



Employee/Labor Relations & Workforce Compliance

1500 NW 12th Ave, HR Suite 106W
Miami, FL 33136-1096
305-585-6771

February 11, 2023
VIA e-mail: Martha@seiu1991.org
Martha Baker, Executive Director

This Agreement is entered into this 8 day of March, 2023 by and between the Jackson Health System/Public Health Trust of Miami-Dade County (the "JHS") and the Service Employees International Union, Local 1991 ("SEIU").

WHEREAS, SEIU has filed a class action grievance (the "grievance") under the RN collective bargaining agreement between the Service Employees International Union, Local 1991 and the Jackson Health System/Public Health Trust of Miami-Dade County (the "CBA"), alleging a breach of the CBA for the failure to pay RNs assigned to Recovery appropriate differentials; and,

WHEREAS, the Parties desire to amicably settle the grievance on the term outlined below; and,

WHEREAS, the Parties, without any admission of liability or violation of the CBA, rule or regulation, desire to fully and finally settle all differences and disputes relating to the aforementioned claims;

NOW THEREFORE, in consideration of the mutual covenants contained herein, the Parties hereby agree to voluntarily enter into this MOU, which contains the following agreements and stipulations:

1. Beginning upon execution of this MOU by the parties, and moving forward, JHS agrees to pay employees assigned to Main Recovery Room (cost code 66107) at Jackson Memorial Hospital, whose shifts begin at 6:00 a.m. or earlier, the night shift differential, in the amount specified in the CBA, for all hours worked up to 7 a.m.
2. JHS further agrees to provide back pay to the employees named in this MOU below for the failure to pay the night differential as described in paragraph 1 above, retroactive to January 1, 2020. This payment shall be made within thirty (30) days of the execution of this Agreement. This provision shall set no precedent between the parties.

Odalys Bacallao RN	Lolita Iletto RN
Kimberly Benavides ANM	Yasmime Guerrier RN
Anirka Toledo RN	Veronica Alvarez RN
Nelda Amodia RN	Yulieser Oris Martinez RN
Rizalinda Lagazo RN	Kimberlee Branly RN
Jean Guerrier PRM CSN RN	Carol Tracey RN
Mayelin Alba RN	Lunel Milien RN
Tamara Cote RN	Fayon Walker RN

