

	Is collective bargaining legal for teachers?	What items can be negotiated in collective bargaining?	Impasse Procedures	Arbitration Notes	Right-to-Work laws	Strikes	Legality of public worker strikes	Strike Penalties
Alabama	Yes	Not outlined in law.	N/A		Yes	Illegal	Case Law: Cherokee County Hosp. Bd. v. Retail, Wholesale, & Dept. Store Union, AFL-CIO, 294 Ala. 151, 153, 313 So. 2d 514, 516 (1975) "Public strikes are illegal and public lockouts are improper, if not illegal."	
Alaska	Yes	Salaries, fringe benefits, hours, and working conditions.	Mediation, mandatory binding arbitration	Binding arbitration (with awards confirmed by courts) is required for police, firefighters, prison guards, hospital employees and similar workers. Other public employees may go to arbitration only if such provision to resolve an impasse has been written into their collective bargaining agreement and follows procedures in the state's Revised Uniform Arbitration Act.	None	Legal	Statute: Alaska Stat. Ann. § 23.40.200 "Employees in this class may engage in a strike after mediation, subject to the voting requirement of (d) of this section, for a limited time. The limit is determined by the interests of the health, safety, or welfare of the public."	
Arizona	Yes, but not according to state law	Not outlined for public sector employees.	N/A		Yes	Illegal	Illegal for a labor organization to strike or picket any establishment unless there is a bona fide dispute. AG Opinion: 1980 Ariz. Op. Att'y Gen. 34 (1980) "... public school teachers do not have the right."	
Arkansas	Yes, but not according to state law	Wages and other conditions of work	N/A		Yes	Illegal	Case Law: Potts v. Hay, 229 Ark. 830, 833, 318 S.W.2d 826, 827 (1958) "As the Connecticut court pointed out, after a thorough review of the cases, every judicial decision on the subject holds that there is no right against the government."	
California	Yes	Salaries, pension benefits, fringe benefits, hours, working conditions	Mediation, fact-finding, voluntary arbitration		None	Legal	Permitted by California Supreme Court ruling in 2010 in City of San Jose v Operating Engineers for other public sector employees. Case Law: Modesto City Schools, PERB decision 291 (1983) "We conclude that the strike engaged in by the Association was provoked by the District, and that the Association had participated in the collective bargaining process in good faith. We, therefore, hold that the strike by the Association was not in violation of EERA by was protected conduct."	
Colorado	Yes, but not according to state law	Wages, fringe benefits, hours and other terms and conditions of employment	N/A	Binding arbitration is prohibited for state workers by executive order, and does not exist for other types of employees. Impasse resolution procedures vary by contract for non-fire fighter government worker.	None	Legal	Legal for teachers and local government workers. NC case law: a 1992 Colorado Supreme Court ruling (Martin v. Montezuma-Cortez School District) held that public employees have a "qualified right" to strike under certain conditions, which include when all other avenues of resolution have been exhausted, and if the state's Division of Labor director gives up jurisdiction over the labor dispute. These details cloud the issue of whether even technically illegal strikes are prohibited.	
Connecticut	Yes	Wages, fringe benefits, hours and other employment conditions. Educators' unions may not negotiate over the establishment or provisions of retirement incentive plans contained within the teachers' retirement system.	Mediation, mandatory binding arbitration	Binding arbitration is mandatory for municipal employees, teachers, family child care providers and personal care attendants. For municipal employees and teachers, the arbitrators' decision is first subject to approval by the local legislative body. If not approved, the matter goes to arbitration for a second time, and the arbitrator makes a final, binding decision with regards to each rejected issue.	None	Illegal	Illegal for all types of public employee. Statute: Connecticut General Statutes: 10-153e(a) "No certified professional employee shall ... engage in any strike or refusal to render services."	
Delaware	Yes	Wages, benefits, hours and other employment conditions.	Mediation, fact-finding, voluntary arbitration	For all types of public employee, either union, government agency or both may request binding arbitration during an impasse.	None	Illegal	Illegal, with penalties. Statute: Delaware Code: Title 14, Sec 4016 (a) "No public school employee shall strike while in performance of that public school employee's official duties."	Not entitled to any daily pay, reimbursements, or benefits when on strike and restitution cannot be negotiated after the strike.
