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# The Unionization of Clerical Workers at Large U.S. Universities and Colleges

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# The Unionization of Clerical Workers at Large U.S. Universities and Colleges

## **Abstract**

[Excerpt] The unionization of clerical workers on college campuses is steadily increasing and becoming the subject of greater scrutiny. The National Center has long been interested in this facet of unionization and when we learned of the work of Professor Hurd in this area we expressed an interest in publishing his research. This article presents Hurd's and Woodhead's research on college and university clerical unionization.

## **Keywords**

unions, labor movement, organizing, higher education, clerical staff

## **Disciplines**

Higher Education | Labor Relations | Unions

## **Comments**

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## THE UNIONIZATION OF CLERICAL WORKERS AT LARGE U.S. UNIVERSITIES AND COLLEGES

Richard W. Hurd and Gregory Woodhead

**Editor's Note:** The unionization of clerical workers on college campuses is steadily increasing and becoming the subject of greater scrutiny. The National Center has long been interested in this facet of unionization and when we learned of the work of Professor Hurd in this area we expressed an interest in publishing his research. This article presents Hurd's and Woodhead's research on college and university clerical unionization. The views expressed herein are those of the authors and not necessarily those of the National Center. Richard W. Hurd Ph.D., is an Associate Professor of Economics at the University of New Hampshire and Gregory Woodhead a teaching fellow and Ph.D. candidate in economics at the same institution. Dr. Hurd taught previously at Michigan State University's School of Labor and Industrial Relations, and at American University. He was an economic policy fellow at the Brookings Institution.

concentrating on university clericals — the Service Employees International Union District 925, The United Automobile Workers (which has formed an Academic Council to coordinate its efforts), and the Communication Workers of America.

A major attraction of universities for union organizers is that campuses are openly accessible to the public. Because of this, university administrators have difficulty denying union organizers access to employees. A second attraction is the geographic stability of universities. Whereas some major service sector employers, such as insurance companies, have the option of relocating work to avoid unionization, universities are effectively tied to a specific location because of the type of service they offer. Such geographic stability is especially important since union representatives report that organizing is a slower process among clerical workers than among other groups of employees. The organizing is slow, in part, because clerical workers do not naturally identify with unions due to their male, blue-collar image. Union organizers view this as a problem of education to break down stereotypes. Another inhibiting factor which slows down clerical organizing is the close association in most workplaces between clerical workers and management. In a university, this barrier to organizing is complicated by the prestige society affords to faculty members. University clericals take special pride in their jobs due to their close working relationship with faculty.

Although prestige is a barrier and the organizing process is slow, union representatives feel that the time is ripe for university clerical

### INTRODUCTION

In recent years, the U.S. union movement has increased its organizing activity aimed at women clerical workers. Because of the changing structure of our economy, unions have been forced to realize that future membership growth depends on a successful shift of focus away from blue-collar clerical workers and towards white-collar workers in the service sector. Clerical workers account for a large portion of service sector employment, and most clerical workers are women. The AFL-CIO has recently endorsed increased attention to organizing clerical workers in the 1985 blueprint for the future, "Changing Situation of Workers and Their Unions." As unions have embarked on campaigns to organize women clericals, they have discovered a particularly receptive audience on university campuses.

The research reported in this paper grew out of a broader project on the unionization of clerical workers. Based on interviews with union organizers and a review of publications such as the Bureau of National Affairs' White Collar Report, it became evident that colleges and universities have been experiencing a disproportionate share of clerical worker organizing activity. Representatives of three unions specifically noted that they have been

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organizing. The 1980s have witnessed an era of substantial financial pressures in the academic community. University administrators have responded with a business oriented approach which has had a detrimental effect on the pay and workload of many clericals. In this environment, clericals have been receptive to the appeals of union organizers.<sup>2</sup>

In order to develop a picture of the actual extent (and results) of union organizing activity on campus, a questionnaire was mailed to personnel directors of the one hundred largest public universities and fifty largest private universities in the United States.<sup>3</sup> The questionnaire was mailed initially in May 1986, with two subsequent mailings to non-respondents in June 1986 and July 1986. The three mailings, plus follow-up phone calls, resulted in a 100% response rate.<sup>4</sup> The questionnaire sought to gather descriptive information on unions representing clerical workers on these large campuses, to determine the incidence of strike activity among these unions, and to examine the degree of organizing activity in universities where clerical workers are not represented by unions. The survey results are summarized in Tables 1-4.

