

### Title:

Maria E. Manahan vs. Employees' Compensation Commission and GSIS (Las Piñas Municipal High School)

### Facts:

Maria E. Manahan, the widow of Nazario Manahan, Jr., a classroom teacher at Las Piñas Municipal High School who died from Enteric Fever (Typhoid Fever) on May 8, 1975, sought death benefits under Presidential Decree 626 from the Government Service Insurance System (GSIS). GSIS denied the claim, stating Enteric Fever is not an occupational disease. Maria Manahan's motion for reconsideration was also denied based on the disease being caused by Salmonella organisms, akin to Typhoid Fever. Persisting, Manahan appealed to the Employees' Compensation Commission (ECC), which upheld GSIS's decision on the ground that the disease was not induced or aggravated by Nazario Manahan, Jr.'s employment. The case escalated to the Supreme Court as Manahan contended the disease was contracted due to his employment conditions, citing epidemiology and pathology of Enteric Fever and indicating the deceased's health declined while in service.

### Issues:

1. Whether Enteric Fever (Typhoid Fever), from which Nazario Manahan, Jr. died, is compensable under the Workmen's Compensation Act, as amended, or the Labor Code, despite not being listed as an occupational disease.
2. Whether the conditions of Nazario Manahan, Jr.'s employment increased his risk of contracting Enteric Fever.
3. Whether social legislations, like the Workmen's Compensation Act and the Labor Code, should be liberally construed in favor of the worker in cases of doubt.

### Court's Decision:

The Supreme Court set aside the decision of the Employees' Compensation Commission and ordered GSIS to compensate Maria Manahan. The Court applied the doctrine of presumptive compensability under the Workmen's Compensation Act and emphasized that, in case of doubt, interpretations favoring the worker should prevail. Despite Enteric Fever not being classified as an occupational disease, the Court found that the circumstances and conditions of Nazario Manahan, Jr.'s employment, such as eating meals at the school canteen and using the school's facilities, likely increased his risk of contracting the disease. The Court concluded that social justice and labor protection mandates warrant a liberal interpretation of social legislations in favor of laborers.

### Doctrine:

This case reiterates the doctrine of presumptive compensability under the Workmen's Compensation Act, emphasizing that social legislations should be liberally construed in favor of workers. It underscores that in cases of doubt, the court should rule in a manner that provides relief to the worker or their dependents.

### Class Notes:

1. **Presumptive Compensability**: Under the Workmen's Compensation Act, there exists a presumption that ailments and diseases contracted during employment are compensable, especially when working conditions could contribute to the disease.
2. **Liberal Construction of Social Legislations**: The Labor Code and other social legislations are to be interpreted liberally in favor of workers to fulfill the objectives of social justice and labor protection.
3. **Increased Risk Doctrine**: Even if a disease is not listed as an occupational disease, if an employee's working conditions can be shown to significantly increase the risk of contracting the disease, it may be considered compensable.

### Historical Background:

This case highlights the evolving nature of occupational health jurisprudence in the Philippines. While traditional interpretations of what constitutes an 'occupational disease' have been restrictive, this case signifies a shift towards a more worker-friendly approach, reflecting broader social and labor protections under the Philippine legal system.