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

**Director of Labor Relations:** 

This Notice follows the HOA's Grievance dated September 20, 2024. The Employer's written, third step response to the grievance was due October 21, 2024 but has not been received. The HOA is filing within the ten (10) day timeline within the CBA on October 29<sup>th</sup> for the grievance on behalf of Dr.

The issue for arbitration is: "Did the Employer violate the parties' collective bargaining agreement when it failed to advance Dr. to the HO-6 salary level on 7/1/24 despite academic program and duties advancing? If so, what is the appropriate remedy?"

The directly implicated contract provision is Article III.

The Employer violated the rights of Dr. under the CBA. The grievance should be sustained, and she should be made whole.

The HOA will reach out to Robert Young, the next arbitrator on our agreed upon umpire list by 11/1/24 unless we hear an objection from the Employer.

Sincerely,

**Dominic Barbato** 

Director or Organizing and Representation, HOA

On behalf of the Association