Florida	Yes	Wages, hours, terms of employment	Mediation, fact-finding		Yes	Illegal	Illegal, with penalties. Statute: Florida Statutes: 447.505 "No public employee or employee organization may participate in a strike against a public employer by instigating or supporting, in any manner, a strike."	Participants guilty of misdemeanor of the second degree, which includes a possible fine.
Georgia	No	Firefighters may negotiate wages, rates of pay, hours, working conditions, and all other terms and conditions of employment. Not specified in law for all public sector workers.	N/A		Yes, but not applicable to public sector employees.	Illegal	Statute: Ga. Code Ann. § 45-19-2 "No public employee shall promote, encourage, or participate in any strike..."	

Hawaii	Yes	Wages, fringe benefits, hours, other terms and conditions of employment, and amounts of contributions by State and counties to the Hawaii employer-union health benefits trust fund	Mediation, voluntary arbitration	Yes, for some workers. A union and government agency may lay out impasse procedures in contracts. In the absence of such provisions, for employees such as local and state police, firefighters, nurses and certain white-collar workers, negotiations go to mandatory binding arbitration 20 days after the start of an impasse. For certain blue-collar workers, public school teachers, and University of Hawaii and community college faculty, impasses go through mediation only.	None	Legal	To strike legally, certain conditions must be met. Statute: Hawaii Statutes: 89-12(a) & (b) "It shall be unlawful for any employee to participate in a strike if the employee: (1) Is not included in the appropriate bargaining unit involved in an impasse; or (2) Is included in the appropriate bargaining unit involved in an impasse that has been referred to arbitration for a decision. (b) It shall be lawful for an employee, who is not prohibited from striking under subsection (a) and who is in the appropriate bargaining unit involved in an impasse, to participate in a strike under the following conditions: (1) The requirements of section 89-11 relating to the resolution of disputes have been complied with in good faith; (2) The proceedings for the prevention of any prohibited practices have been exhausted; (3) The collective bargaining agreement and any extension of the agreement has expired; and (4) The exclusive representative has given a ten-day notice of intent , together with a statement of its position on all remaining issues in dispute, to the employer and the board."	
Idaho	Yes	All terms and conditions of employment.	Mediation		Yes	Illegal	Illegal for firefighters; illegal for all labor organizations to strike or picket in an attempt to induce an employer to enter into an agreement prohibited by statute. Case Law: Oneida Sch. District No. 351 v Oneida Educ. Ass'n, 567, P 2d, 830, 833-35 (Idaho 1977) Public school teachers have no constitutional or common law or other right , and any teacher strike may be enjoined.	
Illinois	Yes	Wages, fringe benefits, hours and other conditions of employment	Mediation, fact-finding, voluntary arbitration	For school districts that serve cities with populations less than 500,000, there is no binding arbitration, but the most recent offer from each side on disputed issues must be posted on the Illinois Educational Labor Relations Board website. For school districts serving cities with populations greater than 500,000, the parties may go to binding arbitration by mutual agreement. Only non-binding arbitration exists for court reporters.	None	Legal	Public school teachers may strike only under five conditions: They are represented by an exclusive representative, mediation and fact-finding have failed; the contract has expired; the union has given at least 10 days notice of a strike; and the sides have not mutually submitted to arbitration. Even so, an educational employer may request an injunction against a strike if it has become a "clear and present danger to the health or safety of the public" (115 ILCS 5/13) (Statute).	
Indiana	Yes	Salary, wages, hours, and fringe benefits, including including accident, sickness, health, dental, vision, life, disability, retirement benefits, and paid time off.	Mediation, fact-finding	State law instructs a fact-finder to choose a "last best offer" from both parties. Either party can appeal the fact-finder's decision to the education employment board. If either party disagrees with the board's decision, they can appeal in court.	Yes, though Indiana has separate laws prohibiting public employees from being forced to join a union.	Illegal	Illegal, with penalties. Statute: IC 20-29-9-1 "It is unlawful for: (1) a school employee; (2) a school employee organization; or (3) an affiliate including state and national affiliates, of a school employee organization; to take part in or assist in a strike against a school employer or school corporation."	Liabile to proceedings; union participating in strike loses dues deduction privilege for 1 year; the district cannot require makeup days; teacher loses pay salary for days on strike.
