

ISSUE

The issue is whether appellant has met her burden of proof to establish a medical condition causally related to the accepted September 6, 2025 employment incident.

FACTUAL HISTORY

On September 22, 2025 appellant, then a 59-year-old rural carrier, filed a traumatic injury claim (Form CA-1) alleging that, on September 6, 2025, she sustained a right shoulder injury when she grabbed a falling package from her work vehicle as the buggy started to move while in the performance of duty. She stopped work on September 11, 2025, and returned to full-time regular-duty work on October 27, 2025.

In support of her claim, appellant submitted unsigned discharge instructions from an emergency department documenting treatment for a cervical nerve root disorder, osteoarthritis of the cervical spine, and right upper limb pain.

In a September 25, 2025 development letter, OWCP informed appellant of the deficiencies of her claim. It advised her of the type of factual and medical evidence required to establish her claim and provided a questionnaire for her completion. OWCP afforded appellant 60 days to submit the requested evidence.

Thereafter, OWCP received additional evidence. In a September 19, 2026 referral order, Samantha Jackson, an advanced practice registered nurse, noted a diagnosis of extremity numbness and pinched nerve and referred appellant to neurology for further evaluation.

Dennis Kurz, a physician assistant, documented treatment for appellant's right shoulder and cervical radiculopathy following the claimed September 6, 2025 employment incident. He restricted appellant from returning to work and requested additional imaging studies pertaining to the right shoulder and neck.

In an October 10, 2025 form report, Mary Ferguson, a registered nurse, documented treatment for appellant's right shoulder following the claimed September 6, 2025 injury.

OWCP also received a duty status report (Form CA-17) dated October 28, 2025 signed by an unidentifiable healthcare provider.

In a follow-up letter dated November 5, 2025, OWCP advised appellant that it conducted an interim review, and the evidence remained insufficient to establish her claim. It noted that she had 60 days from the September 25, 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 additional evidence was received.

By decision dated November 24, 2025, OWCP denied appellant's claim, finding that the evidence of record was insufficient to establish causal relationship between her diagnosed medical condition and the accepted September 6, 2025 employment incident.

On December 4, 2025 appellant requested reconsideration. In support of her claim, she submitted a November 3, 2025 magnetic resonance imaging (MRI) scan of the right shoulder and cervical spine, and a November 28, 2025 referral from Ms. Ferguson.

By decision dated December 8, 2025, OWCP denied modification of the November 24, 2025 decision.

LEGAL PRECEDENT

An employee seeking benefits under FECA⁴ has the burden of proof to establish the essential elements of his or her claim, including that the individual is an employee of the United States within the meaning of FECA, that the claim was timely filed within the applicable time limitation of FECA,⁵ 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.⁶ 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.⁷

To determine whether a federal employee has sustained a traumatic injury in the performance of duty, it first must be determined whether fact of injury has been established. First, the employee must submit sufficient evidence to establish that he or she actually experienced the employment incident at the time and place, and in the manner alleged. Second, the employee must submit sufficient evidence to establish that the employment incident caused an injury.⁸

The medical evidence required to establish causal relationship between a claimed specific condition and an employment incident is rationalized medical opinion evidence.⁹ The opinion of the physician must be based on a complete factual and medical background of the employee, 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 specific employment incident identified by the employee.¹⁰

ANALYSIS

The Board finds that appellant has not met her burden of proof to establish a medical condition causally related to the accepted September 6, 2025 employment incident.

⁴ *Supra* note 2.

⁵ *E.K.*, Docket No. 22-1130 (issued December 30, 2022); *F.H.*, Docket No. 18-0869 (issued January 29, 2020); *J.P.*, Docket No. 19-0129 (issued April 26, 2019); *Joe D. Cameron*, 41 ECAB 153 (1989).

⁶ *S.H.*, Docket No. 22-0391 (issued June 29, 2022); *L.C.*, Docket No. 19-1301 (issued January 29, 2020); *J.H.*, Docket No. 18-1637 (issued January 29, 2020); *James E. Chadden, Sr.*, 40 ECAB 312 (1988).

⁷ *E.H.*, Docket No. 22-0401 (issued June 29, 2022); *P.A.*, Docket No. 18-0559 (issued January 29, 2020); *K.M.*, Docket No. 15-1660 (issued September 16, 2016); *Delores C. Ellyett*, 41 ECAB 992 (1990).

