

I am a Registered Nurse (RN) who recently participated in an election conducted by the National Labor Relations Board and based on my experience, I encourage the Board to maintain its current election procedure rules. Please find below an explanation of why the current Board rules work and should be preserved and enforced.

The rules allowed me and my coworkers to participate in a fair and timely election. The Union filed a petition for election at my hospital in December of 2016 and an election was subsequently held in January of 2017, 22 days after the petition was filed. This period of time between petition and election is longer than ideal for workers, but I am grateful that the Board rules prevented further delay beyond those 22 days. In the time before the election, my Employer had extensive contact with RNs to discourage us from voting for the union. Management held numerous one-on-one meetings, as well as group meetings, and had plenty of time to reach each nurse with their message. The time between petition and election, if anything, was longer than necessary. Employees should have a right to a quick and fair election—it's what the majority of workers want. And it seems to me that Employers also benefit from a quicker process, as they also have to exhaust a lot more resources if the process is long. The Board's rules allowed nurses at my facility who wanted to vote to do so without an extended delay.

The Board's rules also helped even the playing field to allow nurses to be more informed in their decisions. In getting their message out to nurses, hospital management spent a lot of time meeting with nurses in-person, often one-on-one, during work time. This was very intimidating for a lot of my coworkers. The Union did not have the same kind of access—specifically, union representatives were not allowed on the Employer's property. However, because the Union got employee contact information from the Employer shortly after filing its petition, the Union was able to at least make contact and share information with many employees, and that was crucial so that nurses could get information from both sides before making a choice. In that way, the Board's election rules helped to make the process more fair.

The Board's rules also helped to alleviate concerns about voter eligibility. The rules ensured that Hospital promptly provided a voter eligibility list, which made it easy for nurses and the Union to quickly identify and resolve eligibility issues. The handful of nurses that the Hospital and Union could not agree on were quickly identified by the Board and then allowed to vote subject to challenge, allowing for disputes to be resolved if necessary after the election. This helped ease nurses' concerns about who was allowed to vote and let everyone focus on the more important decision: whether or not we wanted to be represented by a union. If we had to battle for each disputed employee before the election, it would have taken way too long and would have been a divisive distraction that would have undermined our vote.

If the Board's rules were not in place, I am confident my Employer would have taken every opportunity to delay the vote and attempt to divide and intimidate nurses. Ultimately, the process affects patient care and our employee community, so any efforts to upend these rules and allow for potential extended delay and confusion would negatively impact our patients. For these reasons I do not believe the Board should change those procedures.

Thank you for your consideration,


Farah Germani