

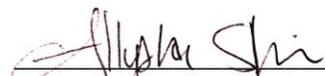
I am writing to encourage the Board to maintain and strengthen its current election rules. In April of 2015 I participated in a union election at Huntington Memorial Hospital (HMH) that was conducted by the National Labor Relations Board. The election was conducted under the Board's old election rules that heavily advantaged management and did not foster a fair and free election. I feel that the new election rules are a much-needed attempt to better protect workers' rights throughout the election process.

Under the old rules, HMH administration had an unfair advantage over pro-union nurses. HMH had the ability to easily access RNs with anti-union messages, which led to the union's loss. Management conducted closed-door one-on-one meetings with RNs and nurses were being intimidated or bribed into compliance with the hospital. HMH increased security presence throughout the hospital to the point of having a security canine rounding at night on units during the organizing campaign—something that had never been done before. This created an atmosphere of fear and intimidation that made a fair election nearly impossible.

When the time between filing a petition for election to the actual election is prolonged, hospitals just have more time to intimidate and manipulate voters. At HMH, the hospital knew that the process was slow and protections weak, so Administration's game plan was to act first, regardless of the consequences, and then ask for forgiveness later. For example, management went so far as to change the retirement date of a pro-union nurse and then try to challenge her vote.

It is imperative that workers' rights to unionize are protected to the fullest extent possible. The current Board rules are definitely a step in that direction. The Board should not go back to its old rules, but instead work on strengthening and enforcing the current rules to protect workers.

Thank you for your consideration,


Allysha Shin