



Workers' Compensation  
**Research &  
Evaluation Group**



# Designated Doctors

in the Texas Workers' Compensation System

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Conrado Garza managed the project, conducted the analyses, and converted statistical results into tabular output. Dr. Jamie Hinojosa provided technical writing assistance and created the data visualizations. Conrado Garza and Dr. Jamie Hinojosa co-authored the report. Director Botao Shi, Dr. Hari Luintel, and Vivien Meng contributed valuable editorial comments.

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# Executive summary

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## Purpose

This report provides an overview of Texas-certified designated doctors (DDs) in the Texas workers' compensation system and describes their role within the administrative dispute resolution process. This report is an analysis of DDs by evaluating their performance and presents comparative information for the years 2020 to 2024 by comparing metrics such as rescheduled appointments, timeliness of reports, and other DD responsibilities. This report compares DDs who use an agent, such as a scheduling company, and those who work independently. This report looks at DDs collectively, both agent and independent, and does not analyze any DD's individual performance. This report also highlights 2024 data for DDs who work with an agent. Some 2020 results may reflect effects due to COVID-19 temporary policy changes.

## Background

A DD is a neutral, independent doctor trained and certified by DWC to help resolve disputes about an injured employee's claim. DDs are selected by DWC to answer questions about a work-related injury or occupational illness. Labor Code Section [408.0041](#) authorizes DD's to examine injured employees to help resolve:

- The percentage of physical impairment caused by the injury.
- Whether the employee has reached maximum medical improvement (MMI).
- The extent of the employee's injury.
- Whether an injured employee's disability is a direct result of a work-related injury.
- The ability of the employee to return to work.
- Other similar issues.

The injured employee, the employee's representative, if any, the insurance carrier, or DWC can request a DD examination. DDs may not provide medical treatment or determine the appropriateness of medical care for an injured employee. All DD appointments for a particular claim, as well as any related medical testing, are paid by the insurance carrier and the fees for these appointments are established by 28 Texas Administrative Code (TAC) Section [134.2](#).

According to 28 TAC Section [180.1](#), an agent is a person who a system participant uses or contracts for the purpose of providing claim services or fulfilling duties. An agent may also be known as an administrative services company or a "scheduling company." These agents are private companies with which a DD may contract for administrative support services, including:

- Examination location management.
- Scheduling activities with the injured employee.

- Travel coordination for the DD.
- Medical records coordination.
- Distribution of DD reports to the injured employee, insurance carrier, and DWC.
- Billing and other related administrative tasks.

In 2024, among all the Texas-certified DDs, there were 209 DDs contracting with an agent and 95 DDs working independently. There were 12 agents providing services to about 69% of DDs. DWC does not regulate agents. DDs are liable for any administrative violations of the Texas Workers' Compensation Act, applicable laws, or rules which may result from the agent's work as outlined in 28 TAC Section [127.210](#).

## Data highlights

- Total number of DDs decreased slightly from 2020 to 2024. In 2024, there were a total of 304 DDs: 209 working with an agent and 95 working independently.
- Total number of DD appointments remained consistent at almost 27,000 appointments across the years. In 2024, there were 27,866 DD appointments.
- DDs who work with an agent performed nearly two-thirds of all DD appointments annually.
- DDs working with an agent handled more claims, redesignations, disputes, and letters of clarification (LOC) across all years reviewed.
- There were, on average, 12,500 reschedule requests, or 34%, throughout the years.
- In 2024, there were more than 13,000 reschedule requests: 84% of these reschedule requests were for DD is unavailable.
- Out of all DD ratings, 98.6% were upheld by DWC in 2024.
- In 2024, 7% of DD ratings were disputed. On average, 80% of these disputed ratings were upheld, throughout the years studied.
- More than 94% of DDs received a high or average performance-based oversight (PBO) rating, 2023-2024. To see the full list of PBO ratings, visit DWC's [website](#).

## Key findings, 2024



Source: Workers' Compensation Research and Evaluation Group, 2026.

# Introduction

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In Texas, DWC administers and operates the Texas workers' compensation system. DWC manages an important part of the workers' compensation system: the administrative dispute resolution process. Disputes are disagreements between participants in a workers' compensation claim: the injured employee, an injured employee's representative, or the insurance carrier. These disputes have consequences for the injured employee and their access to medical or income benefits and the amount to be paid. DDs are a critical component of the administrative dispute process.

This report will discuss and cover various aspects of Texas-certified DD roles and responsibilities, and show side-by-side comparisons between DDs who work with an agent to assist in their tasks and those who choose to work as an independent. This report is part of the REG's responsibility to study the quality and effectiveness of the DD as part of the administrative dispute resolution process within the Texas worker's compensation system.

## DD program overview

An injured employee, the injured employee's representative, the insurance carrier, or, rarely, DWC can request a DD exam. DWC staff evaluate examination requests to see if they meet DWC rule requirements, and, if approved, determine which type of doctor is needed. DWC selects a DD with the appropriate qualifications in the injured employee's county of residence. DDs are selected from a list maintained by DWC. This list rotates DDs. Once a DD has been assigned an examination, this DD will move to the bottom of the list. If a DD with the appropriate qualifications is not available in that county, a DD from a neighboring county is selected, as outlined in 28 TAC Section [127.5](#). If a DD is not available due to location or qualifications, DWC may exempt a doctor of medicine (MD) or a doctor of osteopathy (DO) to perform a DD examination. This exemption requires a board certified physician to help resolve the dispute in a timely manner as outlined in 28 TAC Section [127.130\(d\)](#).

MDs and DOs are qualified to evaluate almost all types of injuries. However, certain complex diagnoses, such as traumatic brain injuries, spinal cord injuries, and severe burns, must be evaluated by a licensed MD or DO with required board certification. Doctors of chiropractic are qualified to evaluate injuries to the musculoskeletal aspects of the body, such as hand, arms, legs, and spine. Doctors of podiatric medicine are qualified to evaluate only feet. Doctors of optometry are qualified to evaluate only eyes. Doctors of dental surgery are qualified to evaluate only teeth and jaws. The qualification standards for DD examinations by type of injury or diagnosis are outlined in 28 TAC Section [127.130](#).

Doctors who wish to become certified to perform DD examinations must complete all DWC required training, pass the required test once, and apply. DDs must renew every two years by attending required training and reapplying. In addition to training and testing, DDs must also:

- Maintain an active medical license.
- Have had an active medical practice for at least three years during the doctor’s career.
- Own or subscribe to the currently adopted edition of the American Medical Association “Guides to the Evaluation of Permanent Impairment,” to assign impairment ratings and return-to-work status.
- Comply with financial disclosure requirements.

Prior to the DD exam, only the injured employee, their representative, or appropriate DWC staff may communicate with the DD about the injury. The DD may communicate with any previous doctors, if needed, as outlined in 28 TAC Section [127.15](#). Once the DD exam is completed, the DD writes a narrative report which is sent to DWC and all involved parties. This narrative report, and its findings, are used to determine information about the injured employee’s medical condition as needed for their claim. The DD’s findings are prioritized and viewed as the most accurate information to use to make decisions for the injured employee’s claim. If a disagreement about the DD’s findings occurs, the claim will continue through the dispute resolution process.

### **Important terms and concepts included in this report:**

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The following definitions are meant to provide background context and explain important concepts within this report. Please note: some of these definitions are set by statute.

- **Agent:** A person who a system participant uses or contracts with for the purpose of providing claim services or fulfilling duties under the Labor Code, Title 5 and rules. The system participant who uses or contracts with the agent may also be responsible for the administrative violations of that agent, as outlined in 28 TAC [180.1](#). When a DD files material with DWC, they must provide contact information for their agent, including a fax number, for the secure transfer of medical information. Although DDs have identified 13 agents to DWC, only 12 contracted with DDs that had appointments in 2024.
- **Appointment:** The scheduled date and time the injured employee agrees to meet with the DD for the required workers’ compensation examination. Appointments associated with an agent fax number are counted in the agent data. Appointments without an agent fax number are counted in the independent data. There may be multiple appointments per claim ID.
  - **Redesignation:** A different DD is assigned to the examination. Examples of this are when the DD determines they are not qualified to conduct the exam or when a DD is unable to reschedule the exam within 21 days of the originally scheduled date.
  - **Reschedule:** An appointment where the date of the exam was changed from the ordered date. Agreement between the DD and the injured employee is required to

reschedule the exam under 28 TAC [127.5\(h\) and \(i\)](#). Documentation of the agreement is maintained by the DD.

- Claim: A single date of injury or occupational disease represented by a DWC claim number. If an employee has a new injury, they are assigned a new DWC claim number. A claim may have more than one DD appointment.
- **DD narrative report:** A narrative report written by the DD after the exam is complete explaining and supporting their determinations. The DD writes about their determination of maximum medical improvement (MMI), impairment rating (IR), and any other questions addressed. The DD has seven working days after the exam to send this report to DWC and all parties involved. If additional testing was ordered, the DD has 15 working days to complete this report unless the DD receives DWC approval for additional time before the 15 working days expire, as outlined in 28 TAC [127.10](#).
- **Dispute:** When there is disagreement about a doctor's finding, either the treating doctor or the DD, by the injured employee, the injured employee's representative, or the insurance company.
- **Extent of injury (EOI):** Whether the claimed condition is causally related to or part of the compensable injury.
- **Impairment rating (IR):** A percentage rating from 0 to 100 that an authorized doctor assigns to an injured employee. This IR means the percentage of permanent impairment of the whole body resulting from a compensable injury, as defined in Texas Labor Code chapter [401.011](#). This percentage is a whole number. This is one of the top three reasons a DD exam occurs.
- **Independent:** A DD who has chosen not to contract or work with an agent to help in their roles and responsibilities. This DD must determine how to complete tasks without the assistance of an agent.
- **Letter of clarification (LOC):** A letter of clarification is completed by the DD if DWC approves a party's request for additional or corrected information concerning the DD's report.
- **Maximum medical improvement (MMI):** A date which is the earlier of
  - the earliest date after which, based on reasonable medical probability, further material recovery from or lasting improvement to an injury can no longer reasonably be anticipated.
  - The expiration of 104 weeks from the date on which income benefits begin to accrue.
  - The date determined as provided by Section [408.104](#).This is one of the top three reasons a DD exam occurs.
- **Performance-based oversight (PBO):** A tiered-rating system given to DDs every two years based on their written reports (DWC Form-069, *Report of Medical Evaluation*). There are three tiers: high, average, and poor.

