Division of Workers' Compensation

Topical Analgesic Plan-Based Audit

September 23, 2026

Section 1: General Statement and Overview

The Texas Department of Insurance, Division of Workers' Compensation (DWC) will conduct an audit of health care practitioners that prescribe topical analgesics to ensure that these prescriptions are medically necessary, reasonable, and appropriately documented. The audit will evaluate compliance with the Official Disability Guidelines (ODG), as adopted by DWC in 28 Texas Administrative Code Section 137.100, by reviewing applicable treatment guidelines.

Medical quality reviews ensure appropriate care and treatment under Texas Labor Code Sections 413.002 and 413.0512 and DWC rules, while helping injured employees receive medically necessary, evidence-based and cost-effective care.

DWC requires health care practitioners to prescribe medically necessary medications related to a workers' compensation claim, recommend over the counter (OTC) and generic medications when clinically appropriate, specify the strength and quantity of OTC medications, and document the medical necessity of any prescribed brand-name drug in the medical record.

The Medical Quality Review Process (Process) helps DWC monitor compliance with the Labor Code and DWC rules. Reviews also ensure that injured employees in the workers' compensation system receive medically necessary and appropriate health care that is timely and cost-effective. In addition, these medical quality reviews facilitate functional recovery and appropriate return-to-work outcomes. DWC's data reflects a high utilization of topicals being prescribed compared to the past. As a result, the review will evaluate prescribing patterns and medical necessity based on diagnosis of the injured employee.

Section 2: Purpose

- Ensure topical analgesics are prescribed in accordance with the ODG and evidence-based medical practices.
- Assess provider documentation supporting the medical necessity of any prescribing that deviates from established evidence-based guidelines.
- Support appropriate therapeutic prescribing practices to promote optimal outcomes for injured employees.

Section 3: Scope and Selection Criteria

This plan-based audit includes health care practitioners who prescribe topical analgesics for injured employees during the audit period. The review will evaluate whether

prescribing practices align with the ODG or other evidence-based guidelines. Specifically, the review will assess whether documentation supports the medical necessity of medications prescribed outside recommended guidelines; whether brand-name medications were prescribed when generic equivalents were available or clinically appropriate; and whether the prescribing documentation demonstrates functional or therapeutic improvement, clinical need, and overall compliance with DWC expectations for medical necessity.

Section 4: Selection Criteria

The Audit Plan incorporates the approved Medical Quality Review Process. However, if a specific conflict exists between this plan and the Medical Quality Review Process, this plan prevails.

Timeframe

Prescriptions subject to review include topical analgesics prescribed between December 1, 2024, and November 30, 2025.

Population

Health care practitioners who wrote prescriptions for topical analgesics within this timeframe.

Case Selection

- Up to 25 health care practitioners will be selected based on prescription volumes.
- For each selected health care practitioner, up to five cases will be randomly chosen for review.

Review Process

The Medical Quality Review Panel will evaluate selected cases to determine whether:

- The prescription was medically necessary and reasonable.
- The prescription complied with the ODG or other evidence-based medicine.
- The prescription was properly documented in the medical record.
- The medical record shows documentation of functional improvement or clinical need.

Section 5: Conflicts

This plan-based audit complies with the approved Process. If a conflict exists between this audit plan and the Process, the Process prevails.

Section 6: Approvals

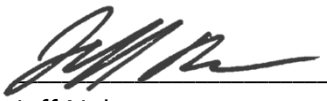
Submitted by:



9/21/26

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Approved by:



9/22/2026

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