

## SUMMARY STATEMENT

*Oliveros v. Rule Steel Tanks, Inc.*, Docket No. 45782

This is a worker's compensation case. Bryan Oliveros filed a complaint with the Idaho Industrial Commission ("Commission") after he was involved in a work accident at Rule Steel Tanks, Inc. ("Rule Steel"). The accident resulted in the partial amputation of all four fingers on his dominant hand. The Commission awarded Oliveros compensation for a 32% partial permanent impairment ("PPI") rating but declined to award any additional benefits after it later found his permanent partial disability ("PPD") rating to be 25%.

The Idaho Supreme Court affirmed the Commission's decision that found Oliveros was not entitled to a separate award for his PPD and PPI. In so holding, the Court overruled certain statements in *Corgatelli v. Steel West, Inc.*, 157 Idaho 287, 335 P.3d 1150 (2014), and *Davis v. Hammock Management*, 161 Idaho 791, 391 P.3d 1261 (2017), that suggest an injured worker is entitled to recover both "impairment" and "disability" benefits under the Act. The Court clarified that Idaho's workers compensation law only provides for an award of income benefits based on disability, not impairment, and any monies received by a claimant for PPI are part of his final award for PPD. The Court recognized that the Commission erred in its determination that Oliveros could suffer a PPD lower than his PPI because impairment is part of the calculation for disability. Even so, the Court held that the Commission's determination was in reality a finding that Oliveros established no disability in excess of impairment. The Court also held that the Commission's decision to deny Oliveros' request for retraining benefits was supported by substantial and competent evidence.