



April 25, 2019

Professional Distinction

Personal Dignity

Patient Advocacy

Mark Nordby  
Director of Employee and Labor Relations  
Park Nicollet-Methodist Hospital  
6500 Excelsior Blvd  
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VIA USPS and E-Mail: Mark.Nordby@ParkNicollet.com

Dear Mark,

The Minnesota Nurses Association continues to evaluate the Employer's proposals and advance our proposals. In order to do so the Union requires certain information. On February 26, 2019 the Employer provided the Union with requested information, however some of the information was not provided. Therefore, the Union renews its request for the following information and still requires the hospital to provide the Union with this data.

### General Information Request

In the Union's request for information Question 17 a. and b.:

17. For the period June 1, 2017 through May 31, 2018:

- a. A listing of all open shifts that remained unfilled 24 hours or fewer prior to the start of the shift.
- b. A listing of all shifts that were initially posted as open shifts and were filled 24 hours or fewer prior to the start of the shift, the name of the nurse who filled the shift, their FTE, and indicate whether it as straight-time or premium pay.

Employer Response: The work shifts may or may not be "open" at a given time would be entirely fluid and dynamic. The Hospital does not treat the issue of whether a shift was or was not "open" 24 hours before the start of the shift as a particular benchmark or standard that is maintained or tracked.

### Miscellaneous Information Request

In Union Request for information 40-42:

40. Average hold time, by month, in the Emergency Center after the transfer order has been written for 2016, 2017, and 2018;
41. Average hold time, by month, for patients in Post-Op after the order to transfer has been written for 2016, 2017, and 2018;
42. Average time, by month, to discharge patient after discharge order has been written for 2016, 2017, and 2018.

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Employer Response: We do not see how the information you have requested is relevant to your statutory duty as the bargaining representative. If you provide us with an explanation, we will review that and give the matter due consideration.

Union Response: Union request 17 a. and b., Union request 40, 41, and 42: The Union currently has a number of outstanding proposals related to staffing and we are seeking the above information in order to better understand the impact of staffing on the units, patient flow and the impact of nursing assignments related to the number of patients a nurse may care for in particular shift.

44. The Union is concerned about the circumstances under which agency or other temporary help is hired. For purposes of bargaining over this issue the Union asks that the employer provide the following information:
- a. Copies of all contracts with outside temporary personnel agencies.
  - b. A list of all individuals who have been hired as agency or temporary help from June 1, 2016 to date; giving the names, the date of hire, the rate of pay, classification, the date of termination and the reason that the agency or temporary help was hired.
  - c. A copy of any company policies or procedures with respect to the hiring of agency or temporary help.

Union Response: This information is necessary and relevant for the Unions ability to effectively bargain over our proposals as they relate to staffing as well as economic proposals. In order to formulate proposals and counter proposals, the Union seeks to understand 1) the nature and extent of worries outside the bargaining unit who are used to supplement bargaining unit nurses, and 2) what the employer is willing to pay workers/agencies who provide the same services the represented employees. See. St. George Warehouse, Inc 341 NLRN No. 120 (2004), at 904 and agencies who have provisions who have provided temporary nurses in numerous occasions during the past three years.

Please provide the above information by May 1, 2019.

The Union reserves it rights to request further data as it becomes necessary throughout the bargaining process.

Sincerely,



Eric Tronnes  
Labor Relations Specialist

CC: MNA Negotiating Team  
Paul Zech, Felhaber Larson Law Firm