



Washington Teachers' Union

February 22, 2016

Via Electronic Delivery

Kaya Henderson, Chancellor
District of Columbia Public Schools
1200 First Street Northeast, 12th Floor
Washington, DC 20002
kaya.henderson@dc.gov

Dear Ms. Henderson:

The Washington Teachers' Union (WTU) hereby files this Class Action Step 2 grievance in accordance with Article 6 (6.1.1–6.4.2.2) of the Collective Bargaining Agreement (CBA) between WTU and the District of Columbia Public Schools (DCPS). This grievance is filed on behalf of all DCPS teachers and bargaining unit members assigned to Raymond EC, Garfield Elementary School, H.D. Cooke Elementary School, Hendley Elementary School, Johnson Middle School, Kelly Miller Middle School, King Elementary School, Randle Highlands Elementary School, Thomas Elementary School, Turner Elementary School, and any other DCPS school where such is occurring.

The WTU files this grievance for violations of Article 1 (1.1–1.5.3), Article 2 (2.8–2.12.12), Article 3 (3.1–3.3.3), Article 10 (10.1–10.1.3) and other applicable articles, including Board Rules, Comprehensive Merit Personnel Act and District of Columbia Acts, regulations and laws by engaging in the following conduct:

1. DCPS, without first bargaining with or notifying the WTU, unilaterally decided to, and did, extend the school year for WTU bargaining unit employees assigned to Raymond EC, Garfield Elementary School, H.D. Cooke Elementary School, Hendley Elementary School, Johnson Middle School, Kelly Miller Middle School, King Elementary School, Randle Highlands Elementary School, Thomas Elementary School and Turner Elementary School;
2. DCPS unilaterally and without first notifying and bargaining with the WTU changed the rates of pay, job duties and responsibilities of WTU bargaining unit members at the ten DCPS schools listed in number 1, above;
3. DCPS negotiated directly with WTU bargaining unit members over wages, hours, and working conditions in violation of its obligation to bargain only with the WTU over those subjects;
4. DCPS has interfered with the WTU in its efforts to represent its bargaining unit members;
5. And, DCPS communicated with, and negotiated directly with, WTU bargaining unit members regarding its unilateral decision to extend the 2016–2017 school year without first notifying or bargaining with the WTU as the exclusive bargaining agent of bargaining unit employees.



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As relief for these violations of the CBA, the WTU demands:

- A. That DCPS immediately cease and desist from all activities and conduct that violates the CBA;
- B. That DCPS reverse and rescind its unilateral decision to extend the school year for bargaining unit employees in the DCPS schools listed above;
- C. That DCPS rescind all notices to the public and to WTU bargaining unit members that are in violation of the CBA;
- D. That DCPS reverse or rescind its notices to WTU bargaining unit members regarding what actions they must take if they chose not to remain in the ten schools wherein DCPS unilaterally extended the school year for SY 2016–2017;
- E. That DCPS bargains first with the WTU before implementing any and all changes in the school year in all DCPS schools;
- F. That DCPS meet with the WTU to negotiate all matters that relate to wages, hours, or working conditions of bargaining unit members as the exclusive representative of all WTU bargaining unit members;
- G. And, that DCPS make all WTU bargaining members whole for any and all lost wages, benefits and expenses caused by DCPS' unilateral implementation of an extended school year for SY 2016–2017 in the schools listed in number 1, above.

Please contact Charles Moore at cmoore@wtulocal6.net to arrange a mutually agreeable date and time for the grievance hearing.

Sincerely,

Elizabeth Davis
President, WTU

cc: Crystal Jefferson, Chief, Office of Talent and Culture, DCPS
Erin Pitts, Deputy Chief, Labor Management and Employee Relations, DCPS
Candi Peterson, General Vice President, WTU
Charles Moore, Field Representative, WTU