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One Person, One Vote, One Time?

Re-election Votes Hold Unions Accountable to Their Members

By James Sherk

Executive Summary

Unions exercise considerable power in the workplace. As the sole collective bargaining representative for a unionized workforce, unions negotiate wages, benefits, and working conditions. Yet the vast majority of union members had no say in selecting their union representatives.

As a general rule, unions do not periodically stand for re-election. After being certified they remain workers' representatives indefinitely. Most major Ohio unions have represented the same workplaces for decades. The Columbus Education Association, for example, has bargained for Columbus Public School teachers since 1968. Virtually all of the teachers currently in the district have been hired since then. They – like most Ohio union members – inherited union representation that a previous generation of employees once thought was a good idea.

In theory, unionized workers can vote to decertify an unwanted union. In practice, however, navigating the decertification process is difficult. The Ohio State Employment Relations Board received just 14 validly submitted decertification petitions in the past three years. Very few Ohio unions face electoral accountability to the workers they represent.

Consequently, unions do not have to cultivate workers' support to remain their representatives. Polling shows considerable dissatisfaction among union members with the quality of their union representation. Almost three-quarters of union members say they want their unions held more accountable to the rank-and-file, and 82 percent of union members support holding union votes where members can maintain or replace their union.

The Ohio General Assembly has little authority over private sector unions under federal law, but it can provide for a greater degree of accountability for state and local government unions by requiring them to periodically stand for re-election and give workers voting rights. New re-election requirements would provide a regular opportunity for government employees to assess their union's performance. Holding periodic elections would likely improve the public unions' representation, give all members a voice in their union, and afford workers the right to vote. Additional legislative steps could be taken to further improve union accountability. The legislature could require, for instance, that unions win an overall majority of the workforce or win an election with a minimum quorum of support, such as an election with at least 50-percent turnout. Such changes would force unions to cultivate support across the broader workplace, rather than by mobilizing only a small core of supporters.

Meaningful representation does not mean one man, one vote, one time. Today's union members should have the freedom, opportunity, and right to vote on whether to be unionized.

Introduction

Members of Congress do not stay in office indefinitely. They must stand for re-election to remain voters' elected representatives. Not so with labor unions. Once formed, unions do not stand for re-election. As a result, very few Ohio union members ever voted for union representation.

Regular elections hold politicians accountable and give workers real voting rights. The fear of being removed from office motivates them to serve their constituents. The absence of union re-election votes diminishes the quality of representation that Ohio union members receive. Unions can spend their dues inefficiently with little fear of losing their status as bargaining representative.

Meaningful representation does not mean one man, one vote, one time. Ohio should require state and local government unions to periodically stand for re-election to give union members the right to vote for their union and its leadership.

Inherited Unions

Unionized employees may not directly negotiate wages, benefits, or other working conditions with their employers. Instead, union representatives negotiate on their behalf. Whether a worker supports the union and its priorities or not, the union negotiates their contract. Representing the workers, the union decides what provisions to press for and which concessions to make.

However, few union members ever chose this representation. Only 7 percent of private sector union members voted for their union.¹ The vast majority of active union members are represented by a union that they never selected. This happens because the National Labor Relations Act – which regulates private sector unions – does not require unions to stand for re-election.

Consider General Motors. The United Auto Workers (UAW) organized the labor force at GM in 1937. No current GM employees voted for the union's representation. They inherited the union that their fathers or grandfathers chose before World War II – two generations ago.

The same dynamic applies to Ohio government employees. The legislation requiring collective bargaining in Ohio's state and local governments took effect in 1984.² It provided for one-time secret ballot votes on unionizing government agencies. Once formed, these unions do not regularly stand for re-election. Moreover the legislation grandfathered in any unions already engaging in collective bargaining. For example, the Columbus Education Association (CEA) formed in 1951 and began negotiating collective bargaining agreements in 1968.³ After the legislature mandated collective bargaining in 1984, the CEA was grandfathered in as Columbus teachers' bargaining representative without a secret ballot election. The CEA represents almost everyone currently teaching in Columbus Public Schools without ever asking for or receiving their consent to do so.⁴

Under both federal and state law, unions in Ohio need only win one election to represent employees in a workplace. After that it remains unionized indefinitely. New employees inherit the union for which previous employees voted. Most Ohio union members joined their union this way.