This REG report compares various characteristics and tasks within the DD program. Points of analysis include general appointment data including reschedules, disputes, redesignation, and referrals. Other

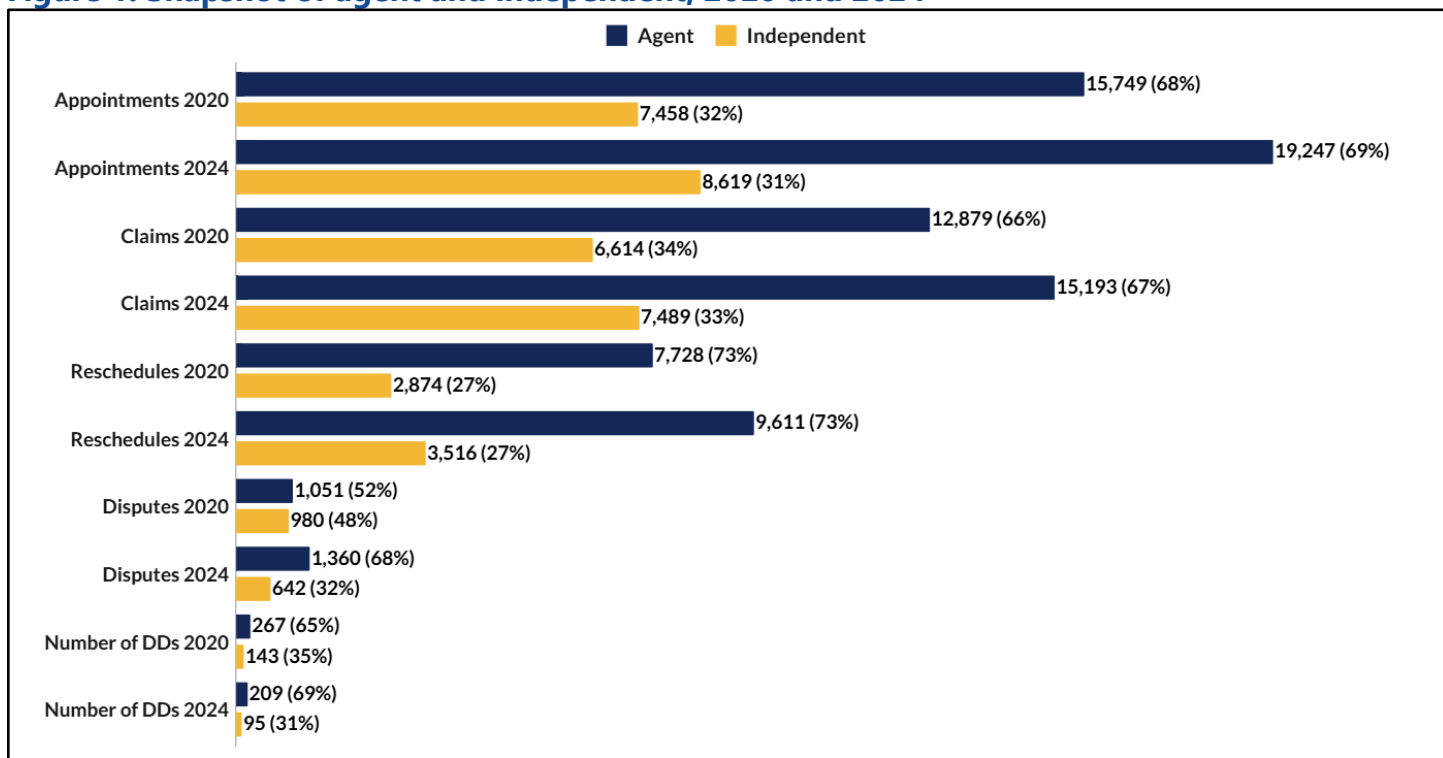
points of data analysis include administrative tasks such as timeliness of reports, LOCs, and PBO ratings. Many of these aspects have time constraints.

## Additional information

This report covers data from 2020 through 2024. Due to COVID-19 in 2020, there were operational changes which may have affected the number of claims, appointments, disputes, and reschedules, among other aspects of the DD program. While the DD program and process is to help resolve disputes, there are times when the dispute moves forward because there is still disagreement from one, or more, of those involved with the injured employee’s claim.

Figure 1 shows several data points for agents and independents, for the years 2020 and 2024. For appointments, claims, reschedules, and number of DDs, these years represent the exam year of the appointment. For disputes, these years represent the concluded year, after the contested case hearing (CCH) was finished. In 2024, DDs with an agent handled 15,193 claims. From these claims, there were 19,247 appointments and 1,360 disputes. Independent DDs handled 7,489 claims in 2024. There were 8,619 appointments associated with these claims and 642 disputes. Throughout the years, agents handled about two-thirds of claims and appointments. The number of appointments, claims, reschedules, and disputes remained stable throughout the years studied.

**Figure 1: Snapshot of agent and independent, 2020 and 2024**



Source: Workers’ Compensation Research and Evaluation Group, 2026.

More information about the DD program, including how to become a DD, along with any updates can be found on the DWC’s [website](#).

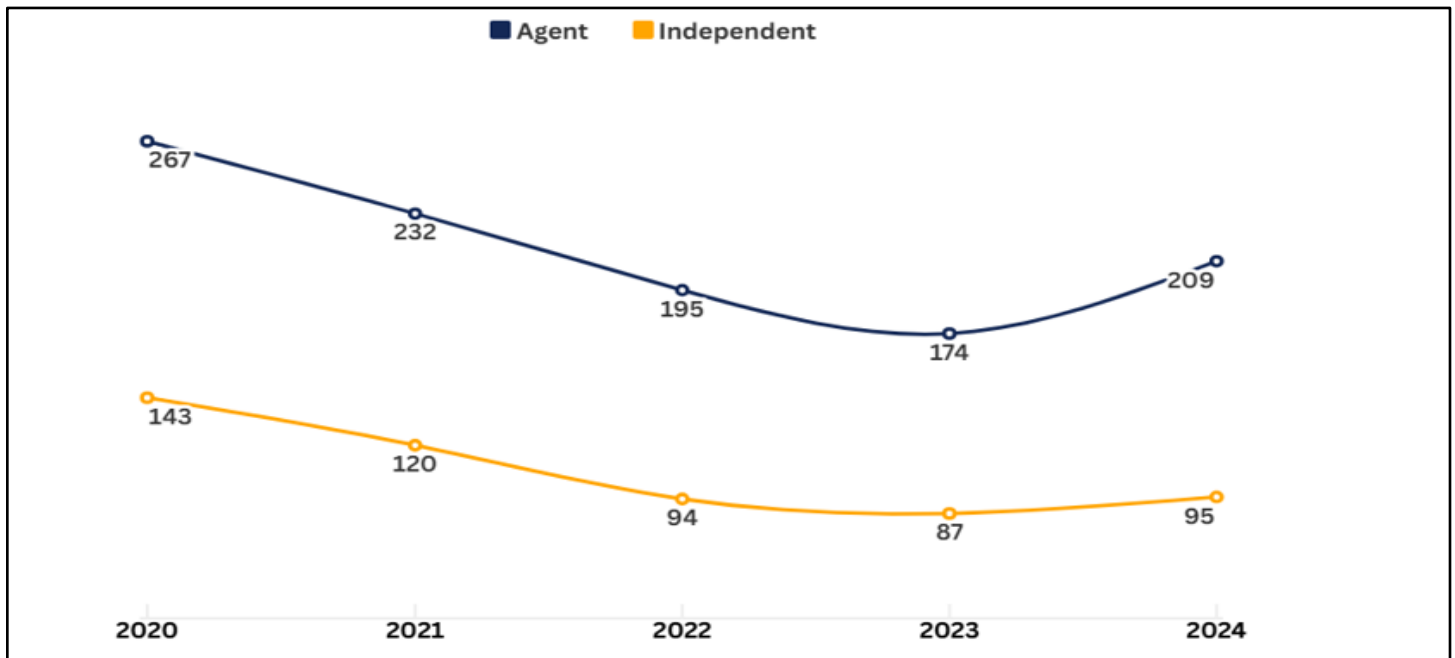
## DD appointments

This report shows claims and appointments by fiscal year of the examination and compares those with and without an agent by the fax number provided by the DD. If an appointment is associated with an agent fax number, this appointment is counted in the agent data. If the appointment does not have an agent fax number, this appointment is counted in the independent data. The top four agents included individually in this report are ExamWorks, Genesis Medical (Genesis), United Medical Examination (UME), and RGV Healthcare Management (RGV). These four agents handled the most DD agent-assisted appointments in 2024, about 82% of the total. The other eight agents are combined into an "Other" category: MET Healthcare Solutions, RMJ Evaluations, Pentacle, Churchill Evaluators, Clarity Evaluators, Global Examination Services, Medical Equation, and Accurate Medical Evaluators LLC. These eight agents handled only about 18% of total agent-assisted DD appointments in 2024.

## Total DD numbers

At the end of the fiscal year, DDs are counted by their license number on file with DWC. Overall, DDs associated with an agent made up about 67% of DDs and independent DDs made up about 33%. From 2020-2024, the average number of DDs associated with an agent was 215 and the number of independent DDs was 108. Figure 2 shows the total number of DDs for 2020-2024, both agent and independent.

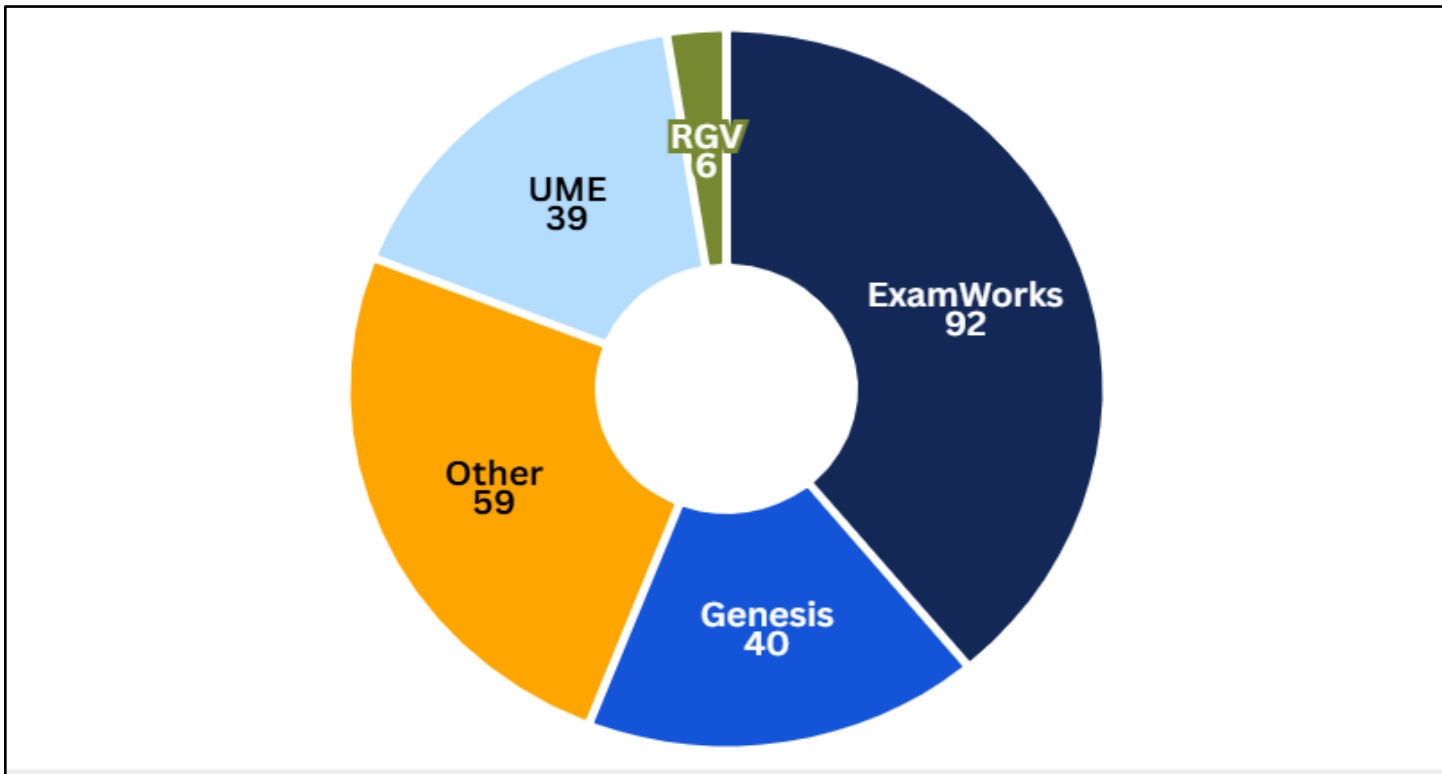
**Figure 2: Total number of DDs, agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, there was a total of 209 DDs who contracted with an agent. Out of these 209 DDs, 26 switched agents during the year and worked with more than one agent. These DDs are counted for each agent they contracted with in Figure 3.

