

SUPREME COURT OF IDAHO

Uhl v. Ballard Medical Products, Inc., 138 Idaho 653

67 P.3d 1265 (2003) · No. No. 28286 · Decided April 10, 2003

SUMMARY

The Supreme Court of Idaho affirmed the Industrial Commission's denial of unemployment benefits to Michael Uhl, holding that he failed to prove good cause for voluntarily quitting his employment due to hand pain. The court also upheld the Commission's refusal to admit additional medical evidence, concluded that Idaho Code §§ 72-1366(4) and 72-1368(4) did not require benefits or a new hearing, and denied attorney fees.

CASE DETAILS

COURT	Supreme Court of Idaho
WRITING FOR THE COURT	Justice Eismann; Chief Justice Trout; Justice Schroeder; Justice Walters; Justice Kidwell
JURISDICTION	Idaho
DECIDED	April 10, 2003
DOCKET	No. 28286
DISPOSITION	affirmed
PROCEDURAL POSTURE	Michael Uhl appealed the Idaho Industrial Commission's decision affirming the denial of his unemployment-insurance claim after he voluntarily quit his employment. The Idaho Supreme Court reviewed the Commission's evidentiary ruling, factual determination, statutory arguments, and denial of attorney fees.
STANDARD OF REVIEW	The court freely reviews questions of law, but reviews factual questions only to determine whether the Industrial Commission's findings are supported by substantial and competent evidence. The Commission's decision whether to admit additional evidence is reviewed for abuse of discretion, and credibility and weight determinations are not disturbed unless clearly erroneous.
PRECEDENTIAL VALUE	Published Idaho Supreme Court opinion; precedential
PARTIES	Michael Uhl v. Ballard Medical Products, Inc., Idaho Department of Labor

TOPICS

unemployment benefits

administrative law

judicial review of agency action

appellate procedure

standard of review

PRACTICE AREAS

Unemployment insurance

Administrative law

Appellate procedure

QUESTIONS PRESENTED

1. Whether the Industrial Commission abused its discretion by refusing to admit additional medical evidence or grant a supplemental hearing.
2. Whether substantial and competent evidence supported the Commission's finding that Uhl failed to prove good cause for voluntarily quitting his employment.
3. Whether Idaho Code § 72-1366(4) required the Commission to grant Uhl unemployment benefits.
4. Whether Idaho Code § 72-1368(4) required that Uhl receive a new hearing or special redetermination.
5. Whether Uhl was entitled to attorney fees on appeal.

HOLDINGS

1. The Industrial Commission did not abuse its discretion in refusing to admit Dr. Wathne's post-hearing letter or grant a hearing to supplement the record because the evidence was available, and Uhl had adequate time and access to obtain it before the appeals examiner's hearing.
2. Substantial and competent evidence supported the Commission's determination that Uhl failed to prove good cause connected with his employment for voluntarily quitting.
3. Idaho Code § 72-1366(4) did not apply because Uhl's claim was denied for failure to prove good cause for voluntarily quitting, not because he was unable, unavailable, or not seeking work during a benefit week.
4. Idaho Code § 72-1368(4) did not require a new hearing because the statute authorizes the Department Director to make a special redetermination, and the record did not show that Uhl had requested one.
5. Uhl was not entitled to attorney fees because he did not prevail on appeal.

KEY QUOTATIONS

"This is an appeal from the Industrial Commission's ruling that the claimant-appellant Michael Uhl failed to prove good cause for voluntarily quitting his employment. We affirm the order of the Commission." (1267)

"We do not re-weigh the evidence or consider whether we would have reached a different conclusion from the evidence presented." (1270)

"Idaho Code § 72-1366(4) has no application to this case." (1271)

"The order of the Industrial Commission is affirmed. Costs on appeal are awarded to the Department of Labor." (1271)

FACTUAL BACKGROUND

Michael Uhl worked for Ballard Medical Products assembling forceps, a job involving repetitive hand use. After developing hand and finger pain, he received medical treatment and was told by Dr. Wathne that his hands would worsen if he did not find work without repetitive motions, but Uhl did not provide Ballard with work restrictions or additional medical documentation. Uhl voluntarily quit to seek different employment and later applied for unemployment benefits. His physician initially indicated on a medical form that he had not advised Uhl to change occupations, although the physician later stated that he had checked that answer inadvertently.

PROCEDURAL HISTORY

The Idaho Department of Labor claims examiner denied Uhl unemployment benefits because he failed to establish good cause for voluntarily leaving Ballard. An appeals examiner affirmed after a telephonic hearing. The Industrial Commission reviewed the matter de novo on the existing record, declined to admit a physician's post-hearing letter or conduct a new hearing, affirmed the denial, and denied reconsideration. Uhl appealed to the Idaho Supreme Court, which affirmed and awarded costs to the Department of Labor.

DISPOSITION

affirmed

CASES CITED

- *Hughen v. Highland Estates*, 137 Idaho 349, 48 P.3d 1238 (2002)
- *Quinn v. J.R. Simplot Co.*, 131 Idaho 318, 955 P.2d 1097 (1998)
- *Teevan v. Office of the Attorney General*, 130 Idaho 79, 936 P.2d 1321 (1997)
- *Clay v. BMC West Truss Plant*, 127 Idaho 501, 903 P.2d 90 (1995)
- *Moore v. Melaleuca, Inc.*, 137 Idaho 23, 43 P.3d 782 (2002)
- *Thomson v. City of Lewiston*, 137 Idaho 473, 50 P.3d 488 (2002)