This once-and-for-all election system stands in sharp contrast to national and state political representatives. Members of Congress and the Ohio General Assembly do not serve for life. Members of the House of Representatives in Washington, D.C. and Columbus must run for re-election every two years, while U.S. senators must run again every six years and, in Ohio, every

four years. Both the President of the United States and the Governor of Ohio serve four-year terms. Elected officials must renew their mandates to continue to represent their constituents. This keeps them accountable.

Barriers to Change

Ohio workers can petition for a decertification election to remove an unwanted union. However, both state labor law and labor unions make requesting another vote extremely difficult. To call for an election, workers must collect signatures from 50 percent of the government employees in the bargaining unit.⁵ This is much higher than the comparable requirements for political office in Ohio. Candidates for governor and state senator in Ohio must submit 1,000 signatures to get on the state-wide ballot – or approximately 0.013 percent of the 7.8 million registered voters in Ohio.⁶

Moreover, workers may only submit this petition in a 30-day window: between 120 and 90 days before their collective bargaining agreement expires.⁷ The National Labor Relations Board (NLRB) imposes similar restrictions on private sector union members.⁸ This typically leaves workers only a one-month window every three years in which to ask for a vote. That window expires before the new contract gets negotiated. Workers upset with their union’s representation must typically wait years before they can attempt to remove it.

The government rigorously enforces these restrictions. Neither the NLRB nor the Ohio State Employment Relations Board will process decertification petitions submitted even a few days late. For example, on December 3, 2014, a majority of Medina County Highway Engineers petitioned the Ohio State Employment Relations Board to remove Teamsters Local 436 as their bargaining representative. However, their “window period” expired on November 30. Because the workers filed three days late the state dismissed their petition and did not allow them to vote.⁹ These rules make triggering an election challenging – especially in a large unit.

This narrow election window primarily exists to provide stability for unions by ensuring that they do not need to fear being removed in the middle of a contract. Unfortunately, these kinds of procedural protections make it much harder for workers to hold their union accountable.

Union Opposition

Workers who try to navigate these procedures will face significant union opposition. A successful decertification means their union no longer takes 1 to 2 percent of employees’ pay as dues or a different union will now collect the dues. So unions strenuously fight decertification campaigns. Workers trying to change their union representation often report harassment from union activists. As an employee at a Nevada hotel and casino explained to reporters: “[A] lot of people are scared about supporting the petition because the union would harass them. . . . [T]he union supporters would call us names, use vulgarities. They called us liars and said we are trying to take workers’ pensions away and that the union will give job security.”¹⁰

Most unions also formally penalize workers who try to remove them as their bargaining representative. For example, American Federation of State, County, and Municipal Employees (AFSCME) Local 4 represents about 40,000 Ohio government employees. Local 4’s constitution prohibits “engaging in or supporting activities directly against the purposes set forth in this Constitution” or “assist[ing] a competing organization within the jurisdiction of this Union.”¹¹ Local 4 members who support decertification face fines of up to a year’s worth of dues – several

hundred dollars – or expulsion from the union.

These punishments have real workplace consequences, in addition to the financial costs. Only union members can vote in elections for union officers, and only union members vote on whether to ratify a new contract. If a worker supports a decertification drive and their union is not removed, they lose their voting privileges. The union will still represent them, and the worker will still be covered by the collective bargaining agreement, but they will no longer have any say in the process. Such workers face the prospect of having even less of a voice on the job than they had before.

Re-election Votes Rare

These obstacles make further elections after a union’s first certification extremely rare. Ohio’s state and local governments contain more than 3,100 collective bargaining units covering almost 300,000 government employees.¹² Across these units the Ohio State Employment Relations Board received just 14 validly submitted decertification petitions in calendar years 2013, 2014, and 2015.¹³ During that same three-year period every member of the Ohio House of Representatives and half of the state Senate stood for election.

When given the opportunity, many government employees opted for change. Unions prevailed in only three of those 14 re-election efforts.¹⁴ But the vast majority of Ohio government employees never got the opportunity to vote on union representation. Their unions will continue to represent them as long as they tolerate it enough not to fight for another vote.

Unaccountability Means Worse Representation

Inherited representation and a difficult election process mean that unions have little fear of being fired. This makes them less responsive to their members’ concerns. Once formed, unions almost never have to earn their status as bargaining representatives again. Limited electoral accountability reduces unions’ institutional incentives to represent their members well. Failure has few consequences – for the union. Whether the union creates better working conditions or not, it is unlikely to be removed from the workplace.

