



Carrier narratives and causal links

The opinion of the physician must be based on a complete factual and medical background of the claimant, 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 the specific employment factors identified by the claimant.¹

Many claims are denied because the physician could not causally link the diagnosis to a specific employment factor. The best way to avoid this problem is to provide your physician with a narrative that paints a detailed picture of your work.

Narratives for work-related illnesses—It is generally necessary for the injured carrier to develop two types of narratives when filing a workers' compensation claim for a work-related illness. The first type of narrative should include a step-by-step analysis of your daily job duties. The second type of narrative should focus on what specific parts of your job you believe to be responsible for either causing or aggravating the medical condition that you are claiming as an occupational disease.

When writing your narrative, you should keep in mind that most people have their own preconceived notions of what a letter carrier does, and they do not fully understand the job or the repetitive motions that carriers perform on a daily basis. Try to avoid using postal terms and be sure to explain the postal terms that you do use.

An appropriate narrative for your physician might include the following:

Upon reporting for work, I conduct the required vehicle inspection. I then retrieve mail from a designated location and place mail on the case ledge. I stand almost the entire time I am in the office, which is normally about three hours per tour.

The majority of my office time is spent casing mail. Casing mail involves holding mail with my left hand or arm while using my right hand to retrieve and case one piece of mail at a time. I look down to read each address and then look up to locate the corresponding case separation. Then by twisting and turning my body as needed, and extending my right arm in the appropriate

direction, I place the mail piece in the designated slot. When casing letter-size mail, I pick up a handful of letters and hold them in my left hand (between my fingers and my thumb) and advance the top letter with my left thumb. While holding mail, my left elbow usually remains bent at about 90 degrees. I also reach with my right arm at or above my shoulder level about 60 percent of the time while casing mail. On my current route, I repeat this casing motion approximately 500 times each tour of duty. I have performed these same casing actions over my 23-year career; however, my casing time used to be about 30 percent higher than it is right now.

The mail case on my current route has approximately 600 separations and the three-piece case is configured in a "U" shape. The bottom shelf and ledge of the case is approximately three feet from the floor and the case extends upward to approximately six feet, and has five shelves.

The above is only an example and would need to be tailored to fit your circumstances. Your narrative would also continue to describe the rest of your office functions and street duties with the same level of detail. This type of narrative should be useful for most occupational repetitive motion injury claims.

Narratives for a traumatic injury claim—Your focus should be on providing the specific date, time and location of the incident. What happened? A clear picture of what occurred must be given. However, be sure that your narrative does not conflict with your prior reports (1769 or CA-1) regarding the accident. If it was a chain of events, provide a description of all the links in that chain.

An employee has the burden of establishing a causal relationship between the working conditions and the diagnosis. To meet this burden, the employee must show, through rationalized medical evidence, that there is a causal relationship between the injury and an employment factor. ☒

1. Kathy Marshall - ECAB Docket No. 93-993