

ISSUE: TRANSFER REQUEST - DENIALS¹ ARTICLE 12 AND MEMO OF UNDERSTANDING	
DOCUMENTATION	EXPLANATION
All grievance paperwork	All paperwork developed and utilized in the grievance procedure
All Applicable regulations EL-311 section 253, Article 12, Transfer Memo page 316 1998-2000 CBA	Establishes work rule and criteria
All written correspondence from employee and Postal Service regarding transfer request	Normally this is the factor that triggers consideration for transfer and subsequent decisions. This would include stated reasons for denial.
Employee's PS Form 50, employee's work history	Shows employees date of hire, how long in present installation, present craft, level and step. Transfer memo says exception to time in present office waived if employee is seeking transfer to office where they were formerly employed.
If applicable, employee's paycheck stubs or clock rings; records of craft hours used in gaining installation; and craft complement in gaining installation	Transfer memo says exception to time in present office depends on if employee can get more hours by transferring. This would generate proofs.
Installation heads' evaluation, from both the gaining and losing installation, employee's 3972 with written explanation from employee if sick leave balance is an issue, and safety and/or accident record if applicable.	Transfer memo states that full consideration will be given to employee's work, safety and attendance record
Employee's training records, and other proofs of skills, qualifications and knowledge	Transfer memo states employee must meet minimum qualifications for all jobs for which they request reassignment
Written statement from employee rebutting management's reasons for denial of transfer	Helps to prove management does not have valid reasons for denying the transfer
Hiring registers, seniority list, personnel memos, size and location of office, and list of transfer requests for last 2 years	Shows whether PS meets criteria of 1 transfer in every four or six hired depending on office size. Also, whether geographically adjacent or not.
Applicable case law. Remember difference between precedent and persuasive value	Strengthens case through Step 4s, national arbitrations or pre-arbs, regional arbitrations or pre-arbs. Cites must be on point

¹This only refers to transfers outside the installation which fall under Article 12 and the Memo of Understanding.