Union Member Dissatisfaction with Their Union Representation

Percent of private sector and government union members who:

- Approve of America’s union leaders: 43%
- Disapprove of America’s union leaders: 45%
- Believe union officers primarily look out for themselves: 66%
- Believe union leaders should be held more accountable: 72%
- Think union dues are too high for the value they get from them: 57%
- Consider union leaders overpaid: 63%

The Word Doctors, “Benchmark Study of Union Employee Election Year Attitudes,” October 2010, questions 13, 32-35, <http://www.nrtwc.org/FactSheets/2010NationalRightToWorkLuntzUnionMemberSurvey.pdf>. The survey used a representative sample of 760 union members with a margin of error of plus or minus 3.7 percent.

Polling unsurprisingly shows widespread dissatisfaction among union members with their union representation. More union members disapprove than approve of the job union leaders do. Two-thirds believe union officers primarily look out for themselves. Over three-fifths consider union executives overpaid. Most members think they pay too much in dues for the value they receive. Almost three in four union members want unions held more accountable to the workers they represent. This dissatisfaction has its roots in the lack of real accountability that unions have toward their members.

Misspent Dues

Seldom standing for re-election reduces the pressure that unions face to spend dues wisely. Politicians often lose elections for spending tax dollars foolishly. Unions rarely face similar constraints. They know that removing their representation is prohibitively difficult. If unions operate inefficiently they can simply pass those costs on as higher dues. When unions spend their members' dues on unpopular causes – like political campaigns – they almost always remain their representatives. The lack of accountability through re-election votes makes unions less responsible stewards of their members' money.

For example, polling shows that 57 percent of union members say they do not get enough value for the dues they pay.¹⁵ Similarly, polls also show that most union members do not like seeing their dues spent on politics. Fully 60 percent of union members oppose such spending on their behalf.¹⁶ But this rank-and-file opposition does not deter unions from collectively spending well over \$1 billion on politics and lobbying each election cycle.¹⁷ In 2014, the AFL-CIO national headquarters spent more than one-fifth of its budget on such activities.¹⁸

If unions had to stand for re-election they would be more circumspect with their members' money. Union executives would have to consider the effect that spending dues on unpopular causes would have on the unions' re-election chances.

Inflated Union Salaries

Similarly, the fact that unions do not regularly stand for re-election allows for inflated salaries for union executives. Becky Higgins, president of the Ohio Education Association (OEA), made \$209,000 in 2015. That year OEA Vice-President Scott Dimauro made \$192,000 while the union paid John Grafton \$153,000 in 2015 for working as a “political advocate.” All told, 115 OEA officers and staff made over \$100,000 in 2015.¹⁹ Ohio union members also paid John Lyall \$159,000 for work as president of AFSCME Council 8, and another \$17,000 for work as a vice president at the AFSCME national headquarters.²⁰ Lennie Wyatt makes \$292,000 as president of the United Food and Commercial Workers Local 75 representing hourly workers at grocery stores in Cincinnati and Dayton.²¹ These cash earnings come on top of non-cash benefits and deferred compensation. They are considerably more than virtually all Ohio teachers, state employees, or grocery store clerks make.

These high salaries may well be justified. But regular re-election votes would require unions to make that justification to their members.

Officer Elections Insufficient

Though unions do not institutionally stand for re-election, union executives do. The Labor-

Management Reporting and Disclosure Act (LMRDA) requires periodic secret ballot elections for private sector union officers. Ohio law requires government unions to do the same.²² Unfortunately, these officer elections are structured in such a way as to minimize accountability to the rank-and-file.

Incumbent union officers hold overwhelming advantages in officer elections. Most union locals span multiple employers. Challengers need support from employees in other worksites with whom they never interact. This makes mounting an insurgent campaign very difficult. The typical union voter recognizes their incumbent officers but has no idea who the challengers are.

Moreover, officer elections provide no accountability to non-members forced to accept union representation. The Supreme Court has ruled that unions cannot force workers in non-right-to-work states to pay for their political activities.²³ Workers have a First Amendment right to resign their union membership and pay only the portion of union dues that cover representational activities. Since these “agency fee payers” do not belong to the union they – understandably – cannot vote in officer elections. But the union continues to represent them and negotiate on their behalf. Officer elections exclude the workers’ most dissatisfied with their union’s representation.

