

SETTLEMENT AGREEMENT
National Grievance – 1/31/2011
“Failure to Provide Proper Notice and An Opportunity
To Bargain over the 2011 Voice of the VA (“VOVA”) Survey”
April 13, 2011

The National Veterans Affairs Council – American Federation of Government Employees (“AFGE” or the “Union”) and the Department of Veterans Affairs (“Agency”) hereby agrees to settle all disputes arising out of the AFGE’s National Grievance 01/31/2011, “Failure to Provide Proper Notice and an Opportunity to Bargain Over the 2011 Voice of the VA Survey” (“National Grievance”), in accordance with the following terms and conditions:

I. Withdrawal of Grievance:

By execution of this settlement agreement (hereafter “Agreement” or “Settlement Agreement”), AFGE voluntarily withdraws the National Grievance and waives any and all actions, claims, complaints, grievances, appeals, or proceedings of whatever nature arising from the allegations contained in the National Grievance, with the exception of any grievances that may arise by reason of breach of any term of this Settlement Agreement. AFGE agrees to promptly provide any document or take other action necessary to effectuate the withdrawal or dismissal of the National Grievance.

II. Terms of the Settlement:

By execution of this Agreement, AFGE and the Agency (collectively the “parties”) have agreed to the following:

1. The Agency acknowledges that in December 2010, timely notice by regular U.S. mail was not provided to AFGE National Veterans Affairs Council (“NVAC”) concerning the implementation of the 2011 VOVA survey.

III. Stipulations:

1. The parties have entered into this Settlement Agreement freely and voluntarily.
2. This Settlement Agreement does not constitute an admission of guilt, fault, or wrongdoing by either party.
3. The obligations of the parties specified above constitute consideration sufficient to render this Settlement Agreement enforceable by either party.
4. This Settlement Agreement shall not serve as precedent for resolving any other complaints, grievances, appeals, or actions that may be filed.
5. This Settlement Agreement constitutes the entire understanding between the parties regarding the resolution and settlement of the National Grievance, and there are no other terms or commitments, verbal or written, regarding the settlement of the National Grievance.

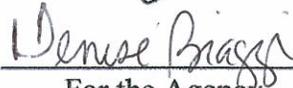
6. Either party may bring a claim in the form of a grievance arising by reason of breach of any term of this Settlement Agreement.

7. This Settlement Agreement may not be modified, except by a written agreement signed by the undersigned herein:



For AFGE

DATE: 4/25/2011_____



For the Agency

DATE: 4/25/2011_____