

Can Graduate Students Re-energize the Labor Movement?

by Deeb-Paul Kitchen, II

In recent years, issues pertaining to graduate student union organizing have been at the center of several political battles and court cases. This attention is, at least in part, due to the growth of graduate student unions at a time when organized labor's influence is receding in other, more traditionally unionized sectors of the labor force. As many unions struggle with decreasing membership and against well-funded corporate assaults on the rights of workers to collectively bargain, these graduate student or graduate employee unions, once disregarded as idealist kids or “radicals,” may provide an organizing model for American labor as it seeks to reinvigorate itself.

This new focus on graduate labor organizing comes at a time of transition for both organized labor and higher education. Increasingly, American institutions, even public ones—such as universities—are governed by a corporate logic that stresses efficiency and control.¹ Within this framework, which elevates the interests of corporations above the public good, unionization has declined in terms of “density, organizing capacity, level of strike activity, and political effectiveness” across most sectors of the workforce. In 2012, according to the Bureau of Labor Statistics, union members accounted for 11.3 percent of employed wage and salary workers in the U.S., down slightly from 11.8 percent in 2011 and dramatically less than the 20.1 percent in 1983.²

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And yet, despite these bleak figures, not all unions are struggling to survive. Even within this increasingly hostile anti-worker climate, some unions are adapting—even flourishing. As traditionally dominant union groups have receded, previously marginalized ones, such as migrant and temporary workers, have moved into positions of influence. Specifically, on the campuses of research universities from California to Florida to New York, unionization is flourishing among graduate employees.

I would offer to readers of *Thought & Action*, as well as members of unions across the labor spectrum, that the organizing model provided by graduate student

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unions should be embraced by any worker who wants to survive and thrive in this world dominated by corporate power. As both an ethnographic researcher and a former organizer and activist within the graduate labor movement I have seen this approach used successfully under these unfavorable conditions. In the face of budget cuts, union busting, and high rates of turnover, the organizing model has allowed graduate unions to increase membership, expand bargaining units, and secure more generous benefits. What is more, it enables labor unions to exert influence beyond the scope of these traditional labor issues.

GRADUATE LABOR IN THE AGE OF NEOLIBERALISM

Research universities increasingly employ graduate assistants (GAs) to teach their undergraduate students and to do other work that used to be done mostly by tenured or tenure-track faculty.³ But they typically do this work for little pay, minimal benefits, and without job security.

Consequently, many GAs have collectively sought the same rights and benefits afforded their faculty colleagues and other unionized workers.⁴ The first GA unions were established in the 1960s, and after a few decades of stagnation their numbers increased sharply in the 1990s.⁵ This growth period corresponds with other changes within the academy, and more broadly, with the transition from an industrial economy in the U.S. to a knowledge- and information-based one—the third wave of marketization.⁶ Meanwhile, the 1990s also saw the ascension of neoliberal and neoconservative lawmakers to positions of power in state houses, where they promoted policies that stress higher education's economic functions while devaluing its role in democratic learning, activism, and social criticism. At

the same time, these same legislators significantly reduced the public resources invested in higher education, particularly state funds.⁷ Restricted budgets have resulted in academic managers prioritizing short-term economic concerns: implementing policies that can potentially generate revenue and expanding the academy's connections to states and private sector organizations, while deemphasizing and divesting from the humanities and liberal arts. This marks a departure from the classical view of the university, which dates back to the Greeks and Romans who saw the liberal arts as necessary to make a person free.⁸

Predictably, most of graduate assistants who are willing to organize unions

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work in the humanities and social sciences.⁹ Graduate employees in these fields are routinely among the lowest paid on campus, while those in the STEM fields are the highest. In 2013, the average graduate assistant in all of the social sciences and humanities made below the national average for GAs.¹⁰ Also, within those fields, the reliance on graduate labor and time to degrees has grown the most dramatically while the chances of tenure-track employment upon graduation have sharply declined.¹¹ But the varying popularity of unions in these different fields isn't just a matter of pay or fate — it also illustrates their functions.¹² In the social sciences and humanities, students learn to develop criticism and commentary on relevant social institutions. In a way, these economic shifts and policies have created the conditions from which their challenges emerged. This contradiction leads Rhoads and Rhoades to depict GA labor unions as simultaneously reflecting shifts in academia and challenging them.