These factors make most union officer elections uncompetitive and very few workers – typically fewer than 20 percent – vote in them. Given the procedural hurdles and advantages for incumbent officers, it is not surprising that incumbent union executives very rarely lose re-election and have little accountability to their members. Union executives often get re-elected repeatedly without opposition and often anoint chosen successors upon their retirement.²⁴

But even replacing the incumbent officers running a local union typically has a limited effect on union policies. Most union policies get decided by statewide or national union bodies, not local chapters. These higher bodies also spend the majority of union dues. For example, each union teacher in Ohio pays approximately \$700 a year in union dues. Of that amount, their local union spends approximately \$200, the Ohio Education Association (OEA) spends \$300, and the National Education Association spends \$200.²⁵ Dissatisfied Ohio teachers who replaced their incumbent local officers could only influence spending of one-third of the dues they pay. They could not reduce the six-figure salaries the OEA pays its statewide staff. Nor can they prevent the NEA or OEA from spending their members’ dues on political activities.

Rank-and-file members often have little influence over the selection of these statewide and national union officers. The largest and most successful unions insulate their senior executives from accountability through indirect officer elections.²⁶ For example, an assembly of more than 1,000 delegates from locals across Ohio selects the Ohio Education Association president. To change their statewide leadership, teachers cannot simply urge their co-workers to vote against their president or campaign for a challenger. They must instead win hundreds of low-profile local delegate elections.

Moreover, the constitutions of most major unions allow state or national bodies to place local chapters in trusteeship. Union presidents facing challenges to their leadership from unhappy locals have the power to take them over. This strongly discourages local officers from attempting to unseat statewide or national union presidents.²⁷

Economists have found these indirect officer elections largely insulate state and national union executives from accountability to the rank-and-file. The indirect election structure frees them

to pursue policies that their members dislike but which benefit the union institutionally – such as charging higher dues and spending more on organizing and lobbying.²⁸ Union’s institutional structures allow them to take their members for granted.

Even senior union executives acknowledge this. Unions began massive outreach campaigns to their members in preparation for a recent Supreme Court case – *Friedrichs v. California Teachers Association*. The case nearly made all government workplaces right-to-work environments.²⁹ The Washington Post asked AFSCME President Lee Saunders why the union hadn’t actively reached out to their members before. Saunders explained that: “I think we took things for granted. We stopped communicating with people, because we didn’t feel like we needed to.”³⁰ In the face of such startling admissions, it is unfortunate that Ohio law does little to hold unions accountable to the workers they represent.

Accountability Through Worker Voting Rights

Congress and state legislatures can make unions more accountable by requiring unions themselves – not just their officers – to periodically stand for re-election. Such votes would give every worker represented by a union a chance to weigh in on its representation as a whole – not just the job their local officers do. They would allow dissatisfied workers to exit their union entirely, rather than simply exercising a limited voice within it. Worker voting rights would also give workers a chance to periodically reassess the costs and benefits of union representation by allowing more frequent re-election votes. Even well-run unions may offer services that workers do not want.

During organizing campaigns unions make optimistic promises about improving working conditions. They also downplay the downsides of collective representation. Unions actually train their organizers to deflect questions about subjects they know will turn workers off.³¹ As with political campaigns, the reality after a union election may not live up to the campaign rhetoric. Only after the election do the workers experience the true costs and benefits of union representation firsthand.

Union dues are an obvious cost of union representation, typically costing employees several hundred dollars per year, but collective bargaining has less obvious “costs” as well. Chief among these is the fact that collective representation inherently ignores individual performance. Collective bargaining agreements (CBAs) are exactly that – collective contracts. One contract sets the pay for hundreds or thousands of employees. They cannot and do not reflect individual performance or achievement. Instead, union contracts typically base pay, promotions, and layoffs on seniority. Unions rarely allow employers to reward workers with individual raises or bonuses. As a Heritage Foundation report explains, this is out of step with what many modern workers want:

One-size-fits-all CBAs were workable when all workers brought essentially the same skills to the bargaining table – individual skills and effort do little to distinguish workers on the assembly line. But the nature of work in the economy is changing. Employers are automating many rote repetitive tasks. The fastest growing job sectors are positions requiring individual skills: professional specialty, executive and managerial, and technical and sales jobs.

