

Via Email <u>jacrowe@kingcounty.gov</u> amarshall@kingcounty.gov

James Crowe, King County Labor Negotiator Angela Marshall, King County Interim Director OLR

October 9, 2025

RE: WSNA Grievance 25-10-0251 – Association Grievance (Article 30) CHSS arbitration decision appeal

Dear Angela,

We are filing this Association Grievance on behalf of the Seattle King County Public Health RN Supervisors and Managers Bargaining Unit, per Section 30.7 Association Grievances:

**Section 30.7. Association Grievances**. A grievance in the interest of two or more employees in the bargaining unit shall be reduced to writing by the Association and may be introduced at Step 2 of the contract grievance procedure to the Division Manager or designee and be processed within the time limits set forth herein.

The nature of the grievance relates to King County filing an appeal of the final and binding CHSS arbitration decision issued by Arbitrator David P. Beauvais on May 30, 2025 (Grievance No. 23-02-0042/FMCS #240531-06677). This violates Article 30.4 Grievance Process of the CBA:

STEP 4. Mediation and/or Arbitration. Should the decision of the Negotiator not resolve the grievance at Step 3, the parties, prior to submitting a dispute to arbitration, may agree to select a neutral third party to serve as mediator. This agreement shall be reached within thirty (30) calendar days of receipt of the Step 3 response by the Association. If such agreement cannot be reached, the Association may request arbitration within sixty (60) calendar days of receipt of the Step 3 decision. If mediation is undertaken and is not successful, the Association may request arbitration within thirty (30) calendar days if either the County or the Association declares impasse at mediation. The arbitration request shall be submitted in writing to the Director of the Office of Labor Relations and the Negotiator. Should arbitration be chosen, the parties shall then select a third disinterested party to serve as arbitrator. In the event that the parties are unable to agree upon an arbitrator, then the arbitrator shall be selected from a panel of eleven (11) arbitrators furnished by the Federal Mediation Conciliation Services. The arbitrator will be

selected from the list by both the department representative and the Association, each alternately striking a name from the list until only one remains. The arbitrator shall be asked to render a decision promptly and the decision of the arbitrator shall be final and binding on both parties.

Additionally, under Article 30.4:

The parties agree to otherwise abide by the award made in connection with any arbitrable difference. Each party shall bear the cost of any witnesses appearing on that party's behalf.

WSNA asserts that we're being harmed by having to incur unnecessary attorney's fees to defend the final and binding arbitration award.

If you can contact me at your earliest convenience to arrange for a mutually agreeable date and time to meet.

Sincerely,

## Linda Burbank

Linda Burbank, JD, BSN, RN Nurse Representative Washington State Nurses Association (206) 575-7979 ext. 3131 Lburbank@wsna.org

Cc: Robin Laurence, Interim Chief Nurse Officer, Public Health Tamura Hikari, Deputy Director, Public Health Alex Golan, Employee & Labor Relations Manager Christopher Salatka, RN Local Unit Vice-Chair Annie Roberts, RN Local Unit Secretary/Treasurer