountability, the BOI and Legislature must follow through immediately on funding, Methodology detail, data tooling, and pragmatic enforcement calibration. If implemented as written and adequately resourced, Montana can move from laggard to a recognized model of pension transparency within a single proxy season.



What best-practice transparency looks like for state pensions

## **FAQ — For Members, Stakeholders, and the Public**

What does the law require the BOI to publish?

The BOI must publish every proxy vote for directly owned securities within 30 days, in both humanreadable and machinereadable formats, including issuer, meeting date, full resolution text (or a link), ticker/CUSIP/ISIN, portfolio/mandate, vote cast, manager who cast the vote, manager and BOI rationale, and any conflicts disclosed.

Why publish the votes in machinereadable formats?

Machinereadable formats (CSV, JSON) and an open API let researchers, members, journalists, and civic technologists analyze and build tools to review votes efficiently without filing records requests.

What is "financial materiality"?

A factor is financially material if it is reasonably expected to have a direct, measurable effect on returns or risks of a BOI portfolio within defined time horizons. The BOI's published Methodology explains tests, metrics, and examples used to decide materiality.

Can managers still vote on ESG items?

Yes — managers can vote on ESG-related items when the BOI's Methodology shows the issue is financially material and the BOI authorizes the vote. For routine, non-material matters within preapproved categories, managers may vote and must report those votes promptly.

How quickly must the BOI respond to manager authorization requests?

BOI must act within ten business days. For urgent votes, an expedited process (Chair + two public board members) allows timely action; the authorization must be publicly disclosed within 48 hours.

What happens if the BOI or a manager fails to publish or misreports votes?

The BOI Compliance Unit will require remediation. A graduated enforcement ladder applies: notice and remedial plan, administrative fines and independent audit for continued noncompliance, and possible suspension of delegation. Managers face contractual remedies including liquidated damages and potential termination.

How long will records be kept?

Vote records are archived and publicly available for at least ten years.

Will the BOI explain how stewardship affects returns?

Yes. The annual stewardship report will include case studies and explanations tying stewardship to financial outcomes where feasible, plus a memberfriendly onepage summary and FAQ.

How can members get help understanding the data?

The BOI will publish a onepage guide, an FAQ, and an interactive dashboard. The open API and Data Dictionary let third parties build tools and tutorials.

Who enforces these rules?

The BOI Compliance Unit and an independent annual auditor enforce and verify compliance. The Legislature retains oversight authority but the Act provides the BOI internal and independent mechanisms for timely enforcement.



How do I find the data and reports?

All materials will be available from a single BOI Stewardship Transparency page on the BOI website, linked from the main BOI site (Data Dictionary, API docs, annual reports, audit reports, and FAQs).

#### Data-Field Specification (Required Fields and Formats)

Field Name	Description	Format	Example	Required
vote_id	Unique identifier for the proxy vote record	string (UUID)	123e4567-e89b-12d3-a456-426614174000	Yes
issuer_name	Issuer legal name	string	Acme Energy Inc.	Yes
issuer_country	Country of issuer incorporation	string (ISO 3166-1 alpha-2)	US	Yes
meeting_date	Date of shareholder meeting	YYYY-MM-DD	2026-05-20	Yes
resolution_id	Identifier for resolution within proxy materials	string	Res. 4(a)	Yes
resolution_text_or_link	Full resolution text or direct URL to full proxy text	string (max 2000 chars) or URL	https://...	Yes
ticker	Public market ticker	string	AEM	Yes if publicly listed
cusip_or_isin	Security identifier	string	037833100 (CUSIP)	Yes if available
boi_portfolio	BOI account or mandate name	string	MPERA General Equity	Yes

vote_cast	How vote was recorded	enum: For / Against / Abstain For / Withheld		Yes
vote_cast_date	Date vote was cast	YYYY-MM-DD	2026-05-15	Yes
voting_entity	Who cast the vote	string	Franklin Templeton; BOI staff	Yes
manager_rationale	Manager's written rationale (summary)	string	2sentence summary; supporting link	Yes if manager cast vote
boi_authorization	BOI authorization status and short rationale	string	Authorized 2026-05-16: material to returns	Yes if BOI authorized
financial_materiality_flag	Whether issue was deemed financially material	boolean	true	Yes
conflicts_disclosed	Any conflicts disclosed by manager	string	Manager holds fee-paying relationship	Yes
supporting_documents_link	Link to supporting analysis or files	URL	<a href="https://.../analysis.pdf">https://.../analysis.pdf</a>	No
datasource_timestamp	When record published to BOI site	YYYY-MM-DDTHH:MM:SSZ	2026-05-20T14:32:00Z	Yes
record_format_version	Schema version	string	v1.0	Yes