In addition to courting private-sector investment, universities also have been embracing the top-down methods of management associated with corporations—the chief powers in third wave marketization. Aronowitz claims these types of practices are the norm for most public and private schools.¹³ A recent report showing a sharp 28 percent increase in higher education administrators from 2000 to 2012 (and a 40 percent decrease in full-time faculty and staff) bolsters this claim.¹⁴ GA activists see the growth of their unions, at least in part, as a reaction to these changes that “seek to alter the distribution of power within the academy.”¹⁵ The specific reaction that has been engendered reaches beyond the ivory tower, however, because of the unique structure of graduate labor and its requirements for unionization.

In general, workers are more likely to organize unions when they have long-term attachment to their employers.¹⁶ But neither workers (GAs) nor employ-

ers (universities) see graduate employment as a permanent arrangement. From an organizing standpoint, this means graduate unions lose officers and activists regularly. What's more, with incoming students every year, there are many new employees to educate about the union, and many obstacles to maintaining momentum garnered through activism from year to year. On top of those serious challenges, solidarity among workers from different academic departments, programs, and colleges often is strained by competition for diminishing resources.

In order to manage these dynamics, GAs have adopted a model of unionization that is typically observed among labor organizations in need of renewal.¹⁷

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They have established “organizing unions,” as opposed to “service unions” that have traditionally dominated industrial sectors as well as other campus unions. This approach requires constant, ongoing organizing campaigns and continuous actions, which can prove challenging¹⁸ —but it has propelled GA unions and activists to the forefront of today's American labor movement.

THE ORGANIZING MODEL

Within the intra-movement dispute between “service” and “organizing” unions, graduate unionists see themselves firmly on the side of organizing. Because of the high turnover rates among graduate employees, their constant need to organize guides all graduate union activity. This is demonstrated in a document distributed among GA activists at the Alliance of Graduate Employee Locals (AGEL) conference in 2006.

Recently in the labor movement a division has been staked out between competing models of running a union: the service model union and the organizing model union.¹⁹

The service model is “by far the most widely used model of union organizing past and present,”²⁰ and it differs from the organizing model in purpose and structure. Typically, service unions are centralized and directed by professional staffs. “Members pay dues to the organization and should it become necessary later to file a grievance, they receive this service... this is the extent of member involvement in the union.”²¹ Worker participation in decision making and agenda setting is minimal. They are expected to merely pay dues and let representatives know of

any problems.

On the other hand, graduate labor activists see unions as part of a participatory, democratic movement.²² Members still pay dues, but they actually run their unions. Activities such as contract negotiations, grievances, or political actions are valued as much as opportunities to incorporate more people in union action as they are for settling disputes and securing benefits. Collective action is valued above litigation, while efficiency is valued below member participation and communication.

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presents challenges. Specifically, they need opportunities to organize, or reasons to be active even when there are no grievances to be settled or contracts to be negotiated. In the absence of those typical “service” tasks, they must use the union apparatus to organize around issues beyond the traditional scope of higher wages, more generous benefits, and improved working conditions. As a result, graduate unions often form alliances with other activist and advocacy groups, and function as social movement unions that link the struggles of graduate employees to the pursuit of social justice.

GRADUATE UNIONS AS SOCIAL MOVEMENT UNIONS

Social movement unionism is an approach to labor organizing that attempts to undo the isolation of unions that have typically tended solely to workplace issues, and embrace or advance the causes of democracy, and human rights.²³ Graduate unions are steeped in this movement. They first emerged from the Free Speech Movement and antiwar protests at the University of California, Berkeley in 1965 when graduate students, in response to campus policies that censored student activist groups, organized a chapter of the American Federation of Teachers (AFT). As union members, with the rights and protections of organized labor, their activities could not be restricted by campus policies for existing student clubs or groups.²⁴

Today, graduate union organizers still recognize this 50-year-old dynamic in their own work. Nedda, an organizer with Graduate Assistants United at the University of Florida (UFGAU), talks about her union’s utility and value as being rooted in its right to directly communicate with its bargaining unit.



Thousands of protesters packed the rotunda at the Wisconsin State House in 2011 to protest Gov. Scott Walker's so-called "Budget Repair Bill," which stripped public sector workers of their right to collectively bargain. Photo by Joe Rowley via Wikimedia.