## I. UNION STATUS

A complete list of clerical worker collective bargaining agents at the institutions included in our survey is provided in Appendix A.<sup>5</sup> The extent of unionization is summarized in Table 1. The descriptive data presented in Table 1 provide evidence to support the following observations.

Clerical worker unionization is more firmly established at public institutions than at private institutions. Overall, 52% of the large public universities included in our survey bargain with unions representing clerical workers, compared to 26% of the large private universities. Furthermore, the percent of campuses unionized is greater for public institutions in every geographic region, except West South Central where no clerical unions were reported. This result is consistent with the view expressed by union organizers that resistance to the unionization of clerical workers is typically more intense in private sector campaigns. Confirmation of the organizers' impressions was given at a conference of the College and University Personnel Association, where opposition to organizing was described as "worthwhile especially at a private school".<sup>6</sup>

Based on our sample, clericals employed at two-year colleges are more likely to be unionized than those at four-year colleges. This is not surprising since clerical work is more likely routine and less prestigious at a two-year college, increasing the appeal of unionization. This conclusion should be interpreted cautiously since our survey's large two-year colleges are disproportionately located in more heavily unionized regions of the country — East North Central and Pacific. Even in these regions, however, clericals at two-year colleges appear to be more likely to be represented by a union than are their counterparts at four-year colleges.

Locals of the following unions represent clerical employees as set forth in Table 1: AFSCME 19, SEIU 14, OPEIU 6, AFT 4, NEA 3, UAW 3, CWA 2, Independent 10 and other 6. The total number of locals exceed the number of unionized campuses because there are three separate locals representing clerical workers at Columbia University.

As evidenced by the year of certification, the unionization of university clerical workers is indeed a recent phenomenon. Of the unions listed in Table 1, 6 were certified in 1970 or earlier, 14 between 1971-1975, 19 between 1976-1980, 24 between 1981-1985 and 2 in 1986. Therefore, less than 10% of the bargaining units were certified in 1970 or earlier, with approximately 40% certified in 1981 or later. Although there is some indication that clerical worker unionization at large universities has stabilized with only two certifications in the first half of 1986, this should not be interpreted as a decline in overall organizing activity. More likely, unions are concentrating their efforts on smaller colleges and universities in those geographic regions where they have already established themselves on the large campuses included in our survey.

It comes as no surprise that the national unions with the largest number of university clerical locals are AFSCME, SEIU, and OPEIU. These unions have a long history of representing clerical workers, and this experience has undoubtedly aided them in organizing on college campuses. Similarly, two unions with substantial university experience representing faculty, AFT and NEA, have, in several instances, taken the natural step of extending their bargaining services to university clericals. The UAW and CWA, two unions with a focus on other industries, have established a base among university clericals.

A few pieces of information regarding union status which were included in the questionnaire, but not reported in Table 1, deserve brief mention. (1) The vast majority of university clerical locals attained bargaining rights via a representation election conducted by the appropriate government agency. However, in six cases (slightly under 10%) recognition was granted voluntarily without an election. (2) The membership of most units representing university clericals is either primarily clerical or a mixture of clerical with technical-professional employees. However, 26% of the bargaining units also represent blue-collar workers. (3) In most cases where bargaining is present, the proportion of clerical workers covered by the agreement exceeds 90%. However, on seven campuses (approximately 10%) the contract covered less than one-quarter of all clerical employees.

## II. ORGANIZING ACTIVITY

Summary data on union status and organizing activity for clerical employees on large campuses are reported in Table 2. For comparative purposes, data on unionization levels for the entire workforce by region are also included.