Notes:

- CSV files must use UTF-8 encoding and include a header row matching these field names.
- JSON must follow the schema and include all required fields; optional fields may be null but present.
- The BOI shall publish the Data Dictionary and sample files for vendor use.

## Montana Pension Investment Transparency and Accountability Act

An Act to increase transparency, accountability, and fiduciary clarity for proxy voting and stewardship by the Montana Board of Investments (BOI) and its external asset managers; to require machine-readable public disclosure of proxy votes and related materials; to define a financial-materiality test for ESG matters; to strengthen contract and audit requirements; and to provide proportional enforcement and independent verification.

### Section 1. Short Title

This Act shall be known as the "Montana Pension Investment Transparency and Accountability Act."

### Section 2. Definitions

- BOI: Montana Board of Investments, the agency managing state public retirement system assets.
- Proxy Vote / Proxy Voting: the casting of a vote on a shareholder resolution or other matter presented at a shareholder meeting by the BOI or an external asset manager on behalf of BOI-managed accounts.
- External Asset Manager (Manager): any third-party investment manager, adviser, sub-adviser, or service provider authorized to manage assets, cast proxy votes, or exercise stewardship on BOI-managed mandates.
- Directly Owned Securities: securities (equity, ADRs, or other instruments) directly held in BOI accounts or mandates.
- ESG: Environmental, Social, and Governance factors.
- Financial Materiality: a factor reasonably expected to have a direct and measurable effect on the financial performance, risk profile, or long-term return of a BOI portfolio or mandate, as determined under the BOI Financial Materiality and Stewardship Methodology.
- Machine-readable format: a nonproprietary, structured data format (CSV and JSON) that can be programmatically ingested.

### Section 3. Public Disclosure Requirements — Scope and Timing

3.1 The BOI shall proactively publish each proxy vote for directly owned securities within 30 calendar days of the vote being cast. Publication shall be on the BOI official website in both human-readable and machine-readable (CSV and JSON) formats and via an open API.

3.2 Each published proxy vote record must include the following data fields and supporting items: issuer name; issuer country; meeting date; resolution identifier; full text of the shareholder resolution or a direct link to the full proxy; security identifier (ticker and CUSIP/ISIN); BOI portfolio or mandate name; vote cast (for/against/abstain/withheld); name of manager who cast the vote (or "BOI staff" if cast in-house); date vote was cast; manager's written rationale including any financial-materiality analysis; BOI confirmation of authorization (if applicable) and BOI written rationale; any disclosed conflicts of interest on the vote; and a link to supporting analysis or files.

3.3 The BOI shall maintain and make publicly accessible an archive of proxy voting records for

a minimum of ten (10) years. All records under this Section are proactively published and made accessible without requiring a public records request.

#### Section 4. Data Format, API, and User Access

4.1 The BOI shall publish a machine-readable data feed (CSV and JSON) and an open API that exposes all required data fields and supports bulk download for researchers, members, and the public.

4.2 The BOI shall publish a Data Dictionary and schema documentation within 45 days of enactment and maintain backwards compatibility for published field names for at least five years.

#### Section 5. Financial Materiality and Stewardship Methodology

5.1 The BOI shall adopt and publish a "Financial Materiality and Stewardship Methodology" within 120 days of enactment. The Methodology shall:

- Define time horizons and metrics used to assess financial materiality;
- Provide objective tests and examples for when ESG factors are reasonably expected to affect returns;
- Describe evidentiary standards and documentation required from managers seeking authorization to vote on ESG-related resolutions; and
- Specify thresholds for mandatory BOI review (e.g., percent of issuer holdings, dollar exposure, strategic importance).

