

ISSUE

The issue is whether OWCP properly denied appellant's request for authorization of reimbursement for a semi-electric hospital bed and mattress.

FACTUAL HISTORY

On October 12, 2018 appellant, then a 73-year-old retired appraiser/inspector, filed an occupational disease claim (Form CA-2) alleging that he injured his lower back due to factors of his federal employment including carrying equipment, walking, climbing stairs, and traveling. OWCP accepted the claim for lumbar spondylolisthesis, stenosis, disc degeneration, spondylosis, and radiculopathy. It paid appellant wage-loss compensation on the supplemental rolls effective July 23, 2016, and on the periodic rolls effective October 11, 2020.

In an October 15, 2024 medical report, Dr. John B. Dorsey, Board-certified in orthopedic surgery, noted that appellant related complaints of difficulty walking and constant, sharp, aching stiffness across his lower back which radiated to his left lower extremity. He performed a physical examination and observed pain when appellant moved to and from the examination table, restricted range of motion, tenderness to palpation over the paravertebral musculature with muscle spasm and guarding, reduced strength in the bilateral lower extremities, and a positive straight leg raise test on the left. Dr. Dorsey diagnosed lumbar radiculopathy, disc degeneration, spondylolisthesis, spondylosis, and stenosis.

On October 30, 2024 appellant submitted a claim for medical reimbursement (Form OWCP-915) for a semi-electric hospital bed, mattress, and bed rails in the amount of \$9,047.00. In support thereof, he provided a receipt dated October 25, 2024 totaling \$9,047.00, along with a prescription dated October 29, 2024 from Dr. Dorsey for the hospital bed.

In a letter dated November 13, 2024, OWCP informed appellant of the deficiencies of his medical reimbursement claim. It advised him of the type of evidence needed to establish his claim and afforded him 30 days to respond.

In medical reports dated November 19, 2024 through August 5, 2025, Dr. Dorsey related appellant's low back complaints, physical examination findings, and indicated that diagnostic testing demonstrated severe central canal stenosis and L5-S1 radiculopathy. He noted that appellant had purchased a hospital bed and recommended that he continue to use it. In a medical report dated February 18, 2025, Dr. Dorsey indicated that appellant was unable to walk long distances, had been losing his balance, and required the hospital bed "for difficulty getting up due to severe [low back pain] and [lower extremity] weakness."

In a letter dated October 7, 2025, OWCP advised appellant that it would not authorize reimbursement for the semi-electric hospital bed and mattress. It noted that Dr. Dorsey's February 18, 2025 medical report was insufficient to establish that the requested specialized durable medical equipment/supply was medically necessary to treat the accepted July 7, 2016 employment injury. OWCP advised that if appellant disagreed with this determination, then he could request a formal decision with appeal rights from OWCP.

On October 15, 2025 and February 24, 2026 appellant, through counsel, requested that OWCP issue a formal decision with regard to the denial of authorization for reimbursement of the semi-electric hospital bed and mattress.

By decision dated February 25, 2026, OWCP denied authorization for reimbursement for the semi-electric hospital bed and mattress, finding that the evidence of record was insufficient to establish that it was medically necessary to address the effects of appellant's accepted July 7, 2016 employment injury.

LEGAL PRECEDENT

Section 8103 of FECA provides that the United States shall furnish to an employee who is injured while in the performance of duty, the services, appliances, and supplies prescribed or recommended by a qualified physician, which OWCP considers likely to cure, give relief, reduce the degree, or the period of disability, or aid in lessening the amount of monthly compensation.⁴ While OWCP is obligated to pay for treatment of employment-related conditions, the employee has the burden of proof to establish that the expenditure is incurred for treatment of the effects of an employment-related injury or condition.⁵

Section 10.310(a) of OWCP's implementing regulations provides that an employee is entitled to receive all medical services, appliances or supplies which a qualified physician prescribes or recommends and which OWCP considers necessary to treat the work-related injury.⁶ OWCP procedures provide that nonmedical equipment may be authorized only if recommended by the attending physician and if OWCP finds that the item is likely to cure, give relief, reduce the degree or the period of disability, or aid in lessening the amount of monthly compensation.⁷

OWCP must exercise discretion in determining whether the particular service, appliance, or supply is likely to affect the purposes specified in FECA.⁸ The only limitation on OWCP's authority is that of reasonableness.⁹

ANALYSIS

The Board finds that OWCP did not abuse its discretion in denying appellant's request for reimbursement of a semi-electric hospital bed and mattress.

⁴ 5 U.S.C. § 8103; *see B.C.*, Docket No. 20-0566 (issued March 8, 2022); *R.P.*, Docket No. 17-0428 (issued April 19, 2018); *Thomas W. Stevens*, 50 ECAB 288 (1999).

⁵ *See R.P., id.*; *Kennett O. Collins, Jr.*, 55 ECAB 648 (2004); *Zane H. Cassell*, 32 ECAB 1537 (1981).

⁶ 20 C.F.R. § 10.310(a).

⁷ Federal (FECA) Procedure Manual, Part 3 -- Medical, *Medical Services and Supplies*, Chapter 3.400.3.d(5) (October 1995); *see also* Part 2 -- Claims, *Developing and Evaluating Medical Evidence*, Chapter 2.810.17.h (September 2020).

⁸ OWCP has broad discretionary authority in the administration of FECA and must exercise its discretion to achieve the objectives of section 8103. *T.B.*, Docket No. 15-0061 (issued October 27, 2015); *Marjorie S. Greer*, 39 ECAB 1099 (1988); *see also L.M.*, Docket No. 15-0818 (issued August 4, 2015).

⁹ *Daniel J. Perea*, 42 ECAB 214 (1990); *see also D.M.*, Docket No. 15-0814 (issued July 16, 2015).

On October 29, 2024 Dr. Dorsey prescribed a semi-electric hospital bed. In medical reports dated November 19, 2024 through August 5, 2025, he recommended the hospital bed for difficulty getting up due to severe low back pain and lower extremity weakness. However, Dr. Dorsey failed to explain with sufficient rationale why the requested equipment was medically necessary.¹⁰ The Board has held that a medical opinion is of limited probative value if it does not contain sufficient medical rationale in support of the physician's opinion.¹¹

As noted, the only limitation on OWCP's authority is approving or disapproving services under FECA is one of reasonableness.¹² As the medical evidence submitted provided an insufficient explanation of medical necessity, the Board finds that OWCP properly denied appellant's request under section 8103 of FECA.¹³

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 OWCP properly denied authorization for reimbursement of the semi-electric hospital bed and mattress.

¹⁰ See *D.K.*, Docket No. 20-0002 (issued August 25, 2020); *C.G.*, Docket No. 05-0705 (issued October 14, 2005) (appellant's attending physician opined that a requested mattress would provide appellant support and comfort but provided no explanation as to how this would cure, give relief, or reduce the degree of period of disability for the accepted employment conditions).

¹¹ *S.M.*, Docket No. 22-1028 (issued September 8, 2023); *O.M.*, Docket No. 20-0640 (issued April 19, 2021).

¹² *Supra* note 10.

¹³ *Id.*

ORDER

IT IS HEREBY ORDERED THAT the February 25, 2026 decision of the Office of Workers' Compensation Programs is affirmed.

Issued: July 9, 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