**TABLE 1**  
**UNION STATUS OF CLERICAL EMPLOYEES OF COLLEGES AND UNIVERSITIES**

Region	Public Institutions		Private Institutions	
	Union	Non-Union	Union	Non-Union
New England	2	0	2	4
Mid Atlantic	4	2	8	10
South Atlantic	3	11	0	7
E. South Central	1	4	0	1
W. South Central	0	11	0	3
E. North Central	14	12	1	7
W. North Central	2	4	0	1
Mountain	2	4	0	1
Pacific	23	0	2	1
Puerto Rico	1	0	0	2
Total 2-year colleges	20	9	1	1
Total 4-year colleges	32	39	12	36
Total U.S.	52	48	13	37

**TABLE 2**  
**CLERICAL EMPLOYEES OF LARGE COLLEGES AND UNIVERSITIES**  
**UNION STATUS AND ORGANIZING ACTIVITY BY REGION**

Region	Percent of Total Workforce Organized, 1982*	Union	Non-Union	Non-Union with
				Organizing Campaigns 1971-86
New England	18.5	4	4	4
Mid Atlantic	29.8	12	12	5
South Atlantic	12.4	3	18	4
E. South Central	16.9	1	5	1
W. South Central	13.2	0	14	0
E. North Central	28.2	15	19	8
W. North Central	20.9	2	5	1
Mountain	16.3	2	5	1
Pacific	26.8	25	1	1
Puerto Rico	12.0	1	2	0
Total 2-year colleges		21	10	0
Total 4-year colleges		44	75	25
Total U.S.		65	85	25

\*Source: U.S. Union Sourcebook, First Edition, 1985, Industrial Relations Data Information Services (data weighted by state population, 1982).

**TABLE 3**  
**UNION STATUS OF CLERICAL WORKERS AND FACULTY**  
**OF LARGE COLLEGES AND UNIVERSITIES**

		CLERICALS	
		Union	Non-Union
F A C U L T Y*	Union	38	9
	Non-Union	27	76

\*Source: Joel M. Douglas, Directory of Faculty Contracts and Bargaining Agents in Institutions of Higher Education, V. 12, NCSCBHEP (1986).

Research on clerical organizing in the private sector has established a statistically significant positive relationship between clerical worker votes for unions in NLRB elections and the overall level of unionization in the state. Clericals appear to be more supportive of unions when familiar with them and perceive the labor movement as vital. Table 2 indicates that a high level of overall unionization in a region also creates an environment conducive to organizing university clericals. With the exception of New England, the three regions with the highest proportion of unionized clericals on large campuses are those with the highest overall levels of unionization — Pacific, Mid-Atlantic, and East North Central. The two with the lowest proportion of unionized clericals on large campuses are the two regions with the lowest overall levels of unionization — West South Central and South Atlantic. Organizing activity on non-union campuses is relatively more prevalent in more unionized regions and vice versa.

As a check on the basic point being made here, the nine regions (excluding Puerto Rico) were ranked according to the percent of the total workforce unionized and the percent of large campuses with clerical unions. Based on these rankings, the Spearman rank correlation coefficient was calculated. Although a significance level cannot be determined because the rankings are for a population rather than a random sample, the Spearman coefficient of .768 is clearly very high by any standard and indicative of substantial correlation between university clerical unionization and the broader union environment.

New England deserves special comment because the proportion of its large campuses with clerical unions is relatively high, and all of the non-union campuses have been the target of organizing campaigns. This may appear surprising because of the modest level of overall unionization in the region. There are two reasons for this apparent anomaly. First, all eight large campuses are in southern New England, which has substantially higher levels of union membership than northern New England. This points out an important qualification. The broad regional categories reported here mask the existence of substantial variation in levels of unionization among individual states, and even within states. The most important environmental influence on university clericals will be the presence and vitality of unions in the local labor market.

Second, New England is a special case because the organization "9 to 5", the predecessor of both SEIU District 925 and the National Association of Working Women, started in Boston in 1974. The high visibility afforded to "9 to 5" by television and the press helped to stimulate interest in union organizing among New England clerical workers. Once "9 to 5" had established a strong base in Boston (originally as SEIU Local 925), other unions moved organizers into the region to take advantage of the fertile environment. In this regard, union representatives point out that momentum plays an especially important role in clerical worker organizing. A few

highly publicized successes in a city, state, or region help break down negative stereotypes of unions and attract the interest of clerical workers. In effect, the presence of unions on New England's large campuses is a spillover from the broader based clerical organizing going on in the region.