5.2 The Methodology shall be applied consistently and made publicly available on the BOI website.

#### Section 6. Manager Voting Authority, Authorization Process, and Expedited Procedures

6.1 Default Authority: Managers may cast routine, non-material proxy votes on behalf of BOI mandates when such votes fall within clearly defined, preapproved categories established in the BOI's publicly posted proxy voting policy and do not involve matters that the BOI's Methodology identifies as potentially financially material. Managers must report such routine votes to BOI within 15 business days of casting and must publish them per Section 3.

6.2 Material or ESG-Related Votes: Managers must obtain BOI authorization before casting votes on matters that involve potential financial materiality as defined in the Methodology. Requests for authorization must include the manager's materiality analysis, supporting evidence, and conflicts disclosure. BOI shall act on authorization requests within ten (10) business days. If BOI does not respond within ten business days, the vote may not be cast unless an expedited authorization applies.

6.3 Expedited Authorization: For contested or time-sensitive votes where issuer deadlines prevent a ten-day review, the BOI may use an expedited authorization procedure: written request to the BOI Chair and two other publicly disclosed board members, with concurrence of at least two. All expedited authorizations must be disclosed publicly within 48 hours of the vote and combined with a full BOI review and documentation in the next regularly scheduled public meeting.

#### Section 7. Manager Contract Requirements and Reporting Standards

7.1 The BOI shall require, as a standard term in all manager contracts (new or renewed) within 180 days of enactment:

- Timely delivery of proxy vote records and manager rationales within 15 business days of the vote in the BOI's required machinereadable format;
  - Unfettered audit access to voting records and supporting documentation by BOI-appointed independent auditors;
  - Disclosure of any conflicts of interest related to issuer, board, or manager business relationships on each vote record;
  - Liquidated damage provisions for materially false reporting or repeated late reporting; and
  - Manager certifications attesting to record completeness and accuracy.
- 7.2 Failure to comply with contractual reporting requirements shall permit the BOI to impose contractual remedies including liquidated damages, mandate reduction, suspension of voting authority, and, for repeated violations, termination for cause.

## Section 8. Independent Audit and Compliance Oversight

8.1 Annual Independent Review: The BOI shall commission an independent thirdparty audit of proxy voting records, authorization processes, and compliance with the Methodology and contract terms annually. The auditor's report and BOI response shall be published within 60 days of completion.

8.2 Compliance Unit: The BOI shall designate or create an internal compliance officer/unit with authority to investigate reporting irregularities, trigger audits, require remedial plans, and impose interim contractual remedies subject to review by the BOI Governance Committee. The compliance unit shall publish a summary of investigations and remedial actions annually.

## Section 9. Annual Reporting and Member-Facing Disclosure

9.1 Annual Report: By March 31 each year the BOI shall publish an annual stewardship report that includes: a summary of all proxy votes cast; a machinereadable dataset for the fiscal year; breakdown of votes involving ESG factors and authorizations; summary of manager performance on reporting and stewardship alignment; results of the independent audit; and examples (case studies) linking stewardship decisions to financial outcomes where feasible.

9.2 Member-Facing Materials: The BOI shall publish a onepage summary and FAQ explaining proxy voting, how votes relate to financial performance, and how members can interpret the public data.

## Section 10. Enforcement, Remedies, and Graduated Penalties

10.1 Graduated enforcement for BOI noncompliance with disclosure and reporting requirements:

- First instance: Written notice and required remedial plan within 30 days.
- Continued noncompliance beyond 30 days: BOI Compliance Unit may impose administrative fines up to \$10,000 per month and require an independent audit at BOI expense.
- Noncompliance beyond 90 days after notice: BOI Governance Committee shall suspend the BOI's delegated proxy voting authority for external managers for relevant mandates until compliance is verified; the Legislature may also initiate additional oversight.

10.2 Manager enforcement: Violations of contract reporting obligations or falsification of

records subject managers to liquidated damages, suspension of voting authority, and potential termination for repeated failures.