Iowa	Yes	Non-Public Safety: Base wages and other matters mutually agreed upon. Insurance, leaves of absence for political activities, supplemental pay, transfer procedures, evaluation procedures, procedures for staff reduction, and subcontracting public services are excluded. For all: Retirement systems, dues checkoffs, and other payroll deductions for political action committees or other political contributions or political activities excluded.	Mediation, voluntary arbitration	Ten days after a mediator has been appointed, either party may request arbitration which is then binding.	Yes, but they do not apply to employees covered by the federal Railway Labor Act.	Illegal	Illegal, with penalties. Statute: Iowa State Code: 20.12 "It shall be unlawful for any public employee or any employee organization, directly or indirectly, to induce, instigate, encourage, authorize, ratify or participate in a strike against any public employer."	Participants can be fined up to \$500 for teachers and \$10,000 for unions and districts for each day, and/or face imprisonment up to 6 months. If held in contempt of this pursuit, teachers cannot be employed for 1 year and union loses certification.
Kansas	Yes	The scope of a memorandum of agreement may extend to all matters relating to conditions of employment (salary, hours, holidays, retirement benefits, insurance benefits, etc.). See K.S.A. 72-5413(D)(1) for comprehensive list for items that can be negotiated by teachers (they may choose no more than three).	Mediation, fact-finding	Arbitration not required for teachers' contracts, but may be put into individual teachers' contracts.	Yes	Illegal	Illegal for teachers and those employees part of an unauthorized collective bargaining unit. Statute: Kansas Statutes: 72-4333(c)(5) "It shall be a prohibited practice for professional employees or professional employees' organizations or their designated representatives willfully to: (5) authorize, instigate, aid or engage in a strike or in picketing of any facility under the jurisdiction and control of the board of education."	

Kentucky	Yes, but not according to state law	Wages, fringe benefits, hours, and other conditions of employment.	N/A		Yes	Illegal	Illegal for all types of public employee. Case Law: Board of Trustees, 571 S.W.2d at 616, 619; Jefferson County Teachers Ass'n v. Board of Education of Jefferson County, 463 S.W.2d 627 (Ky. App. 1970) Public employees, including educational employees, have no right .	
Louisiana	Yes, but not according to state law	Not outlined in state law, but can be written into local collective bargaining agreements.	N/A		Yes	Legal	All public employees may strike except those in which a strike would risk public safety. Case Law: Davis v. Henry, 555 So.2d 457, 459, 133 L.R.R.M. (BNA) 2271 (La., 1990) Public employees, except for those essential to public safety, have "the right to engaged in peaceful picketing, work stoppage and other concerted activities.... is applicable to public school employees."	
Maine	Yes	Wages, hours, fringe benefits, contract grievance arbitration and working conditions.	Mediation, fact-finding, voluntary arbitration	Either employer or union in an impasse may request arbitration, which is final and binding on issues other than salaries, pensions and insurance.	None	Illegal	Illegal, with penalties. Case Law: Sanford Highway Unit of Local 481, AFSCME Council No. 74 v. Sanford, 411 A.2d 1010 (Me. 1980) Board decision upheld that ordered reinstatement without backpay of employees who had engaged in an illegal strike after the town had engaged in prohibited practices.	Lost in wages without backpay.
Maryland	Yes	Wages, hours, retirement benefits for some workers, fringe benefits, working conditions	Mediation, voluntary arbitration	Varies. Yes: some local governments and for public school employees if arbitration is requested. No: state employees, higher education and independent home care providers. Conditional on funding approval for other employees such as select park/utilities workers. Also varies for county sheriff employees.	None	Illegal	Illegal, with penalties. Statute: Maryland Education Code: 6-410(a) "An employee organization may not call or direct a strike."	Participating union loses representation rights for 2 years and cannot make dues deductions for 1 year.