**Figure 3: Total number of DD, agent, 2024**

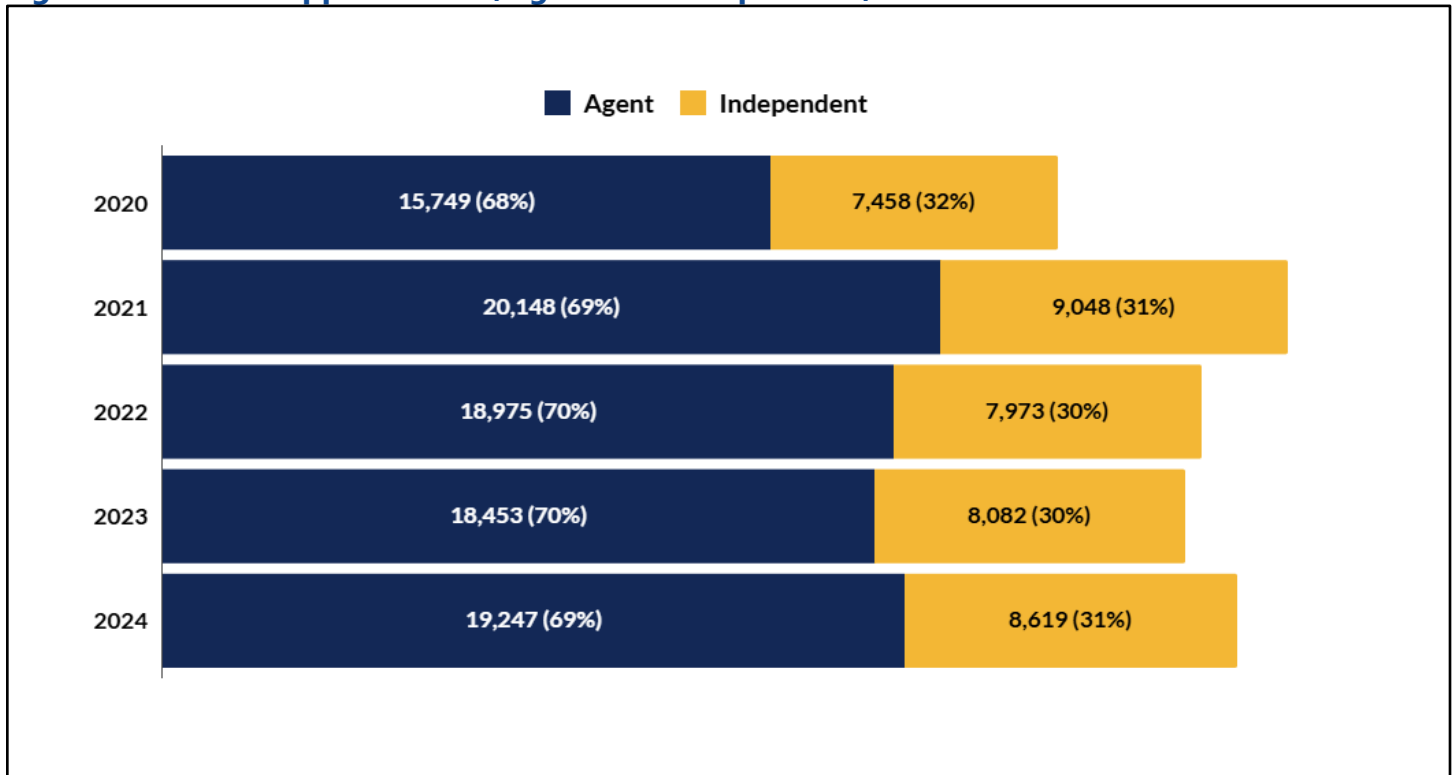


Source: Workers' Compensation Research and Evaluation Group, 2026.

### **DD appointments, claims, and appointment types**

Overall, the total number of appointments slightly increased from 2020 to 2024 with a maximum in 2021 at more than 29,000. There was an overall average of 26,750 appointments per year. Figure 4 shows the total number of DD appointments from 2020 to 2024, separated for agent and independent. Each year, almost two-thirds of appointments were handled by a DD working with an agent while about one-third of appointments were with an independent DD.

**Figure 4: Total DD appointments, agent and independent, 2020-2024**

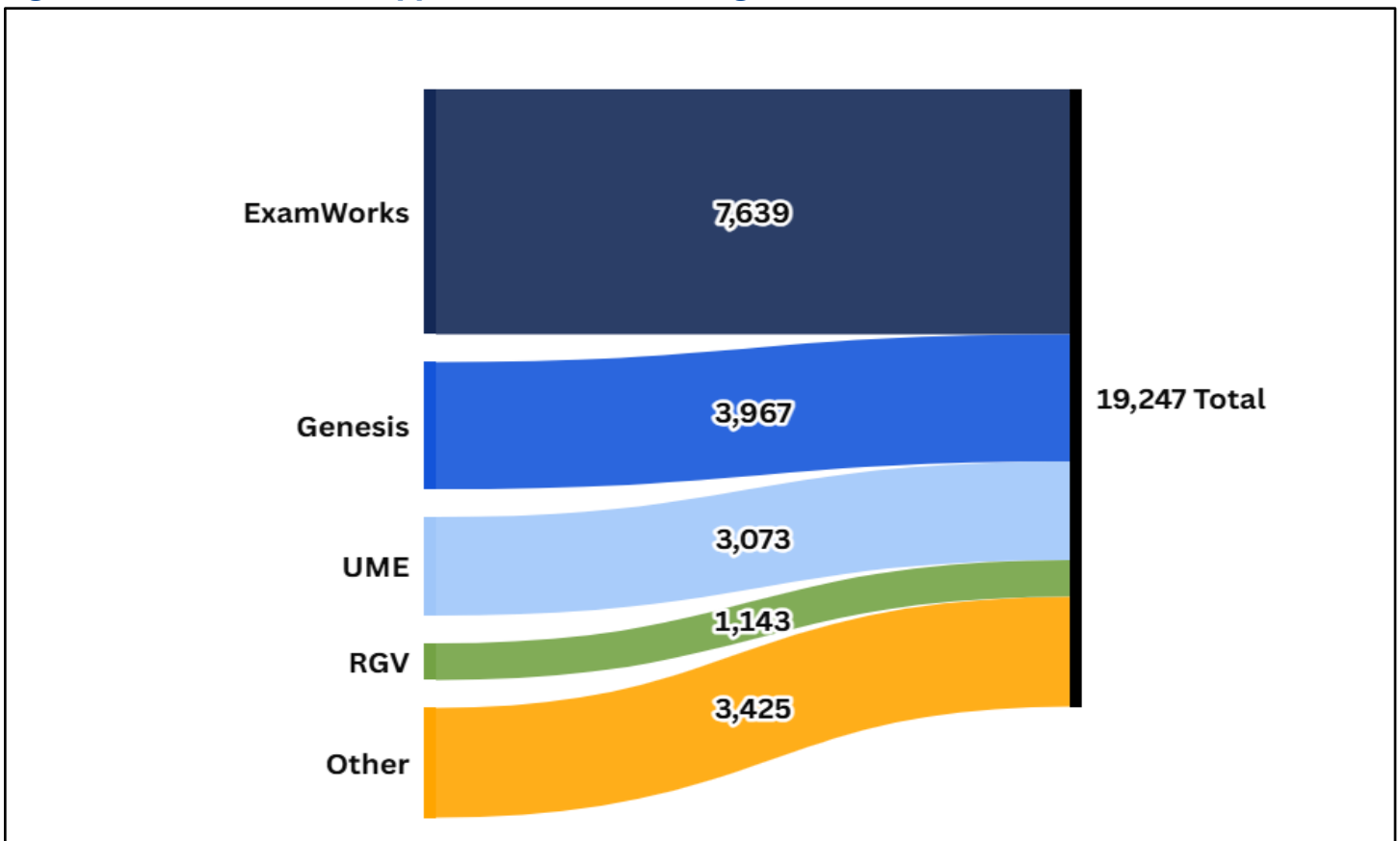


Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, agent-assisted DDs had a total of more than 19,000 appointments and independent DDs had a total of more than 8,600. ExamWorks handled the most agent-assisted DD appointments in 2024, at 40%. Out of the total of agent-assisted DD appointments, the top four agents handled 82% of these DDs appointments: 15,822 out of 19,247. The other eight agents handled about 18% of appointments.

Figure 5 shows the number of appointments for each agent in 2024. The width of the flow band corresponds to the number of DD appointments per agent. Those with thinner bands had fewer appointments. The top four agents are listed in descending order from the most appointments to the fewest.

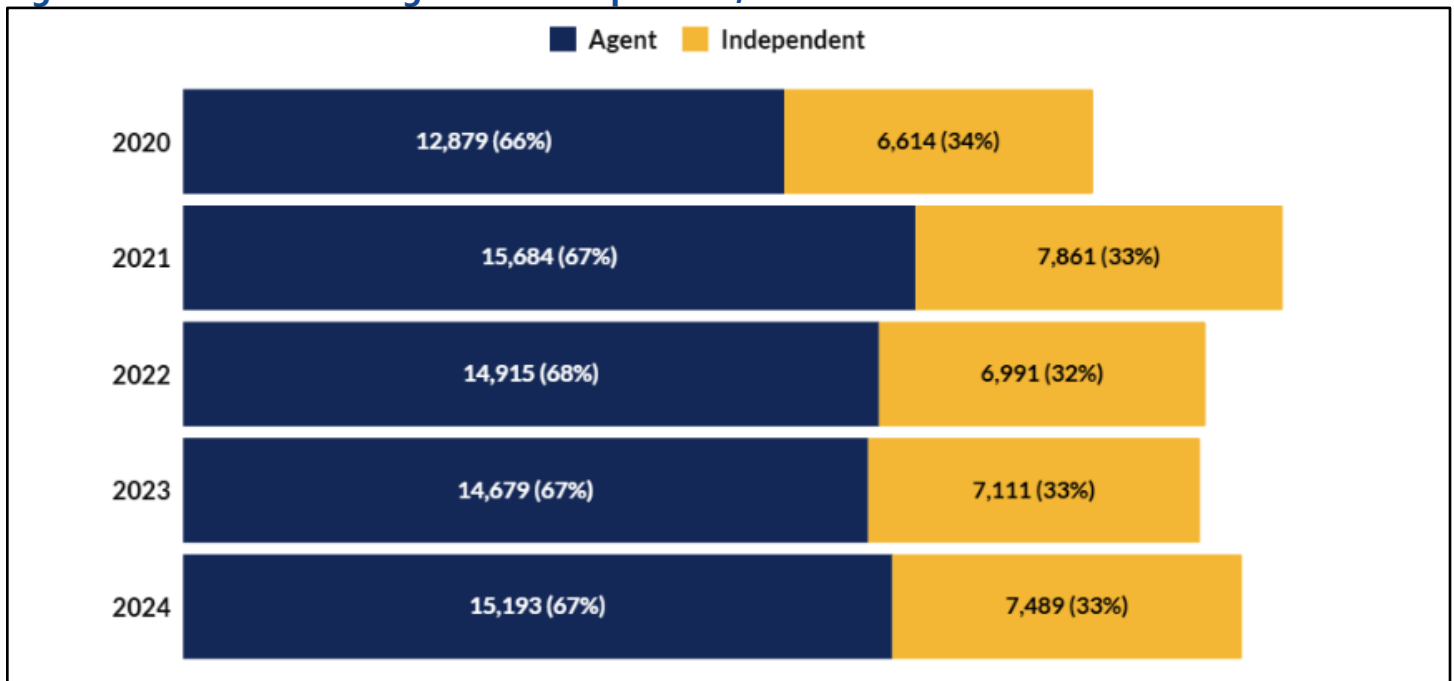
**Figure 5: Total number of appointments for each agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

Throughout the years, 2020-2024, DDs who contracted with an agent, on average, handled almost 15,000 claims a year: about two-thirds of total claims. For both agent and independent, 2020 had the fewest number of claims at more than 19,000. In 2024, there were more than 22,000 claims for agent and independent. Figure 6 shows a comparison of total claims for agents and independents for the years 2020 to 2024.

