

*State Government Contract Grievances &
Investigation*

Participant's Guide

2019 Edition

Prepared by the CSEA State Operations Department

WORKSHOP OBJECTIVES

Success depends on understanding the contract, properly investigating violations and providing supporting evidence. Examples of how key contract articles have been interpreted and applied, what the Master Arbitrator looks for, what State Operations and LRSs needed to properly advocate and what Local Representatives should consider and provide, will all be discussed in this workshop.

At the end of this workshop, participants will be able to:

- ✓ Apply a six-step analysis for investigating and assessing a potential contract grievance
- ✓ Develop and document a chronology of facts and fact sheet throughout the grievance procedure.
- ✓ Apply relevant contract language, local labor/management agreements and agency policies/practices as part of the investigation process.
- ✓ Organize the presentation of a grievance to construct an argument for the Union's position and a counter-argument for management's position.
- ✓ Properly investigate violations and provide supporting evidence.
- ✓ Interpret and apply specific provisions of key contract articles.
- ✓ Have a better understanding for what the Mater Arbitrator looks for in the Triage and Arbitration phases of the contract grievance procedure.
- ✓ The information needed for State Operations and LRSs need to properly advocate the grievance.
- ✓ Identify (and obtain) the relevant information a Local representative should consider and provide throughout the steps.

STATE GOVERNMENT CONTRACT GRIEVANCES & INVESTIGATION

SESSION 1: Welcome & Introductions

SESSION 2: Analyzing and Investigating a Potential Contract Grievance

SESSION 3: Impact of Case Investigation in the Grievance Procedure

SESSION 4: Case Studies

SESSION 5: Summary and Evaluation

Step One: What's the Story?

Typically, when members go to their Union representatives to file a grievance for a perceived contract violation, they rarely think about events chronologically and often present a jumble of facts, assumptions and allegations without specific dates, names or other pertinent information.

Composing a chronology which provides a factual basis for all allegations is essential to facilitate organizing and conducting grievance investigations.

ANALYZING AND INVESTIGATING A POTENTIAL CONTRACT GRIEVANCE

SIX-STEP ANALYSIS The Six-Step Analysis method is used to both analyze a potential grievance and organize its investigation. The Grievance Representative should apply the same investigative questions journalists use to write a story- who, what, when, where and why.

Step Two: Identify the Issue

After hearing the story and asking questions to get enough information for a preliminary analysis, the next step is to identify the problem or issue and determine what contract article(s) may have been violated.

The question of "what" refers to the basis for the grievance:

- ✓ What specific contract violation is alleged and how did the employer violate the contract?

The answer to this question becomes the theory of the case for labor as well as management.

THE ANALYSIS AND INVESTIGATION WILL HELP TO DETERMINE THE TYPE OF GRIEVANCE TO FILE IF NECESSARY:

CONTRACT GRIEVANCE: A dispute concerning the interpretation (or meaning) of a specific article, application or claimed violation of a specific term or provision of this agreement.

NON-CONTRACT GRIEVANCE: A dispute or grievance concerning a term or condition of employment which may arise between parties or which may arise out of an action within the scope of authority of a department or agency head and which is not covered by this Agreement shall be processed up to and including Step 3 of the grievance procedure.

Step Three: Assess Relevant Contract Language

Determine what contract article(s) pertains to the story. Read through the entire article and discuss with the member how it relates to the facts of the situation.

Remember not all contracts – ASU, ISU, OSU, DMNA have exactly the same language and it makes a difference.

Some articles refer to others as well, for example:

- ✓ Art. 44- Seniority in OSU is fundamental to-
 - Art. 10 Vacation Scheduling
 - Art. 27 Distribution of Overtime
 - Art. 50- Location, shift and pass day

Step Four: Unclear Language

If the contract language seems ambiguous or subject to more than one interpretation, then further investigation may be needed.

Other/ Additional Items to Consider:

- ✓ Agency policies and practices
- ✓ Local agreements- reference contract articles which allow for local policies to be negotiated within the confines of the Statewide Agreement:
 - Article 10 Attendance and Leave
 - Article 27 Distribution of Overtime
 - Article 44 Seniority (except OSU)
 - Article 45 Posting of Examinations Announcements and Job Vacancies
- ✓ Previous arbitration decisions

Step Five: Other Forums

If the contract language does not seem to apply directly to the story, consider other forums. In these situations, it is important to contact the CSEA Labor Relations Specialist who will help determine the best forum to address the problem:

- ✓ Local labor/ management meeting
- ✓ Improper practice (IP)-(4) four months to file.
- ✓ Non-contract grievance
- ✓ Lawsuit
- ✓ Other

Step Six: Establish a Timeline for Investigating and Filing the Grievance

Review the language in Article 34.4 for grievance step and time limits.

