

SUMMARY STATEMENT
Est. of William Weeks v. Oneida County
Docket No. 52031

This appeal involved a worker's compensation claim. JaLyn Weeks appealed from a decision of the Idaho Industrial Commission ("the Commission") denying her medical and death benefits for the death of her husband, William Weeks, an employee of Oneida County's Road and Bridge Department. Following her husband's death from complications of COVID-19, Mrs. Weeks filed a worker's compensation complaint with the Commission, contending Mr. Weeks contracted the disease while working. She further argued COVID-19 is an acute occupational disease within the meaning of Idaho's worker's compensation laws, Idaho Code sections 72-102(21)(a) and 72-438 (2021). The Commission denied the complaint after concluding that it was "impossible" to prove by a preponderance of the evidence that Mr. Weeks actually contracted COVID-19 at work. On appeal, Mrs. Weeks argued the Commission erred by (1) applying the wrong legal standard and requiring proof "beyond every possible doubt" that the decedent contracted COVID-19 at work; (2) failing to apply a "balance tipping standard" to resolve doubts in favor of compensability; and (3) ignoring its own factual findings to reach an inconsistent conclusion.

The Idaho Supreme Court affirmed the Commission's decision. The Court held that: (1) the Commission applied the correct legal burden, proof by a preponderance of the evidence, to its determination of whether Mr. Weeks contracted COVID-19 from his employment; (2) there is no "balance tipping standard" in favor of compensability in occupational disease cases; and (3) substantial and competent evidence supported the Commission's decision.

******This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.******