Nedda: The reason something like that [protest] happened demonstrates a more settled value of the union—we have the ability to immediately organize because we have the communication network. I've also been a graduate assistant at a university that didn't have a union and there was no way for graduate assistants to communicate with one another outside a moderated listserv, a listserv moderated by the administration itself. So just the ability to communicate to all graduates assistants through email, because we get an email list from the university as part of our contract, makes the union valuable. We have the ability to communicate and we would not have that if we didn't have a union and that is a simple thing but it's so valuable because we can address issues immediately.²⁵

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This capacity to communicate in unfettered and unfiltered ways makes a GA union a desirable group for potential collaborators. Consequently, various activist groups, such as Students for a Democratic Society (SDS) or the Black Graduate Student organization (BGSO), seek the GA union's cooperation around their own causes or actions. Frequently, these are not traditional labor issues, such as when UFGAU in 2005 contacted its members, held demonstrations, and advocated for the repeal of a \$50 fee charged to international students. Nonetheless, these external issues and causes do enable GA unions to be active, thereby engaging in organizing unionism. Social movement or social justice unionism is a way to manufacture political opportunity.

In another example, graduate laborers in the University of California (UC) system, who are affiliated with the United Auto Workers (UAW), joined in sympathy strikes with campus service workers who belong to another union—the American Federation of State, County, and Municipal Employees (AFSCME) in 2014.²⁶ The strikes demonstrated solidarity across the university's labor force, including students, and it also showed the common cause between graduate labor and service workers—two groups that often must supplement their low pay with food stamps and students loans, thanks to the neoliberal policies governing the academy.²⁷ But it also was a tactical maneuver on the part of the graduate union whose own contract negotiations have been locked in stalemate since June 2014.²⁸ Typically, graduate workers in the UC system are forbidden by law from striking, but when they linked their efforts with the striking service workers they amplified both groups' efforts.

In a third example of social movement unionism by GAs, organizers for the Graduate Employee Organization (GEO) at the University of Michigan mobilized opposition to a 2004 voter referendum to constitutionally ban same-

sex marriages in the state. Although the referendum was approved and the ban enacted, the graduate union was visibly active and able to expand their range of issues. Social justice struggles like these can lead organized labor to effectively ally with more constituencies—and get organized. In fact, research has shown that when unions prioritize racial equality and women’s issues, they are more successful at organizing women and people of color.²⁹

The embrace of social movement unionizing certainly requires ideological conviction, but it is also driven by self-interest. Without this approach, it would be difficult to overcome the high turnover that is an unavoidable aspect of gradu-

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ate labor. By expanding the range of issues addressed by the union, graduate labor organizers create reasons for members to stay active. Additionally, by organizing around more issues, they enlarge the appeal of the union. In other words, social movement unionism and organizing unionism mutually reinforce each other. Indeed, it remains to be seen if either could thrive without the other.

Operating unions in ways that link them to broader social activism isn’t a new strategy, but it hasn’t always been an accepted one. In the 1960s, social activism was at the center of disputes between traditional union members, the so-called “hard hats,” and the new union members at Berkeley, Madison, and elsewhere, known as the “radicals,” who embraced the social justice causes of the Civil Rights Act and Vietnam War era. At that time, industrial workers largely distrusted the graduate unions.³⁰ But these days, as the Great Recession has led to rising numbers of temporary workers³¹ and economic restructuring,³² more jobs in the U.S. more closely resemble graduate employment. These employment trends have not escaped the notice of national labor groups, who have responded with new approaches that adopt the graduate union model. As a result, graduate labor organizers have moved to the center of union activity and are wielding newfound influence.

Take a look at the most visible and militant union efforts of this decade, and you will find high levels of graduate union involvement and influence. From the powerful protests in Madison, Wisc., in 2011, to the massive Occupy Wall Street movement that began that same year, it is clear that GA unions have moved into the forefront of the American labor movement.

At the same time, the largest unions are adopting GA strategies. For example, Richard Trumka, president of the American Federation of Labor and the Congress of Industrial Organizations (AFL-CIO), the largest labor organization

in the U.S., pledged in 2013 to work with non-union allies to bolster union influence and combat harmful trends around college debt and immigration policies.³³ In another example, the NEA has partnered with Generation Progress on NEA's Degrees Not Debt campaign to limit student debt and make college more affordable.³⁴ These are part of national efforts that also involve other large unions such as AFSCME and the Service Employees International Union (SEIU) to reach out to non-union organizations and build a new type of workplace representation through sustained collective action.³⁵

At the AFL-CIO's "Let's Talk" meetings, representatives from union

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and non-union organizations came together to come up with ideas for expanding labor's influence. One of the suggestions, presented at the AFL-CIO's national convention in 2013, was to disconnect union membership from specific workplaces and allow people to join directly. Trumka addressed this in his remarks to the 2013 Conference on New Models for Worker Representation.

