

SUPREME COURT OF IOWA

Toby Brown v. Quik Trip Corporation and CNA Insurance

641 N.W.2d 725 (Iowa 2002) · No. No. 00-0868 · Decided February 27, 2002

SUMMARY

The Iowa Supreme Court addressed whether an employee's post-traumatic stress disorder constituted a compensable mental/mental workers' compensation injury. The court held that legal causation may be established without evidence of stress experienced by similarly situated employees when the injury results from a readily identifiable, sudden, traumatic, and unexpected event. The court reversed the district court and remanded to the workers' compensation commissioner to determine the extent of the claimant's disability.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Larson, Justice; Neuman, Justice; Ternus, Justice
JURISDICTION	Iowa
DECIDED	February 27, 2002
DOCKET	No. 00-0868
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from a district court judgment affirming the workers' compensation commissioner's denial of benefits for a purely mental workers' compensation injury.
STANDARD OF REVIEW	The court reviewed agency action under Iowa Code section 17A.19, applying the statutory substantial-evidence standard and determining whether its conclusions were consistent with those of the district court.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion; precedential
PARTIES	Toby Brown v. Quik Trip Corporation, CNA Insurance

TOPICS

- workers compensation
- administrative law
- judicial review of agency action
- standard of review
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a worker seeking benefits for a purely mental injury must present evidence concerning the stress experienced by similarly situated employees when the claim arises from sudden, traumatic, and unexpected workplace events.
2. Whether Brown established legal causation for his mental/mental workers' compensation claim.
3. Whether the case should be remanded to determine the extent of Brown's disability.

HOLDINGS

1. When a mental-injury claim is based on a manifest event or events of a sudden traumatic nature arising from an unexpected cause or unusual strain, legal causation is established without proof of the stress experienced by similarly situated employees.
2. Brown established legal causation because the shooting-related incident and robbery were sudden, traumatic, and unexpected events occurring in the course of his employment.

KEY QUOTATIONS

“The appropriate test under the circumstances of the present case is not whether the stress is greater than that experienced by similarly situated employees, as we required in Dunlavey.” (728)

“When a claim is based on a manifest happening of a sudden traumatic nature from an unexpected cause or unusual strain, the legal-causation test is met irrespective of the absence of similar stress on other employees.” (729)

“We conclude the claimant satisfied the requirement for establishing legal causation.” (729)

FACTUAL BACKGROUND

Brown worked alone at Quik Trip gas stations and witnessed a customer being shot during an early-morning altercation. Six days later, while working alone at another Quik Trip, he was robbed, threatened with what he believed was a gun, and ordered to lie on the floor. After the two incidents, Brown developed anxiety-related symptoms and was diagnosed with delayed post-traumatic stress disorder attributable to the incidents. The employer did not contest medical causation but disputed legal causation.

PROCEDURAL HISTORY

A deputy workers' compensation commissioner found that Brown sustained a compensable mental/mental injury arising out of and in the course of his employment. The workers' compensation commissioner reversed, finding that Brown failed to prove legal causation. The district court affirmed, and the court of appeals reversed and remanded for a new determination of legal causation. The Supreme Court of Iowa vacated the court of appeals ruling, reversed the district court judgment, and remanded to the commissioner to determine the extent of Brown's disability.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the workers' compensation commissioner to determine the extent of Brown's disability.

CASES CITED

- Bearce v. FMC Corp., 465 N.W.2d 531 (Iowa 1991)
- Dunlavey v. Economy Fire & Casualty Co., 526 N.W.2d 845 (Iowa 1995)
- Shope v. Industrial Commission, 495 P.2d 148 (Ariz. Ct. App. 1972)
- Graves v. Utah Power & Light Co., 713 P.2d 187 (Wyo. 1986)
- Townsend v. Maine Bureau of Public Safety, 404 A.2d 1014 (Me. 1979)
- Johnson v. State ex rel. Worker's Compensation Division, 798 P.2d 323 (Wyo. 1990)
- Tocco v. City of Great Falls, 714 P.2d 160 (Mont. 1986)
- Sechrist v. State ex rel. Workers' Safety & Compensation Division, 23 P.3d 1138 (Wyo. 2001)