If there are any questions as to the date of the occurrence and when the clock starts running, the grievance representative should contact the CSEA Labor Relations Specialist.

If the time limits for a Step 1 or Step 2 response from management are not met, meet with the Local President or LRS to appeal the grievance to the next step of the grievance process.

SAMPLE LETTER DEMANDING INFORMATION FOR GRIEVANCE INVESTIGATION

[Date]

Dear (Employer, Employer Representative):

I am hereby writing to you on behalf of CSEA, demanding any documents that you have which indicate the qualifications, or lack thereof, for the promotion of [NAME] to the position of [TITLE] at [EMPLOYER], [EMPLOYER'S ADDRESS], pursuant to a posting dated [DATE] through [DATE].

1. Copies of all written materials provided by or on behalf of the selected candidate and all other applicants in connection with their respective applications for the positions.
2. Copies of all materials considered on behalf of or as against any of the applicants, including the person selected; where not recorded, state the information so considered.
3. Statement of reasons that the selected candidate was selected instead of the grievant or the other applicants.
4. Statement of criteria considered in the selection process.
5. Copies of any notes taken in the interview process; copies of any rankings made; copies of any preplanned questions; copies of any instructions to interviewers or rankers; information concerning same, if this was not recorded.

CSEA requires this information to evaluate a grievance filed by [GRIEVANT], who asserts that [HE/SHE] should have gotten the promotion pursuant to the Collective Bargaining Agreement for the [UNIT DEFINITION] unit. In the event that it is determined to pursue the grievance to arbitration, CSEA also requires this information to prosecute such grievance.

Please be advised that it is a violation of the Taylor Law for a public employer to refuse to comply with a demand for information that the union needs to represent bargaining unit employees in the administration of its Collective Bargaining Agreement. Please note that CSEA requires this information by [DATE] because the [STEP HEARING] scheduled for [DATE].

Very truly yours,

[GRIEVANCE REP., CSEA LOCAL__]

NOTE: The information requested is determined by the questions generated assembling the facts and developing chronology of the situation you are investigating.

THE RIGHT TO INFORMATION

Much of the information the Grievance Representative will require as part of their investigation is in management's possession. The Taylor Law requires employers to supply the union with such relevant information. Here is a list of **some** of the information the union is entitled to when investigating grievances:

- ✓ Accident reports
- ✓ Attendance records
- ✓ Contracts with customers, suppliers and subcontractors
- ✓ Customer/ client complaints
- ✓ Disciplinary records
- ✓ Employer manuals, guidelines and policies
- ✓ Equipment specifications
- ✓ Inspection records
- ✓ Interview notes
- ✓ Job assignment records
- ✓ Job descriptions
- ✓ Management memos (specific to the issue)
- ✓ Material safety data sheets (MSDS's)
- ✓ Payroll records
- ✓ Performance evaluations
- ✓ Personnel files
- ✓ Photographs
- ✓ Security guard records
- ✓ Security reports
- ✓ Seniority Lists
- ✓ Time study records
- ✓ Videotapes
- ✓ Wage and salary records
- ✓ Work rules

Keep in mind that the union's right to information derives from the Taylor Law for public sector bargaining units- not the Freedom of Information Law (FOIL) or Freedom of Information Act (FOIA). This does not mean that a Grievance Representative cannot exercise rights derived from FOIL/ FOIA- he or she can. However, the Taylor Law provides a much stronger, more efficient leverage than the FOIL/ FOIA when the union attempts to acquire information from the employer.

If management fails to supply the union with information that is relevant to the grievance, the union may have grounds for an improper practice charge. **Be sure to contact your CSEA Labor Relations Specialist to assist with the Taylor Law demand and also if you think you have a possible charge if management fails to provide the requested information.**

NOTE: Under Articles 4.6 (c) and 4.9 (Contract/ Non-contract & Disciplinary Grievance Investigation and Representation) of the CSEA ASU, ISU and OSU State Contracts, Grievance Representatives are entitled to investigate grievances during work time.