Massachusetts	Yes	Wages, hours, fringe benefits, standards, productivity/performance and other terms and conditions of employment.	Mediation, fact-finding, voluntary arbitration	The union and employer may mutually request arbitration. Once the arbitration process is authorized by the relevant legislative body or school committee, arbitration decisions are binding and final.	None	Illegal	Illegal, with penalties. Statute: The General Laws of Massachusetts, Title XXI, 150E-9A(a) "No public employee or employee organization shall engage in a strike, and no public employee or organization shall induce, encourage or condone any strike..."	Superior court proceedings instituted to enforce strike prohibition.
Michigan	Yes	Wages, hours, and other conditions of employment.	Mediation	Yes, but only for those directly employed by a public police or fire department.	Yes, but does not cover most public safety employees.	Illegal	Illegal, with penalties. Statute: Michigan Compiled Laws: 423.202 "A public employee shall not strike and a public school employer shall not institute a lockout."	Participating employees fine 1-day pay for each strike day, without any resititution.
Minnesota	Yes	Wages, hours, fringe benefits, and other employment conditions. Bargaining over retirement benefits or contributions is excluded, except for negotiations over employer contributions to group insurance premiums for retiree coverage or for severance pay.	Mediation, voluntary arbitration	Either the employer or union of essential employees may request binding arbitration. These workers include supervisory/confidential employees, police, firefighters, prison guards and school principals.	None	Legal	Legal, with conditions. Statute: Minnesota Statutes: 179A.18(2) "...public employees may strike only under the following circumstances:(1)(a) the collective bargaining agreement between their exclusive representative and their employer has expired or, if there is no agreement, impasse under section 179A.17, subdivision 2, has occurred; and(b) the exclusive representative and the employer have participated in mediation over a period of at least 45 days, provided that the mediation period established by section 179A.17, subdivision 2, governs negotiations under that section, and provided that for the purposes of this sub clause the mediation period commences on the day following receipt by the commissioner of a request for mediation ..."	
Mississippi	Yes, but not according to state law	Not outlined	N/A	Not outlined	Yes, except for those under the jurisdiction of the Federal Railway Labor Act.	Illegal	Illegal. Statute: Mississippi Code: 37-9-75(2) "It is hereby declared that a strike, concerted work stoppage or concerted refusal to perform lawful duties in any manner by certified teachers against public school districts within the state of Mississippi shall be illegal, unprotected and contrary to the public policy of the State of Mississippi."	
Missouri	Yes, but not according to state law	Salaries, fringe benefits and other conditions of employment. However, health benefits for state employees are set by state statute.	N/A	Not outlined in law, but can be written into contracts.	Yes, pending it withstands a voter referendum in November 2018	Illegal	Statute: Missouri Revised Statutes: 105.530 "Nothing contained in sections 105.500 to 105.530 shall be construed as granting a right to employees covered in sections 105.500 to 105.530 to strike."	

Montana	Yes	Wages, hours, fringe benefits and other employment conditions.	Mediation, fact-finding, voluntary arbitration	Final and binding arbitration may be requested by both sides during an impasse.	None	Legal	Legal for teachers and general government workers. Illegal for police. Firefighters are allowed to strike unless it is during a labor contract term, or the contract is being negotiated/arbitrated. Nurses may not strike if workers at another health care facility within a 150-mile radius are on strike. Case Law: Montana Dept. of Highways v Public Employees Craft Council of Montana, 529 P 2d 785 (Mont. 1974) The Montana Supreme Court has held that the right to engage in concerted activities guaranteed by PECB gives public employees the right by implication. The Montana Supreme Court held that the right to engage in concerted activities guaranteed by PERB gives employees the right by implication.	
Nebraska	Yes	Terms and conditions of employment and the administration of grievances. Retirement programs not bargainable for state employees.	Mediation, fact-finding		Yes	Illegal	Unlawful if it hinders, delays, limits or suspends the continuity or efficiency of any governmental service in a proprietary capacity. Statute: Nebraska Statutes: 48-802(2) "No right shall exist in any natural or corporate person or group of persons to hinder, delay, limit, or suspend the continuity or efficiency of any governmental service or governmental services is a proprietary capacity of this state, either by strike, lockout or other means."	
