

TENNESSEE COURT OF WORKERS' COMPENSATION CLAIMS

Holland v. Randstad

2025 TN WC 89 · No. 2021-08-1180 · Decided December 10, 2025

SUMMARY

The Tennessee Court of Workers’ Compensation Claims held that Judith Holland was entitled to a lumbar fusion and related preoperative diagnostics as medically necessary treatment for her compensable workplace injury. The court found that the authorized treating physician’s opinion was entitled to a presumption of medical necessity and that Randstad did not rebut it by a preponderance of the evidence. The court also awarded Holland attorney’s fees based on Randstad’s failure to provide medical benefits required by the parties’ settlement agreement.

CASE DETAILS

COURT	Tennessee Court of Workers' Compensation Claims
WRITING FOR THE COURT	Shaterra R. Marion
JURISDICTION	Tennessee Court of Workers’ Compensation Claims, at Memphis
DECIDED	December 10, 2025
DOCKET	2021-08-1180
DISPOSITION	other
PROCEDURAL POSTURE	Compensation hearing on an employee's post-settlement request for future medical benefits and attorney's fees after the employer denied authorization for a lumbar fusion surgery.
STANDARD OF REVIEW	Holland had to prove entitlement to the surgery by a preponderance of the evidence. Because the surgery was prescribed by the authorized treating physician, the employer bore the burden of proving by a preponderance of the evidence that the treatment was not medically necessary.
PRECEDENTIAL VALUE	Published compensation hearing order

TOPICS

- workers compensation
- remedies
- evidence
- hearsay

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the lumbar fusion surgery ordered by Holland's authorized treating physician was medically necessary and should be provided as a future medical benefit.
2. Whether Holland was entitled to attorney's fees because Randstad failed to furnish medical treatment provided for in the court-approved settlement.
3. Whether emails concerning the scheduling of an expert's deposition were admissible.

HOLDINGS

1. The lumbar fusion surgery ordered by Holland's authorized treating physician, together with necessary preoperative MRI and CT diagnostics, was medically necessary and had to be approved and provided by Randstad or its workers' compensation carrier.
2. Holland's attorney was entitled to fees under Tennessee Code Annotated section 50-6-226(d)(1)(A) because Randstad failed to approve medical care required by the court-approved settlement and section 50-6-204.
3. The emails exchanged between Dr. Lochemes's staff and Randstad's counsel concerning deposition scheduling were inadmissible hearsay and lacked a sufficient foundation.

KEY QUOTATIONS

“When an employee suffers a compensable work injury, the Workers’ Compensation Law states that an employer must furnish “medical and surgical treatment as ordered by the attending physician . . . made reasonably necessary by accident[.]”” (at 3)

“All factors favor Dr. Schroerlucke and his conclusion that Ms. Holland “failed all conservative management” before he ordered this surgery.” (at 4)

“Therefore, the Court holds that the lumbar fusion surgery ordered by Dr. Schroerlucke, along with the necessary preoperative diagnostics including an MRI and CT scan, are medically necessary and shall be approved by Randstad.” (at 5)

FACTUAL BACKGROUND

Holland suffered a work-related spinal injury in 2019 and was treated by authorized treating physician Dr. Samuel Schroerlucke, a board-certified spine surgeon. After a prior fusion and a later recurrence of symptoms, imaging showed disc herniation above the prior fusion, and Schroerlucke ordered another fusion after conservative treatment failed. Randstad denied authorization, but the court found Schroerlucke's opinion more persuasive because of his spine specialization, six years of treatment, review of the relevant records and imaging, and continuing treatment relationship.

PROCEDURAL HISTORY

Holland sustained a compensable workplace injury and later entered court-approved settlements preserving her right to future medical care. After her authorized treating physician ordered another lumbar fusion, Randstad denied the surgery following utilization review and a medical-director review. Holland sought relief in the Tennessee Court of Workers' Compensation Claims, which held a compensation hearing and granted the requested medical benefits and attorney's fees.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Holland's counsel was ordered to file an itemized motion for attorney's fees and expenses within ten days; Randstad was given five days to respond. Randstad or its carrier was ordered to provide the lumbar fusion and necessary preoperative diagnostics, and Randstad was ordered to pay the \$150 filing fee within five business days after the order became final.

CASES CITED

- Rhea v. Titan Transport, Inc., 2023 TN Wrk. Comp. App. Bd. LEXIS 16, at *8-9 (Apr. 11, 2023)
- Orman v. Williams Sonoma, Inc., 803 S.W.2d 672, 676-77 (Tenn. 1991)
- McCool v. Profl Care Servs., 2025 TN Wrk. Comp. App. Bd. LEXIS 59, at *18 (Nov. 18, 2025)