10.3 Fines and recovered amounts collected under this Section shall be deposited into the Montana Public Employee Retirement Administration (MPERA) trust fund.

#### Section 11. Records and Public Meeting Transparency

11.1 Meeting Records: BOI meeting agendas and minutes shall include summaries of any proxy authorization decisions, the financial-materiality rationale accepted, and any dissenting views. Redactions must be narrowly tailored and justified by statute.

11.2 Public Access: All proxy vote records, audit reports, Methodology, and contract templates shall be readily accessible from a single BOI stewardship transparency page.

#### Section 12. Implementation and Transition

12.1 The BOI shall adopt implementing procedures and the Financial Materiality and Stewardship Methodology within 120 days; machine-readable publishing and contract updates must be completed within 180 days of enactment.

12.2 Existing managers shall conform to the contract reporting standards no later than 180 days after enactment.

#### Section 13. Severability


If any provision of this Act is found invalid, the remaining provisions remain in effect.

#### Section 14. Effective Date

This Act takes effect on July 1, 2027.

Public Comment submitted by Mary Beveridge at the November 17, 2025 SAVA Meeting

**Definitions:**

- 1) Absentee Voter Tracking** (used by candidates to track returned ballots, usually one district)  
**23 columns of informational data; each VOTER has ONE row**
  - 2) Voter Registration Files** List of historical voters, includes active/inactive/provisional status  
**40 columns of informational data;**  
**each row has one voter's information; approx. 725,000 rows of data**
  - 3) Voter History Files** **9 columns of information data** regarding only election voting history  
**Each time, every voter is sent a ballot and/or votes a row is created.**  
**10,705,734 Rows of data**
- 

**Merge Voter Registration Files with Voter History Files;** Only one column is shared by **2 & 3**  
VOTER ID # FP16,FG16,FG17,FP18,FG18,FP20,FG20,FG22,FP24,FG24,MG11,MG15,MG17,MG19  
MP21,MP23,SC23,SC24,SC25,FG,FG,FG,FG

**Schools and Municipalities aren't always included in the history report -Per SOS website**

Is this information included in the voter registration files?

Determine the criteria used for not including these elections?

Without these elections is the State voter and maintenance data accurate?

**VOTER HISTORY FILES Inaccurate Information**

**Determine what is causing the "null" coding.** The election administrators do not have a "null" option.

**Time Stamp** Why are the time stamps not correct? Where does this originate? Does the nightly update overwriting time stamps? Who all has control of the time stamps?

**Special/ School Election Coding and Election Description Inconsistent Use**

Clarify the use of the Election Coding/Description for consistency across the counties;

Explore expanding the coding to clearly define election types to correctly reflect the election. The information should be corrected and accurate—especially since the SOS is "selling" this data.

**Determine if Schools are using the ElectMT system when administering school elections.**

Is the hybrid handling of school elections the most secure, transparent and accurate?

Why are Schools and Municipal elections exempt from post elections audits and ballot reconciliation transparency.

What is the process to determine the proper voter list for ballots for school elections?

Are voter records updated, how are the new registrations verified, undeliverables handled, etc.

School Elections "Date Sent" don't always have time stamps only dates;

Coding is not correct for Election Type and Description

Why are there voter files not reported in ElectMT?: Special District Elections, School, Municipalities

Are the overseas voters and fax/email voters reported in the master files?

**What code/description options do the election administrators require** for accurate data reporting; general enough to cover most election but not cumbersome; Bonds/Levy Stand Alone Elections; non- School; Water/Sewer or Fire District Related election or a combo election. The voter "qualifications" are different for many of these elections.