At the same time, employers are also flattening the job hierarchy. The line between

management and workers is blurring. Employers increasingly expect workers to exercise independent judgment and take initiative on the job. The unique skills of individual financial planners, web developers, or medical specialists do not lend themselves to general representation. Employers want to reward – and employees want to be rewarded for – individual contributions that no collective contract can reflect. Private-sector union membership has fallen sharply because workers’ demand for union representation has decreased.³²

Many workers may find that they do not want general representation – even if union executives manage their local prudently. In fact, union contracts repel some workers so much that many top performers quit after their employer unionizes; they prefer to work for a firm that rewards their individual merit and productivity.³³ Periodic union re-election votes would let workers regularly reconsider whether the benefits of collective representation outweigh the costs.

Union Members Overwhelmingly Support Re-election Votes

Americans overwhelmingly support the idea of holding union re-election votes. Polling shows that 84 percent of Americans favor requiring “all unionized workplaces to hold a secret ballot referendum periodically to determine whether the employees wish to remain represented by their current union.” Union members are equally emphatic: 82 percent of union households agree with that statement.³⁴ Union executives might not welcome the accountability elections would bring, but their rank-and-file members do. Union members want voting rights to hold their leadership accountable to the needs of the members.

State Reforms Possible

Although most Americans favor the idea of union re-election votes, it faces an uphill climb in Congress. Congress almost never amends the National Labor Relations Act (NLRA). The last substantive modification to it came in 1959. Since then, neither liberals nor conservatives have been able to defeat a Senate filibuster and significantly amend the act. This dynamic seems unlikely to change anytime soon. But the NLRA applies only to the private sector. Thus, state legislatures can give government employees the right to vote on their union representation. States have the freedom to regulate their state and local government unions as they see fit. Until recently few state legislatures considered this possibility.

The NLRA allows unions to remain workers’ representatives indefinitely unless removed via decertification. Most state labor laws simply copied that example. The idea of letting workers regularly vote on re-electing their union historically received little attention. Then, in 2011, both Tennessee and Wisconsin required most of their government unions to regularly stand for re-election. Wisconsin Act 10 included a provision requiring government unions to run for re-election annually.³⁵ Wisconsin also required unions to cover the expense of these elections (which proved minimal – approximately \$1.50 per voter).³⁶ A 2011 Tennessee law required education unions to stand for re-election approximately once every three years.³⁷

Most Wisconsin unions have won these re-election votes, but the opportunity to vote has resulted in a non-trivial number of unions getting decertified. For example, in the 2013 school district elections, Wisconsin unions lost 73 of the 406 elections they contested. As a result, 5,300 education employees elected to stop engaging in collective bargaining – 9 percent of all

unionized education employees in the state.³⁸

Election Structure

States that implement union re-election votes should carefully think through their election structure. To ensure meaningful accountability they should require unions to demonstrate broad support throughout the workplace – not simply a majority of those who turn out to vote. Otherwise unions could focus their efforts on turning out the vote of a small minority of committed activists and ignore the needs of the broader rank-and-file.

This happened to many families in Michigan. The Service Employees International Union (SEIU) petitioned for an election among 43,000 home health care aides reimbursed by the state. Many of these “employees” were parents taking care of their disabled children. The state conducted a mail-in election, in which only 20 percent of home care aides participated.³⁹ Most parents thought the ballots were junk mail and threw them out. The SEIU, however, mobilized its supporters and won a majority among the 20 percent who voted. Parents with disabled children soon found union dues being taken out of their Medicaid payments when they had no idea an election had even taken place.⁴⁰

Many complained that the SEIU provided them no services for the over \$350 a year it took in dues. As one frustrated parent told reporters: “We’re not getting anything from them (SEIU). We’ve tried to contact them, and they don’t even bother to respond. I don’t even know what they could do to help. Considering the dues money we’re sending them, maybe they should come over and babysit our kids so we could have one night out.”⁴¹

The SEIU ignored these parents’ needs because it did not need their support to remain their representatives. To hold unions meaningfully accountable states should require them to surpass a minimum threshold of support. Wisconsin and Tennessee both required unions to obtain the support from a majority of all employees, not just a majority of voters. Alternatively, states could require a quorum to participate in the election for the union to win. For example, states could require unions to win a majority of the vote in an election in which at least 50 percent of eligible voters participate.

Such measures would prevent a small minority of employees from imposing a union on an entire workplace or workforce. If a union can muster only the votes of 20 percent of workers – even if they are the only ones who show up at the polls – it should not negotiate for and take dues from all employees.