We are building other new forms of membership through partnership agreements with the National Day Laborers Organizing Network and the National Domestic Workers Alliance. In 2006, here in Chicago, the AFL-CIO adopted a new policy extending affiliation to worker centers across the country... Many of our unions were created over 100 years ago when the economic and demographic landscape was very different. We can't just defend our historic industrial and geographic bases when global forces far outside our power to control are eroding, if not destroying, those bases. Unions and our progressive allies need to collectively redirect our energy to focus on where jobs will be in the future and which workers can successfully organize and gain representation in the new global economy.³⁶

These comments and initiatives signal a departure from traditional models in favor of an organizing approach that strives for broad participation through the embrace of non-union struggles.

This new form of representation is being crafted to fit the realities of contemporary workplaces, where workers often are part-time employees or contracted to jobs—but not necessarily to places of employment. It also reflects the GA model, which reached beyond traditional bases long ago, probably because colleges and universities experienced early on the effects of neoliberal policies. Regardless, as the big unions reorient themselves to movement unionism, GA activists have been at the center of the most visible examples of union struggles.³⁷

In 2011, when Wisconsin Gov. Scott Walker unleashed his attacks on working people and their right to collectively bargain, the Teaching Assistants Association

(TAA) from the University of Wisconsin-Madison was instrumental in orchestrating the two-week occupation of the Wisconsin State Capitol. The prolonged demonstrations involved nearly 30,000 workers—from elementary teachers to firefighters— including large numbers of students. The TAA arranged for food, blankets, and other supplies so that protestors could set up camp, and they used their communications capacity to quickly mobilize attendees for legislative hearings. State Rep. Mark Pocan observed that the TAA “brought people in volume, I don’t know if anyone else brought them in as continually and consistently.”³⁸ The result was a spectacle of diverse workers standing together in a way that placed

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union issues at the center of public debate and news coverage.

Predictably, legislative efforts aimed at silencing workers and damaging unions, especially public sector unions, ensued in state houses across the Midwest. In Michigan, Gov. Rick Snyder signed a bill limiting the expansion of GA unions in public universities.³⁹ The law denies collective bargaining rights to the state universities’ graduate student research assistants (GSRAs) on the basis of their work being tied to their status as students. Currently, only graduate student teaching assistants (GSTAs) are unionized in Michigan’s universities. A district court ruling in February 2014 deemed parts of the law to be unconstitutional.⁴⁰ The ruling will be appealed and it does not settle any of the larger fights over GA union rights, but it does indicate that those seeking to curtail organized labor are aware of graduate unions. It is not farfetched to assume that this attention may be part of attempts to curtail their influence.

In the wake of the Madison protests, the larger unions returned to familiar tactics and focused on recalling Wisconsin lawmakers who supported Walker’s measures and also lobbying against similar legislation in other states. But TAA Co-President Alex Hanna suggested they move instead to “reform our unions in such a way that they are oriented toward a culture of organizing and of collective power.”⁴¹ In the months after the Madison protests, it’s possible they heeded Hanna’s call.

In 2011, the Occupy Wall Street (OWS) movement emerged from widespread opposition to increasing social and economic inequalities in the U.S., as well as the nation’s military interventionism and environmental ruin. These are all serious social justice issues—although not traditional union issues—and yet established labor groups such as the Transport Workers Union of America, SEIU, CWA, AFSCME and UNITE HERE provided resources and assistance. Just as the TAA helped sustain the Madison occupation, the Communications Workers supplied mattresses, walkie-talkies and other materials to New York City occupi-

ers to effectively maintain their demonstrations.

In perhaps the grandest gesture of support, in November 2011 the AFL-CIO, SEIU, and the Laborers' International Union of North America joined a "We are the 99 percent" demonstration.⁴² Trumka's words formally endorsing the OWS movement echoed the basic goals of social movement unionism.

We are proud that today on Wall Street, bus drivers, painters, nurses and utility workers will join students and homeowners, the unemployed and the underemployed to call for fundamental change... [Organized labor] will open our union halls and community centers as well as our arms and our hearts to those with the courage to stand up and demand a better America.⁴³

This support for OWS, a movement known for not articulating specific demands, might be the surest sign of big labor's new orientation towards popular organizing. And it's one with practical benefits, helping labor to garner support for its own more traditional causes and bridge the gulf between unions and other advocates for social justice.⁴⁴ Just as unions sent people and supplies to assist the Occupiers, the OWS activists lent their support to unions. For example, when managers at Sotheby's auction house were cutting employees' hours and pensions while increasing their own pay, Occupiers disrupted their auctions.

