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S.W., Appellant	)	
	)	
and	)	Docket No. 26-0449
	)	Issued: August 5, 2026
U.S. POSTAL SERVICE, LANHAM	)	
SEABROOK POST OFFICE, Lanham, MD,	)	
Employer	)	
	)	

Case Submitted on the Record

Before:
ALEC J. KOROMILAS, Chief Judge
PATRICIA H. FITZGERALD, Deputy Chief Judge
JANICE B. ASKIN, Judge

On April 20, 2026¹ appellant filed a timely appeal from an October 20, 2025 merit decision of the Office of Workers' Compensation Programs (OWCP). Pursuant to the Federal Employees' Compensation Act² (FECA) and 20 C.F.R. §§ 501.2(c) and 501.3, the Board has jurisdiction over the merits of this case.³

² 5 U.S.C. § 8101 *et seq.*

³ The Board notes that, following the October 20, 2025 decision, appellant submitted additional evidence to OWCP. However, the Board's *Rules of Procedure* provides: "The Board's review of a case is limited to the evidence in the case record that was before OWCP at the time of its final decision. Evidence not before OWCP will not be considered by the Board for the first time on appeal." 20 C.F.R. § 501.2(c)(1). Thus, the Board is precluded from reviewing this additional evidence for the first time on appeal. *Id.*

ISSUE

The issue is whether appellant has met her burden of proof to establish a medical diagnosis in connection with the accepted July 24, 2025 employment incident.

FACTUAL HISTORY

On August 5, 2025 appellant, then a 29-year-old city carrier, filed a traumatic injury claim (Form CA-1) alleging that on July 24, 2025 she sustained right hand and wrist injuries when she fell while in the performance of duty. She stopped work on July 24, 2025.

On July 28, 2025 Dr. Ayanna M. Beard, a Board-certified family practitioner, related that she provided medical care on July 24 and 28, 2025 and that appellant was totally disabled from July 28 through August 4, 2025.

On August 4, 2025 Amandeep Chhabra Sandhoo, a physician assistant, examined appellant and related that she had fallen down 14 stairs while at work. She diagnosed de Quervain's tenosynovitis of the right wrist. In a separate note of even date, Ms. Sandhoo indicated that appellant received medical care and would be evaluated by a hand specialist on August 11, 2025.

In an August 11, 2025 note, Dr. Haroon Munawar Hussain, a Board-certified orthopedic surgeon, related that he had provided medical care that day and held appellant off work through September 5, 2025.

In an August 21, 2025 development letter, OWCP informed appellant of the deficiencies of her traumatic injury claim and advised her of the type of evidence needed. It afforded her 60 days to respond.

OWCP continued to receive evidence. Appellant resubmitted Ms. Sandhoo's August 4, 2025 note.

In a follow-up September 25, 2025 letter, OWCP advised appellant that it had conducted an interim review, and the evidence remained insufficient to establish her claim. It noted that she had 60 days from the August 21, 2025 letter to submit the necessary evidence. OWCP further advised that if the evidence was not received during this time, it would issue a decision based on the evidence contained in the record. No response was received.

By decision dated October 20, 2025, OWCP denied appellant's traumatic injury claim, finding that the medical evidence of record did not contain a diagnosis in connection with the accepted July 24, 2025 employment incident. It concluded, therefore, that the requirements had not been met to establish an injury as defined by FECA.

LEGAL PRECEDENT

An employee seeking benefits under FECA⁴ has the burden of proof to establish the essential elements of his or her claim, including the fact that the individual is an employee of the

⁴ *Supra* note 1.

