

September 2, 2014

VIA EMAIL, FACSIMILE AND FIRST CLASS MAIL

Mr. Victor Blackwell
Executive Director
Illinois Education Labor Relations Board
160 North LaSalle Street
Suite N-400
Chicago, IL 60601-3103

Re: Waukegan School District 60/Lake County Federation of Teachers ("LCFT")

Dear Mr. Blackwell:

Pursuant to Public Act 098-0513 (the "Act"), Section 12, Impasse Procedures (2) states in relevant part: "Within seven days after the initiation of the public posting process, each party shall submit to the mediator, the Board and the other party in writing the most recent offer of the party, including a cost summary of the offer. Seven days after receipt of the parties' offers, the Board shall make public the offers and each parties' cost summary dealing with those issues in which the parties have failed to reach agreement by immediately posting offers on its Internet website,..."

The LCFT's correspondence of August 26, 2014 initiating the public posting process fails to follow the referenced provision in that there was no inclusion of a "cost summary" of the offer. Moreover, the LCFT has submitted to the Board negotiating team and federal mediator, Commissioner Thomas K. Jeffery, a package of proposals in which we are not aware whether the package proposals were included with the correspondence to the Executive Director of August 26, 2014. As reiterated hereinbelow, neither the Board nor Union teams have exchanged any proposals with respect to wages, hours, and other terms and conditions of employment.

School District 60 responds to the LCFT's correspondence of August 26, 2014, as follows:

1. That the LCFT has failed to comply with the provisions under Section 12(2) of the Act.

2. That the following chronology of events have led to neither the Board nor Union negotiating teams exchanging any proposals before a scheduled mediation date of September 18, 2014:

a. June 5, 2014, the LCFT had requested mediation to initiate any negotiations with School District 60.

b. June 25, 2014 – consistent with the previous tentative agreement reached between the Board and Union teams for the 2013-2014 salary opener negotiations, a meeting with the Union and Board representatives was held to discuss the formulation of a salary schedule committee.

c. June 27, 2014 – representatives from the Board and Union further discussed the composition of a salary schedule committee.

d. July 8, 2014 – first meeting of the salary schedule committee is convened and the Board representatives submitted a salary schedule model for consideration and discussion with the LCFT. The LCFT did not submit an alternate model nor did it respond to the District's model.

e. July 15, 2014 – federal mediation is commenced in which the Board and Union negotiating teams exchanged proposals on ground rules for negotiations/mediation.

f. July 17, 2014 – federal mediation is convened in which the Board and Union teams further discussed and exchanged proposals and counter-proposals on ground rules for mediation/negotiations.

g. August 5, 2014 – the salary schedule committee convenes with a mediator present to discuss and establish common interests between the parties for a possible recommendation to the Board and Union negotiating teams for an alternate salary model.

h. August 7, 2014 – the federal mediator meets with the salary schedule committee to further discuss components of a salary schedule model.

i. August 14, 2014 – the federal mediator is present for a salary schedule committee meeting wherein the Union rejects the Board model and withdraws its own model as presented. The Union's model is comprised of eliminating the salary schedule, however conditioned upon neither the Board nor Union teams exchanging any proposals other than a salary schedule and allowing for the release of the Union President to conduct Union business during school day without any classroom assignments.

j. September 18, 2014 – a mediation session is scheduled in which the Board and Union teams will exchange a full package of proposals.

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At this time, School District 60 is not in the position of making public any offers and cost summary of those issues which the parties have failed to reach.

Very truly yours,

HINSHAW & CULBERTSON LLP

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cc: Dr. Donaldo Batiste, Superintendent, Waukegan School District 60
Dr. Mary Lamping, Deputy Superintendent/Chief of Staff, Waukegan School District 60
Mr. Thomas Jeffery, Commissioner
Ms. Michelle Standridge, Field Service Director
Ms. Kathy Schwarz, LCFT President
Mr. Tom Morris, General Counsel, Waukegan School District 60