Nevada	Yes	Wages, hours, other terms and conditions of employment (See N.R.S. 288.150 for scope of mandatory bargaining of local government employer).	Mediation, fact-finding, voluntary arbitration	Required for firefighters and police officers if fact-finding does not resolve dispute. Not required for other public employees, but the parties may agree to make findings of fact-finders binding prior to the submission of the dispute.	Yes	Illegal	Illegal, with penalties. Statute: Nev. Rev. Stat. Ann. § 288.230 "The Legislature therefore declares it to be the public policy of the State of Nevada that strikes against the State or any local government employer are illegal."	Participating union fined \$50,000 for each strike day, union officer fined \$1,000 each day or imprisoned, and teachers dismissed or suspended. If strike persists, dismissal, contract cancellation, and lost wages instituted.
New Hampshire	Yes	Wages, hours, fringe benefits, and other employment conditions.	Mediation, fact-finding	No form of binding arbitration; only mediation and fact-finding.	None	Illegal	Statute: New Hampshire Revised Statutes: 273- A:13 "Strikes and other forms of job action by public employees are hereby declared to be unlawful."	
New Jersey	Yes	Wages, hours, fringe benefits, terms and conditions of employment.	Mediation, fact-finding, voluntary arbitration		None	Illegal	Illegal. Whether or not public employees could strike was not outlined in statute, but established by Case Law: Board of Ed., Borough of Union Beach v. New Jersey Ed. Ass'n, 247 A.2d 867, 53 N.J. 29 (N.J., 1968) School employees do not have the right to strike.	
New Mexico	Yes	Wages, hours, fringe benefits and other terms and conditions of employment except retirement benefits. For public school employees and educational workers in state agencies, "the impact of professional and instructional decisions made by the employer" is a mandatory subject of bargaining	Mediation, voluntary arbitration	During impasses, either party may request arbitration, which is then binding and final and limited to selecting one side's complete last, best, offer.	None	Illegal	Illegal, with penalties. Statute: New Mexico Statutes: 10-7E-21(A) "A public employee or labor organization shall not engage in a strike. A labor organization shall not cause, instigate, encourage or support a public employee strike. A public employer shall not cause, instigate or engage in a public employee lockout."	Participating union can be decertified.
New York	Yes	Wage, hours, fringe benefits, and other terms and conditions of employment. Retirement benefits are explicitly excluded.	Mediation, fact-finding, voluntary arbitration	Final and binding arbitration exists for essential and public safety workers including firefighters, local and state police, and corrections officers at the request of either the union or government agency, or if initiated by the state's Public Employment Relations Board. Binding arbitration also exists for New York City Transit Authority and certain Metropolitan Transportation Authority workers upon joint request of union/agency or if the Board finds a voluntary resolution cannot be reached.	None	Illegal	Illegal, with penalties. Statute: N.Y. Civ. Serv. Law § 210(1) "No public employee or employee organization shall engage in a strike, and no public employee or employee organization shall cause, instigate, encourage, or condone a strike."	Participants subject to removal or other disciplinary actions and fined twice the rate of wages for each strike day, and the union faces loss of dues.
North Carolina	No, explicitly prohibited	Not applicable	N/A		Yes	Illegal	Illegal, with penalties. Statute: N.C. Gen. Stat. Ann. § 95-98.1 "Strikes by public employees are hereby declared illegal and against the public policy of this State."	Considered a lass 1 misdemeanor.
North Dakota	Yes	Pension contributions, health insurance, and other fringe benefits are set by state law.	Mediation, fact-finding	Not required by law, but binding arbitration provisions allowed in teachers' contracts.	Yes	Illegal	Illegal, with penalties. Statute: North Dakota Century Code: 15.1-16- 16 "Teachers and administrators employed by school districts may not participate in a strike."	Loss of full or partial wages for participants.

Ohio	Yes	Wages, hours, fringe benefits, and other terms and conditions of employment	Mediation, fact-finding, voluntary arbitration	Yes, for essential employees such as state and local police, firefighters, civilian dispatchers, corrections officers, and guards at mental institutions. Other types of government agencies and employee unions may mutually request binding arbitration during an impasse. Final settlements awarded are subject to review by the court of common pleas with jurisdiction over the public agency in question.	None	Legal	Legal for teachers and other types of government workers if 10-day notice is given, the strike happens on consecutive full workdays, and at least 10 working days have passed since the bargaining unit's last strike. A public agency may seek a temporary restraining order against a lawful strike if it would endanger the health or safety of the public. Statute: Ohio Rev. Code Ann. § 4117.14 "Public employees other than those listed in division (D)(1) of this section have the right to strike under Chapter 4117 of the Revised Code..."	
