

**United States Department of Labor
Employees' Compensation Appeals Board**

B.R., Appellant

and

**U.S. POSTAL SERVICE, HARRISBURG POST
OFFICE, Harrisburg, NC, Employer**

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**Docket No. 26-0465
Issued: July 23, 2026**

Appearances:
Appellant, pro se
Office of Solicitor, for the Director

Case Submitted on the Record

DECISION AND ORDER

Before:

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

JURISDICTION

On April 24, 2026 appellant filed a timely appeal from an April 22, 2026 merit decision of the Office of Workers' Compensation Programs (OWCP). Pursuant to the Federal Employees' Compensation Act¹ (FECA) and 20 C.F.R. §§ 501.2(c) and 501.3, the Board has jurisdiction over the merits of this case.²

ISSUE

The issue is whether OWCP properly denied authorization for travel expenses on November 18 and 20, 2025.

¹ 5 U.S.C. § 8101 *et seq.*

² The Board notes that OWCP received additional evidence following the April 22, 2026 decision. 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 at the time of its final decision 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.*

FACTUAL HISTORY

On June 22, 2019 appellant, then a 48-year-old rural carrier, filed a traumatic injury claim (Form CA-1) alleging that on that date, he experienced headache, nausea, and muscle ache due to a motor vehicle accident that occurred while in the performance of duty. OWCP initially accepted the claim for concussion with loss of consciousness for 30 minutes or less; strain of muscle, fascia, and tendon at neck level; and strain of muscle, fascia, and tendon of lower back. It subsequently expanded the acceptance of the claim to include strain of unspecified muscle, fascia, and tendon at shoulder and upper arm level, left arm, initial encounter; adjustment disorder with mixed anxiety and depressed mood; rotator cuff tear or rupture of left shoulder not specified as traumatic; and lateral epicondylitis, left elbow. OWCP later expanded the acceptance of appellant's claim to include radiculopathy, lumbar region; other intervertebral disc degeneration, lumbar region; and post-traumatic stress disorder, chronic. It paid him wage-loss compensation on the supplemental rolls as of August 3, 2019 and on the periodic rolls as of October 13, 2019.

On November 11, 2025 appellant submitted a request for authorization to travel an estimated 154 miles, *via* a wheelchair van from his home to a medical provider's office/clinic, on November 18, 2025. The estimated total cost was \$1,600.00. In a second travel authorization request, appellant requested authorization to travel an estimated 241 miles *via* a wheelchair van to a medical provider's office/clinic on November 20, 2025. The estimated total cost for that trip was \$1,750.00.

In a development letter dated November 13, 2025, OWCP advised appellant that it was unable to authorize his requests for non-routine travel reimbursement for November 18 and 20, 2025. It noted that his request involved travel that exceeded 100 miles roundtrip from his home to the location of the examination or exceeded \$75.00. OWCP requested that appellant submit evidence that there were no physicians or appropriate treatment facilities within 50 miles of his residence who could provide adequate medical treatment for his accepted conditions; or any other evidence or explanation supporting the need to travel more than 100 miles roundtrip to receive medical treatment for his work-related conditions, that the route to be traveled was the shortest or most direct route to receive medical treatment for his work-related conditions, and provide any additional evidence or explanation in support of the mileage for which prior authorization was being requested. It afforded him 30 days to respond. No response was received.

By decision dated April 22, 2026, OWCP denied authorization for travel expenses on November 18 and 20, 2025.

LEGAL PRECEDENT

OWCP regulations provide that the employee is entitled to reimbursement for reasonable and necessary expenses, including transportation needed to obtain authorized medical services, appliances, or supplies.³ To determine a reasonable travel distance, it will consider the availability of services, the employee's condition, and the means of transportation. Effective

³ 20 C.F.R. § 10.315(a).

August 29, 2011, the most recent regulations provide that a round-trip distance of up to 100 miles is considered a reasonable distance to travel.⁴ If round-trip travel of more than 100 miles is contemplated, or air transportation or overnight accommodations will be needed, the employee must submit a written request to OWCP for prior authorization with information describing the circumstances and necessity for such travel expenses. OWCP will approve the request if it determines that the travel expenses are reasonable and necessary, and are related to obtaining authorized medical services, appliances, or supplies.⁵

Pursuant to FECA Bulletin No. 14-02, when a claimant submits a travel reimbursement in excess of 100 miles for a single date of service, the bill will automatically be suspended, and the Central Bill Processing provider will send notification to OWCP's claims examiner.⁶ FECA Bulletin No. 14-02 notes that, in some limited circumstances, it may be necessary for a claimant to travel more than 100 miles on a regular basis, such as when the claimant lives in a remote area.⁷

In interpreting this section, the Board has recognized that OWCP has broad discretion in approving services provided under FECA.⁸ The only limitation on OWCP's authority is that of reasonableness. OWCP may authorize medical treatment but determine that the travel expense incurred for such authorized treatment was unreasonable or unnecessary.⁹

ANALYSIS

The Board finds that OWCP properly denied authorization for travel expenses on November 18 and 20, 2025.

On November 11, 2025 appellant sought prior authorization from OWCP for travel *via* wheelchair van from his home to an office/clinic for the treatment of his accepted June 22, 2019 employment-related conditions. He submitted a travel authorization request for a wheelchair van to travel an estimated 154 miles on November 18, 2025, with an estimated total cost of \$1,600.00. In a second travel authorization request, received on November 11, 2025, appellant requested a wheelchair van for travel on November 20, 2025, for an estimated 241 miles, and an estimated total cost of \$1,750.00

OWCP's regulations provide that, generally, a round trip of up to 100 miles is a reasonable distance to travel.¹⁰ There may be circumstances where reimbursement for travel of

⁴ *Id.*

⁵ *Id.* at § 10.315(b).

⁶ FECA Bulletin No. 14-02 (issued January 29, 2014).

⁷ *Id.*

⁸ *A.N.*, Docket No. 24-0824 (issued February 21, 2025); *V.L.*, Docket No. 23-0061 (issued August 22, 2023); *S.M.*, Docket No. 19-0989 (issued May 12, 2020); *G.C.*, Docket No. 19-0298 (issued June 24, 2019).

⁹ *Id.*

¹⁰ 20 C.F.R. § 10.315(a).

more than 100 miles is appropriate. An example of those circumstances might be an appellant who lives in a remote area with limited medical services and physicians of an appropriate specialty. In a development letter dated November 13, 2025, OWCP requested that appellant submit evidence that there were no physicians or appropriate treatment facilities within 50 miles of his residence who could provide adequate medical treatment for his accepted conditions; or any other evidence or explanation supporting the need to travel more than 100 miles roundtrip to receive medical treatment for his work-related conditions. To establish that a travel reimbursement of more than 100 miles is warranted, OWCP's regulations provide that the claimant must submit information describing the circumstances and necessity for such travel expenses. Appellant, however, did not respond.

OWCP has broad discretion in considering whether to reimburse or authorize travel expenses.¹¹ As the only limitation on its authority is reasonableness, abuse of discretion is generally shown through proof of manifest error, clearly unreasonable exercise of judgment, or actions taken which are contrary to both logic and probable deduction from known facts.¹² The Board thus finds that OWCP properly denied appellant's request for authorization of travel expenses on November 18 and 20, 2025.

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 of travel expenses on November 18 and 20, 2025.

¹¹ *Id.*

¹² *Id.*; see also *Daniel J. Perea*, 42 ECAB 214 (1990).

ORDER

IT IS HEREBY ORDERED THAT the April 22, 2026 decision of the Office of Workers' Compensation Programs is affirmed.

Issued: July 23, 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