



TEAMSTERS LOCAL UNION 117

Affiliated with the International Brotherhood of Teamsters

General Public and Private Sector Employees and Special Services Employees in King and Pierce Counties and Employees of the State of Washington

July 13, 2015

Ms. Diane Lutz, Section Chief
Office of Financial Management/Labor Relations
P.O. Box 43113
Olympia WA 98504-3113

Via E-Mail Transmittal Only
labor.relations@ofm.wa.gov

Ms. Julie Moultime
Interim Labor Relations Manager
Department of Corrections
PO Box 41105
Olympia, WA 98504-1105

Via E-Mail Transmittal Only
teamsters117@doc1.wa.gov - 3101

**Re: All Bargaining Unit Members Statewide
Improper Removal of Assignment Pay
Grievance No. 37-15 (Statewide)
Step 1 (Panel Grievance)**

Dear Ms. Lutz and Ms. Moultime:

In accordance with Section 9.1(M) of the parties Collective Bargaining Agreement (CBA), the Union requests mutual agreement to bypass Steps 1, 2, and 3 of the panel grievance process and move this grievance directly to Step 4 – Arbitration.

A grievance has been filed through the Union office as follows:

The Union protests the improper removal of Assignment Pay for the purposes of recruitment and retention issues. In accordance with Section 9.1(E)(2), the Union hereby provides the following information relating to this grievance:

- a. The action referenced above constitutes a violation of the Collective Bargaining Agreement (CBA) including, but not limited to, Article 32 (Compensation) and Appendix F (Assignment Pay) as established by the Interest Arbitration Decision issued by Arbitrator Howell Lankford. On July 7, 2015, the Department notified the Union of its intent to cease paying assignment pay to classifications identified in Appendix F, Group C, of the CBA. The Union asserts that the Department's decision was arbitrary and capricious and is therefore a direct violation of the negotiated agreement and interest arbitration decision in Case No. 26673-I-14-0659. We stand ready to provide you with additional facts supporting the Union's position.

- b. The violation occurred on July 1, 2015 and is ongoing.

Ms. Julie Moultime and Ms. Diane Lutz
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- c. The Union attempted to resolve this grievance informally when the Union's General Counsel, Spencer Nathan Thal, contacted Interim Labor Relations Manager Julie Moultime, yet no resolution could be reached.
- d. The Union requests a full make-whole remedy including immediately reinstating the assignment pay, back pay with interest for all members that did not receive the appropriate assignment pay, and any other relief that is just and equitable.
- e. I will be the Business Representative for this grievance. Please direct all correspondence regarding this grievance to me at the Union Headquarters office.
- f. The Business Representative's signature (or signature on behalf of the Business Representative) appears below.

The Union hopes that this matter can be discussed and settled on an informal basis. With this in mind we would appreciate hearing from you, as soon as possible, to arrange a suitable meeting for a proper review of this issue.

Sincerely,



Michelle Woodrow
President and Director of Corrections & Law Enforcement

MW:ms