



May 19, 2023

Burke,

We have reviewed management's April 7<sup>th</sup>, 2023 response to our renewed information request. Unfortunately we have yet to receive responsive documents for a number of items, many of which were previously renewed. We are again renewing the following requests at this time:

**Items (j) and (k) for #2, #3, #4 of the coalition's February 13, 2023 request, previously renewed on March 24, 2023:**

These requests included the cost of pay premiums and differentials (item j) and the source of funds for each position (item k) for Local 21 units as well as ABMEI and MEF. We have not received the remaining items detailed in (j) and (k) and we are renewing these requests at this time.

Accurately understanding pay premiums, many of which are percentage based and may increase with salary adjustments, is critical to our ability to cost proposals. Additionally, understanding the source of funds for positions is critical to our union coalition's collective understanding of the employer's ability to pay. The city's budget contains a diverse array of funds, some of which are able to achieve full cost recovery for staffing expenditures and wage increases. Understanding the source of funds for payroll is essential in understanding the extent to which any negotiated agreement impacts the general fund as compared to other funds over which the city exercises more direct control and ability to achieve cost recovery such as but not limited to enterprise funds, fees, fines, permits, or ballot measures with the discretionary ability to adjust for inflation.

In addition, management's partial response seems to suggest that there is a difference between the premium pay amount budgeted and the premium pay amount actually received. We are also requesting clarification of why budgeted pay premiums for employees are different from the pay premiums actually received and would like to be provided with a copy or description of any policies regarding the budgeting of premium pays and differentials.

**Item #5, requested February 13, 2023, renewed March 24, 2023:**

This request was for a list of citywide vacant positions and the amount budgeted for each vacancy (item 5 c). Management's April 7<sup>th</sup> response provides a list of citywide vacant positions and asks that the unions perform our own calculations of estimated cost by inferring that for most positions (but not all), the lowest salary for the classification and the tier 2 pension are budgeted. Management's response suggests that even these calculations would be speculative and possibly not accurate for each vacant position. In prior responses to similar information requests, management has provided budgeted pay data for each vacancy as requested. In our March 24 response to management, we provided examples of responsive documents from prior information requests. This data has previously been provided to us for multiple years, including 2014, 2015, 2016, 2017, and 2018. Management's April 7<sup>th</sup> response does not provide any reason why this data, which has clearly been provided in the past, cannot be provided now and so we are renewing this request at this time.

We would also like to note that the mayor's proposed budget utilized cost savings from the over 900 vacant positions in the city as a balancing measure and that on April 12<sup>th</sup>, management presented financial information to IFPTE Local 21 which showed that the city's own financial forecasts assumed approximately \$30 million in additional fund balance (surplus) would be recognized each year, largely



due to forecasted vacancy savings. Understanding the full potential extent of vacancy savings and the accuracy of these forecasted savings is critical to discussions of economic matters and the city's ability to pay and in order to understand the extent to which these savings may align with forecasts, we must understand the amount budgeted for vacant positions.

**Item #6 requested February 13, 2023, renewed March 24, 2023:**

This request was for all approved Temp-U and retiree rehire requests, including job titles, rate of pay or monetary value of the request. Hourly rates of pay have been provided, however no information regarding the total monetary cost has been provided. As stated in our March 24 renewed request, we are requesting these items in order to understand the extent to which the city has resorted to hiring temporary or retiree rehire staff to perform services and work duties that overlap with areas where the city is experiencing difficulty in recruitment and retention. The data provided, while it includes the hourly rate, does not include the total amount of hours or the total monetary cost, which are necessary to understanding the actual amount of time billed and utilized and total cost of these hires. We are renewing this request and ask that either the total hours paid/billed or the total monetary value of each request be provided.

**Item #10 requested February 13, 2023, requested amended and renewed on March 24, 2023:**

In recognition that management was not able to provide potentially identifying race and gender data for individual employees, our amended request on March 24, 2023 asked for both median and average MPP data for each race/ethnicity category tracked in the city's system, differentiated by gender. A data table was provided in management's April 7<sup>th</sup> response, however it is not specified what the data contained in the table is. The amended request was for both averages and medians, it appears that only one of these data points has been provided though it is not clear which. Therefore, we are renewing this request for both average and median data by race/ethnicity category differentiated by gender.

Please note that I am renewing all of these requests on behalf of our labor coalition, including IFPTE Local 21 represented units, MEF and ABMEI. We ask that management provide responsive documents within 10 calendar days of receipt.

Thank you,

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