

As part of the proposed rules, the Department proposes to revise the employer report (LM-10) and the consultant report (LM-20) forms, along with the instructions for each, to reflect the new interpretation. Each new report contains an itemized checklist of 12 reportable activities (plus a catchall “other”):

- *Drafting, revising, or providing written materials for presentation, dissemination, or distribution to employees*
- *Drafting, revising, or providing a speech for presentation to employees*
- *Drafting, revising, or providing audiovisual or multi-media presentations for presentation, dissemination, or distribution to employees*
- *Drafting, revising or providing website content for employees*
- *Planning or conducting individual or group employee meetings*
- *Developing or administering employee attitude surveys concerning union awareness, sympathy or proneness*
- *Training supervisors or employer representatives to conduct individual or group employee meetings*
- *Coordinating or directing the activities of supervisors or employee representatives*
- *Establishing or facilitating employee committees*
- *Developing personnel policies or practices*
- *Deciding which employees to target for persuader activity or disciplinary action*
- *Conducting a seminar for supervisors or employer representatives*