Oklahoma	Yes	Wages, hours, fringe benefits and other terms and conditions of employment.	Fact-finding		Yes	Illegal	Illegal, with penalties. Statute: Okla. Stat. Ann. tit. 70, § 509.8 "It shall be illegal for the organization to strike or threaten as a means of resolving differences with the board of education."	Participating employees lose full wages for each strike day and the union loses representation rights.
Oregon	Yes	Wages, fringe benefits, leave, hours, and other terms and conditions of employment. Retirement contributions are set by state law, and generally only whether the government agency (such as school districts or state) pays the employee 6% contribution can be negotiated.	Mediation, fact-finding, voluntary arbitration	Final binding arbitration procedures can be requested during an impasse.	None	Legal	Teachers may strike under certain conditions, including: if no agreement has been reached 30 days after each side submits its final offer or after a factfinder releases his report; official notice has been given of the strike; and the previous contract has expired or was subject to re-negotiation. "It shall be lawful for a public employee who is not prohibited from striking under subsection (1) of this section and who is in the appropriate bargaining unit involved in a labor dispute to participate in a strike over mandatory subjects of bargaining..."	
Pennsylvania	Yes	Wages; hours; fringe benefits; and other terms and conditions of employment.	Mediation, fact-finding, mandatory binding arbitration	Binding arbitration is also required for teachers, with a choice among settlement options: final best package offer from employer/union/fact-finder (if the last exists); issue-by-issue settlement from one of the three; or selecting one of the three's offers based on considering economic and non-economic issues as "separate units." Other unions and government agencies, including teachers, may submit impasses to arbitration which is final and binding pending legislative enactment for provisions that require such approval.	None	Legal	Legal, with conditions. Legal for teachers (with limitations on duration) once impasse procedures are exhausted. Case law says teachers cannot continue a strike if it would have the effect of depriving children of the mandatory number of school days. Statute: 43 Pa. Stat. Ann. § 1101.1003 "If a strike by public employees occurs after the collective bargaining processes set forth in sections 801 and 802 of Article VIII of this act have been completely utilized and exhausted, it shall not be prohibited unless or until such a strike creates a clear and present danger or threat to the health, safety or welfare of the public."	
Rhode Island	Yes	Wages, hours, some benefits, working conditions, and terms and conditions of employment. Retirement benefits are excluded for state and school employees; health care for school district employee must comply with separate statutory benefit requirements to be included in collective bargaining agreements.	Mediation, voluntary arbitration	Binding arbitration for state and municipal workers exists only for non-monetary matters. Once both sides in teacher bargaining agree to arbitration, it is binding on all issues in question.	None	Illegal	Statute: R.I. Gen. Laws Ann. § 28-9.3-1 "...nothing contained in this chapter shall be construed to accord to certified public school teachers the right to strike."	
South Carolina	No	Not applicable	N/A		Yes, for private sector workers. Not applicable to government employees.	Illegal	Not addressed in statute or case law, but considered illegal for this report considering collective bargaining is illegal.	
South Dakota	Yes	Wages, hours, some pension benefits, fringe benefits and other conditions of employment.	Mediation		Yes	Illegal	Statute: S.D. Codified Laws § 3-18-10 "No public employee shall strike against the State of South Dakota, any of the political subdivisions thereof, any of its authorities, commissions, or boards, the public school system or any other branch of the public service."	
Tennessee	No for police/firefighters; "collaborative conferencing" permitted for teachers	Conferencing negotiations may include salaries and wages, grievance procedures, insurance, fringe benefits (except pensions or retirement packages), working conditions, leave, and payroll deductions. Conferencing may not include incentive compensation plans, expenditure of grants or awards, evaluation of professional employees pursuant to State or Federal law, staffing decisions, personnel decisions, or payroll deductions for political activities.	N/A	Arbitration eliminated by the Professional Educators Collaborative Conference Act of 2011.	Yes	Illegal	Illegal, with penalties. Statute: Tenn. Code Ann. § 49-5-606 (b)(5) "It is unlawful for a recognized professional employees' organization or its representatives to: Engage in a strike;."	Tennessee has a process for school boards to follow if teachers strike which grants them special ability to dismiss and revoke tenure rights and other special powers.