ARTICLE 34: CONTRACT GRIEVANCE AND ARBITRATION PROCEDURE

PRIOR TO INITIATING A FORMAL WRITTEN GRIEVANCE, AN EMPLOYEE OR CSEA IS ENCOURAGED TO RESOLVE DISPUTES, SUBJECT TO THIS ARTICLE, INFORMALLY WITH THE APPROPRIATE IMMEDIATE SUPERVISOR.

STEP 1

- CSEA OR THE AGGRIEVED EMPLOYEE SHALL PRESENT THE GRIEVANCE TO THE FACILITY HEAD OR DESIGNATED REPRESENTATIVES NOT LATER THAN THIRTY (30) CALENDAR DAYS AFTER THE DATE ON WHICH THE CLAIMED VIOLATION OCCURRED.
- THE FACILITY HEAD OR DESIGNEE SHALL MEET WITH THE EMPLOYEE OR CSEA AND SHALL ISSUE A WRITTEN DECISION NOT LATER THAN TWENTY (20) WORKING DAYS FOLLOWING RECEIPT OF THE GRIEVANCE.

STEP 2

- CSEA OR THE EMPLOYEE SHALL FILE AN APPEAL OF AN UNSATISFACTORY STEP 1 DECISION ON FORMS PROVIDED BY THE STATE, WITH THE AGENCY REPRESENTATIVE WITHIN TEN (10) WORKING DAYS OF RECEIPT OF THE STEP 1 DECISION.
- SUCH APPEAL SHALL BE IN WRITING AND INCLUDE COPY OF GRIEVANCE, COPY OF STEP 1 DECISION, AND SHORT WRITTEN STATEMENT.
- THE AGENCY HEAD OR DESIGNEE SHALL MEET WITH EMPLOYEE/CSEA FOR A REVIEW OF THE GRIEVANCE AND SHALL ISSUE DECISION TO THE EMPLOYEE OR CSEA NOT LATER THAN TWENTY (20) WORKING DAYS AFTER RECEIPT OF THE APPEAL.

STEP 3

- AN APPEAL OF AN UNSATISFACTORY STEP 2 DECISION SHALL BE FILED THROUGH THE DIRECTOR OF CONTRACT ADMINISTRATION OR DESIGNEE ON FORMS PROVIDED BY THE STATE TO THE DIRECTOR OF THE GOVERNOR'S OFFICE OF EMPLOYEE RELATIONS WITHIN FIFTEEN (15) WORKING DAYS OF RECEIPT OF THE STEP 2 DECISION.

SEND 3RD STEP APPEALS TO:

CSEA, INC.

ATTN: STATE OPERATIONS
143 WASHINGTON AVE.
ALBANY, NY 12210

- GOER SHALL ISSUE A DECISION WITHIN THIRTY (30) WORKING DAYS AFTER THE CONCLUSION OF THE 30-DAY AMENDMENT PERIOD OR RECEIPT OF THE STEP 3 APPEAL LETTER, WHICHEVER IS EARLIER. A COPY OF THIS DECISION SHALL BE FORWARDED TO CSEA.

STEP 4 (TRIAGE/ ARBITRATION)

- CONTRACT GRIEVANCES, THAT ARE APPEALABLE TO ARBITRATION, SHALL BE APPEALED TO GOER WITHIN FIFTEEN (15) WORKING DAYS OF THE STEP 3 DECISION.
- THE MASTER ARBITRATOR SHALL HAVE COMPLETE AUTHORITY AT THE TRIAGE PHASE TO SUSTAIN OR DENY THE GRIEVANCE OR TO SUGGEST AND ACCOMPLISH RESOLUTION OF THE GRIEVANCE. IF THE MASTER ARBITRATOR DETERMINES THAT AN EVIDENTIARY HEARING IS NECESSARY, THE GRIEVANCE SHALL BE SCHEDULED FOR A HEARING BEFORE THE MASTER ARBITRATOR.

Note: All contract grievances, appeals, responses and demands for arbitration shall be submitted by registered or certified mail, return receipt requested, or by personal service. All time limits set forth in this Article shall be measured from the date of receipt.

