



June 11, 2019

Ronda Dunham
Human Resources Manager
Children's Business Campus
5901 Lincoln Drive, CBC-2-HR
Edina, MN 55436

Professional Distinction

Personal Dignity

Patient Advocacy

Via USPS and Email: ronda.dunham@childrensmn.org

Dear Ronda,

The Union is aware that in a June 7, 2019 email communication from Pam VanHazinga, CNO, to Children's MNA Nurses she stated the following:

"Please be aware that, in order to obtain agency-employed replacement nurses (who will be traveling here from out of state) we had to agree to provide them with a minimum of five days of work. In those cases where a bargaining unit nurse is replaced by an agency nurse for the period of the strike, and it's a short strike of pre-announced duration (e.g. a one-day or two-day strike), Children's is required to continue using and paying the agency nurse beyond the end of announced strike. In these cases, the bargaining unit nurses who were replaced by agency nurses with a five-day guarantee won't return to work until that guarantee period has run out."

MNA is requesting the following information in order to evaluate Children's claims that its agreement requires guaranteeing replacement nurses a minimum of five days of pay and the assertion that the employer must therefore lock out nurses and unilaterally suspend important contractual guarantees during that time:

1. Copies of all contracts with outside temporary personnel agencies.
2. A list of all individuals who have been hired as agency or temporary help since June 1, 2016, including:
 - a. Name
 - b. Date of hire
 - c. Reason for hire
 - d. Rate of pay
 - e. Classification
 - f. Termination date
 - g. Reason for termination
3. A copy of company policies and/or procedures referring or relating to the hiring of agency or temporary help.
4. A list of all individuals who have been contracted to provide temporary help in the event of a potential strike in 2019, including their name, address, phone number, and email address. We contend that the Employer is obligated to provide this information under *Georgetown Holiday Inn* (235 NLRB 485).
5. Any and all documents relating in any way to the agreement(s) described in the employer's June 6 communication to bargaining unit nurses regarding Children's obligation to replacement nurses in the event of a strike, including but not limited to correspondence, notes, emails, drafts, proposals, counterproposals, memoranda and any other writing between employees, agents, and/or representatives of Children's or any of its affiliates and the temporary staffing agency(ies) with whom the agreement(s) was made.
6. Copies of any written plans Children's may have to reduce patient census or close units in the event that MNA conducts a limited duration strike.

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AFL-CIO

In addition, the Union is reiterating its verbal request made at the June 4 bargaining session for the following information related to Children's health insurance plans:

1. In electronic excel format, a list of all employees (First Name, Last Name, Employee Number) for each year from 2000 to 2019. The insurance plan and tier they selected for that year (including if they declined to receive insurance benefits through Children's).
2. Copies of the benefit guides provided to employees for all plans offered from 2000-2010 (same format as what was to what was provided in 19 D of the Union's initial request for information)
3. Total enrollment by tier and by plan since 2000.

The Union is also reiterating its request for the actuarial rate development report for the past three years which was not provided in response to our initial request (Item 21 a and b). Children's included the rates that were developed, but not the more detailed "rate development" or what is sometimes known as a "premium development" report (21 a).

The report we are seeking would most likely include elements such as an executive summary, PMPM values (per member per month), Utilization and PMPM data (such as visits/days/discharges per 1000 members for inpatient and outpatient visits), pharmacy PMPM costs, pharmacy details, top drugs utilized, rate details, and assumptions and definitions. Based on your other responses we believe the Hays Company or HealthPartners likely developed this report.

Sincerely,



John Aho
Labor Relations Specialist

cc. Tom Poulos – MNA Director of Labor Relations
Scott Kleckner – MNA Lead Labor Relations Specialist
Laura Hundt – MNA Lead Labor Organizer
Children's Bargaining Team