These and other examples of cooperation between the OWS movement and organized labor are not unique: they greatly resemble the relationships that GA unions regularly form with other student activist groups. Through their actions, and especially their organizing model, GA unions have shown the way to reinvigorate the American labor movement during these difficult times.

WHERE DOES THIS LEAVE US?

The newfound influence of the more radical, movement-oriented elements of organized labor offers those of us who seek to revitalize American unions a chance to heed Alex Hanna's call to prioritize organizing and collective action over discreet, measurable gains in wages and benefits. This requires participation on the part of members and supporters. It may also require internal insurgent campaigns akin to what the Academic Workers for a Democratic Union did in California. In that case, members of the Academic Workers for a Democratic Union (ADWU), a reform caucus within the UC graduate union, have promoted vigorous action against UC's labor practices and drawn the support of the California Nurses Alliance and UC Santa Cruz's Skilled Crafts Unit, who all participated in a sympathy strike alongside the graduate employees and service workers in November 2013.⁴⁵

The California example offers hope that reform can take place within existing service-oriented unions, whose scope of action and concern has been narrowly focused on specific workplaces or types of workers (e.g. college faculty within a state). Another reason for optimism is the acknowledgment by some of the most entrenched labor leaders, such as Trumka, that unions must adapt to survive in the age of neoliberalism.

Restructuring access to union membership so that it is not necessarily linked to specific workplaces is a good start, but it's just a start. To truly transform unions for the 21st century, our work also must entail re-conceptualizing organizing, so that unions reach beyond the workplace and beyond their own members, and prioritize social justice concerns. We must all recognize organizing as an *end* rather than a means to secure greater benefits.

In the immediate future, readers of this article who are members of service unions, which most faculty unions are, should begin the process of reorienting their local chapters by following the lead of graduate unions and pushing for collaboration with other workers' and advocacy groups. Adopt social justice issues as union concerns. Again, this will likely require local, insurgent campaigns, but any efforts to expand unions' scope of representation and agenda items will set a foundation for organizing and movement unionism. Make it a point to encourage unionization among your GA colleagues, and understand that your collaboration with them can lend credibility to their efforts.

Further down the road, consider the opportunities provided by the 2016 state and presidential elections and how the anticipated massive voter-turnout operation can be utilized for grassroots organizing among non-union members. One of the hallmarks of the GA-style organizing model is that events such as elections or contract negotiations aren't just about electing new lawmakers or getting new contracts—they are understood as ancillary activities that enable the union to organize more effectively. In other words, you don't organize to take action on Election Day, and then return to daily life; you see these opportunities as beginnings. After Election Day, regardless of who wins, union members and working class allies should immediately identify key issues of concern and accelerate their collective action.

Above all, move forward with this in mind: If there is to be a resurgence of organized labor in the United States, perhaps the once mocked graduate students offer the best path forward. [nea](#)

ENDNOTES

1. See Burawoy, "Introduction: A Public Sociology for Human Rights."
2. Bureau of Labor Statistics, "Union Members in 2012." Of note, 1983 was the first year of data collection.
3. See Bousquet, *How the University Works: Higher Education and the Low-Wage Nation*, and also Ehrenberg, et al., "Collective Bargaining in American Higher Education."
4. Barba, "The Unionization Movement: An Analysis of Graduate Student Employee Union Contracts," and Rhoades and Rhoads, "The Public Discourse of US Graduate Employee Unions: Social Movement Identities, Ideologies, and Strategies."
5. The University of Wisconsin-Madison's Teaching Assistants Association was the first to be recognized as an independent union in 1969. In the 1990s, the many GA unions to be recognized include the University of Wisconsin-Milwaukee (1991), the University of Kansas (1995), the University of Massachusetts, Lowell and the University of Iowa (1996). In 1999, the University of California system was the second to unionize GAs, after the State University