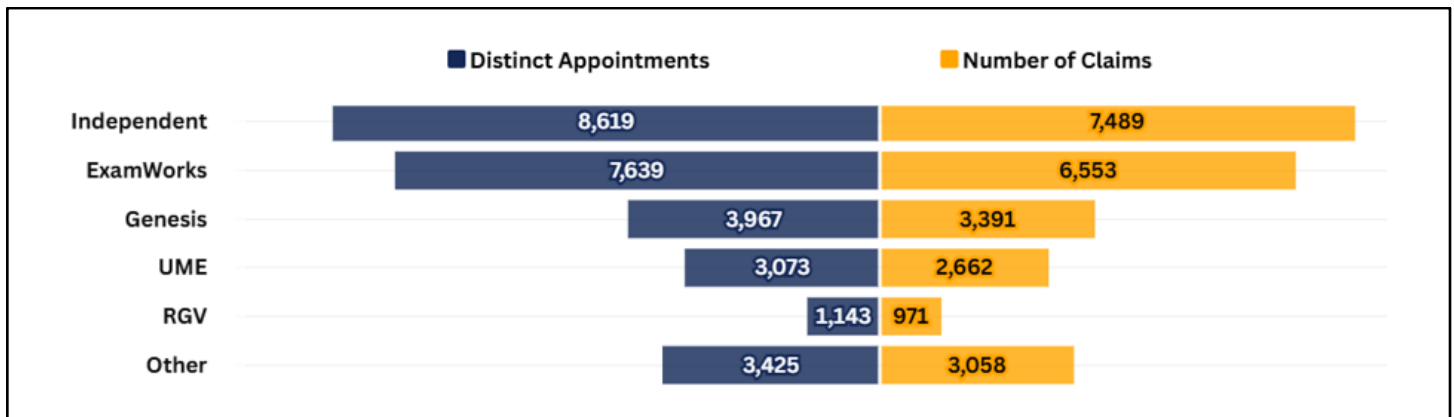
**Figure 6: Total claims for agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, ExamWorks, Genesis, UME, and RGV handled 82% of agent-assisted DD appointments and claims. Figure 7 shows the number of appointments and claims for each agent in 2024<sup>1</sup>, compared to independent. The number of appointments is slightly higher than the number of claims demonstrating there were multiple appointments with the same claim ID number.

**Figure 7: DD appointments and claims, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

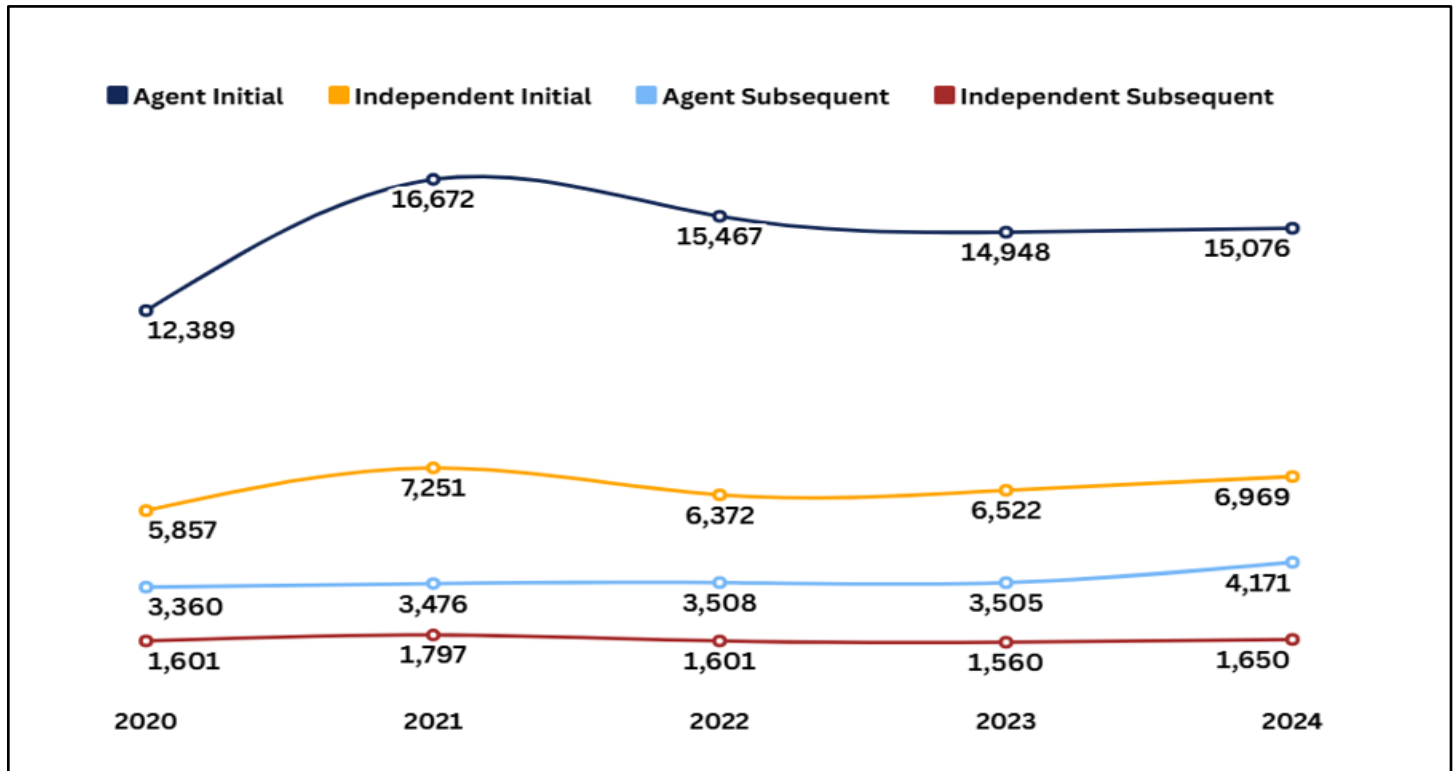
When a dispute arises and a DD exam is scheduled, the injured employee will have an initial appointment. Sometimes, a subsequent, or follow-up, appointment is needed, maybe more than one. About 69% of initial and subsequent appointments were associated with an agent-assisted DD. Overall,

<sup>1</sup> There were multiple claims which used more than one fax number and are double counted in the figure below.

from 2020-2024, including both agent and independent, about 80% of DD appointments were initial, first-visits. The average for initial appointments from 2020-2024 was about 21,500.

In 2024, agent initial appointments made up about 68% of the total initial appointments for both agent and independent: 15,076 out of 22,045. DDs working with an agent handled about 72% of total subsequent appointments for agent and independent: 4,171 out of 5,821. In Figure 8, the breakdown of DD appointments is shown by type, initial and subsequent, for years 2020-2024 for agent and independent.

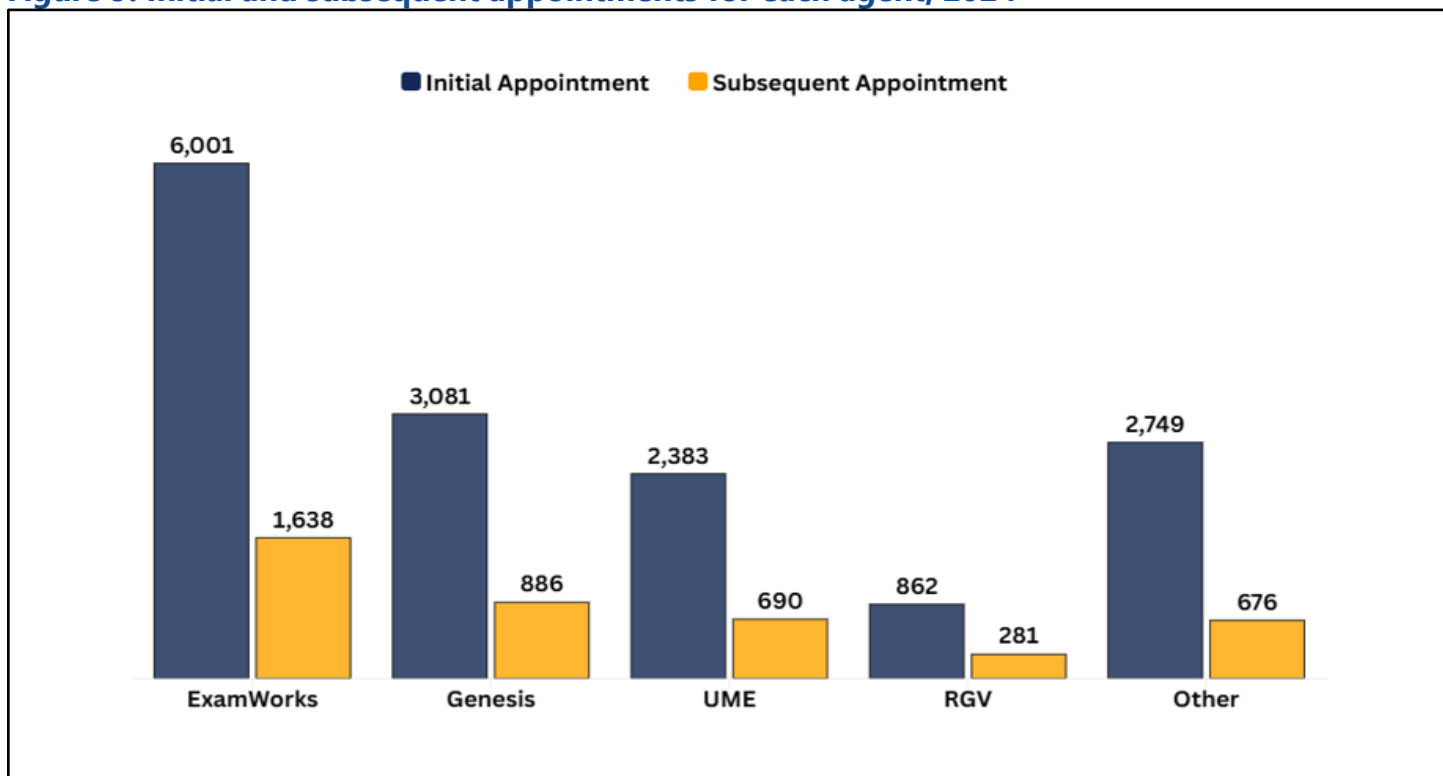
**Figure 8: Initial and subsequent appointments, agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, for agent-assisted DDs, ExamWorks handled about 40% of initial appointments. The top four agents handled about 82% of initial appointments. The other eight agents handled the other 18% of initial appointments. Figure 9 shows the breakdown of the appointment type for DD appointments for each agent in 2024.

