

November 10, 2022

Article XX, Section E - Step Four: Notice of Intent to Arbitrate

Director of Labor Relations:

This Notice follows the HOA's Grievance dated October 4, 2022 and the Employer's written, third step denial of the Grievance dated November 3, 2022 (#22-11282).

The issue for arbitration is: "Did the Employer violate the parties' Agreement when it assigned the task of carrying the EP Department's Device On-call pager to bargaining unit Fellows?"

The Employer violated Article XVIII of the parties' labor contract when it added this pager responsibility to EP Fellows' work duties. As previously stated, this task is outside the EP fellows' job classification, has no clinical or educational value, and negatively impacts fellows' schedules. The HOA disputes that there is any binding past practice in this regard and requests as a remedy (1) that this work be assigned to a non-bargaining unit employee; and (2) that unit members be made whole for their added working time.

The HOA will contact FMCS for a panel.

Sincerely,

Robin Tarter

Robin Tarter
Executive Director, HOA
On behalf of the Association