CONTRACT GRIEVANCE SUBMISSION CHECKLIST

NYS EXECUTIVE BRANCH EMPLOYEES
(ISU/ ASU/ OSU)

INFORMATION AND SUPPORTING DOCUMENTATION NEEDED FOR ALL GRIEVANCE APPEALS

- Chronology and Analysis of Case
- Grievant Information
 - Name/ Title/ Seniority Date
 - Work Location/ Shift/ Pass Days
 - Contact Information (phone/ email)
- Forms/ Decisions
 - Grievance Form- **completed with signatures/ dates**
 - Step 1 Decision
 - If none issued, include on form any attempts made to request a decision issued.
 - Step 2 Decision
 - If none issued, include on form any attempts made to request a decision issued.

KEY ARTICLES COMMONLY GRIEVED AND SUPPORTING INFORMATION NEEDED FOR APPEALS

Article 27: Distribution of Overtime

- Overtime Roster
- Dates skipped

Article 44: Seniority

- Name/ Title/ Seniority Date of less senior appointee
- Grievant disciplinary history (if any)
- Grievant performance evaluation ratings (if given)

Article 32: Workday/ Workweek

- Copy of work schedule change
- Management's reason for change, date of notification and date effective
- Copy of any correspondence from management regarding change

Article 45: Posting and Bidding

- Name/ Title/ Seniority Date of less senior appointee
- Grievant disciplinary history (if any)
- Grievant performance evaluation ratings (if given)
- Job Posting
- Interview questions
- Interview notes

OTHER SUPPORTING DOCUMENTATION THAT MAY BE APPLICABLE

- Agency policies
- Facility policies
- Local agreements

IMPACT OF CASE INVESTIGATION IN THE GRIEVANCE PROCEDURE

CHRONOLOGY OF FACTS

Establishing the chronology of a case helps in understanding the evidence and serves as the framework for the grievance. It begins with the information gathered in the analysis and investigation process, evolving as the grievance progresses through the steps. Thus, it is imperative to conduct a thorough investigation as early as possible.

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Investigations done shortly before any stage of the grievance process can have a negative impact on your advocacy. The

likelihood of getting accurate information relating to the key aspects of a case decreases greatly than if it were obtained when the grievance was filed.

GRIEVANCE FACT SHEET

The reporter's "what" is often called the "story line." The "what" supports the "when" in the case. A labor advocate's heaviest responsibility is to uncover and present the facts which will support a favorable decision. It is difficult to know in the early stages of a case which facts will be the most relevant and persuasive. For that reason, the advocate must do a thorough investigation of the case to:

- ✓ Uncover all the relevant facts;
- ✓ Identify/ collect all related documents, whether available or not, to prove each fact.

CHRONOLOGY OF FACTS OSU ARTICLE 45 GRIEVANCE

ISSUE:

Did DOT violate Article 45 when grievant who is most senior was not appointed to the HMW2 (SG-10) position posted for Alder Creek on 4/7/14?

CHRONOLOGY:

1. Grievant is a 20-year employee.
2. Four employees bid on the posting.
3. Grievant applied 4/18/14 for posted position.
4. Grievant is most senior (seniority date 7/13/88)- not disputed.
5. Grievant meets the minimum and posted qualifications- not disputed.
6. State asserts grievant does not meet legitimate operating needs and does not have ability to perform duties and responsibilities satisfactorily.
7. Grievance filed 5/1/14.
8. Step 1 decision 8/21/14.
9. Step 2 appeal filed 9/3/14.
10. Step 2 decision 11/5/14.
11. Step 3 appeal 11/24/14.

FACT SHEET

A good fact sheet will include a great deal of information, the most obvious being thorough answers to the 5 "W's"-

- ✓ Who is involved?
- ✓ What happened?
- ✓ When did it happen?
- ✓ Why is there a grievance?
- ✓ What is the remedy?

The first step a grievance representative should take is to plan a strategy to frame the grievance. Include all the information relevant to prove the perceived contract violation, such as:

- ✓ Grievant(s) contact information
- ✓ Seniority Date(s)
- ✓ Job Posting
- ✓ Interview Questions & Notes
- ✓ Classification Standard
- ✓ Attendance Records
- ✓ Overtime Rosters

The relevant documentation gathered during the analysis and investigation phase of the grievance will be used to support the union position for arguments in each step of the grievance procedure.

Remember that while a grievance form is written for management, a fact sheet is written for the union use alone.

