



STATE OF WASHINGTON
PUBLIC EMPLOYMENT RELATIONS COMMISSION

MICHAEL P. SELLARS, EXECUTIVE DIRECTOR

112 Henry Street NE, Suite 300 • Post Office Box 40919 • Olympia, Washington 98504-0919
(360) 570-7300 • Fax: (360) 570-7334 • Email filings: filing@perc.wa.gov • Website: www.perc.wa.gov

September 28, 2023

Via Email Only

Kendra Hsieh
Washington State University
kfonten@wsu.edu

Amy Bowles
Douglas Drachler McKee & Gilbrough LLP
amyb@ddmglaw.com

Cause of Action Statement

Case 137584-U-23, Washington State University
Academic Student Employees Bargaining Unit

Dear Kendra Hsieh and Amy Bowles:

The following case is pending before PERC:

- 137584-U-23, filed by United Automobile, Aerospace, And Agricultural Implement Workers of America Local 4121 against Washington State University on September 18, 2023

This case has been reviewed under WAC 391-45-110. At this stage, all facts alleged in the complaint or amended complaint are assumed to be true and provable. The facts alleging an unfair labor practice violation state a cause of action for further processing.

The complaint alleges the following:

Employer refusal to bargain in violation of RCW 41.56.140(4) [and if so derivative interference in violation of RCW 41.56.140(1)] within six months of the date the complaint was filed, by

1. Unilaterally implementing changes to the Student Health Insurance Plan without providing the union an opportunity for bargaining.
2. Failing and/or refusing to provide the union with information necessary to bargain changes to the Student Health Insurance Plan.
3. Breaching its good faith bargaining obligation during negotiations with the union concerning the Student Health Insurance Plan.

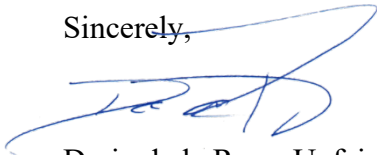
The person or organization charged with unfair labor practices in this matter (the respondent) **shall file and serve its answer to the complaint within 21 days** following the date of this letter. WAC 391-45-110(2)(c). The answer must

1. specifically admit, deny, or explain each fact alleged in the complaint, except if the respondent states it is without knowledge of the fact, that statement will operate as a denial; and
2. assert any affirmative defenses that are claimed to exist in the matter.

The answer must be filed and served in accordance with WAC 391-08-120. If the respondent does not file a timely answer or an answer that specifically denies or explains facts alleged in the complaint, the respondent may be deemed to have admitted and waived its right to a hearing on those facts. WAC 391-45-210.

Please direct all correspondence and motions to me until an Examiner is assigned to conduct further proceedings. Settlement mediation may be offered under WAC 391-45-260.

Sincerely,



Dario de la Rosa, Unfair Labor Practice Administrator
dario.delarosa@perc.wa.gov | (360) 570-7328

cc: David Parsons, dparsons@uaw.net