**Figure 9: Initial and subsequent appointments for each agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

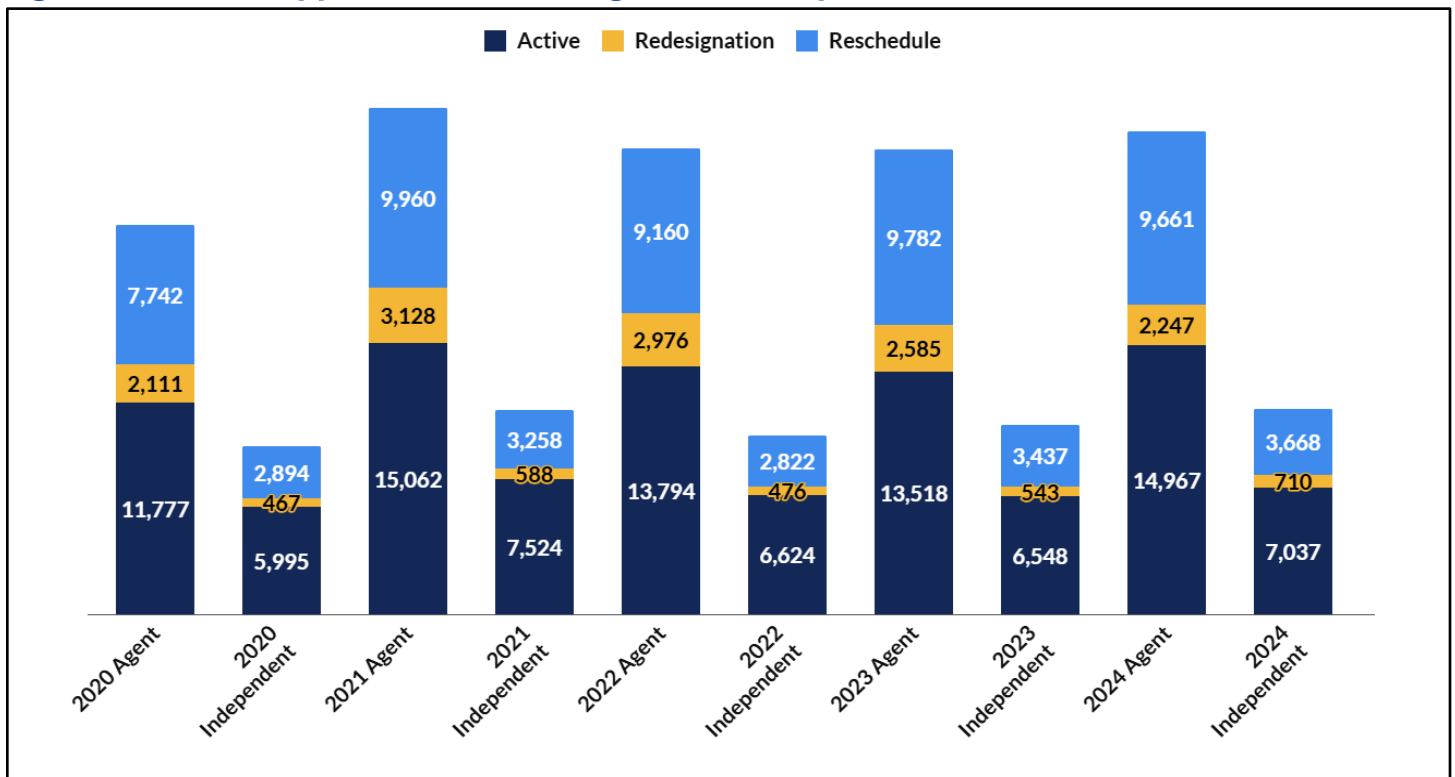
## DD appointment characteristics

DD appointments may have varying statuses to indicate an important characteristic of the appointment. These statuses may include active, resignation, or rescheduled, among others. The status of an appointment is important because any status, such as rescheduled or resignation, extends the amount of time for the injured employee's dispute and may create additional burdens and issues for those involved in the claim. The top three appointment statuses are active, reschedule, and resignation.

### DD appointment status: active, reschedule, and resignation

Overall, active appointments made up about 57% of the total appointment statuses, agent and independent, with an average of about 20,500 per year. An active appointment status means the appointment occurred without any scheduling issues. Active appointments were lowest in 2020 with almost 18,000. Agents, on average, had almost 14,000 active appointment statuses throughout the years studied. The second largest number of appointments had a reschedule status, about 34%, with an average of almost 12,500 per year. Reschedule statuses were also the lowest in 2020. Resignation status was around 9% throughout the years studied, with an average of almost 3,200 per year. This status was lowest in 2020. Figure 10 shows the appointment status for active, reschedule, and resignation for both agent and independent.

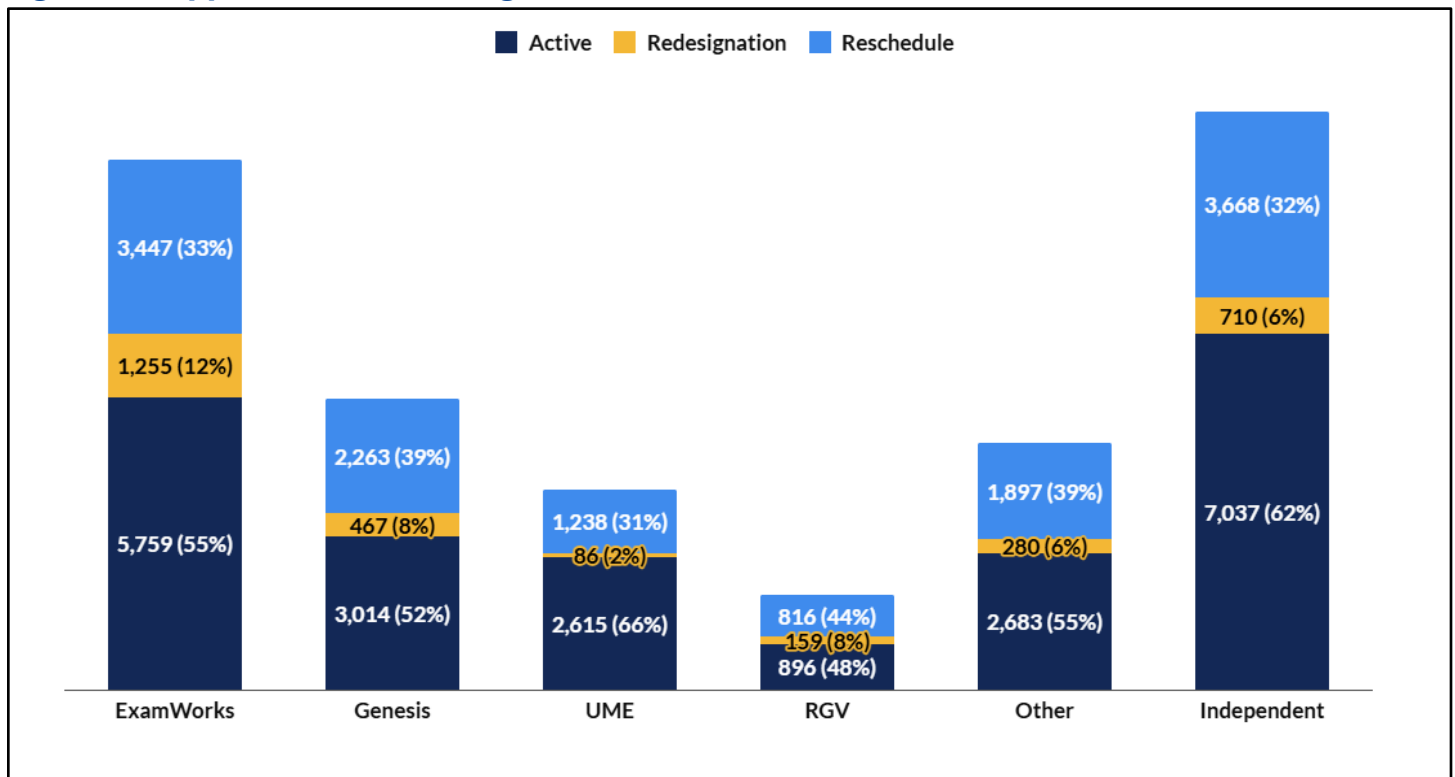
**Figure 10: Overall appointment status, agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

ExamWorks appointment statuses for active was about 38% for all active statuses for agent appointments. ExamWorks made up about 36% of agent statuses for reschedule, and about 56% of resignation statuses. The top four agents made up about 82% of active statuses. The top four agents made up about 80% of reschedule statuses, and 88% of resignation statuses. Figure 11 displays the number of active, reschedule, and redesignated appointments for agents in 2024 alongside independent for comparison.

**Figure 11: Appointment status, agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

## Rescheduled appointments

When an appointment needs to be rescheduled, both the DD and the injured employee must agree to the reschedule. The DD is responsible for documenting the reschedule process and informing DWC of why the appointment needs to be changed. The rescheduled exam must be scheduled within 21 days of the original appointment date. If the exam cannot be scheduled within 21 days or the injured employee fails to attend the rescheduled exam, the DD must notify DWC. This may result in DWC selecting a new DD. Throughout the years, on average, 34% of appointments have a reschedule status.

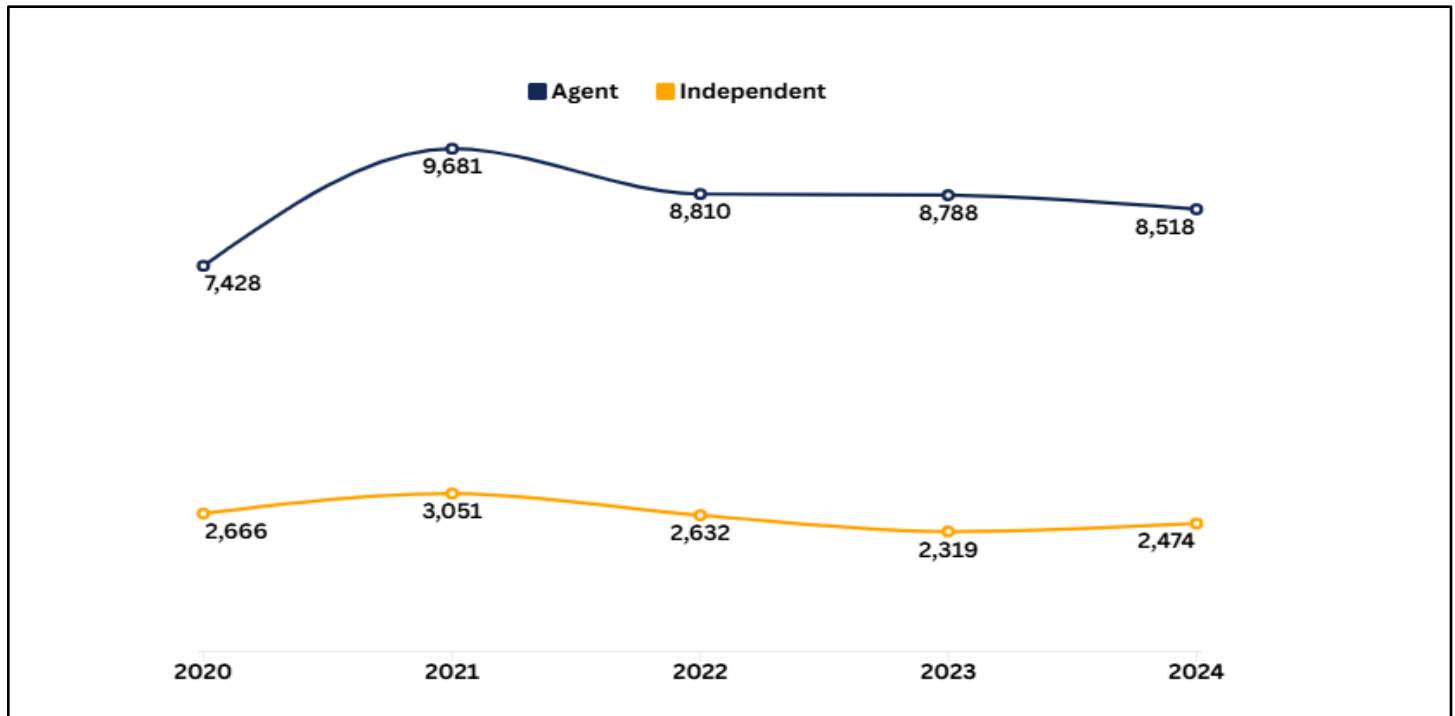
The top three reasons for a reschedule are:

- DD is unavailable.
- Injured employee is not available.
- Injured employee missed the appointment.

For both agents and independent, the most frequent reason to reschedule is DD is unavailable. A DD being unavailable means the DD could not find an available and agreed upon date with the injured employee within 21 days of the original exam date. Agents had an average of more than 8,600 of these reschedule requests throughout the years studied. Independents had an average of more than 2,600 reschedule requests because the DD was unavailable. For both agent and independent, a DD being

unavailable made up about 91% of the reschedule requests, out of the top three reasons, throughout the years studied. Figure 12 presents the most frequent reschedule request for both agent and independent for 2020-2024: DD unavailable.