The union officer must anticipate that the CSEA State Operations Department and the Master Arbitrator handling the grievance at Steps 3 and 4 may not have a familiarity with the worker or possibly the work involved; thus, the fact sheet must be comprehensive.

The fact sheet requires both diligence and discipline:

Diligence
because you
must cover
every element
of the case in
detail;

While a grievance form is written for management, a fact sheet is written for the union use alone.

Discipline
because you
need to keep
careful records as you go along.
By the time the case is heard, months or years may have passed. This all makes the fact sheet an important tool in the grievance process. It gives a union officer all of the necessary information to handle the case while also helping to establish possible strategies.

Consider the following questions in the appeal:

- ✓ Was the appropriate article grieved?
- ✓ Is there a perceived violation of another article as well?
- ✓ Is management's position addressing the alleged violations cited?
- ✓ What evidence, information, or argument did management introduce to justify their position?
- ✓ Was there a legitimate operating need cited?
- ✓ Was there an identification of differences in the employees involved?
- ✓ What supporting evidence did the union provide and how did that factor into the grievance?
- ✓ Other

ADDITIONAL FACT INVESTIGATION NEEDED WHEN REFUTING STEP 1 AND STEP 2 DECISIONS

If a grievance is denied at Step 1 and an appeal to Step 2 is sought, cite the specific reasons. The appeal should generally not be the blanket response "disagree with the step decision" and the same applies for an appeal to Step 3. Evaluate management's response in relation to the instant grievance. This could lead to a further investigation of the facts of the case to determine if the matter continues to have merit to sustain an appeal.

IMPACT OF CASE INVESTIGATION TO LABOR ADVOCACY AT STEP 3 AND STEP 4 (TRIAGE/ ARBITRATION)

The chronology of facts and the story line will be critical to the potential success of a grievance appeal at Triage or the Arbitration phase. The evidence which is old and familiar to the parties is entirely new to State Operations and the arbitrator. The easiest way to understand a case is to piece together by a timeline of events. Arbitrators do not have to work hard to understand a case when it is presented in chronological order. Otherwise, evidence which is presented without a time frame confuses the arbitrator and even suggests that the case is weak.

To an arbitrator, the more complete the story line, the more persuasive the case. If there are gaps in the story line, the arbitrator is often left to wonder why there is a gap and wants an explanation. Arbitrators are divided on the question of what to do when both parties do not provide an explanation for the gap in evidence.

NOTE: It is important to emphasize that gaps in the story nearly always negatively impact the union position in these Steps, particularly at Step 4. Remember, for contract grievances filed by CSEA, the burden of proof is typically on CSEA to prove a violation or violations.

TRIAGE PREP FORM

Name

Title

Work Location:

Shift/ Pass Day:

OER No.

Contract and Article #

Issue:

Contract Language:

Facts of Case:

Management Position:

Union Position:

Remedy:

Documents in File:

Name: Kristopher Harvey
Location: OMH- Central NY PC

OER No. 2018-04-0337
Contract and Article #: ISU 44, 45

Issue:

Did the State violate Articles 44 and 45 of the ISU Agreement when it failed to assign employees based on seniority to the SOTP Transport Team position?

Contract Language:

Article 44- Seniority

§44.2 Appointments and promotions to vacant positions in the non-competitive service or assignment of employees to work locations and shifts shall be made on the basis of seniority, subject to the operating needs of a department or agency or component thereof, or subject to an identification of differences between employees with respect to relevant factors concerning the employee's ability to perform the required duties and responsibilities satisfactorily.

Article 45- Posting and Bidding for Job Vacancies

§45.2(c) When vacancies are announced as provided herein, employees who wish to be considered for transfer or reassignment to such vacancies shall be allowed to bid for such vacancies...in such cases assignments shall be made on the basis of seniority, as defined in the Seniority Article of this Agreement, subject to the operating needs of a department or agency or component thereof, or subject to an identification of differences between employees with respect to relevant factors concerning the employee's ability to perform the required duties and responsibilities satisfactorily.

Facts of Case:

On or around February 12, 2018, Grievant, a Secure Care Treatment Aide 1 (SCTA 1) and more senior applicant was not selected to be a member of the Sex Offender Treatment Program (SOTP) Transport Team "Trip Team" giving rise to the instant grievance.

