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Brian Wood, UCHWU

Thank you for this opportunity to provide written comments on the updates rule making with respect to PROPWA.

In the last rules making sessions (11.2023) and the guidance offered by CDLE on how the rules will be implemented (INFO 15C), there is no mention of providing individual complainant name and information to their employers when filing ULPs under PROPWA. In fact, doing so would negate both the letter and spirit of PROPWA to protect workers' rights as outlined in SB111 and the follow up legislation under consideration here.

Nonetheless, now that the CDLE is funded to handle PROPWA complaints and complaints are being submitted, the CDLE is reporting to us in UCHWU that individual names and contact information must be shared in the complaint, which is absolutely no problem so that we can help with the complaint investigation, but the CDLE has also stated that all of these individual names and contacts WILL be shared with the employer.

This totally negates the spirit and letter of PROPWA for workers, especially those in UCHWU working for UCHealth, where the management - worker relationship is under constant strain across the system due to persistent retaliation and harassment by UCH when workers perform any act that does not simply ascend to company policies. Moreover, the retaliation also routinely contains threats of termination, which poses considerable, downstream professional complications on licensed workers.

Therefore, there simply cannot be any department procedural or rule-making aspect included in the rules under consideration today that mandate sharing of complainant information with their employer, whether an individual or collective complaint is submitted.

In contrast, CDPHE works extremely hard to protect the anonymity of complainants and I see no reason CDLE should not operate similarly. Moreover, even in submitting these comments, this google doc is prefaced with the assertion that we can remain anonymous. Why can the CDLE not translate this same anonymity to ULP filings under PROPWA? It simply makes no sense.

Thank you for your time and attention.