

No. **2025-9681**

**Official Order  
of the  
Texas Commissioner of Workers' Compensation**

**Date: 12/15/2025**

**Subject Considered:**

Standard Fire Insurance Company  
1 Tower Square  
Hartford, Connecticut 06183-0001

Consent Order  
DWC Enforcement File No. 37700

**General remarks and official action taken:**

This is a consent order with Standard Fire Insurance Company (Respondent). The commissioner of the Texas Department of Insurance, Division of Workers' Compensation (DWC) considers whether DWC should take disciplinary action against Respondent.

**Waiver**

Respondent acknowledges that the Texas Labor Code and other applicable laws provide certain rights. Respondent waives all of these rights, and any other procedural rights that apply, in consideration of the entry of this consent order.

**Findings of Fact**

1. Respondent holds a certificate of authority issued by the Texas Department of Insurance to transact the business of insurance pursuant to Tex. Ins. Code §§ 801.051-801.053 and is licensed to write multiple lines of insurance in Texas, including workers' compensation/employers' liability insurance.
2. Respondent was classified as "average" tier in the 2020, 2022, and 2024 Performance Based Oversight (PBO) assessments.

Failure to Timely Provide Medical Records in Advance of a Designated Doctor Exam

3. On [REDACTED], DWC ordered the injured employee attend a designated doctor (DD) exam on [REDACTED].
4. On [REDACTED], Respondent received notice of the DD exam and a request to produce the injured employee's medical records to the DD.
5. Respondent was required to ensure that the medical records were received by the DD no later than three working days prior to the exam, or by [REDACTED].
6. On [REDACTED], Respondent emailed and faxed the medical records to the DD three days late.
7. The medical records were received three days late and led to the appointment being rescheduled for [REDACTED].

**Assessment of Sanction**

1. Failure to timely provide required documentation to system participants is harmful to the Texas workers' compensation system. Failing to provide medical records, as required, increases the likelihood of disputes.
2. In assessing the sanction for this case, DWC fully considered the following factors in Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e):
  - the seriousness of the violation, including the nature, circumstances, consequences, extent, and gravity of the prohibited act;
  - the history and extent of previous administrative violations;
  - the violator's demonstration of good faith, including actions it took to rectify the consequences of the prohibited act;
  - the penalty necessary to deter future violations;
  - whether the administrative violation had a negative impact on the delivery of benefits to an injured employee;
  - the history of compliance with electronic data interchange requirements;
  - the economic benefit resulting from the prohibited act; and
  - other matters that justice may require, including, but not limited to:
    - PBO assessments;
    - prompt and earnest actions to prevent future violations;

- self-report of the violation;
  - the size of the company or practice;
  - the effect of a sanction on the availability of health care; and
  - evidence of heightened awareness of the legal duty to comply with the Texas Workers' Compensation Act and DWC rules.
3. DWC found the following factors in Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e) to be aggravating:
    - a. the violation is serious, delaying the DD examination;
    - b. Respondent has a history of three substantially similar administrative violations in the past two years;
    - c. a penalty is necessary to deter future violations; and
    - d. Respondent is the seventh largest Texas workers' compensation insurance carrier and has a heightened awareness of the legal duty to comply with the Texas Workers' Compensation Act and DWC rules.
  4. DWC is aware of no mitigating factors pursuant to Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e).
  5. Respondent acknowledges communicating with DWC about the relevant statute and rule violations alleged; that the facts establish that the administrative violation(s) occurred; and that the proposed sanction is appropriate, including the factors DWC considered under Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e).
  6. Respondent acknowledges that, in assessing the sanction, DWC considered the factors in Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e).

### **Conclusions of Law**

1. The commissioner has jurisdiction over this matter pursuant to Tex. Lab. Code §§ 402.001, 402.00111, 402.00114, 402.00116, 402.00128, 414.002, and 414.003.
2. The commissioner has the authority to dispose of this case informally pursuant to Tex. Gov't Code § 2001.056, Tex. Lab. Code §§ 401.021 and 402.00128(b)(6)-(7), and 28 Tex. Admin. Code § 180.26(h) and (i).

3. Respondent has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intent to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, a rehearing by the commissioner, and judicial review.
4. Pursuant to Tex. Lab. Code § 415.021, the commissioner may assess an administrative penalty against a person who commits an administrative violation.
5. Pursuant to Tex. Lab. Code § 415.002(a)(20), an insurance carrier or its representative commits an administrative violation each time it violates a DWC rule.
6. Pursuant to 28 Tex. Admin. Code § 127.10(a)(3), the insurance carrier shall ensure that the required records are received by the DD no later than three working days prior to the date of the DD examination.
7. Pursuant to 28 Tex. Admin. Code § 127.10(a)(3)(C), the DD must reschedule the exam if the DD doesn't receive the required medical records within one working day of the DD examination.
8. Respondent violated Tex. Lab. Code § 415.002(a)(20) and 28 Tex. Admin. Code § 127.10(a)(3) by failing to timely provide an injured employee's medical records to a DD prior to a DD examination.

**Order**

It is ordered that Standard Fire Insurance Company must pay an administrative penalty of \$750 within 30 days from the date of this order.

After receiving an invoice, Standard Fire Insurance Company must pay the administrative penalty by electronic transfer using the State Invoice Payment Service, company check, cashier's check, or money order and make it payable to the "State of Texas." Mail the administrative penalty to the Texas Department of Insurance, Attn: DWC Enforcement Section, MC AO-9999, PO Box 12030, Austin, Texas 78711-2030.

  
\_\_\_\_\_  
Jeff Nelson  
Commissioner  
TDI, Division of Workers' Compensation

Approved Form and Content:

  
\_\_\_\_\_  
Savanna O'Neal  
Staff Attorney, Enforcement  
Compliance and Investigations  
TDI, Division of Workers' Compensation

Commissioner's Order  
Standard Fire Insurance Company  
DWC Enforcement File No 37700  
Page 6 of 6

**Unsworn Declaration**

STATE OF TEXAS

§

COUNTY OF DALLAS

§

§

Pursuant to the Tex Civ Prac and Rem Code § 132.001(a), (b), and (d), my name is ALAN WITKMAN I hold the position of VICE PRESIDENT and am the authorized representative of Standard Fire Insurance Company My business address is.

1301 E. COLLINS BLVD. , RICHARDSON , DALLAS , TX , 75081 .

(Street)

(City)

(County) (State) (ZIP Code)

I am executing this declaration as part of my assigned duties and responsibilities I declare under penalty of perjury that the facts stated in this document are true and correct.

  
Declarant

Executed on 11 Nov , 2025