⁸ *H.M.*, Docket No. 22-0343 (issued June 28, 2022); *T.J.*, Docket No. 19-0461 (issued August 11, 2020); *K.L.*, Docket No. 18-1029 (issued January 9, 2019); *John J. Carlone*, 41 ECAB 354 (1989).

⁹ *S.M.*, Docket No. 22-0075 (issued May 6, 2022); *S.S.*, Docket No. 19-0688 (issued January 24, 2020); *A.M.*, Docket No. 18-1748 (issued April 24, 2019); *Robert G. Morris*, 48 ECAB 238 (1996).

¹⁰ *J.D.*, Docket No. 22-0935 (issued December 16, 2022); *T.L.*, Docket No. 18-0778 (issued January 22, 2020); *Y.S.*, Docket No. 18-0366 (issued January 22, 2020); *Victor J. Woodhams*, 41 ECAB 345, 352 (1989).

In support of her claim, appellant submitted unsigned discharge instructions from an emergency department documenting treatment for cervical nerve root disorder, osteoarthritis of the cervical spine, and right upper limb pain. OWCP also received an October 28, 2025 form report from an unidentifiable healthcare provider. However, the Board has long held that reports that are unsigned or bear an illegible signature lack proper identification and cannot be considered probative medical evidence because the author cannot be identified as a physician.¹¹ Therefore, this evidence is of no probative value and is insufficient to establish the claim.

Appellant also submitted form reports from Mr. Kurz, a physician assistant, and Ms. Jackson, and Ms. Ferguson, nurses. However, certain healthcare providers such as nurses and physician assistants are not considered physicians as defined under FECA and their reports do not constitute competent medical evidence.¹² Consequently, these medical findings or opinions are insufficient to meet appellant's burden of proof.¹³

The remaining medical evidence consists of diagnostic test results. The Board has held that diagnostic studies, standing alone, lack probative value as they do not address whether the employment factors caused any of the diagnosed conditions.¹⁴ Such reports are therefore insufficient to establish appellant's claim.

As the medical evidence of record is insufficient to establish causal relationship between appellant's medical condition and the accepted September 6, 2025 employment incident, the Board finds that she has not met her burden of proof.¹⁵

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.

¹¹ *H.T.*, Docket No. 26-0129 (issued March 23, 2026); *L.B.*, Docket No. 21-0353 (issued May 23, 2022); *T.D.*, Docket No. 20-0835 (issued February 2, 2021); *Merton J. Sills*, 39 ECAB 572, 575 (1988).

¹² Section 8102(2) of FECA provides as follows: 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. § 8102(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 therapists are not competent to render a medical opinion under FECA); see also *A.C.*, Docket No. 24-0661 (issued September 11, 2024) (advanced practice registered nurses are not considered physicians as defined under FECA and, therefore, are not competent to provide a medical opinion); *S.S.*, Docket No. 21-1140 (issued June 29, 2022) (physician assistants are not considered physicians under FECA and are not competent to provide medical opinions); *P.S.*, Docket No. 17-0598 (issued June 23, 2017) (registered nurses are not considered physicians as defined under FECA).

¹³ *T.H.*, Docket No. 23-1142 (issued March 28, 2024).

¹⁴ See *C.B.*, Docket No. 25-0772 (issued December 15, 2025); *M.P.*, Docket No. 23-1131 (issued June 18, 2024); *V.A.*, Docket No. 21-1023 (issued March 6, 2023); *M.K.*, Docket No. 21-0520 (issued August 23, 2021); *F.D.*, Docket No. 19-0932 (issued October 3, 2019).

¹⁵ *I.D.*, Docket No. 22-0848 (issued September 2, 2022); *T.G.*, Docket No. 14-751 (issued October 20, 2014).

CONCLUSION

The Board finds that appellant has not met her burden of proof to establish a medical condition causally related to the accepted September 6, 2025 employment incident.

ORDER

IT IS HEREBY ORDERED THAT the November 24 and December 8, 2025 decisions of the Office of Workers' Compensation Programs are affirmed.

Issued: May 13, 2026
Washington, DC

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

Janice B. Askin, Judge
Employees' Compensation Appeals Board

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