To return briefly to other information presented in Table 2, the unions involved in organizing on the non-union campuses are the same ones which already represent clerical workers on other large campuses as noted in Table 1. With respect to these campaigns, AFSCME was involved in 13, SEIU in 6, UAW in 3, CWA in 2, NEA in 1, OPEIU in 1 and others in 1. The total number of organizing unions (27), exceeds the number of organizing campaigns because in two campaigns there were two unions involved. Three of the organizing campaigns that resulted in no union occurred between 1971-1975, seven between 1976-1980, nine between 1981-1985 and six in 1986. Also consistent with Table 1, the information on the year of most recent organizing confirms the trend towards increased activity over time. Combining the numbers for union representation with organizing activity, of the 84 large campuses which have reported organizing activity since 1971, 59 now have clerical unions. Although the organizing process may be slow, this extraordinary 70% success rate helps explain why unions are attracted to university clerical employees. Of the six campaigns reported for the first half of 1986, five were still in progress in July 1987. Depending on the ultimate resolution of these cases, the 70% figure may eventually increase.

A final determinant of organizing success among university clerical employees can be assessed by combining our survey results with information regularly published by the Baruch College National Center. The cross tabulation exhibited in Table 3 helps us evaluate the relationship between the unionization of university clerical workers and the presence of a faculty union on the same campus. On 76% of the large campuses included in our survey, faculty and clerical workers are either both union or both non-union. This high degree of correspondence likely reflects a more positive organizing environment for clerical workers on campus where the faculty are unionized. This observation is supported by the fact that in 85% of the cases where both faculty and clerical workers are represented, the faculty union was organized in either the same year or earlier. Given the barrier to organizing created by the faculty prestige factor discussed in the introduction, the presence of a unionized faculty would clearly create a more sympathetic organizing environment for clerical unions. On another point, it is also interesting to note that for our sample, campus clericals are more likely to be represented by a union (43%) than are faculty members (31%).

### III. STRIKE ACTIVITY

Of the sixty-five large campuses whose clerical workers are represented by a union, only thirteen have experienced strikes since 1970. All fifteen strikes reported in our survey are listed in Table 4.

**TABLE 4**  
**LARGE COLLEGE AND UNIVERSITY CLERICAL UNION**  
**STRIKE ACTIVITY SINCE 1970**

<u>College</u>	<u>State</u>	<u>Year</u>	<u>Approximate Length (Weeks)</u>	<u>Bargaining Agent</u>
*Yale	CT	1984	10	HERE
*Boston U	MA	1979	2	UAW
*Columbia	NY	1985	1	UAW
*Hofstra	NY	1977	1	OPEIU
*Syracuse U	NY	1974	4	SEIU
Temple U	PA	1979	2	RWDSU
Wayne State U	MI	1980	1	UAW
		1978	2	
Macomb County CC	MI	1970	2	AFSCME
U of Wisconsin- Madison	WI	1977	3	AFSCME
U of Wisconsin- Milwaukee	WI	1977	2	AFSCME
American River College	CA	1980	1	INDEPENDENT
City College of San Francisco	CA	1976	4	SEIU
U of Puerto Rico	PR	1976	6	INDEPENDENT
		1973	6	

\* Indicates private institution

Strikes do appear to be more likely at private universities than at public universities. Of the thirteen unionized private institutions in our survey, five (or 38%) have had clerical worker strikes. Among the fifty-two unionized public institutions, only eight (or 15%) have had clerical worker strikes. There are two possible explanations for this. Most obviously, public sector labor laws typically place strict legal restrictions on strike activity, which would naturally limit the number of strikes at public institutions. Secondly, union organizing has been resisted more fiercely by management at private institutions, contributing to a more acrimonious collective bargaining atmosphere and increasing the likelihood that negotiations will end in conflict.

The mix of bargaining agents for clerical workers who have been involved in strikes is approximately representative of the distribution of bargaining agents for all unionized campuses. There are exceptions worth noting, however. All three of the campuses in our survey where the UAW is a bargaining agent have been through strikes. Although the numbers are small and this may be accidental, it is fitting that a union which has made very effective use of strikes in its primary arena (the automobile industry) would also turn more frequently to the strike even when representing a very different group of workers. In contrast, of the seven clerical locals whose parent union also represents faculty (AFT and NEA), none have been on strike.

In terms of geographic distribution, the strikes are roughly representative of the unionized campuses. It is a bit surprising, though, that the Pacific region has had very little strike activity in spite of its

extensive degree of clerical unionization on large campuses. Only two of the twenty-five unionized campuses in the Pacific region have had strikes, compared to eleven of forty for the rest of the country (or 8% compared to 28%). Most of the strikes have been relatively brief. Nine of the fifteen strikes have lasted two weeks or less. The distinction for the longest strike goes to Yale University and its highly publicized ten week clerical strike in 1984.