Grievant's seniority date: 1/24/13

Candidates selected: Michael Wright 12/26/13
Fernando Harvey 12/26/13
Hassan Jones- do not have- no longer employed there. **Note: Jones left and position was not filled.**

No Step 3 decision issued.

Management Position:

In the First Step decision, management cited the position required a "specific set of distinguishing criteria required to complete the duties of the position. As management, we need to confirm that the employee is fully capable of performing the duties before being placed in the position. Candidates were selected based on seniority, experience, and identifiable differences between applicants. At the time of the interview, Mr. Harvey did not qualify based on the criteria considered for the position."

Management states in the second step decision, "Rather than rely on seniority as the controlling factor for these appointments, to satisfy the operating needs of the facility, management established objective criteria to distinguish between relevant factors concerning the candidates' ability to perform the required duties. These factors, among others, include satisfactory time and attendance and proficiency with the facility's MINTS system. Management determined that these criteria were determinative in selecting the right candidate for this post."

Union's Position:

The Union contends that the Property Room Facilitator position is not a specialized position. The SOTP Transport Team position is not a position classified by Civil Service that requires minimum qualifications. Relevant Illustrative Duties of the SCTA positions stated in the Classification Standard include:

- Maintains order and a secure environment for patients, visitors, and staff through the application of therapeutic methods and postures.
- Escorts patients to activities and appointments on and off facility grounds, including to and from meals, and accounts for all eating utensils before patients leave the dining area.
- Assists and encourages patients to participate in recreational activities and other rehabilitation goals to enhance recovery and draw patients into fuller participation in family and community life.
- Attends to the personal needs of patients who cannot take care of themselves; and assists and instructs patients in attending to personal care tasks concerning hygiene, grooming, nutrition, and daily living.
- Orients new patients to the established policies and procedures of the secure intensive treatment unit or forensic facility.
- Conducts periodic checks to account for each patient as required by facility policies and procedures.
- Observes patients during visits with friends and relatives to ensure that no contraband is provided.
- Observes high-risk patients closely; and records frequent notes on patient's behavior.
- Communicates with parents, guardians, or other stakeholders to obtain general information about patients.

The posted qualifications list:

- Successful completion of probation of SCTA 1
- Skilled at basic computer/ Microsoft Office applications (Excel, Word, photo printing)).
- Demonstrates interpersonal communication models, including PMCS, Motivational interviewing, and Trauma Informed Care.
- Has demonstrated ability to work independently to complete required tasks.
- Has demonstrated ability to be detail-oriented and possess good organizational skills.
- Has demonstrated satisfactory work performance under the direction of supervisors.
- Satisfactory personal history folder review.
- Compliance with time and attendance standards.

The interview questions have not been provided. However, the interview schedule with average score and comments was provided. Upon review, grievant scored highest compared to other less senior candidates selected. Grievant also had "excellent interview" listed in the comments. The Union contends that seniority is the controlling factor and management was hanging their hat on "compliance with T&A standards" as the determining factor. The T&A Standards are outlined in the Time &

Attendance Management Guidelines facility policy. Counseling is not discipline; the Union does not view counseling as an identification of differences.

Interview Scores:

K. Harvey (Grievant)- 60.0

M. Wright- 56.6

F. Harvey- 59.3

H. Jones- 57.3

Remedy:

CSEA seeks, as a remedy, for management to cease and desist and to award the SOTP Transport Team bids based on the Seniority provision of the Agreement.

Documents in File:

- Advocate Letter
- Step 1 & 2 decisions
- SCTA 1, SCTA 2 Classification Standard
- SOTP- Transport Team Posting- dated 11/24/17
- SOTP Transport Team Interview Schedule-dated 1/2/18
- SCTA 1 Contract Seniority Dates
- CNY PC APPM- Time & Attendance Management Guidelines
- Forms

SUMMARY & EVALUATION

Thank you for attending and participating in this workshop. We hope that your experience has been positive and what you have learned will assist you in representing our members in the State Contract Grievance Process.

Remember to contact the Contract Administration Specialists in the CSEA State Operations Department with questions regarding any aspect of the grievance process.

Please take a moment to complete the Workshop Evaluation Form and return it to the Instructor.

SOURCES CITED

Case Investigation, Labor Arbitration Institute, 2010 Program Course Book.

“The Fact Sheet As a Union Weapon,” Bill Barry, Director of Labor Studies for the Community Colleges of Baltimore (MD) County.