**Figure 12: Most frequent reschedule request, DD unavailable, agent and independent, 2020-2024**

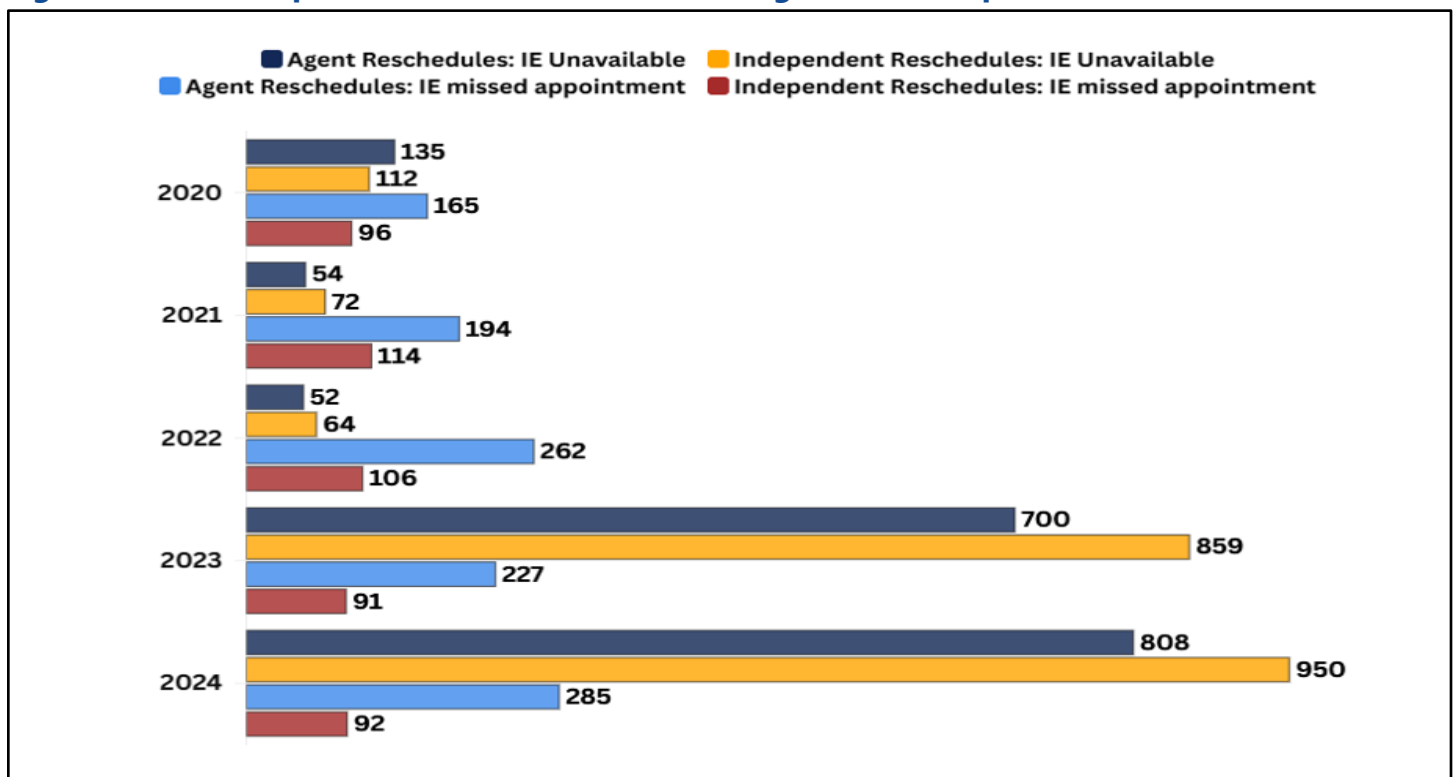


Source: Workers' Compensation Research and Evaluation Group, 2026.

The other two most frequent reasons for a reschedule are injured employee is unavailable, and injured employee missed the appointment. Throughout the studied years, these two reasons for a reschedule usually accounted for less than 9% of the total. The second most frequent reason for a reschedule was injured employee not available for appointment. For agents, they had an average of about 350 reschedules because the injured employee was not available. Independents had more than 400 of these reschedules throughout the studied years.

In 2023 and 2024, both agent and independent had a significant increase in the number of reschedules because the injured employee was not available. DDs working with an agent had an increase from 52 reschedules in 2022 to 808 in 2024. Independent DDs also had an increase in reschedules: 64 in 2022 to 950 in 2024. Reschedules because the injured employee missed the appointment remained consistent throughout the years for both agent and independent. Agents, on average, had more than 200 injured employee missed appointment reschedules. Independent DDs had about 100. Figure 13 shows the other top two rescheduling reasons for agent and independent from 2020 through 2024.

**Figure 13: Other top two reasons for reschedules, agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

There are eight other reschedule reasons which may be filed with DWC. On average, throughout the years, agents had 39 reschedules for these other reasons and independents had 76.

In 2024, within the top three reasons to reschedule, agents had more than two-thirds of these reschedules for both DD is unavailable and injured employee missed appointment. Independents had the majority of reschedules for injured employee is unavailable:

- There was a total of almost 11,000 reschedules for DD is unavailable for both agent and independent.
  - Out of this total, agents had 77% of these reschedules and independent had 33%.
- There were about 1,700 reschedules for injured employee is unavailable, for both agent and independent.
  - Out of this total, agents had 46% of these reschedules and independent had 54%.
- There were almost 400 reschedules for injured employee missed appointments, for both agent and independent.
  - Agents had 76% of these reschedules and independent had 23%.

Table 1 shows the top three rescheduling reasons for all agents in 2024. ExamWorks had 36% of the total reschedules for all agents. A reschedule could occur multiple times for an appointment.

**Table 1: Top three rescheduling reasons for DD appointments, agent, 2024**

<b>Agent</b>	<b>DD is unavailable</b>	<b>IE is unavailable</b>	<b>IE missed appointment</b>	<b>Total Appointments</b>
ExamWorks	3,074 (90%)	193 (6%)	158 (5%)	7,639
Genesis	2,057 (91%)	165 (7%)	36 (2%)	3,967
UME	1,065 (86%)	141 (11%)	27 (2%)	3,073
RGV	693 (85%)	112 (14%)	6 (1%)	1,143
Other	1,629 (86%)	197 (10%)	58 (3%)	3,425
Independent	2,474 (70%)	950 (27%)	92 (3%)	8,619

Source: Workers' Compensation Research and Evaluation Group, 2026.

Note: Due to rounding, some of the numbers may not add up to 100%.

## Redesignation requests

Redesignation requests ask for another DD to be assigned for an exam, as needed. The only way to request a redesignation request is via fax.

The top four redesignation requests are:

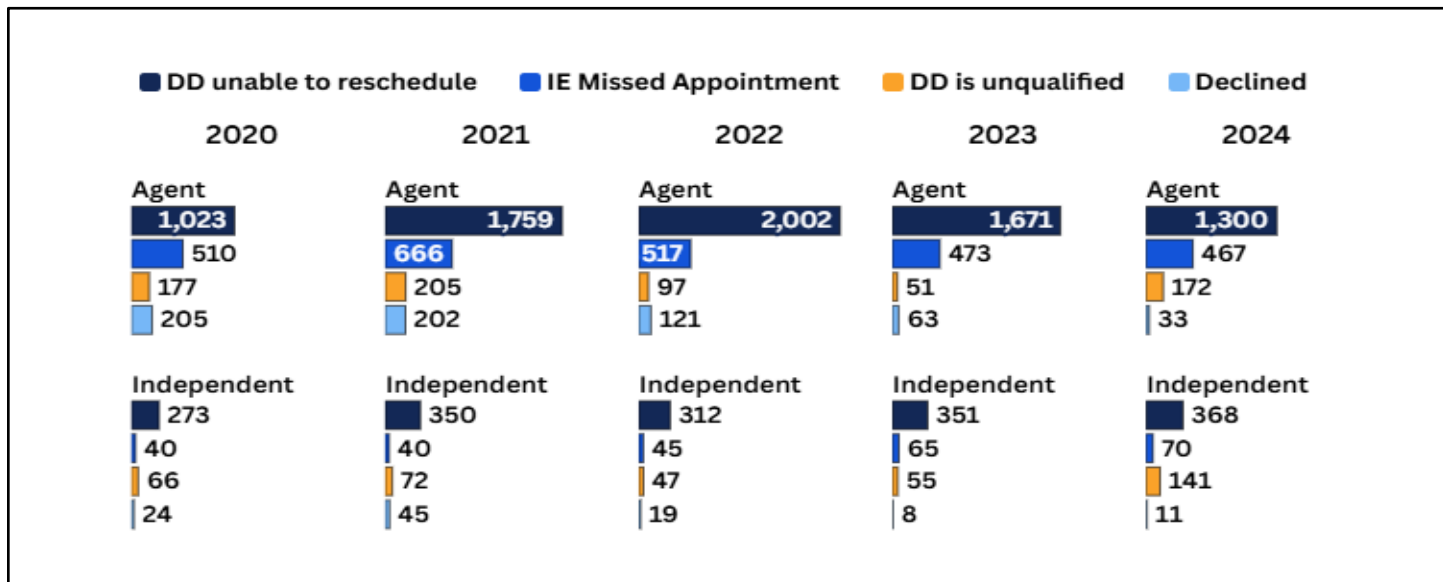
- DD unable to reschedule.
- Injured employee missed appointment.
- DD is unqualified.
- Declined, and no disqualifying association.

When a DD does not have availability for a reschedule within 21 days, which the injured employee must agree upon, DWC will assign a new DD for the exam. If the injured employee misses the appointment, the DD may ask for a different DD to be assigned. If a DD is not qualified for the specific injury or illness, another DD must be assigned who meets the appropriate qualification standard for the area of the body affected by the injury and the injured employee's diagnosis. If a DD is not available with the required qualifications, DWC may exempt a MD or DO from the qualification standards to serve as a DD to perform the examination. A redesignation may also be needed if the DD declines to accept the appointment from DWC.

The most frequent redesignation request is for DD unable to reschedule. This request had an average of about 1,550 for agents across the years studied. For independents, this request had an average of about 330. In 2020, agents had about 1,000 redesignation requests for DD unable to reschedule. This

number increased in 2024 to 1,300. Figure 14 displays a side-by-side comparison of the top four redesignation requests for agent and independent for 2020-2024.

**Figure 14: Frequency of redesignation requests, agent and independent, 2020 – 2024**



Source: Workers’ Compensation Research and Evaluation Group, 2026.

For exam fiscal year 2024, agents had 1,300 redesignation requests because the DD was unable to reschedule in 21 days. Out of these requests, ExamWorks made up about 46% of the total requests. Genesis made up about 28% of redesignation requests. The other eight agents made up the remaining 26%. Table 2 shows the number of redesignation requests for the top three reasons along with the percentages for each agent’s total. Independent is included for comparison. The fourth most frequent redesignation reason of declined is not shown in Table 2 because only four agents had this request for redesignation: ExamWorks had 27, Churchill Evaluators had 4, and RGV and UME each had one.

**Table 2: Top three redesignation requests, agent, 2024**

Agent	DD unable to reschedule in 21 days	IE missed appointment	DD is unqualified
ExamWorks	597 (55%)	398 (36%)	94 (9%)
Genesis	360 (88%)	24 (6%)	26 (6%)
RGV	121 (88%)	14 (10%)	2 (1%)
UME	29 (41%)	7 (10%)	34 (49%)
Other	193 (83%)	24 (10%)	16 (7%)
Independent	368 (64%)	70 (12%)	141 (24%)

Source: Workers’ Compensation Research and Evaluation Group, 2026.

The top three agents which had redesignation requests for DD is unable to reschedule in 21 days were ExamWorks with 597, Genesis with 360, and RGV at 121. ExamWorks had the most redesignation requests for injured employee missed appointment at almost 400. The second highest number for injured employee missed appointment is with the agent Genesis at 24. For DD is unqualified, ExamWorks had the highest with 94 requests, which is almost 55% of the total for this type of request amongst agents. UME had the second most at 34, or about 20%. Genesis had 26 and RGV had two. All other agents had 16 or fewer requests because DD is unqualified.

