United States Department of Labor
Employees' Compensation Appeals Board

K.C., Appellant	)	
and	)	**Docket No. 24-0498**
	)	**Issued: September 10, 2026**
U.S. POSTAL SERVICE, SAINT ANN POST OFFICE, Saint Ann, MO, Employer	)	

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 10, 2024 appellant filed a timely appeal from a March 1, 2024 merit decision of the Office of Workers' Compensation Programs (OWCP). Pursuant to the Federal Employees' Compensation Act[1] (FECA) and 20 C.F.R. §§ 501.2(c) and 501.3, the Board has jurisdiction over the merits of this case.

ISSUE

The issue is whether OWCP abused its discretion by denying appellant's requests for reimbursement of the remaining claimed travel expenses.

[1] 5 U.S.C. § 8101 *et seq*.

FACTUAL HISTORY

This case has previously been before the Board on a different issue.[2] The facts and circumstances as presented in the Board's prior decision are incorporated herein by reference. The relevant facts are as follows.

On September 13, 2010 appellant, then a 55-year-old letter carrier, filed a traumatic injury claim (Form CA-1) alleging that on September 9, 2010 he sustained injuries to his head, stomach, left hand, left knee, and left shoulder, when he slipped on the lip of a driveway and fell while in the performance of duty.[3] He stopped work on the date of injury. OWCP accepted the claim for frontal sinus fracture and subsequently expanded the acceptance of the claim to include crushing face injury, left visual disturbance, bilateral tinnitus, post-traumatic intractable headache, nose and nasal sinus cyst and mucocele, bilateral eyelids ptosis, left eye exposure keratoconjunctivitis, left shoulder and upper arm acromioclavicular sprain, left closed acromioclavicular dislocation, and left shoulder bursae and tendons disorder.[4] It paid appellant wage-loss compensation on the supplemental and periodic rolls.

On May 16 and November 7, 2022 appellant's wife informed OWCP that appellant had been referred to the Mayo Clinic for surgery on his forehead. On November 8, 2022 OWCP explained to appellant's wife that the service provider had to request authorization for medical treatment through the website and explain how the service was related to the accepted September 9, 2010 injury.

On November 20, 2023 appellant requested reimbursement for mileage from Brookfield, Missouri to the Mayo Clinic, Rochester, Minnesota for the period May 9, 2022 through April 25, 2023. This included reimbursement for one-way travel of 752 miles. Additionally appellant requested reimbursement for lodging.

In a letter dated January 3, 2024, OWCP noted receipt of appellant's request for travel reimbursement for expenses incurred during the period May 9, 2022 through April 25, 2023. It informed him that generally a roundtrip distance of 100 miles was considered a reasonable distance to travel. OWCP further noted that, if a roundtrip of more than 100 miles was contemplated, an employee must submit a written request describing the circumstances and necessity for travel expenses such as air transportation or overnight accommodations. It advised appellant to submit the necessary documentation to support his claim within 30 days.

[2] Docket No. 21-0662 (issued February 22, 2023).

[3] OWCP assigned the claim OWCP File No. xxxxxx893. Appellant also has a traumatic injury claim (Form CA-1) under OWCP File No. xxxxxx344, accepted for an August 12, 2018 closed injury of the head. His claims have been administratively combined by OWCP, with OWCP File No. xxxxxx893 serving as the master file.

[4] On May 12, 2010 appellant underwent left shoulder arthroscopic decompression, left shoulder arthroscopic distal clavicle resection, left shoulder arthroscopic rotator cuff repair, and left shoulder arthroscopic glenohumeral and labral debridement. OWCP authorized left shoulder arthroscopic rotator cuff tear repair, which appellant underwent on March 21, 2011. Appellant's postoperative diagnoses were listed as massive recurrent rotator cuff tear, torn subscapularis, torn supraspinatus, and recurrent torn infraspinatus.

In response, appellant submitted clinical notes from the Mayo Clinic covering the period May 9, 2022 through April 25, 2023, including a June 3, 2022 medical report from John D. Muller, a physician assistant. He also submitted an undated statement explaining that the specialized medical care he required was not available within 50 miles of his residence.

By decision dated March 1, 2024, OWCP denied appellant's request for travel reimbursement for the period May 9, 2022 through April 25, 2023. It explained that it was able to verify appointments or travel for appointments for his accepted conditions on May 9, 11, and 23, and August 3, 2022; and January 26, and April 24 and 25, 2023. However, OWCP could not verify treatment on June 3, 2022. It found that appellant failed to obtain prior authorization for reimbursement for mileage exceeding 100 miles roundtrip, airfare, lodging and/or meals; failed to submit evidence or explanation supporting the need to travel more than 100 miles roundtrip; and failed to submit evidence he was unable to obtain adequate medical treatment for the accepted work-related conditions in his commuting area.

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.[5] To determine a reasonable travel distance, it will consider the availability of services, the employee's condition, and the means of transportation. Effective August 29, 2011, the most recent regulations provide that a roundtrip distance of up to 100 miles is considered a reasonable distance to travel.[6] If roundtrip 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.[7]

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.[8] 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.[9]

[5] 20 C.F.R. § 10.315(a).

[6] *Id.*

[7] *Id.* at 10.315(b).

[8] FECA Bulletin No. 14-02 (issued January 29, 2014).

[9] *Id.*

In interpreting this section, the Board has recognized that OWCP has broad discretion in approving services provided under FECA.[10] 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.[11]

ANALYSIS

The Board finds that this case is not in posture for decision.

In its March 1, 2024 decision, OWCP denied the remaining claimed travel expenses. However, it did not consider or address the June 3, 2022 medical report from Mr. Muller.

In the case of *William A. Couch*,[12] the Board held that, when adjudicating a claim, OWCP is obligated to consider all evidence properly submitted by a claimant and received by OWCP before the final decision is issued. As OWCP did not review the above-noted evidence of record in its March 1, 2024 decision, it failed to follow its procedures.[13]

As Board decisions are final with regard to the subject matter appealed, it is crucial that OWCP consider and address all relevant evidence received prior to the issuance of its final decision.[14] On remand, OWCP shall review all relevant evidence submitted by appellant regarding the request for travel reimbursement for the period May 9, 2022 through April 25, 2023. Following this and other such further development as deemed necessary, it shall issue a *de novo* decision which clearly delineates the travel expenses paid from those which were denied.

CONCLUSION

The Board finds that this case is not in posture for decision.

[10] *T.J.*, Docket No. 24-0706 (issued September 6, 2024); *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).

[11] *Id.*

[12] *William A. Couch*, 41 ECAB 548, 553 (1990); *see also Order Remanding Case, A.B.*, Docket No. 22-0179 (issued June 28, 2022); *Order Remanding Case, S.H.*, Docket No. 19-1582 issued May 26, 2020); *R.D.*, Docket No. 17-1818 (issued April 3, 2018).

[13] OWCP's procedures provide that all evidence submitted should be reviewed and discussed in the decision. Evidence received following development that lacks probative value should also be acknowledged. Whenever possible, the evidence should be referenced by author and date. Federal (FECA) Procedure Manual, Part 2 -- Claims, *Initial Denials*, Chapter 2.1401.5b(2) (November 2012).

[14] *See A.B., supra* note 12; *C.S.*, Docket No. 18-1760 (issued November 25, 2019); *Yvette N. Davis*, 55 ECAB 475 (2004); *see also William A. Couch, supra* note 12.

ORDER

IT IS HEREBY ORDERED THAT the March 1, 2024 decision of the Office of Workers' Compensation Programs is set aside and the case is remanded for further proceedings consistent with this decision of the Board.

Issued: September 10, 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