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

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| **W.L., Appellant** | ) | |
| **and** | ) | **Docket No. 26-0596** |
| | ) | **Issued: September 15, 2026** |
| **U.S. POSTAL SERVICE, RICHMOND POST OFFICE, Richmond, VA, Employer** | ) | |

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

*Case Submitted on the Record*

# DECISION AND ORDER

Before:
PATRICIA H. FITZGERALD, Deputy Chief Judge
JANICE B. ASKIN, Judge
VALERIE D. EVANS-HARRELL, Alternate Judge

## *JURISDICTION*

On June 16, 2026 appellant filed a timely appeal from a June 15, 2026 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 appellant has met his burden of proof to establish an emotional/stress-related condition in the performance of duty, as alleged.

## *FACTUAL HISTORY*

On March 16, 2026 appellant, then a 60-year-old international operations specialist, filed an occupational disease claim (Form CA-2) alleging that he developed depression and a stress

[1] 5 U.S.C. § 8101 *et seq*.

condition due to factors of his federal employment. He explained that following reassignment to a different duty station, he experienced the pressure of deciding between caregiving for his spouse and keeping his job. Appellant noted that he first became aware of his condition and realized its relation to his federal employment on February 27, 2026. On the reverse side of the claim form, the employing establishment indicated that he was last exposed to the implicated work factors on March 4, 2026.

In a supporting statement dated March 4, 2026, appellant recounted that on or about January 19, 2026, the employing establishment informed him that he would be reassigned to a different duty station effective April 6, 2026. He asserted that he developed "work-related stress and depression" as the reassignment would significantly increase his commute time, disrupt his stable, established work arrangement, create uncertainty in job expectations, and interfere with his duties as primary caregiver for his spouse, who was "under physician-directed medical care." Appellant listed the tasks he performed for his spouse, including daily transportation, transportation to medical appointments, assistance with activities of daily living, medication management, and monitoring of her medical condition. Following notification of the reassignment, he experienced anxiety, insomnia, difficulty concentrating, elevated stress, emotional distress, feelings of hopelessness, and depressive symptoms. Appellant noted that he had requested reasonable accommodation due to hardship based on his spouse's medical condition, and that the request had been denied.

OWCP received a March 4, 2026 work slip wherein Dr. Joynita Nicholson, an osteopath Board-certified in family practice, held appellant off work through April 14, 2026.

OWCP also received a March 16, 2026 report wherein AnAlease Cauthorne, a certified psychiatric mental health nurse practitioner, related that appellant was under treatment for work-related stress. Ms. Cauthorne held him off work for six weeks.

In a March 18, 2026 report, Ms. Cauthorne recounted that appellant identified stressors of "reassignment to a different duty station, relocation from his home environment, and increased difficultly maintaining his role as a caregiver for his wife. She diagnosed "depression and stress-related symptoms" and held appellant off work for six weeks.

In an April 3, 2026 development letter, OWCP informed appellant of the deficiencies of his claim. It advised him as to the type of factual and medical evidence required and provided a questionnaire for his completion. OWCP afforded appellant 60 days to submit the necessary evidence.

OWCP subsequently received a series of chart notes and diagnostic questionnaires dated March 30 through May 31, 2026, wherein Dr. Nicholson noted that appellant had been off work commencing March 4, 2026. Dr. Nicholson assessed moderate major depression, single episode, and adjustment disorder with anxiety due to life changes, declining health, and life stressors, including recent changes at work. She held appellant off work through July 1, 2026.

In a June 11, 2026 report, Rani Sangha, DNP, a Board-certified psychiatric mental health nurse practitioner, recounted appellant's occupational stressors of "reassignment to a different duty station, relocation from his home environment, and increased difficulty" caregiving for his wife.

She diagnosed "generalized anxiety disorder, recurrent moderate major depressive disorder, panic symptoms, insomnia, and adjustment disorder with mixed anxiety and depressed mood related to occupational and caregiver stressors."

By decision dated June 15, 2026, OWCP denied appellant's claim for an emotional/stress-related condition sustained in the performance of duty, finding that he had not established any compensable employment factors, and thus, the requirements had not been met to establish an injury as defined by FECA.

## ***LEGAL PRECEDENT***

An employee seeking benefits under FECA[2] 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,[3] 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.[4] 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.[5]

To establish an emotional condition in the performance of duty, a claimant must submit: (1) factual evidence identifying an employment factor or incident alleged to have caused or contributed to his or her claimed emotional condition; (2) medical evidence establishing that he or she has a diagnosed emotional or psychiatric disorder; and (3) rationalized medical opinion evidence establishing that the accepted compensable employment factors are causally related to the diagnosed emotional condition.[6]

Workers' compensation law does not apply to every injury or illness that is somehow related to a claimant's employment. There are situations where an injury or illness has some connection with the employment, but nevertheless does not come within the purview of workers' compensation. When disability results from an emotional reaction to regular or specially assigned work duties or a requirement imposed by the employment, the disability is deemed compensable.[7] However, disability is not compensable when it results from factors such as an employee's fear of

[2] *Id*.

[3] *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).

[4] *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).

[5] *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).

[6] *See C.C.,* Docket No. 21-0283 (issued July 11, 2022); *S.K.,* Docket No. 18-1648 (issued March 14, 2019); *Donna Faye Cardwell,* 41 ECAB 730 (1990).

