



November 24, 2025

VIA EMAIL ONLY

Rachel Nuzzo, Esq.
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RE: RWU FURLOUGH PROGRAM 2026

Dear Attorney Nuzzo:

I write to you in your capacity as the legal representative for Roger Williams University and RWU President Ioannis Miaoulis, regarding President Miaoulis' communication of November 13, 2025, to his Roger Williams University "colleagues" about a furlough program to be implemented at his direction, with the assent of his presidential cabinet.

As you know, NEARI represents three (of five) private sector bargaining units at Roger Williams University. Notably, as to these aligned employees, only the NEARI locals will be affected by these proposed furloughs, specifically, the Roger Williams University Faculty Association, the Roger Williams University Professional Support Staff Association, and the Roger Williams University Facilities Management Employees. I am certain that it is by design that these bargaining units were designated for furloughs, given that the contracts for each of these units are due to expire in 2026.

In any case, *as you apparently do not know*, the action taken by the University is squarely prohibited by federal labor law. Pursuant to the National Labor Relations Act, the employer cannot unilaterally implement changes to hours of work, wages, working conditions, or any other terms of employment that constitute mandatory subjects of bargaining during the term of an existing labor contract. Moreover, labor law does not provide an exception to this obligation for alleged financial exigency, which is apparently the reason for this furlough decision. To be clear, the University has an unequivocal obligation to bargain with the Union(s) before the implementation of this furlough program.

Indeed, there was a time when the University, and President Miaoulis himself, recognized this obligation. At the height of the COVID shutdown, in April 2020, when students were told not to return to campus and families were refunded unexpected sums of money for room, board and other expenses, President Miaoulis approached all of the University employees, aligned and non-aligned, from the lowest paid to the highest paid, to implore that everyone engage in a shared sacrifice to keep the University on firm financial footing for future years. At that time, negotiations

were undertaken, personally sustainable concessions were made, and those agreements were later ratified via votes undertaken by the affected bargaining units.

Again, why such an ask has not been made in this instance is both bewildering and suspect. In any case, a unilateral furlough program imposed upon the aligned units we represent, as proposed, is plainly unlawful.

Accordingly, each NEARI bargaining unit will be engaging in the following actions:

First, each unit will be filing a grievance that these actions are violations of various applicable provisions of their respective collective bargaining agreements. To that end, we wish to have these grievances heard at the President's level at one of the times proposed by the President's administrative assistant in a recent email.

In addition, in connection with those grievances, NEARI will be sending information requests for a variety of financial documents. You are required by law to produce such documents, not only because they are necessary in order for us argue our grievance, but also because, the University and President Miaoulis have placed the financial health of the University at the core of his reasoning for these proposed furloughs.¹

Furthermore, each NEARI bargaining unit will be sending a formal request to bargain over the unilateral implementation of this proposed lockout and wage theft.

Please note that any delay in either producing the information requested and/or agreement to negotiate before the implementation of this ill-advised furlough program will result in multiple unfair labor practice charges being filed with the National Labor Relations Board.

At this time, we have advised our members not to provide any "dates" for which they agree to be furloughed. To the extent your Human Resources Department expects said dates to be finalized by December 18, 2025, as outlined in Vice President McDonough's memorandum, you will not be receiving such information from any NEARI-represented employee, as the unilateral implementation of the furlough program among our members is unlawful.

Additionally, in the event these furloughs should ultimately happen, we have advised our members to file unemployment claims with the Rhode Island Department of Labor and Training. We plan to work with RI DLT to determine if there is any way to obtain the week of pay you seek to take from these employees.

¹ Unlike the University's prior bad faith machinations during the 2022 faculty negotiations (which we have long suspected and that these actions now confirm), wherein the University's attorneys argued it had no obligation to produce the many fiscal records we requested during bargaining *because the University was not making inadequate financial proposals based on any fiscal distress of the University*, here, the economic health of the University is the sole reason for the unlawful attempt to strip wages from employees.