A cross-check was made to determine the make-up of the bargaining units that have gone out on strike. Twelve of the thirteen bargaining units that have struck are composed primarily of clerical workers, or of a mix of clerical workers and professional-technical employees. This represents 25% of the forty-eight exclusively white-collar locals in our survey. By contrast, only one local which has been on strike includes blue-collar workers in the bargaining unit, or 6% of the seventeen mixed clerical-blue-collar units. We suspect that this reflects less cohesiveness within the mixed units.

By comparing strike dates with the date of certification, we find that on seven of the thirteen campuses which have experienced strikes, the conflict occurred within one year of certification. In most of these cases, the strike was either part of the process leading to recognition, or the result of an impasse in bargaining the first contract. As is true in other settings, the collective bargaining relationship is likely to be especially hostile during this period because of both the fervor of new union members and the resistance of the administration which is often insulted that the workers have chosen to unionize.

**APPENDIX A**  
**CLERICAL BARGAINING AGENTS AT LARGE COLLEGES AND UNIVERSITIES**

<u>Region</u>	<u>College</u>	<u>2yr/4yr</u>	<u>Bargaining Agent</u>	<u>Certification Year</u>	<u>Unit Size</u>	<u>Clerical Percent**</u>
<u>New England</u>						
	U of Connecticut	4	AFSCME	1982	658	100
	* Yale	4	HERE	1983	2600	98
	U of Massachusetts	4	NEA	1980	1293	87
	* Boston U	4	UAW	1979	850	53
<u>Mid-Atlantic</u>						
	Rutgers	4	AFSCME	1971	1450	93
	* Seton Hall	4	OPEIU	1977	220	93
	SUNY Buffalo	4	AFSCME	1972	1920	98
	* Columbia (3 separate locals)	4	UAW, SEIU, 1199	1985, '69, '69	2400	95
	* Fordham	4	OPEIU	1968	305	98
	* Hofstra	4	OPEIU	1974	375	100
	* Long Island U - C. W. Post	4	OPEIU	1979	190	90
	* New York U	4	AFT	1978	1600	100
	* Syracuse U	4	SEIU	1974	135	11
	Nassau CC	2	AFSCME	1968	266	100
	Temple U	4	RWDSU	1971	1250	88
	* Center for Degree Studies	2	USW	1946	110	95
<u>South Atlantic</u>						
	U of Florida	4	AFSCME	1981	3000	99
	Florida State U	4	AFSCME	1981	1100	100
	U of South Florida	4	AFSCME	1981	1160	95
<u>E.S. Central</u>						
	Air Force CC	2	AFGE	1970	100	25
<u>E.N. Central</u>						
	U of Illinois-Chicago	4	SEIU	1981	1300	100
	Southern Illinois U	4	NEA	1978	658	87
	* U of Chicago	4	IBT	1979	1700	89
	Triton CC	2	AFT	1985	250	70
	Michigan State U	4	INDEP	1973	2200	95
	Wayne State U	4	UAW	1978	900	94
	Lansing CC	2	NEA	1977	100	66
	Macomb County CC	2	AFSCME	1973	150	98
	Oakland CC	2	AFSCME	1971	223	100
	U of Cincinnati	4	AFSCME	1974	300	22
	Toledo U	4	CWA	1986	300	40
	Cuyahoga CC	2	SEIU	1983	305	61
	U of Wisconsin-Madison	4	AFSCME	1975	2200	90
	U of Wisconsin-Milwaukee	4	AFSCME	1976	400	90
	Milwaukee Area Tech	2	AFSCME	1968	192	54