## Secretary of State Website Sample of the VOTER HISTORY FILES for purchase (last updated in 2015)

Not this  
detailed

"Processed" is not differentiated between  
"accepted" & "rejected" in history prior to 2023

Not  
Included

Voter ID	ELECTION_TYPE	ELECTION_DATE	ELECTION_DESCRIPTION	JS_CODE	VVM_ID	SENT_DATE	RECEIVE_DATE	BALLOTSTAGE/STATUS	BALLOT_STATUS_REASON
1	1	11/2/2010	05 Federal General	25	1	9/15/2010		Sent	
1	3	9/12/1995	City Primary Election	25	2				
1	4	11/3/2009	City of Helena	25	4	8/27/2009	10/25/2009	Undeliverable	
2	1	11/3/1998	GENERAL ELECTION 1998	24	2				
2	1	11/7/2000	GENERAL ELECTION 2000	24	2				
2	1	11/5/2002	GENERAL ELECTION 2002	24	2				
3	4	11/8/2011	05 CITY OF HELENA MUNICIPAL GENERAL 2011	25	4	9/30/2011		Sent	
3	6	1/8/2008	Neighborhood Council Election	25	1	12/15/2007	12/17/2007	Processed/Accepted	
3	7	5/8/2012	2012 School Election	25	4	4/8/2012		Sent	
4	7	2/26/2013	15 2013 School Polson Bond	24	4	2/4/2013	4/9/2013	Processed/Rejected	Late for election
4	100000029	5/6/2008	Chief Cliff Fire Service Area	24	4	4/10/2008		Sent	
4	100000029	5/4/2010	15 Chief Cliff Fire 2010	24	4	4/9/2010		Sent	
5	2	6/8/2010	15_Federal Primary_2010	24	2				
5	6	7/27/2010	15 N Lake Co Library Dist Creation 2010	24	4	7/1/2010		Sent	
5	7	5/4/2010	15 Polson / Ronan School 2010	24	2				
6	1	11/6/2012	01 FEDERAL GENERAL ELECTION 2012	47	2				
6	2	6/5/2012	01 Federal Primary 2012	47	2				
6	6	9/27/2011	01 STODDEN PARK RENOVATION 2011	47	4	8/23/2011	9/13/2011	Processed/Accepted	
7	1	11/4/2008	PRESIDENTIAL GENERAL	47	2				

[https://sosmt.gov/wp-admin/admin-ajax.php?juwfpisadmin=false&action=wpfd&task=file.download&wpfd\\_category\\_id=23&wpfd\\_file\\_id=64908&token=e4257b0e50bb795eb30c1064aa71c1a8&preview=1](https://sosmt.gov/wp-admin/admin-ajax.php?juwfpisadmin=false&action=wpfd&task=file.download&wpfd_category_id=23&wpfd_file_id=64908&token=e4257b0e50bb795eb30c1064aa71c1a8&preview=1)

### Q. What are the fields in the statewide voter file and voter history report?

A. A list of the fields in the reports is available online at <https://voterportal.mt.gov/PurchaseVoterFile.aspx>. Sample reports are available at: [Statewide Voter File Sample](#) and [Voter History Report Sample](#).

My Voting Information

Voter Information Lookup

First Name:

Last Name:

Date of Birth:

Link to find the field key report  
connects to VOTER INFORMATION LOOKUP.

### Q. Are municipal, school, and/or special election information included in the file?

A. Although most municipal, school, and special district elections' history are included in the voter history file, in certain cases the history will not be included. The user should check with the county or with the Secretary of State's office if the user is looking for history for a specific local election. The voter history file is included with purchase of the Statewide Voter File (and customized county and legislative district files). **Why is this information not included? Is it possible to include?**

## HISTORY KEY FILE SOS Website

### VOTER HISTORY FILE

VTRID – Unique voter identification number

Election\_Details

ElectionType_ID	CODE	Description
1	FG	Federal General
2	FP	Federal Primary
3	MP	Municipal Primary
4	MG	Municipal General
6	S	Special
7	SC	School
8	PP	Special Primary - Presidential
10000029	FD	Fire District General
10000030	WS	Water/Sewer District

Election\_Date – Date of the election

Election\_Description – Jurisdiction's description of the election

E\_JS\_CODE – Election jurisdiction code – county code

### Voting\_Method

1 - Absentee

2 - Polling Place 4 - Vote by Mail

Sent\_Date – For absentee ballots only Received\_Date – For absentee ballots only Ballot\_Status – For absentee ballots only Ballot\_Status\_Reason – For absentee ballots only

\*The current system to track statewide voter history was implemented for use by all Montana counties in early 2006, prior to the 2006 Federal Primary Election.