A quorum requirement differs from the structure of political elections, where candidates need only obtain a majority of votes cast – not a majority of the overall electorate. Elections to political office are structured this way because someone must fill the political offices. The state of Ohio does not have the option of going without a governor or an attorney general. The same is not true of workplace representation. Workers can represent themselves; the vast majority of U.S. workers do so.

A quorum requirement would be similar to the Ohio Constitution’s requirements for enacting legislation.⁴² A majority of the members of the legislature must be present for a bill to pass. A dozen legislators cannot pass a bill, even if they are the only legislators who show up to vote that day. The same common sense principle should apply to union elections. States can function without passing

new laws, and workers can work without union representation. Quorum requirements in both contexts help to prevent a tiny minority from imposing their preferences on the majority.

Conclusion

Unions legally represent workers, but the vast majority of union members never voted for union representation. Under federal law, once a private sector union organizes a workplace it need never stand for re-election. Most union members inherited representatives for whom they never voted. Union members should have the freedom to regularly decide whether to remain unionized. Such re-election votes would make unions more accountable to their members. They would force union leaders to serve their members' interests instead of pursuing their own priorities. Workers deserve the ability to hold their union regularly accountable. Meaningful representation does not mean one man, one vote, one time.

About the Author



As research fellow in labor economics at The Heritage Foundation, James Sherk researches ways to promote competition and mobility in the workforce rather than erect barriers that prevent workers from getting ahead.

Sherk, who joined Heritage in 2006, frequently testifies before committees of Congress on labor policy issues. He has testified before the House Education and Workforce Committee, Oversight and Government Reform Committee, the Joint Economic Committee, and the Senate Health Education Labor and Pensions Committee.

Sherk has also testified before state legislatures across the country, including the Wisconsin legislature as it debated passing right to work.

His testimony identified errors in union-backed studies claiming right-to-work laws lower wages. Sherk explained to legislators that correcting these errors shows right-to-work laws have no negative effect on wages but do increase employment.

Sherk's commentary and analysis have appeared in publications such as the Wall Street Journal, the Washington Post, USA Today, Washington Times, Business Week and Roll Call. CNN, Fox News Channel, CNBC, and PBS are among the TV news outlets to feature his analysis of pressing labor issues.

Sherk completed graduate studies at the University of Rochester, where he received a master of arts in economics with a concentration in econometrics and labor economics. He also holds a bachelor's degree in economics and mathematics from Hillsdale College in Hillsdale, Michigan. Sherk resides with his beloved wife in northern Virginia.

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35. 2011 Wisconsin Act 10, §242.
36. Priya M. Abraham, “Bringing Democracy to Pennsylvania Labor Unions,” Commonwealth Foundation Policy Brief, January 2016, page 6 at http://www.commonwealthfoundation.org/docLib/20160119_UnionDemocracyPolicy-Brief2016_CFN1JWW1_1.pdf

37. The Tennessee Professional Educators Collaborative Conferencing Act of 2011 requires a majority of public school teachers to vote to engage in “collaborative conferencing” before any discussions with employee representatives can begin. If they do the union may negotiate a binding memorandum of understanding with the school board that lasts up to three years. If the union and school board cannot come to an agreement the school board may adopt the policies it prefers. Once the memorandum expires it takes another vote to re-start this process.

38. Author’s analysis of data from the Wisconsin Employment Relations Commission, “Votes cast in 2013 annual school elections.” Available online at <http://werc.wi.gov/Home/electionUpdates.aspx>

39. Suzanne Lowe, “PERA BARGAINING UNIT EXCLUSION S.B. 1018 (S-1): ANALYSIS AS PASSED BY THE SENATE,” Bill Analysis, Michigan State Senate Fiscal Agency, March 28, 2012, at <http://www.legislature.mi.gov/documents/2011-2012/billanalysis/Senate/pdf/2011-SFA-1018-B.pdf>

40. The Mackinac Center for Public Policy, “The SEIU in Michigan: Home Health Aides,” July 7, 2011 at http://www.youtube.com/watch?v=G4g9ILNUr_8

41. Jack Spencer, “Parents Forced to Pay Union Dues,” Michigan Capitol Confidential, November 9, 2011 at <http://www.michigancapitolconfidential.com/16001>

42. Ohio Constitution, Article II, §6.

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