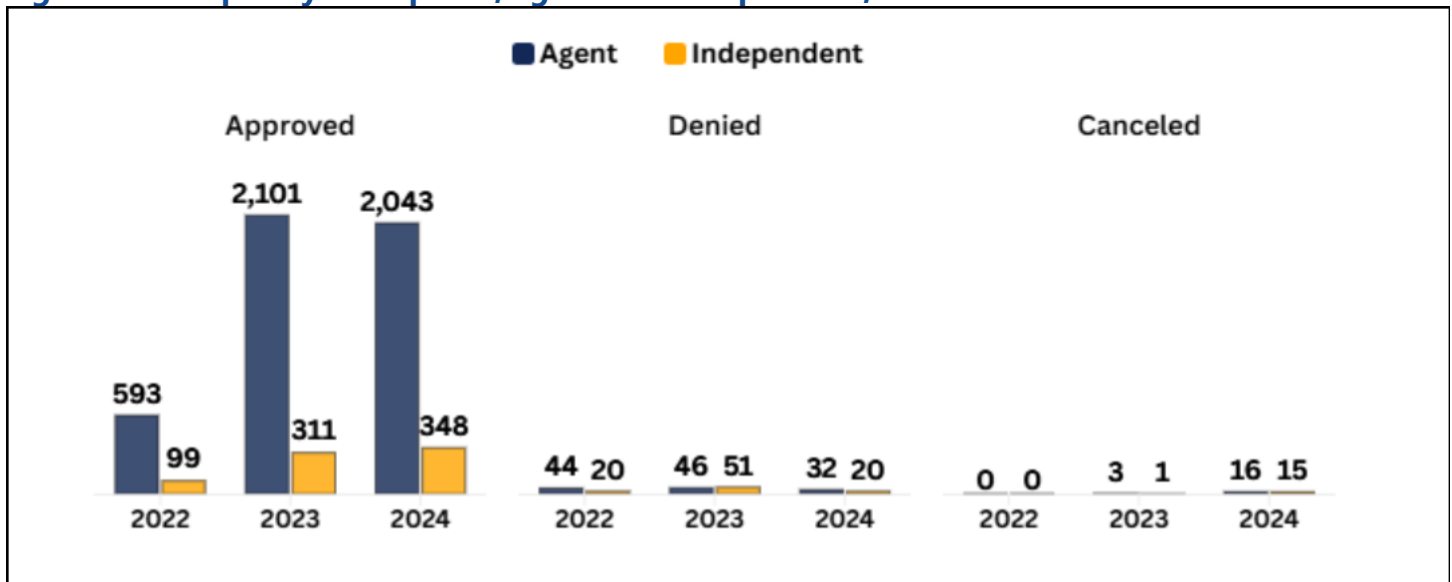
## **Requests for additional time (additional testing or evaluation)**

There are instances when the DD determines that additional testing or evaluation of the injured employee is required for the DD to answer medical questions and complete his report. This includes instances where the DD is not qualified to fully resolve the issue, as outlined in 28 TAC section [127.10](#). The DD may request additional time to submit the report, but this must be approved by DWC. The vast majority of requests for additional time are approved. This approval means DWC has processed the request and given extra time for this additional testing or evaluation to occur, and for the DD to write their narrative report.

Any additional testing, referral examination, and DD narrative report must be completed within 15 working days of the DDs examination of the injured employee unless the designated doctor receives division approval for additional time before the 15 working days expire. After the additional testing or evaluation, the DD then has all the information needed to submit their DD narrative report. In their narrative report, a DD must describe in detail and provide sufficient information about why additional testing or evaluation and time was needed.

Figure 15 shows the amount of approved, denied, and canceled requests for additional time for agent and independent for 2022 to 2024.

**Figure 15: Frequency of requests, agent and independent, 2022-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, Genesis had the most approved requests at 1,161 out of 2,043. ExamWorks handled the second largest number of approved requests at 409. RGV had 167 approved requests. UME had 95 approved requests. All other agents had 211. Table 3 shows the breakdown of each agent in 2024 for approved, denied, and canceled requests.

**Table 3: Frequency of approved, denied, and canceled requests for each agent, 2024**

Agent	Approved	Denied	Canceled	Total Requests	Total Appointments
ExamWorks	409	4	3	416	7,639
Genesis	1,161	16	2	1,179	3,967
RGV	167	1	5	173	3,073
UME	95	5	2	102	1,143
Other	211	6	4	224	3,425

Source: Workers' Compensation Research and Evaluation Group, 2026.

### Frequency of disputes

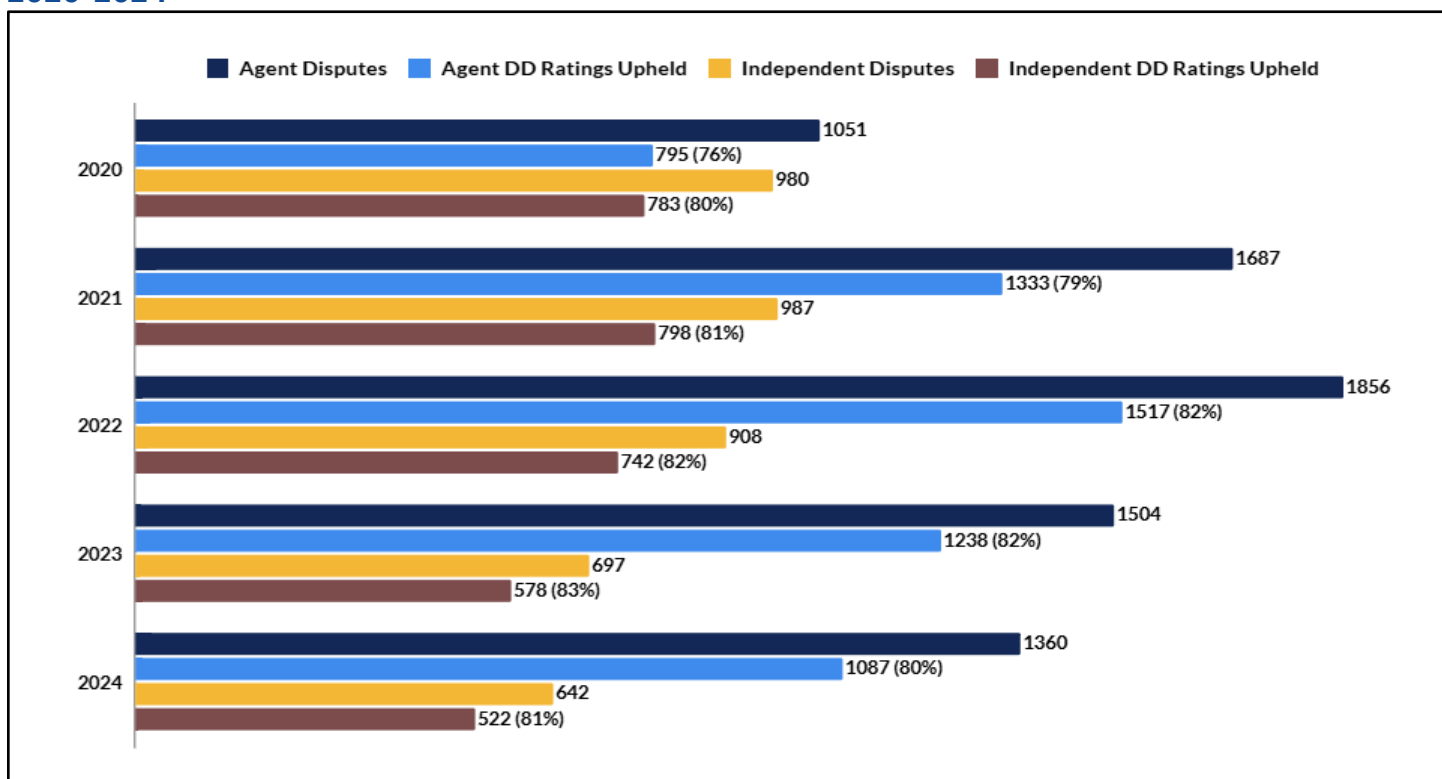
A DD appointment occurs when a dispute arises about an injured employee's claim. There are instances where disputes arise about a DD's findings after the DD appointment. Both MMI and IR are consistently disputed aspects of an injured employee's claim. There are instances when the DD's finding of MMI, IR,

or both, are disputed. These disputes move through the dispute resolution process and may result in a CCH. These CCHs help resolve the dispute. In 2024, about 7% of DD ratings were disputed. Out of all DD appointments in 2024, 98.6% of DD ratings were upheld.

The frequency of disputes for MMI and IR throughout the years, for both agents and independents, had an average of about 2,300. This amount remained stable throughout the years studied with the most occurring in 2022 and the fewest in 2020, potentially due to COVID-19. For those DD ratings which were disputed more than 80%, on average, were upheld by DWC. Disputes can occur for both MMI and IR and these numbers would be counted for both, resulting in some overlap in the dispute numbers and ratings upheld.

Both agents and independents have the majority of MMI and IR DD disputed ratings upheld. Figure 16 shows the concluded years for disputes (once the CCH is finished) and compares agent and independent for the number of disputes alongside the percentage of upheld DD ratings for 2020-2024.

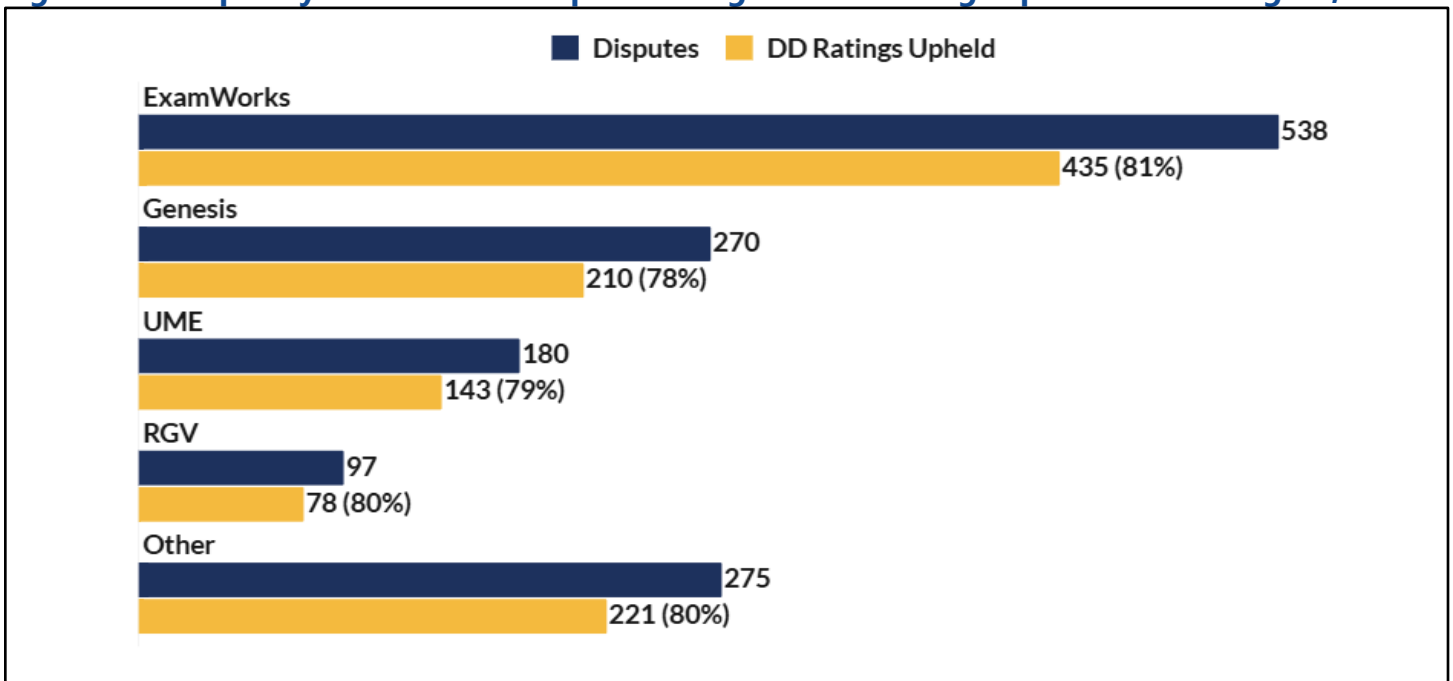
**Figure 16: Frequency of MMI and IR disputes, agent and independent, with DD ratings upheld, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

The agent ExamWorks had the largest number of disputes, 538, for MMI and IR, amongst agent disputes. Genesis had the next largest number of disputes at 270. Figure 17 shows MMI and IR disputes for agents with at least one dispute which concluded in 2024. Disputes can occur for both MMI and IR and these numbers would be counted for both, resulting in some overlap in the dispute numbers and ratings upheld.