### Election Descriptions in the Voter History File

Empty container

Fire District

General

Municipal General

Municipal Primary

Primary

School

Special

Water and Sewer

2008 Federal Primary

School elections show as  
“null” since 11/2022 not  
using code 7

2017 Fed General

1. VoterID	2.Election Type	3.Election Date	4. Election Description	5. JS Code (County)	6. Absentee 4=Absentee 2=Poll	7. Sent Date	8. Received Date	9. Ballot Status
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### VOTER HISTORY FILES

1 <sup>2</sup> Voter_ID	1 <sup>2</sup> Election_Type	1 <sup>2</sup> Election_Date	1 <sup>2</sup> Election_Description	1 <sup>2</sup> E_JS_CODE	1 <sup>2</sup> VVM_ID	1 <sup>2</sup> Sent_Date	1 <sup>2</sup> Receive_Date	1 <sup>2</sup> BallotStage_Status
		4	11/8/2011 Municipal General	32	4	10/17/2011 11:30:09 AM	11/8/2011 12:00:00 AM	Processed
		1	11/4/2014 General	32	4	11/4/2014 2:44:58 PM	null	Sent
		1	11/5/2018 General	32	4	10/12/2018	10/23/2018 12:00:00 AM	Processed
		1	11/8/2022 General	32	4	10/14/2022	11/1/2022 11:16:12 AM	Processed
		1	11/8/2016 General	32	4	10/14/2016	10/25/2016 12:00:00 AM	Processed
		1	11/2/2010 General	32	2		null	
		null	11/5/2024 General	32	4	10/11/2024	10/28/2024 12:00:00 AM	Accepted
		null	6/4/2024 Primary	32	4	5/10/2024	6/5/2024 12:00:00 AM	Accepted
		4	11/5/2019 Municipal General	32	4	10/16/2019	10/21/2019 12:00:00 AM	Processed
		null	9/12/2023 Municipal Primary	32	4	8/23/2023	9/12/2023 12:00:00 AM	Accepted
		null	5/7/2024 School	32	4	4/17/2024	5/7/2024 12:00:00 AM	Accepted
		450000001	5/25/2017 General	32	4	5/1/2017	5/9/2017 12:00:00 AM	Processed
		1	11/4/2008 General	32	2		null	
		4	11/7/2017 Municipal General	32	4	10/18/2017	10/30/2017 12:00:00 AM	Processed
		1	11/6/2012 General	32	2		null	
		2	6/5/2018 Primary	32	4	5/11/2018	6/4/2018 12:00:00 AM	Processed
		2	6/2/2020 Primary	32	4	5/8/2020	5/28/2020 12:00:00 AM	Processed
		null	5/2/2023 School	32	4	4/12/2023	4/24/2023 12:00:00 AM	Accepted
		3	9/14/2021 Municipal Primary	32	4	8/25/2021	9/3/2021 12:20:48 PM	Processed
		null	5/6/2025 School	32	4	4/21/2025	4/25/2025 12:00:00 AM	Accepted
		4	11/3/2015 Municipal General	32	4	10/9/2015	10/29/2015 12:00:00 AM	Processed
		2	6/7/2016 Primary	32	4	5/13/2016	5/24/2016 12:00:00 AM	Processed
		1	11/3/2020 General	32	4	10/9/2020	10/21/2020 2:20:32 PM	Processed
		1	11/8/2022 General	32	4	10/14/2022	11/1/2022 11:59:46 AM	Processed
		1	11/7/2006 General	32	2		null	
		1	11/4/2008 General	32	2		null	
		4	11/7/2017 Municipal General	32	4	10/18/2017	10/24/2017 12:00:00 AM	Processed
		2	6/3/2014 Primary	32	2		null	
		1	11/8/2016 General	32	2		null	
		null	11/5/2024 General	32	4	10/11/2024	11/4/2024 12:00:00 AM	Accepted
		2	6/6/2006 Primary	32	2		null	
		2	6/7/2016 Primary	32	2		null	
		1	11/4/2008 General	32	4	10/28/2008 2:10:40 PM	10/28/2008 12:00:00 AM	Processed
		450000001	5/25/2017 General	32	2		null	
		null	5/6/2025 Special	53	4	4/18/2025	null	Canceled

