

TIPS FOR SUBMITTING COMMENTS TO THE NLRB ON THE PROPOSED RULE CHANGES FOR STUDENT EMPLOYEES

- All comments must be received by the NLRB by January 15th
- For organizing purposes we ask that you submit your comment by December 6th
- Please submit all comments on our website, aftacademics.org/weareworkers
- Send any attachments you would like to include with your comment to info@aftacademics.org
- Comments may be submitted in any language you speak

HOW DO WE WRITE THE MOST EFFECTIVE COMMENTS POSSIBLE?

Comments **must be unique** to be counted. The best comments will be **specific to your experience** or your knowledge of others' specific experiences as graduate teachers and researchers.

GENERAL SUGGESTIONS

- Directly address the rule—e.g. “Any rule on this topic should recognize that I am an employee” or “The rule should acknowledge that people who do what I do are employees”
- Describe details of the work you perform at your university—e.g.:
 - Teaching: how many students you teach; what you teach and how it helps students fulfill requirements; specific work duties (class time, office hours, commenting/grading, etc.); how much your students rely on your work
 - Research: area in which you perform research; variety of duties in your lab/research group; how your work contributes to the overall research objectives of the lab/research group and helps generate grant funding.

SUGGESTIONS FOR RESPONDING TO SPECIFIC ARGUMENTS IN THE PROPOSED RULE

The best comments will directly address the NLRB's arguments about why we are not workers. Below are a few key quotes from the rule and some questions to prompt responses to them.

“[t]he Act was intended to accommodate the type of management-employee relations that prevail in the pyramidal hierarchies of private industry.” (p. 5)

- Do you have examples from your experience of work-related issues (teaching/research assignments, wages, health care, grievance procedures, etc.) being determined by administrators rather than your faculty mentors?

“Students spend a limited amount of time performing these additional duties because their principal time commitment is focused on their coursework and studies.” (p. 13)

- Do you have examples of spending substantial time on teaching and research, including outside your field, that in fact distracts from coursework and studies?

“Further, with regard to remuneration, students typically receive funding regardless of the amount of time they spend researching or teaching, and only during the period that they are enrolled as students.” (p. 13)

- Has your pay or funding been tied to your teaching or research work?

OTHER QUESTIONS YOU MIGHT ANSWER:

- How does your work advance your university's overall research and/or teaching operations?
- How does your work benefit your university economically?
- How would this rule inhibit development of fair procedures for sexual or racial harassment?
- How could you or do you already benefit from collective bargaining?
- Has your university's refusal to bargain led to disruption?