[7] *A.C.,* Docket No. 18-0507 (issued November 26, 2018); *Pamela D. Casey,* 57 ECAB 260, 263 (2005); *Lillian Cutler,* 28 ECAB 125, 129 (1976).

a reduction-in-force, or frustration from not being permitted to work in a particular environment, or to hold a particular position.[8]

Administrative and personnel matters, although generally related to the employee's employment, are administrative functions of the employer rather than the regular or specially assigned work duties of the employee and are not covered under FECA.[9] However, the Board has held that where the evidence establishes error or abuse on the part of the employing establishment in what would otherwise be an administrative or personnel matter, coverage will be afforded.[10] In determining whether the employing establishment has erred or acted abusively, the Board will examine the factual evidence of record to determine whether the employing establishment acted reasonably.[11]

## ***ANALYSIS***

The Board finds that appellant has not met his burden of proof to establish an emotional/stress-related condition in the performance of duty, as alleged.

The Board must initially review whether appellant's allegations constitute compensable employment factors under FECA.[12] Appellant has not attributed his emotional/stress-related condition to the performance of his regularly or specially assigned duties under *Cutler*.[13] Rather, he has alleged that he sustained an emotional/stress-related condition as a result of error and abuse in administrative and personnel matters taken by the employing establishment.

With respect to administrative/personnel matters, appellant alleged that on or about January 19, 2026, management informed him that he would be transferred to a new duty station effective April 6, 2026. He contended that the transfer would interfere with caregiving for his wife, increase his commute time, disrupt his established work arrangement, and create uncertainty in job expectations. The Board has recognized that the assignment of a work location is an administrative function of the employer and, absent evidence of error or abuse, does not constitute a compensable employment factor.[14] Appellant has not provided any evidence that the employing establishment erred or acted abusively with respect to his transfer. Consequently, appellant has

[8] *S.W.*, Docket No. 26-1016 (issued April 29, 2026); *A.E.,* Docket No. 18-1587 (issued March 13, 2019); *Gregorio E. Conde,* 52 ECAB 410 (2001).

[9] *See G.R.,* Docket No. 18-0893 (issued November 21, 2018); *Andrew J. Sheppard,* 53 ECAB 170-71 (2001), 52 ECAB 421 (2001); *Thomas D. McEuen*, 41 ECAB 387 (1990), *reaff'd on recon.,* 42 ECAB 556 (1991).

[10] *See O.G.,* Docket No. 18-0359 (issued August 7, 2019); *D.R.,* Docket No. 16-0605 (issued October 17, 2016); *William H. Fortner,* 49 ECAB 324 (1998).

[11] *B.S.,* Docket No. 19-0378 (issued July 10, 2019); *Ruth S. Johnson,* 46 ECAB 237 (1994).

[12] *P.G.,* Docket No. 25-0555 (issued June 20, 2025); *S.K.,* Docket No. 18-1648 (issued March 14, 2019); *Dennis J. Balogh,* 52 ECAB 232 (2001).

[13] *Supra* note 7.

[14] *S.W.*, *supra* note 8; *D.W.,* Docket No. 22-0639 (issued May 10, 2023); *Anita Martin,* Docket No. 02-1077 (issued November 12, 2002); *see also David M. Furey,* 44 ECAB 302, 306 (1992).

not established a compensable employment factor with regard to this administrative/personnel matter.

Appellant also indicated that the employing establishment erred in denying his request for reasonable accommodation based on the hardship the duty station transfer would cause in caregiving for his wife. This allegation relates to an administrative or personnel management action.[15] However, appellant has not shown that the employing establishment acted unreasonably in the above-noted administrative matter.[16] Therefore, the Board finds that he has not established a compensable employment factor in this regard.[17]

As appellant has not established a compensable employment factor under FECA, the Board finds that he has not met his burden of proof to establish an emotional/stress-related condition in the performance of duty, as alleged. Therefore, it is not necessary to consider the medical evidence of record.[18]

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 his burden of proof to establish an emotional/stress-related condition in the performance of duty, as alleged.

[15] *W.C.*, Docket No. 25-0623 (issued December 3, 2025); *J.A.*, Docket No. 23-1001 (issued July 2, 2024); *M.H.*, Docket No. 21-1297 (issued December 20, 2022); *B.T.,* Docket No. 20-1627 (issued January 11, 2023); *F.W.,* Docket No. 18-1526 (issued November 26, 2019); *James P. Guinan,* 51 ECAB 604, 607 (2000); *John Polito,* 50 ECAB 347, 349 (1999).

[16] *Robert Brown*, Docket No. 99-203 (issued February 14, 2001).

[17] *W.C.*, *supra* note 15.

[18] *See B.O.,* Docket No. 17-1986 (issued January 18, 2019) (finding that it is not necessary to consider the medical evidence of record if a claimant has not established any compensable employment factors). *See also Margaret S. Krzycki,* 43 ECAB 496, 502-03 (1992).

## ***ORDER***

**IT IS HEREBY ORDERED THAT** the June 15, 2026 decision of the Office of Workers' Compensation Programs is affirmed.

Issued: September 15, 2026
Washington, DC

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

Janice B. Askin, Judge
Employees' Compensation Appeals Board

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