**Primary Election 6/4/2024 Multiple Counties 312,950 Records affected**

**Election Type is NULL should be 2=Primary (Federal) 2024**

1 <sup>2</sup> <sub>3</sub> Voter_ID	1 <sup>2</sup> <sub>3</sub> Election_Type	Election_Date	A <sup>B</sup> <sub>C</sub> Election_Description	1 <sup>2</sup> <sub>3</sub> E_JS_CODE	1 <sup>2</sup> <sub>3</sub>
1		6/4/2024	Primary		32
2		6/4/2024	Primary		32
3		6/4/2024	Primary		32
4		6/4/2024	Primary		32
5		6/4/2024	Primary		32

**Election Type is "Null" Should be 7- School; School Code "7" Code was last used in 11/2022**

**All Counties starting in 2023: Election Type Coded for School Elections is NULL**

1 <sup>4</sup> <sub>3</sub> Voter_ID	1 <sup>4</sup> <sub>3</sub> Election_Type	Election_Date	A <sup>B</sup> <sub>C</sub> Election_Description	1 <sup>4</sup> <sub>3</sub> E_JS_CODE	1 <sup>4</sup> <sub>3</sub> VVM_I
736		2/14/2023	School		3
737		2/14/2023	School		3
738		2/14/2023	School		3
739		2/14/2023	School		3
740		2/14/2023	School		3

**Election Type is "Null" Should be 10000029 Fire District 237 Records coded to Null in 2023**

1 <sup>2</sup> <sub>3</sub> Voter_ID	1 <sup>2</sup> <sub>3</sub> Election_Type	Election_Date	A <sup>B</sup> <sub>C</sub> Election_Description	1 <sup>2</sup> <sub>3</sub> E_JS_CODE	
59		5/2/2023	Fire District		34
70		5/2/2023	Fire District		34
71		5/2/2023	Fire District		34
72		5/2/2023	Fire District		34

**Incorrect Election Type 8 = Special Primary-Presidential. Election Type should be 2 Federal Primary**

1 <sup>2</sup> <sub>3</sub> Voter_ID	1 <sup>2</sup> <sub>3</sub> Election_Type	Election_Date	A <sup>B</sup> <sub>C</sub> Election_Description	1 <sup>2</sup> <sub>3</sub> E_JS_CODE	
14	8	6/3/2008	Empty container	28	
15	8	6/3/2008	Empty container	28	
16	8	6/3/2008	Empty container	28	
17	8	6/3/2008	Empty container	28	
18	8	6/3/2008	Empty container	28	
19	8	6/3/2008	Empty container	28	

**Election Description is "Empty Container" ; Should be Federal Primary**



**Election Type is "450000001" (not on the list of Election Types) Should be 1 Fed General**

This misnaming and coding may have led to voters not having credit for this federal election.

1 <sup>2</sup> Voter_ID	1 <sup>2</sup> Election_Type	Election_Date	A <sup>B</sup> Election_Description	1 <sup>2</sup> E_JS_CODE	1 <sup>2</sup> V
233	450000001	5/25/2017	Special		28
234	450000001	5/25/2017	Special		28
235	450000001	5/25/2017	Special		28
236	450000001	5/25/2017	Special		7
237	450000001	5/25/2017	Special		7
238	450000001	5/25/2017	Special		7

### Time Stamp Inaccuracies

252 Ballots sent on 4/18/2008 8:43:22am Exact date, hour, minute and second

One County, One Day, One Election

2	6/3/2008 Primary	5	4 4/18/2008 8:43:22 AM	5/12/2008 12:00:00 AM Undeliverable
2	6/3/2008 Primary	5	4 4/18/2008 8:43:22 AM	6/2/2008 12:00:00 AM Processed
2	6/3/2008 Primary	5	4 4/18/2008 8:43:22 AM	null Sent

Should the times be accurate in the "sent" and "receive" history—is the overnight update inconsistently overwriting the times.