- of New York decades earlier. See DeCew, *Unionization in the Academy: Visions and Realities*; Rhoades and Rhoads; Smallwood, *Success and New Hurdles for TA Unions*; and Wickens, “The Organizational Impact of University Labor Unions.”
6. The first wave of marketization was state capitalism, propagated by colonial powers that appropriated wealth through force and coercion. During that time, labor rights were pursued and protected by local communities, and preserved in custom. The second wave was defined by nation states using their powers to protect private companies. Labor activism was institutionalized and preserved by law. The current third wave is the era of globalization, and it is dominated by multinational corporations rather than states. See Slaughter and Rhoades, *Academic Capitalism and the New Economy*.
 7. In 1987, public colleges and universities received 3.3 times as much in revenue from state and local governments as they did from students. Now revenues from students and from states and localities are almost equal, according to the Oliff, et al, of the Center on Budget and Policy Priorities. See also Giroux, “Neoliberalism, Corporate Culture, and the Promise of Higher Education: The University as a Democratic Public Sphere;” Giroux, *The Terror of Neoliberalism: Authoritarianism and the Eclipse of Democracy*; Rhoads and Rhoades; and Slaughter and Rhoades.
 8. Lustig, “The University Besieged.”
 9. Rhoads and Rhoades, *op cit*.
 10. The average stipend of a graduate assistant in the physical sciences was \$18,018 in 2012-2013, while those in the arts were paid \$10,694 and those in library sciences earned \$10,074. For more, see “The Salary Issue.”
 11. See Bousquet, also Rhoads and Rhoades.
 12. Rhoads and Rhoades, *op cit*.
 13. Aronowitz, *The Knowledge Factory: Dismantling the Corporate University and Creating True Higher Learning*.
 14. Carlson, “Administrator Hiring Drove 28% Boom in Higher Ed Workforce, Report Says.”
 15. Rhoads and Rhoades, *op cit*.
 16. Ehrenberg, et al. “Collective Bargaining in American Higher Education.”
 17. Fiorito, “Union Renewal and the Organizing Model in the United Kingdom.”
 18. Bousquet, *op cit*.
 19. Gabe Kirchner, “Guiding Principles in Graduate Student Unionism.”
 20. Ibid.
 21. Ibid.
 22. Ibid.
 23. Waterman, “Social Movement Unionism: A New Model for a New World Order?”
 24. Draper, *The New Student Revolt*; Lipset, “University Student Politics;” Rhoades and Rhoads; and Singh, et al., “Graduate Student Unions in the United States.”
 25. Nedda is a pseudonym.
 26. Anderson, “University of California Student-Worker Strike: Reject Neoliberal Violence,” and Burns, “A ‘Historic Moment’ for Campus Solidarity.”
 27. Anderson, *op cit*.
 28. Burns, *op cit*.
 29. Clawson and Clawson, “What has happened to the US Labor Movement?”
 30. Dizikes and Sewell, “Wisconsin University Teaching Assistants at Forefront of Capitol Protest.”
 31. Hatton, *The Temp Economy: From Kelly Girls to Permatemps in Postwar America*.
 32. Robinson, “Neoliberal Restructuring and US Unions: Toward a Social Movement Unionism?”

33. Trumka, "Remarks by AFL-CIO President Richard L. Trumka, 2013 Conference on New Models for Worker Representation."
34. NEA's Degrees Not Debt campaign has involved a coalition of partners, including Generation Progress, the Center for American Progress, as well as numerous NEA-Student chapters. Visit nea.org/degreesnotdebt to sign NEA's Degrees Not Debt pledge.
35. Jamieson, "Richard Trumka, AFL-CIO Chief, Reflects on Unions' Thinning Ranks, Calls for New Strategies," and Perkins, "AFL-CIO Wants to be the Voice of Most Workers, Not Just Those in Unions."
36. Trumka, *op cit.*
37. Dizikes and Sewell, *op cit.*
38. Ibid.
39. Oltean, "Michigan Senate Passes Legislation Against Graduate Student Union."
40. Geva, "Court Ruling Brings New Energy to GSRA Fight;" Oltean, *op cit.*; and Patel, "Court Ruling Reopens Debate Over Unions for Graduate Student Researchers."
41. Hanna issued this call in a personal blog post, "Coming Out."
42. Bogardus, "Labor Unions, Occupy Wall Street Plan 'Day of Action' Urging Lawmakers to Invest."
43. Trumka, "Statement by AFL-CIO President Richard Trumka On Occupy Wall Street."
44. Newhouse, "A Labor Breakthrough: Occupy Wall Street's Union Connections and the Role of Solidarity in Staying Power."
45. Burns, *op cit.*

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