

FACTUAL HISTORY

On November 7, 2023 appellant, then a 70-year-old loan specialist, filed a traumatic injury claim (Form CA-1) alleging that on September 14, 2023 she sustained face, right hand/wrist, and left knee injuries when walking to a vending machine while in the performance of duty. OWCP accepted the claim for right wrist sprain and right radial styloid tenosynovitis (de Quervain). It paid appellant intermittent disability on the supplemental and periodic rolls from September 15, 2023 through June 29, 2025. Appellant returned to light duty (six hours per day), answering telephones on June 30, 2025.

In a progress note dated June 23, 2025, Dr. Yashbir Rana, a physician Board-certified in preventive medicine, related that appellant was treated for worsening right wrist complaints. Appellant related that her hand specialist recommended trigger finger surgery, for which she would be off of work for eight weeks. Dr. Rana noted that appellant's work status was "modified duty."

In a July 1, 2025 note, Dr. Julie Woodside, a Board-certified orthopedic surgeon, related that appellant would work for six hours a day, 30 minutes at a time, with 15-minute breaks.

In a July 11, 2025 disability note, Dr. Woodside advised that appellant should not return to work. She held appellant off work commencing July 14, 2025 due to her "hands."

In a work capacity evaluation (Form OWCP-5c) dated July 23, 2025, Dr. Rana advised that appellant was disabled from work due to orthopedic surgery. He estimated she would be off work for approximately six months. In a report of even date, Dr. Rana diagnosed right wrist sprain and radial styloid tenosynovitis (de Quervain). He noted that, on physical examination, appellant had a well-healed surgical scar, with swelling over the carpometacarpal joint (CMC).

On August 13, 2025 appellant filed a claim for compensation (Form CA-7) for disability from work during the period July 29 through August 9, 2025.

In a development letter dated August 22, 2025, OWCP informed appellant of the deficiencies of her Form CA-7 disability claim. It advised her of the type of factual and medical evidence necessary to establish her claim and afforded her 30 days to submit the necessary evidence.

OWCP subsequently received medical evidence from Dr. Woodside. In progress notes dated June 19, 2025, Dr. Woodside related appellant's complaints of locking in both index fingers for approximately three weeks, sudden in onset. She noted full extension and flexion of the fingers and wrist, except with active triggering and locking of the bilateral index fingers, left more severe than right. Dr. Woodside diagnosed bilateral trigger finger and noted that appellant would undergo left trigger finger release. She concluded that she would hold appellant off of work as appellant could not really use her hands.

In a disability note dated July 9, 2025, Dr. Woodside advised that appellant was disabled from work until after her hand surgery.

On August 22, 2025 appellant filed a Form CA-7 claiming disability from work during the period August 10 to 22, 2025.

Dr. Rana, in a Form OWCP-5c dated August 25, 2025, advised that appellant was disabled from work due to orthopedic surgery. In a report of even date, he noted that appellant had undergone left hand trigger finger release, and was off work due to her surgery.

In progress notes dated September 16, 2025, Dr. Woodside related that appellant was provided a note on July 11, 2025 keeping her off work commencing July 14, 2025 until healed from her surgery. She explained that appellant was disabled from work due to a worsening of her bilateral hand trigger fingers. Dr. Woodside related that appellant had locking and catching of her fingers, bilateral hand stiffness and weakness, and inability to grasp or use her hands. In a disability note of even date, she found appellant disabled from work, noting she underwent hand surgery. Dr. Woodside anticipated a return to work after October 20, 2025.

By decision dated September 25, 2025, OWCP denied appellant's claim for disability from work commencing July 11, 2025, finding that the medical evidence of record was insufficient to establish disability from work causally related to the accepted September 14, 2023 employment injury.

LEGAL PRECEDENT

An employee seeking benefits under FECA³ has the burden of proof to establish the essential elements of his or her claim, including that any disability or specific condition for which compensation is claimed is causally related to the employment injury.⁴ The term disability is defined as the incapacity, because of an employment injury, to earn the wages the employee was receiving at the time of the injury.⁵ For each period of disability claimed, the employee has the burden of proof to establish that he or she was disabled from work as a result of the accepted employment injury.⁶ Whether a particular injury causes an employee to become disabled from work, and the duration of that disability, are medical issues that must be proven by a preponderance of the reliable, probative, and substantial medical evidence.⁷

Under FECA, the term disability means incapacity, because of an employment injury, to earn the wages that the employee was receiving at the time of injury.⁸ Disability is, thus, not synonymous with physical impairment which may or may not result in an incapacity to earn wages.⁹ An employee who has a physical impairment causally related to his or her federal

³ *Supra* note 1.

⁴ *V.H.*, Docket No. 23-1013 (issued July 24, 2022); *C.B.*, Docket No. 20-0629 (issued May 26, 2021); *D.S.*, Docket No. 20-0638 (issued November 17, 2020); *S.W.*, Docket No. 18-1529 (issued April 19, 2019); *Elaine Pendleton*, 40 ECAB 1143 (1989); *see also Nathaniel Milton*, 37 ECAB 712 (1986).

⁵ 20 C.F.R. § 10.5(f); *V.H.*, *id.*; *S.T.*, Docket No. 18-412 (issued October 22, 2018); *Cheryl L. Decavitch*, 50 ECAB 397 (1999).