Texas	No, explicitly prohibited	Compensation, hours, fringe benefits, and other conditions of employment. Compensation and conditions of employment must be equal to what's offered in comparable employment in the private sector.	N/A	Arbitration for governments bargaining with public safety unions.	Yes	Illegal	Illegal, with penalties. Statute: Tex. Gov't Code Ann. § 617.003 "Public employees may not strike or engage in an organized work stoppage against the state or a political subdivision of the state."	Participants forfeit all civil service rights, reemployment rights, and any other rights, benefits, and privileges the employee enjoys as a result of public employment or former public employment.
Utah	Yes, but not according to state law	Collective Bargaining for non-firefighters may include issues relating to rates of pay, wages, hours of employment, and other conditions of employment.	N/A	A process for arbitration is only stipulated for firefighters.	Yes	No statute or case law	The ability for public workers to strike, except for firefighters, is not addressed.	
Vermont	Yes	Generally, salaries, fringe benefits, hours and other working conditions.	Mediation, fact-finding, voluntary arbitration	Arbitration for certain classes of employees, including teachers and municipal employees if both sides submit to it.	None	Legal	Legal for teachers if they are not in the process of binding arbitration. Statute: Vt. Stat. Ann. tit. 16, § 2010 "No restraining order or temporary or permanent injunction shall be granted in any case brought with respect to any action taken by a representative organization or an official thereof or by a school board or representative...."	
Virginia	No, explicitly prohibited	N/A	N/A		Yes	Illegal	Illegal, with penalties. Statute: Va. Code Ann. § 40.1-55 "Any employee of the Commonwealth...who...strikes or willfully refuses to perform the duties of his employment shall, by such action, be deemed to have terminated his employment and shall thereafter be ineligible for employment in any position or capacity during the next twelve months by the Commonwealth, or any county, city, town or other political subdivision of the Commonwealth, or by any department or agency of any of them."	Participants forfeit employment for 1 year.
Washington	Yes	Generally, wages, hours, fringe benefits and terms and conditions of employment. Employee pension benefits and contributions are generally set by statute.	Mediation, fact-finding, voluntary arbitration	Arbitration only for police, firefighters, public transit and other uniformed personnel (except Washington state patrol, if the legislature does not approve arbitrated agreement).	None	Illegal	Statute: Wash. Att'y Gen. Op. 2006 NO. 3 (2006) "In Washington, state and local public employees do not have a legally protected right to strike."	
West Virginia	Yes, but not according to state law	No state law, but negotiation is permissible.	N/A		Yes, as of July 1, 2016.	Illegal	Striking is not addressed for non-public sector school employees. Striking is illegal for teachers, according to case law. Case Law: Jefferson County Bd. of Educ. v Jefferson County Educ. Ass'n 393 S.E. 2d 653, 659 (W.Va. 1990) "Teachers have no right to strike."	
Wisconsin	Yes	State law limits bargaining to just base wages for general public employees. Public safety employees are exempt from this restriction.	Mediation	Municipal employers and public safety employees may petition for binding arbitration. It is not required for state employees.	Yes. Public safety or transit employees may be required to pay a fair share fee.	Illegal	Illegal, with penalties. Statute: Wis. Stat. Ann. § 111.70 "(4) (L) Nothing contained in this subchapter constitutes a grant of the right by any municipal employee or labor organization, and such strikes are hereby expressly prohibited."	Participants may be charged with a misdemeanor.
Wyoming	Yes, but not according to state law	Teachers' ability to negotiate on items is not specified, however they are granted the right to negotiate for acceptable terms and conditions of employment.	N/A	The Wyoming State Constitution prohibits arbitration from being binding.	Yes	No statute or case law	No statute specifically addresses an allowance or prohibition of public worker strikes. They can be negotiated in individual collective bargaining agreements.	