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To: Texas Workers' Compensation System Participants

From: Graves Owen, M.D., Medical Advisor

Date: [December 17, 2025](#)

Subject: 2026 Annual Audit Plan

The Texas Department of Insurance, Division of Workers' Compensation (DWC) seeks input for the proposed Medical Quality Review Calendar Year 2026 Annual Audit Plan (Audit Plan).

The Audit Plan identifies Medical Quality Review Process audit priorities for 2026, with DWC selecting one audit focused either on the medical necessity and appropriateness of prescribing topical analgesics or on evaluating utilization review agent peer review reports for compliance with Official Disability Guidelines, accepted standards of care, and appropriate reviewer selection.

The audit topic will be selected based on stakeholder feedback, with both audits conducted if resources allow. The medical advisor may recommend revisions to the Audit Plan, subject to commissioner approval.

The Audit Plan sets the priorities for the medical quality review audits during the upcoming year. Information about the [Medical Quality Review Process](#) (Process) and the proposed Annual Plan is on the TDI website at [Office of the Medical Advisor](#).

The medical advisor is responsible for developing the Audit Plan, which is adopted by the commissioner of workers' compensation. To conduct the audit, the medical advisor evaluates plan categories using the criteria listed in the Process. Medical quality reviews help DWC monitor compliance with the Labor Code and DWC rules.

Email your suggestions for this proposed Audit Plan to [OMA@tdi.texas.gov](mailto:OMA@tdi.texas.gov) by 5 p.m., Central time, on January 16, 2026.

If you have any questions, contact Jennifer Self at 512-804-4852 or [Jennifer.Self@tdi.texas.gov](mailto:Jennifer.Self@tdi.texas.gov).