

Title:

****Julieta T. Verzonilla vs. Employees' Compensation Commission****

Facts:

Reynaldo I. Verzonilla was employed as a Special Operations Officer III with the Quezon City Department of Public Order and Safety from June 1, 1999, until his death on July 5, 2012. His duties involved the following:

1. Assisting in seminars, training, and disaster preparedness.
2. Enhancing public awareness on disaster preparedness.
3. Conducting hazard, vulnerability, and risk assessments.
4. Attending meetings, seminars, and training on disaster prevention.
5. Performing urgent fieldwork and coordinating with other government bodies.

On July 1-6, 2012, he participated in a "Rapid Earthquake Damage Assessment System (REDAS) software" training in Tagaytay City. On July 5, 2012, Verzonilla died from "cardio pulmonary arrest, etiology undetermined" at UniHealth-Tagaytay Hospital and Medical Center. His records show a history of hypertension in 2002.

Julieta Verzonilla, Reynaldo's spouse, filed a claim for compensation with the Government Service Insurance System (GSIS) under Presidential Decree (PD) 626. GSIS denied the claim on April 26, 2013, and on appeal reaffirmed the denial on May 24, 2013. Julieta then elevated her claim to the Employees' Compensation Commission (ECC), which also denied it on August 7, 2013.

Subsequently, Julieta filed a Petition for Review with the Court of Appeals (CA). The CA upheld ECC's decision on October 28, 2016, affirming that Julieta did not prove by substantial evidence that Reynaldo's working conditions exacerbated his heart disease.

Issues:

1. Whether the Court of Appeals erred in affirming the ECC's denial of Julieta's claim for Employees' Compensation (EC) benefits in connection with her husband's death.
2. Whether there was a substantial connection between Reynaldo's heart disease and his work.

Court's Decision:

The Supreme Court found merit in Julieta Verzonilla's petition for review and ruled in her favor. The Court set aside the CA's decision and granted the claim for the following reasons:

1. **Degree of Proof Required:** The required proof for compensability under PD 626 is substantial evidence, which means relevant evidence a reasonable mind might accept as adequate.
2. **Strenuous Work Conditions:** Reynaldo's work included attending seminars, conducting various assessments, and traveling for training—a series of activities that was considered strenuous.
3. **Cardiac Event Timeline:** The records illustrated that Reynaldo experienced the strenuous activities within 24 hours of his cardiac arrest, fulfilling the conditions set in Item 18(b) of Annex "A."

Doctrine:

The case reinforces the principle that for an illness to be compensable:

- It must either be a result of an occupational disease listed under Annex "A" of the Amended Rules on EC with the conditions therein met.
- Or, if not listed, there must be substantial evidence that the employment increased the risk of contracting the illness.

Moreover, the ruling underscores the liberal interpretation of social legislation favoring labor, highlighting substantial evidence as the threshold for proving work-related illnesses.

Class Notes:

- **Key Elements of Compensation Claims:**
 - Occupational disease list compliance.
 - Proof of employment-associated risk increasing the sickness.
- **Essential Statutory Provisions:**
 - Article 165(1) of the Labor Code (as amended by PD 626).
 - Amended Rules on Employees' Compensation, particularly Annex "A."
- **Application in Case:**
 - Work-related strain leading to a fatal cardiac event within 24 hours was considered significant.

Historical Background:

The case situates itself in the context of evolving workers' compensation laws in the Philippines. Initially, under Act No. 3428, there was a presumption of compensability for work-related injuries. This presumption was abandoned by PD 626, placing the burden of proving compensability on the claimant. Despite this change, subsequent jurisprudence and the social justice-oriented principles enshrined in the 1987 Constitution continue to advocate for a liberal interpretation favoring employees, especially in claims for work-

related illnesses or injuries. The Verzonilla case exemplifies the balance between these historical changes and present-day application.