APPENDIX A  
CLERICAL BARGAINING AGENTS AT LARGE COLLEGES AND UNIVERSITIES

<u>W.N. Central</u>						
	U of Iowa	4	AFSCME	1984	3500	90
	Iowa State U	4	AFSCME	1985	1200	94
<u>Mountain</u>						
	Pima CC	2	AFSCME	1979	135	100
	U of New Mexico	4	CWA	1978	1315	90
<u>Pacific</u>						
	Cal State-Fullerton	4	SEIU	1982	650	100
	Cal State-Los Angeles	4	SEIU	1982	403	100
	Cal State-Long Beach	4	SEIU	1982	1200	100
	Cal State-Northridge	4	SEIU	1982	600	100
	Cal State-Sacramento	4	SEIU	1982	419	100
	U Cal-Berkeley	4	AFSCME	1983	2350	51
	U Cal-Los Angeles	4	AFSCME	1983	4272	80
	San Diego State U	4	SEIU	1982	600	100
	San Francisco State U	4	SEIU	1982	490	100
	San Jose State U	4	SEIU	1982	451	100
	* Golden Gate U	4	OPEIU	1984	25	23
	* U of Southern California	4	OPEIU	1974	106	3
	American River College	2	INDEP	1977	450	90
	Cerritos CC	2	INDEP	1977	270	62
	El Camino Coll	2	INDEP	1979	108	89
	De Anza Coll	2	INDEP	1974	400	100
	Long Beach City Coll	2	INDEP	1977	124	98
	Mount San Antonio Coll	2	INDEP	1977	120	100
	Coast District CC	2	AFT	1984	358	13
	Pierce Coll	2	AFT	1984	100	99
	Saddleback CC	2	INDEP	1977	375	100
	City Coll of San Francisco	2	SEIU	1986	450	99
	Santa Anna Coll	2	INDEP	1977	295	100
	U of Hawaii	4	AFSCME	1973	1070	92
	U of Washington	4	SEIU	1982	2800	99
<u>Puerto Rico</u>						
	U of Puerto Rico	4	INDEP	1972	437	18

\* Indicates private institution

\*\* Indicates percent of all clerical employees at colleges and universities covered by the collective bargaining agreement.

#### IV. SUMMARY

The information included in this report should clearly be regarded as a first step in establishing the extent and character of clerical unionization on university and college campuses. Nonetheless, our description of clerical unions on the largest campuses has allowed us to reach a some tentative conclusions which we hope will give future research direction.

The unionization of university clerical employees is indeed a recent phenomenon, with almost all of the activity taking place since 1970. Furthermore, the amount of organizing activity has increased steadily over the past fifteen years. Unions have been remarkably successful, achieving bargaining rights on some 70% of the campuses where formal organizing campaigns have been initiated.

Clerical unions appear to be more firmly established at public institutions than at private institutions, with two-year colleges more likely to be unionized than four-year colleges. University clerical unions are more likely to be present in those areas where the degree of unionization is relatively high in the total labor force. Momentum seems to be quite important. Once a base is established among clerical workers on one campus in an area, the successful union expands its activity to neighboring campuses and other clerical union organizers are attracted to the region. There appears to be some correspondence between the successful organizing of clerical workers and the prior existence of a faculty union on campus. However, clerical unions are spreading rapidly and are more common than faculty unions on the large campuses in our survey.

#### FOOTNOTES

<sup>1</sup> For a more detailed discussion of the organizing environment among clerical workers and a statistical analysis of NLRB elections in clerical units, see Richard Hurd and Adrienne McElwain, "Factors Influencing the Outcome of NLRB Certification Elections in Clerical Units", Industrial and Labor Relations Review, forthcoming 1988.

<sup>2</sup> "WCR Interview: Barbara Rahke, United Automobile Workers", Bureau of National Affairs, White Collar Report, February 29, 1984, pp. 222-223.

<sup>3</sup> The list of institutions was taken from Broyles, Susan G., Fall Enrollment in Colleges and Universities, 1983, National Center for Education Statistics, Department of Education, June 1985, pp. 70-79. The list is based on total enrollment (full-time students plus part-time students) on a single campus. Mailing addresses were taken from the College and University Personnel Association Directory.

<sup>4</sup> Two institutions requested anonymity, but because of their non-union status and the lack of organizing activity on those campuses this request can be honored without affecting the results reported below. A third institution refused to participate, but interviews with officials from relevant unions in the area provided the necessary information.

<sup>5</sup> In addition to the institutions listed in Appendix A, two campuses — Indiana University and the University of Kansas — have clerical worker unions that do not bargain collectively. The summary data in Tables 1-4 do not count these two campuses as unionized.

<sup>6</sup> "College Officials Advised of Ways to Stall Union Drives", Bureau of National Affairs, Government Employee Relations Report, August 24, 1987, p. 1178.

<sup>7</sup> Richard Hurd and Adrienne McElwain, Op. Cit.

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