Indeed, the University's absence of advice or outright misstatement of the employees' rights with regard to their eligibility for unemployment compensation, is indicative of the University's lack of respect and sympathy for what is being asked of these employees, and certainly belies the hyperbolic language referencing "shared sacrifice" and "community" so conveniently tossed around in President Miaoulis message to the campus.

As I alluded to earlier in my letter, not only do I find it dubious that the University has chosen the three bargaining units who are about to begin negotiations in 2026 to shoulder the burden of closing the University's deficit, but the list of those particular non-aligned employees *who will not be affected* by this furlough program would almost be laughable, if it were not so patently pernicious to the financial gap the University claims it wants to close.

It appears no administrators or other non-aligned staff (who, I remind you, are employees-at-will) are affected, and the University apparently retains sole discretion to determine exemptions based on "essential operational needs," as determined by "the relevant Cabinet member." Clearly, the insulting implication in this "Furlough Program FAQs" sheet is that the NEARI union members make no contribution to the essential operational needs of the University.

It goes without saying that given the University's unlawful actions over the last two weeks, our members will be freely exercising their constitutional and statutory right to picket, protest, speak, and otherwise publicize these unlawful actions by the University, and the incredible labor distress it has created at the University. I assure you that some of these protests will be timed to coincide with key events at the University and will convey a variety of unrestrained messages.

Though the NEARI bargaining units have always been cognizant of what could result from public attention to the University's financial mismanagement, and judicious of what actions might be most effective to achieve understanding at the bargaining table, there are undoubtedly some employees who will be unable to buy groceries, pay housing costs, afford child care, and will otherwise suffer personal and private financial and emotional distress when the University seizes a week of pay to fill the University's financial gap, a hole which these employees had no hand in creating, and whose highly-paid president, cabinet, management, administrators, and other alleged stewards have driven off a fiscal cliff.

Finally, please be advised that NEARI has also retained outside labor legal counsel to support, evaluate and pursue any other legal remedies that may be available to our members. The actions I have outlined above are not exhaustive, and we will proceed with any other avenues that are available to us, as may be advised, necessary and just.

I must note that I have represented each of the NEARI bargaining units at the University in one capacity or another since March 2012. In that time, I personally witnessed the incredible growth of administrative full-time employees (and the associated growth in salaries and benefits), all while enrollment has steadily fallen. I have also observed multiple presidents and financial officers repeatedly fail to get the University on solid fiscal ground.

Indeed, I still remember when President Miaoulis was brought on board at his exorbitant salary because his allegedly keen fundraising skills would be invaluable in growing the endowment and placing the University on firm financial footing. It appears, from his own recent communication, that the University has repeatedly *drawn from the endowment instead of growing it*. Indeed, public disclosures indicate that President Miaoulis received a seventy percent (70%) salary increase from 2022 to 2023, despite missing benchmarks (if there ever were any) time and again.

[Roger Williams University - Full Filing - Nonprofit Explorer - ProPublica](#) (2022 IRS Form 990)

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I am certain the University would not hesitate to discipline and remove any aligned employee who failed so spectacularly in the job for which they were hired and claimed to have experience.

I am forced to restate what has been noted at the multiple bargaining tables at which I have sat since 2012: The management-side of the table is always a rotating cast of characters with little to no institutional knowledge or interest in the long-term viability of Roger Williams University. The labor-side of the table is always made up of tenured and other lifelong employees who have taught, mentored, assisted, supported, and defended the learning and living environment of many thousands of students over countless years.

It is those employees who are the heartbeat of this University, and keep the students (and the tuition) coming back. That President Miaoulis would so callously pick their pockets to fund what appear to be the University's alternative spending priorities (as if there could be any other priority besides employee salary) is utterly appalling despite the fancy rhetoric in his communication. The three NEARI bargaining units will not be his lottery ticket to close the fiscal mess he and his staff have created.

In closing, I would urge you to advise President Miaoulis to reconsider this unlawful, and what is certain to be, devastating strategy to move Roger Williams University "toward a stronger and more sustainable future." Without question, it will certainly have the opposite effect.

Sincerely,

[/s/ Jennifer Azevedo](#)

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