

**Federal Labor Relations Authority**  
**Quarterly Digest Report: October 1, 2025 – December 31, 2025**



*The following case digests are summaries of decisions/orders issued by the Federal Labor Relations Authority, with a short description of the issues and facts of each case. Descriptions contained in these case digests are for informational purposes only, do not constitute legal precedent, and are not intended to be a substitute for the opinion of the Authority.*

**CASE DIGEST:      *U.S. Dep't of the Army, Fort Huachuca, Ariz.*, 74 FLRA 317 (2025)**

The Arbitrator found that the Agency violated the parties' collective-bargaining agreement by requiring the grievant to submit a medical certificate to substantiate his sick leave, without communicating to the grievant why he must do so. The Agency filed exceptions arguing the award was based on nonfacts, failed to draw its essence from the agreement, was contrary to 5 C.F.R. § 630.405, and violated management's rights. First, the Authority found that Executive Order 14,251 did not remove the case from the Authority's jurisdiction, because the grievant is a firefighter. Second, the Authority denied the Agency's exceptions because the alleged nonfacts were not clearly erroneous; the award was not irrational, unfounded, implausible, or in manifest disregard of the agreement; the award was consistent with the Agency's discretion under § 630.405; and, even assuming the award affected management rights, the Arbitrator enforced an appropriate arrangement.