This is part of the election record and should be accurate. **Midnight ballot processing.**

null	5/6/2025 Special	53	4 4/18/2025	5/2/2025 12:00:00 AM Accepted
null	5/6/2025 Special	53	4 4/18/2025	4/28/2025 12:00:00 AM Accepted
null	5/6/2025 Special	53	4 4/18/2025	5/5/2025 12:00:00 AM Accepted
null	5/6/2025 Special	53	4 4/18/2025	4/28/2025 12:00:00 AM Accepted
null	5/6/2025 Special	53	4 4/18/2025	5/6/2025 12:00:00 AM Accepted

### How is poll voter history tracked. POLL VOTERS are coded as 2

1_Type	Election_Date	A <sup>B</sup> Election_Description	1 <sup>2</sup> E_JS_CODE	1 <sup>2</sup> VVM_ID	A <sup>B</sup> Sent_Date	Receive_Date	A <sup>B</sup> BallotStage_Status
null	11/5/2024	General		48	2		null
null	6/4/2024	Primary		40	2		null
null	11/5/2024	General		41	2		null
null	6/4/2024	Primary		14	2		null
null	11/5/2024	General		31	2		null
null	11/5/2024	General		7	2		null
null	6/4/2024	Primary		18	2		null

## Voter History Files "Special Elections"

### Code 6 Special Elections

Search

- ☒ 1/26/2020
- ☒ 2/26/2020
- ☒ 3/3/2020
- ☒ 5/5/2020
- ☒ 7/21/2020
- ☒ 9/15/2020
- ☒ 12/8/2020
- ☒ 2/2/2021
- ☒ 2/23/2021
- ☒ 5/4/2021
- ☒ 8/3/2021
- ☒ 8/24/2021
- ☒ 9/14/2021
- ☒ 11/2/2021
- ☒ 12/23/2021
- ☒ 4/5/2022
- ☒ 5/3/2022
- ☒ 7/16/2022

### Election\_Details


ElectionType_ID	CODE	Description
1	FG	Federal General
2	FP	Federal Primary
3	MP	Municipal Primary
4	MG	Municipal General
6	S	Special
7	SC	School
8	PP	Special Primary - Presidential
100000029	FD	Fire District General
100000030	WS	Water/Sewer District

**Special Elections Code 6 Inconsistent Use**  
10 Counties either do not have special elections or do not use the coding for special elections

**Suggestion:**  
Clarify the use of the Election Coding/Description for consistency across the counties;  
Explore expanding the coding to include "Bonds" instead of "special"; what do the election administrators recommend for accurate data reporting if it is for a non-School, Water/Sewer or Fire District Related.

The voter "qualifications" are different for these elections.  
These elections may not be reflected in the history files—**WHY?**

123 Election_Type	Election_Date	Y A <sup>B</sup> Election_Description	123 E_JS_CODE	123 VVM_ID	A <sup>B</sup> Sent_Date
6	12/5/2006	Special		16	4 11/15/2006
6	12/5/2006	Special		16	4 11/15/2006
6	12/5/2006	Special		16	4 11/15/2006
6	12/5/2006	Special		16	4 11/15/2006

 <h2 style="margin: 0;">GALLATIN COUNTY</h2> <p> <a href="https://www.gallatinmt.gov/elections-department/pages/2000-2009-0">https://www.gallatinmt.gov/elections-department/pages/2000-2009-0</a>  <a href="https://www.gallatinmt.gov/elections-department/pages/2010-2019">https://www.gallatinmt.gov/elections-department/pages/2010-2019</a>  <a href="https://www.gallatinmt.gov/elections-department/pages/2020-present-0">https://www.gallatinmt.gov/elections-department/pages/2020-present-0</a> </p>	
<p><b>2005</b></p> <p>2005 Special District Election Results  <a href="#">2005 Countywide Jail Bond Election Results</a>            2005 Municipal/Special District Election Results</p>	<p>Excellent Election Web Pages—for historical election documentation.</p>
<p><b>2006</b></p> <p>2006 Federal Primary Election Results            2006 Federal General Election Results</p>	

No Special Election Noted in 2006