

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Williams, Ashton v. Performance Food Group, Inc.

2026 TN WC 6 · No. 2025-20-3130 · Decided January 27, 2026

SUMMARY

The Tennessee Court of Workers’ Compensation Claims granted Ashton Williams’s request for medical benefits after finding that he was likely to prove he sustained a work-related right shoulder injury. The court ordered Performance Food Group, Inc. and its carrier to schedule an authorized medical appointment and provide reasonable and necessary treatment, while denying payment for unauthorized treatment at that time. The case was referred to the Compliance Program for possible penalties, and a status hearing was set.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Brian K. Addington
JURISDICTION	Tennessee Court of Workers’ Compensation Claims
DECIDED	January 27, 2026
DOCKET	2025-20-3130
DISPOSITION	other
PROCEDURAL POSTURE	Employee sought expedited relief requiring his employer and its workers' compensation carrier to provide medical benefits for an alleged workplace shoulder injury. After an expedited hearing, the Court of Workers' Compensation Claims ordered the employer and carrier to furnish authorized medical treatment, denied payment of unauthorized medical bills at that time, and referred the matter for possible penalties.
STANDARD OF REVIEW	On an expedited-hearing request for medical benefits, the employee must show a likelihood of proving at a hearing on the merits that he is entitled to the requested treatment.
PRECEDENTIAL VALUE	Published expedited hearing order; limited precedential effect because it is interlocutory and addresses entitlement to medical benefits at the preliminary expedited stage.

TOPICS

workers compensation

remedies

interlocutory appeal

appellate procedure

standard of review

PRACTICE AREAS

workers compensation

employment law

remedies

appellate procedure

QUESTIONS PRESENTED

1. Whether Williams demonstrated a likelihood of proving that he sustained an injury by accident arising primarily out of and in the course and scope of employment.
2. Whether an injured worker must present expert medical causation evidence before an employer is required to furnish medical treatment.
3. Whether the employer and carrier must provide authorized medical benefits and pay for treatment obtained without authorization.

HOLDINGS

1. Williams established a likelihood of proving at a merits hearing that he suffered an injury by accident arising primarily out of and in the course and scope of his employment and therefore was entitled to medical benefits.
2. An injured worker is not required to establish medical causation as a prerequisite to an employer's furnishing medical treatment under the workers' compensation statute.
3. Performance Food Group and its carrier must return Williams to the authorized physician and furnish reasonable and necessary medical treatment made necessary by the alleged work injury.
4. The court denied Williams's request for payment of unauthorized medical bills at that time because no physician had yet provided a causation opinion.

KEY QUOTATIONS

“Moreover, an injured worker is not required to prove medical causation as a prerequisite to an employer furnishing medical treatment.” (2)

“Performance Food Group, Inc. and its carrier must schedule an appointment with the authorized physician and furnish any reasonable and necessary medical treatment under Tennessee Code Annotated section 50-6-204(a)(1)(A).” (3)

FACTUAL BACKGROUND

Ashton Williams, an order puller, reported right shoulder pain after moving cases of sauce at work on January 29, 2025. He promptly reported the injury, later sought treatment, and was placed on light-duty restrictions; an MRI subsequently showed partial interstitial tearing of the infraspinatus tendon. His employer delayed providing a physician panel, denied the claim, and refused to approve physical therapy, asserting that Williams had changed his account and that the MRI reflected a chronic condition.

PROCEDURAL HISTORY

Ashton Williams alleged that he injured his right shoulder at work on January 29, 2025. Performance Food Group denied the claim and declined to authorize additional treatment. Following an expedited hearing on January 22, 2026, the court found that Williams was likely to prove a compensable workplace injury and ordered medical benefits, while denying his request for payment of unauthorized treatment without prejudice to further development of medical causation evidence.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. The employer and carrier were ordered to schedule an appointment with the authorized physician and furnish reasonable and necessary medical treatment. The case was set for a status hearing and referred to the Compliance Program for consideration of penalties.

CASES CITED

- McCord v. Advantage Human Resourcing, 2015 TN Wrk. Comp. App. Bd. LEXIS 6
- Young v. Young Elec. Co., 2016 TN Wrk. Comp. App. Bd. LEXIS 24, at *16 (May 25, 2016)