United States within the meaning of FECA, that the claim was timely filed within the applicable time limitation period of FECA, that an injury was sustained in the performance of duty as alleged, and that any disability or medical condition for which compensation is claimed is causally related to the employment injury.⁵ These are the essential elements of each and every compensation claim, regardless of whether the claim is predicated upon a traumatic injury or an occupational disease.⁶

To determine if an employee has sustained a traumatic injury in the performance of duty, OWCP begins with an analysis of whether fact of injury has been established. Fact of injury consists of two components that must be considered in conjunction with one another. The first component is whether the employee actually experienced the employment incident that allegedly occurred at the time and place, and in the manner alleged.⁷ The second component is whether the employment incident caused an injury.⁸

Causal relationship is a medical question that requires rationalized medical opinion evidence to resolve the issue. The opinion of the physician must be based on a complete factual and medical background, must be one of reasonable medical certainty, and must be supported by medical rationale explaining the nature of the relationship between the diagnosed condition and the specific employment incident.⁹ Neither the mere fact that a disease or condition manifests itself during a period of employment, nor the belief that the disease or condition was caused or aggravated by employment factors or incidents is sufficient to establish causal relationship.¹⁰

ANALYSIS

The Board finds that appellant has not met her burden of proof to establish a medical diagnosis in connection with the accepted July 24, 2025 employment incident.

Appellant submitted a July 28, 2025 note from Dr. Beard relating that she provided medical care on July 24 and 28, 2025 and that appellant was totally disabled from July 28 through August 4, 2025. In an August 11, 2025 note, Dr. Hussain reported that he had provided medical care and that appellant was totally disabled through September 5, 2025. However, no medical diagnosis in connection with the accepted July 24, 2025 employment incident was provided. It is appellant's burden of proof to obtain and submit medical documentation

⁵ *T.B.*, Docket No. 26-0381 (issued June 25, 2026); *J.M.*, Docket No. 17-0284 (issued February 7, 2018); *R.C.*, 59 ECAB 427 (2008); *James E. Chadden, Sr.*, 40 ECAB 312 (1988).

⁶ *K.M.*, Docket No. 15-1660 (issued September 16, 2016); *L.M.*, Docket No. 13-1402 (issued February 7, 2014); *Delores C. Ellyett*, 41 ECAB 992 (1990).

⁷ *B.P.*, Docket No. 16-1549 (issued January 18, 2017); *Elaine Pendleton*, 40 ECAB 1143 (1989).

⁸ *M.H.*, Docket No. 18-1737 (issued March 13, 2019); *John J. Carlone*, 41 ECAB 354 (1989).

⁹ *S.S.*, Docket No. 18-1488 (issued March 11, 2019).

¹⁰ *J.L.*, Docket No. 18-1804 (issued April 12, 2019).

containing a firm diagnosis in connection with the accepted employment factors.¹¹ Therefore, this evidence is insufficient to establish appellant's traumatic injury claim.

Appellant also submitted August 4, 2025 notes from Ms. Sandhoo, a physician assistant, who diagnosed de Quervain's tenosynovitis. However, certain healthcare providers such as physician assistants are not considered physicians as defined under FECA.¹² Consequently, their medical findings and/or opinions will not suffice for purposes of establishing entitlement to FECA benefits.¹³ Therefore, this evidence is insufficient to establish appellant's traumatic injury claim.

As the medical evidence of record is insufficient to establish a medical diagnosis in connection with the accepted July 24, 2025 employment incident, 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 a medical diagnosis in connection with the accepted July 24, 2025 employment incident.

¹¹ *B.H.*, Docket No. 26-0067 (issued March 3, 2026).

¹² Section 8101(2) provides that physician includes surgeons, podiatrists, dentists, clinical psychologists, optometrists, chiropractors, and osteopathic practitioners within the scope of their practice as defined by State law, 5 U.S.C. § 8101(2); 20 C.F.R. § 10.5(t). *See* Federal (FECA) Procedure Manual, Part 2 -- Claims, *Causal Relationship*, Chapter 2.805.3a(1) (May 2023); *David P. Sawchuk*, 57 ECAB 316, 320 n.11 (2006) (lay individuals such as physician assistants, nurses, and physical and occupational therapists are not competent to render a medical opinion under FECA); *see also T.S.*, Docket No. 19-0056 (issued July 1, 2019) (a physician assistant is not considered a physician as defined under FECA).

¹³ *Id.*

ORDER

IT IS HEREBY ORDERED THAT the October 20, 2025 decision of the Office of Workers' Compensation Programs is affirmed.

Issued: August 5, 2026
Washington, DC

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

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

Janice B. Askin, Judge
Employees' Compensation Appeals Board