

SETTLEMENT AGREEMENT  
BETWEEN THE  
UNITED STATES POSTAL SERVICE  
AND THE  
AMERICAN POSTAL WORKERS UNION, AFL-CIO

Re: Clerk Craft Jobs MOU Remedy – Case No. Q10C-4Q-C 15174956

In accordance with the terms of this Settlement Agreement, the parties agree to a full and final resolution and remedy of the pending dispute involving the Memorandum of Understanding (MOU), Re: Clerk Craft Jobs, Arbitrator Stephen Goldberg's April 21, 2017 Award in case number Q10C-4Q-C 15174956, and grievances held pending the outcome of the issues in the above-referenced national level case as follows:

1. The monetary remedy for the Clerk Craft Jobs MOU will be administered by the parties at the national level. Within 14 days of the signing of this Settlement Agreement, the Postal Service will provide the APWU a list of the employees who were awarded the HR Clerk and Training Technician positions and those employees who were the successful bidders on the subsequent vacancies, to include Postal Support Employees (PSEs) converted to career, when applicable.
2. No later than sixty (60) days from the signing of this Settlement Agreement, the parties will identify the appropriate individual make-whole remedy for those individuals identified in the list provided in paragraph 1 above, consistent with the above referenced Goldberg award, Section 3, pages 18-19. If the parties are unable to reach agreement on the appropriate remedy for any individual(s), the issue(s) will be handled by the parties' Alternative Dispute Resolution Process (ADRP).
3. Any reversion grievances that were filed at the local level related to subsequent vacancies created as a result of the posting and filling of the 362 HR Clerk and Training Technician positions will be processed in accordance with Article 15 of the National Agreement. If adjudicated in the Union's favor the remedy will continue with successful bidder/PSE conversion of the reverted position. The parties at the national level will be responsible for identifying the appropriate payee and monetary liability. If the parties are unable to reach agreement on the appropriate remedy, the issue will be handled by the parties' ADRP. Any outstanding issues in reversion grievances filed at the local level that are not directly related to the Clerk Craft Jobs MOU Remedy will be subject to the Article 15 grievance-arbitration process.
4. No later than ninety (90) days from the signing of this agreement, the Postal Service will create a new Clerk Craft job description and qualification standards related to the handling of various government services. Thereafter, the new job description and qualification standards notification to the APWU will be provided in accordance with Article 19 of the National Agreement. The Union reserves the right to challenge the job description and qualification standards, in accordance with Article 19.
5. The Postal Service will establish and post a minimum of 54 duty assignments, as referenced in paragraph 4 above, no later than September 31, 2022.

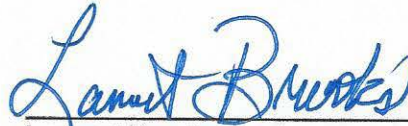
6. Except as provided herein, it is understood by the parties that this Agreement is a full and final resolution of the grievance and dispute set forth in national case number Q10C-4Q-C 15174956. Except as provided in paragraphs 2 and 3 above, the Postal Service will be relieved from any further liability concerning these disputes.
7. The Union has the right to challenge the enforcement of the terms of the settlement agreement. Those issues will be addressed exclusively via the parties ADRP.

Additionally, the APWU has a national level dispute regarding the Learning Management System (LMS) and OAYsis, Case No. Q06C-4Q-C 10278913, which includes the elimination of Training Technician positions. If the APWU is successful in the LMS/OAYsis dispute, the fifty-four (54) Training Technician positions created as part of the Clerk Craft Jobs MOU Remedy case will be deducted from any remedy awarded.



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Shannon R. Richardson  
Director, Contract Administration (APWU)  
United States Postal Service



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Lamont Brooks  
Director, Clerk Craft Division  
American Postal Workers Union,  
AFL-CIO

Date: January 13, 2022