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## NLRB: Employer's Obligation to Deduct Union Dues Ends When CBA Ends

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The National Labor Relations Board has held that an employer's obligation to deduct union dues ends when the collective bargaining agreement containing the checkoff provision expires. *Valley Hospital Medical Center, Inc. d/b/a Valley Hospital Medical Center,* 368 NLRB No. 139 (Dec. 16, 2019).

The NLRB overruled *Lincoln Lutheran of Racine*, 362 NLRB 1655 (2015), in which the Board held an employer continues to have an obligation to deduct union dues from employee paychecks despite the expiration of a collective bargaining agreement containing a dues check-off provision on which the deductions were based.

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