

### Title:

Capacio v. Republic of the Philippines: A Landmark Case on Workmen's Compensation for Public School Teachers

### Facts:

Zosimo Capacio served as a public school teacher for 33 years in Barrio Matambong, Palapag, Northern Samar. Near the end of his career, Capacio suffered from peptic ulcer, hypertension, and schistosomiasis, leading to his retirement on August 13, 1974. Subsequent medical evaluations revealed the severity of his conditions, prompting Capacio to file for sickness compensation under the Workmen's Compensation Act.

The claim was initially heard at the Department of Labor Regional Office No. 9, Tacloban City, where hearing officer Romeo M. Resuello awarded Capacio P5,693.57 in sickness compensation and reimbursement of medical expenses. The Republic of the Philippines, through the Bureau of Public Schools, petitioned for reconsideration. The Workmen's Compensation Commission (WCC) reviewed and reversed the award, doubting the work-relatedness of Capacio's conditions due to insufficient evidence and timing of medical treatments post-retirement.

Capacio, dissatisfied with the WCC's decision, petitioned for review by the Supreme Court, invoking the mandatory provision of Section 45, Act No. 3428, as amended, arguing for the compensability of his illness due to its occurrence and aggravation during his employment.

### Issues:

1. Whether Capacio's ailments were compensable under the Workmen's Compensation Act due to their occurrence during his employment.
2. Whether the failure of the respondent to timely controvert the claim waives their right to dispute the claim's compensability.

### Court's Decision:

The Supreme Court reversed the decision of the WCC, reinstating the original award by the hearing officer. The Court held that the ailments from which Capacio suffered were aggravated by the conditions of his employment, particularly highlighting the strenuous physical demands of his teaching position and the risk of schistosomiasis associated with his daily commute through infested waters. The Court also affirmed the principle that failure to timely controvert a compensation claim as per Section 45 of Act No. 3428 constitutes a waiver of the right to dispute the claim's compensability, effectively rendering Capacio's

illness presumptively compensable.

**### Doctrine:**

- The Supreme Court reiterated the doctrine of presumptive compensability of illnesses or injuries that occur or are aggravated in the course of employment, placing the burden of proof on the employer to demonstrate otherwise.
- Failure to timely controvert a workmen's compensation claim results in the waiver of the right to dispute the claim's compensability.

**### Class Notes:**

- **\*\*Compensability of Illness:\*\*** An illness or injury is compensable under the Workmen's Compensation Act if it occurs or is aggravated during the course of employment.
- **\*\*Presumption:\*\*** There is a legal presumption in favor of compensability. The burden of proof shifts to the employer to demonstrate that the illness or injury is not work-related.
- **\*\*Timely Controversion:\*\*** Employers must dispute a compensation claim within 14 days from disability or 10 days after gaining knowledge of the alleged illness, failing which they waive their right to challenge the claim.
- **\*\*Section 45, Act No. 3428, as amended:\*\*** This statutory provision underlines the framework for disputing compensability claims, emphasizing the importance of adherence to procedural timelines.

**### Historical Background:**

The Capacio case underscores the evolving jurisprudence in the Philippines regarding workmen's compensation, particularly for public school teachers whose occupational risks and contributions had not been comprehensively recognized until relatively recent legal interpretations. The decision represents a significant affirmation of the state's commitment to protect its workers, acknowledging the intrinsic hazards of seemingly non-hazardous professions like teaching in remote areas.