⁶ *V.H.*, *id.*; *K.C.*, Docket No. 17-1612 (issued October 16, 2018); *William A. Archer*, 55 ECAB 674 (2004).

⁷ *V.H.*, *id.*; *S.G.*, Docket No. 18-1076 (issued April 11, 2019); *Fereidoon Kharabi*, 52 ECAB 291-92 (2001).

⁸ *Supra* note 5 at § 10.5(f); *see M.M.*, Docket No. 24-0553 (issued July 30, 2025); *J.T.*, Docket No. 19-1813 (issued April 14, 2020); *S.L.*, Docket No. 19-0603 (issued January 28, 2020); *Cheryl L. Decavitch*, 50 ECAB 397 (1999).

⁹ *M.M.*, *id.*; *J.S.*, Docket No. 19-1035 (issued January 24, 2020).

employment, but who nonetheless has the capacity to earn the wages that he or she was receiving at the time of injury, has no disability and is not entitled to compensation for loss of wage-earning capacity.¹⁰ When, however, the medical evidence establishes that the residuals or sequelae of an employment injury are such that, from a medical standpoint, they prevent the employee from continuing employment, the employee is entitled to compensation for any loss of wages.¹¹

The Board will not require OWCP to pay compensation for disability in the absence of any medical evidence directly addressing the specific dates of disability for which compensation is claimed. To do so would essentially allow employees to self-certify their disability and entitlement to compensation.¹²

ANALYSIS

The Board finds that appellant has not met her burden of proof to establish disability from work commencing July 11, 2025, causally related to the accepted September 14, 2023 employment injury.

Dr. Woodside, in a progress notes dated June 19, 2025, related appellant's complaints of locking in both index fingers, for approximately three weeks, sudden in onset. She noted full extension and flexion of the fingers and wrist, except with active triggering and locking of the bilateral index fingers, left more severe than right. These notes did not, however, address disability. The Board has held that medical evidence that does not address whether the claimed disability is causally related to the accepted employment-related conditions is of no probative value.¹³ Therefore, this evidence is insufficient to establish appellant's disability claim.

In notes dated July 9 and 11, and September 16, 2025, Dr. Woodside advised that appellant would be off work due to her left trigger finger surgery and subsequent recovery. However, she did not explain with medical rationale how or why appellant's disability from work during the claimed period was causally related to the accepted September 14, 2023 employment injury. The Board has held that a report is of limited probative value regarding causal relationship if it does not contain medical rationale explaining how a given medical condition/disability was related to employment factors.¹⁴ Thus, this evidence is insufficient to establish appellant's disability claim.

Dr. Rana, in form reports dated July 23 and August 25, 2025, noted that appellant was disabled from work due to orthopedic surgery. However, he did not provide rationale for his opinion. As such, these form reports are of diminished probative value and are insufficient on the

¹⁰ See *M.M., id.*; *D.N.*, Docket No. 19-1344 (issued November 6, 2020); *G.R.*, Docket No. 19-0940 (issued December 20, 2019); *S.M.*, 58 ECAB 166 (2006); *Bobbie F. Cowart*, 55 ECAB 746 (2004).

¹¹ *J.T.*, *supra* note 8; *S.L.*, *supra* note 8.

¹² *Id.*; *Fereidoon Kharabi*, *supra* note 7.

¹³ See *N.W.*, Docket No. 25-0270 (issued April 7, 2025); *M.T.*, Docket No. 24-0465 (issued September 27, 2024); *A.O.*, Docket No. 24-0382 (issued May 16, 2024); *F.S.*, Docket No. 23-0112 (issued April 26, 2023); *L.B.*, Docket No. 18-0533 (issued August 27, 2018); *D.K.*, Docket No. 17-1549 (issued July 6, 2018).

¹⁴ See *Y.D.*, Docket No. 16-1896 (issued February 10, 2017).

issue of causal relationship.¹⁵ Therefore, this evidence is insufficient to establish appellant's disability claim.

As the medical evidence of record is insufficient to establish causal relationship between the claimed period of disability and the accepted September 14, 2023 employment injury, the Board finds that appellant has not met her burden of proof.

Appellant may submit new evidence or argument with a written request for reconsideration to OWCP within one year of this merit decision, pursuant to 5 U.S.C. § 8128(a) and 20 C.F.R. §§ 10.605 through 10.607.

CONCLUSION

The Board finds that appellant has not met her burden of proof to establish disability from work commencing July 11, 2025, causally related to the accepted September 14, 2023 employment injury.

ORDER

IT IS HEREBY ORDERED THAT the September 25, 2025 decision of the Office of Workers' Compensation Programs is affirmed.

Issued: April 16, 2026
Washington, DC

Alec J. Koromilas, Chief Judge
Employees' Compensation Appeals Board

Patricia H. Fitzgerald, Deputy Chief Judge
Employees' Compensation Appeals Board

Valerie D. Evans-Harrell, Alternate Judge
Employees' Compensation Appeals Board

¹⁵ *Id.*; see also *C.B. (S.B.)*, Docket No. 19-1629 (issued April 7, 2020); *Deborah T. Lyon*, Docket No. 05-116 (issued December 9, 2005).