**Figure 17: Frequency of MMI or IR disputes along with DD ratings upheld for each agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

Out of the four agents who handled the most appointments in 2024, the majority of DD ratings were upheld:

- ExamWorks had the highest percentage of upheld disputes at 81%.
- Genesis had the lowest percentage at 78%.
- UME had 79% of DD ratings upheld.
- RGV had 80% of DD ratings upheld.

Throughout the years, disputes between MMI and IR are similar in number.

## Administrative tasks

As part of the DD program, after an exam occurs, there are various administrative tasks the DD may have to complete. The administrative tasks discussed in this report will include LOCs and timeliness of reports. There are additional administrative tasks which must also occur but are not covered in this report.

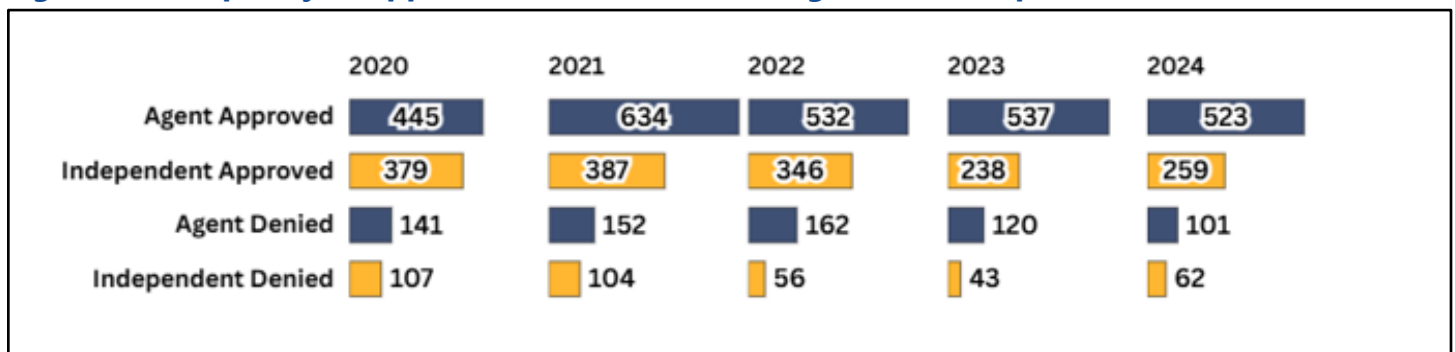
A DD may choose to work with an agent to help complete these tasks as many have deadlines. These tasks help the injured employee, any representative for the injured employee, the insurance carrier, and DWC with efficiently and effectively resolving disputed medical questions or issues about an injured employee's claim.

### Letter of clarification (LOC)

A letter of clarification is completed by the DD if DWC approves a party's request for additional or corrected information concerning the DD's report. Interested parties may only request clarification on issues addressed by the DD's report or on issues that the DD was ordered to address but did not, such as MMI or IR discrepancies, unaddressed issues, incorrect information, or changed circumstances.

These LOC requests may be approved or denied by DWC. LOCs associated with an agent had an average of about 530 approved per year. Independents had about 320 approved LOCs each year. Approved LOCs, for both agent and independent, were the largest number throughout the studied years. In Figure 18, each year is separated into agent and independent, for approved or denied LOCs.

**Figure 18: Frequency of approved and denied LOCs, agent and independent, 2020-2024**



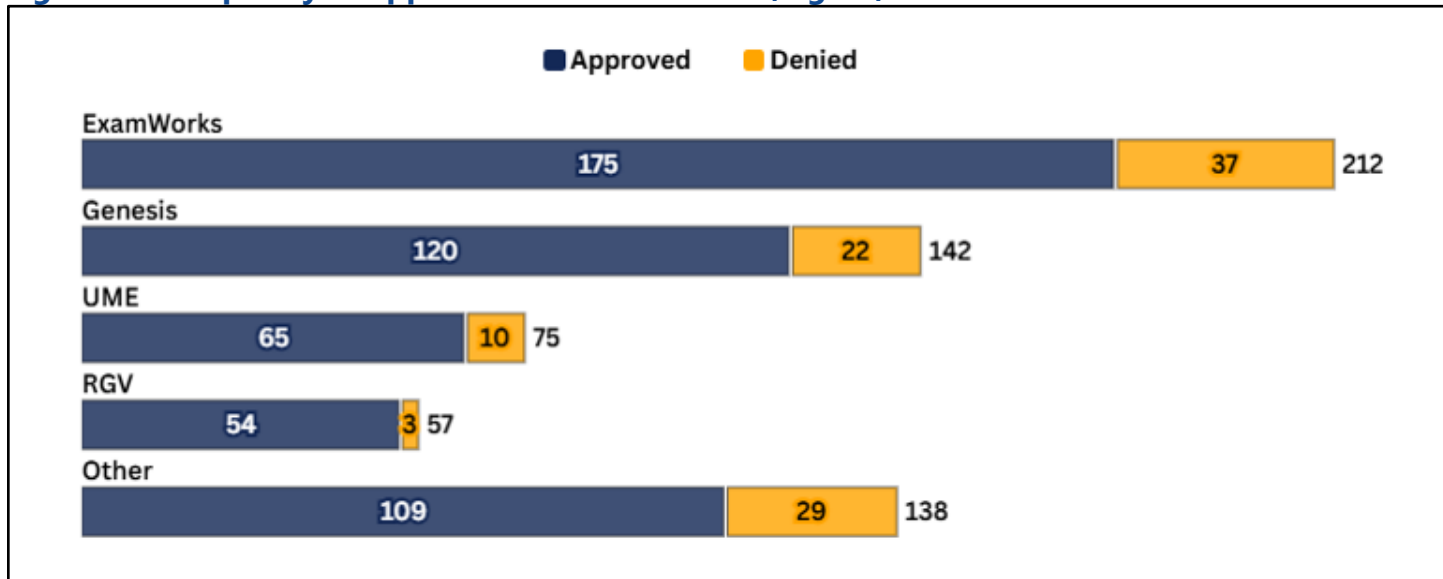
Source: Workers' Compensation Research and Evaluation Group, 2026.

In 2024, there were 523 approved LOCs for agents. For the top four agents:

- ExamWorks had 175, or 33%.
- Genesis had 120, or 23%.
- UME had 65, or 12%.
- RGV had 54, or 10%.

Figure 19 shows the number of approved and denied LOCs for each agent in 2024.

**Figure 19: Frequency of approved and denied LOCs, agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

## Timeliness of reports

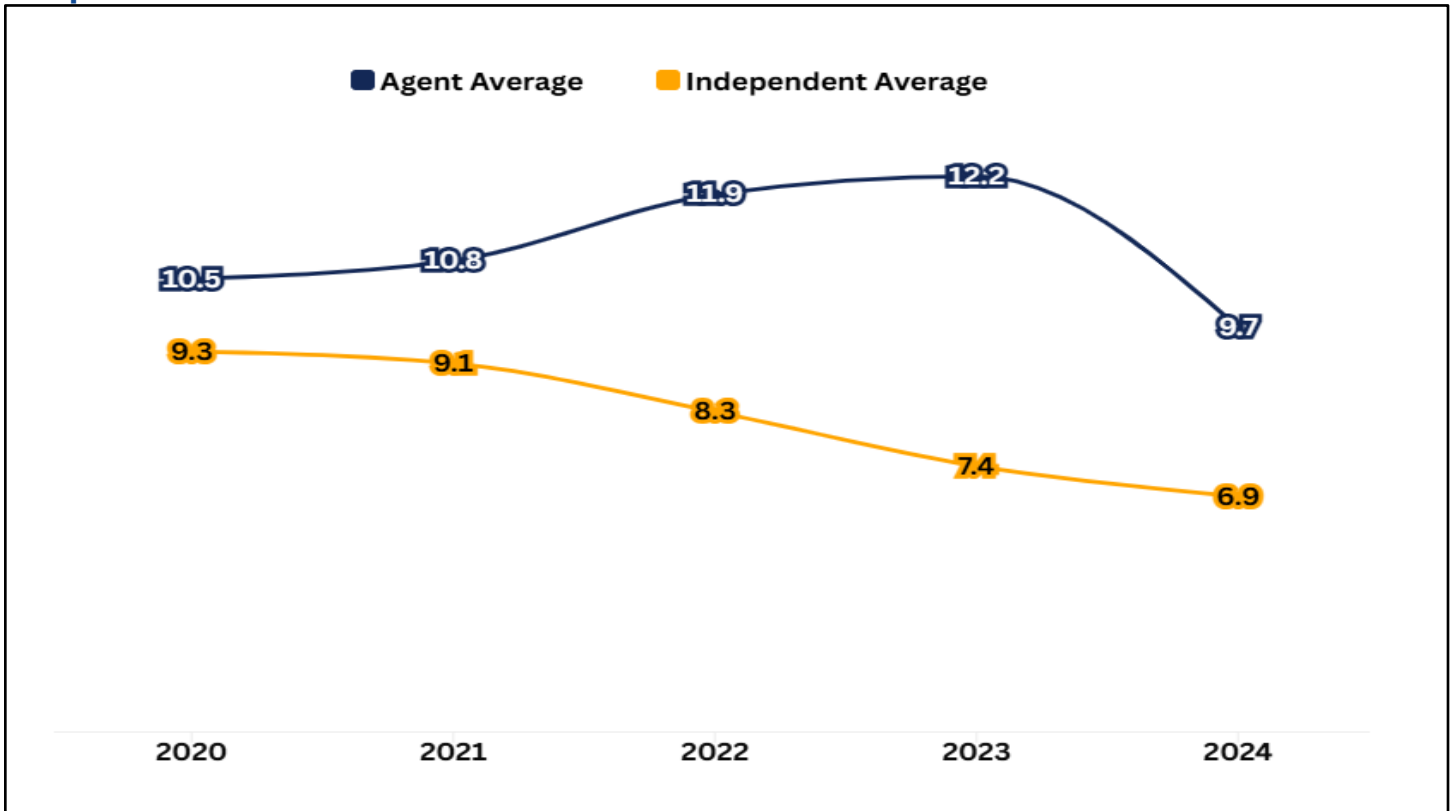
After an exam for MMI or IR, a DD must file a DWC Form-069, *Report of Medical Evaluation*, within seven working days. This form must be sent to DWC, the injured employee, the injured employee's representative, if any, and the insurance carrier. If additional testing or evaluation is necessary, the DD then has 15 working days to complete the form unless the DD receives DWC approval for additional time, as outlined in 28 TAC Section [130.1\(d\)](#).

If additional time is approved, this would affect the number of working days a DD has to submit their reports. This additional time may affect the mean and median for timeliness of reports. The timeliness of these reports is used for the assessment and tiering of the DD in the PBO review. The timeliness of these reports also helps resolve questions or concerns about an injured employee's claim as quickly and effectively as possible.

To measure the timeliness of reporting, weekdays are counted from the DD appointment to the date the narrative report is received by DWC. These days do not account for holidays or any other days deemed to not be a working business day. Throughout the years, the median days for agent was 7 and for independent was 6. The average number of days for agent and independent varied throughout the years.

Figure 20 shows the average number of days the report was received by DWC after the DD appointment for both agent and independent for the years 2020-2024.

**Figure 20: Average number of days for DWC to receive the DD narrative report, agent and independent, 2020-2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

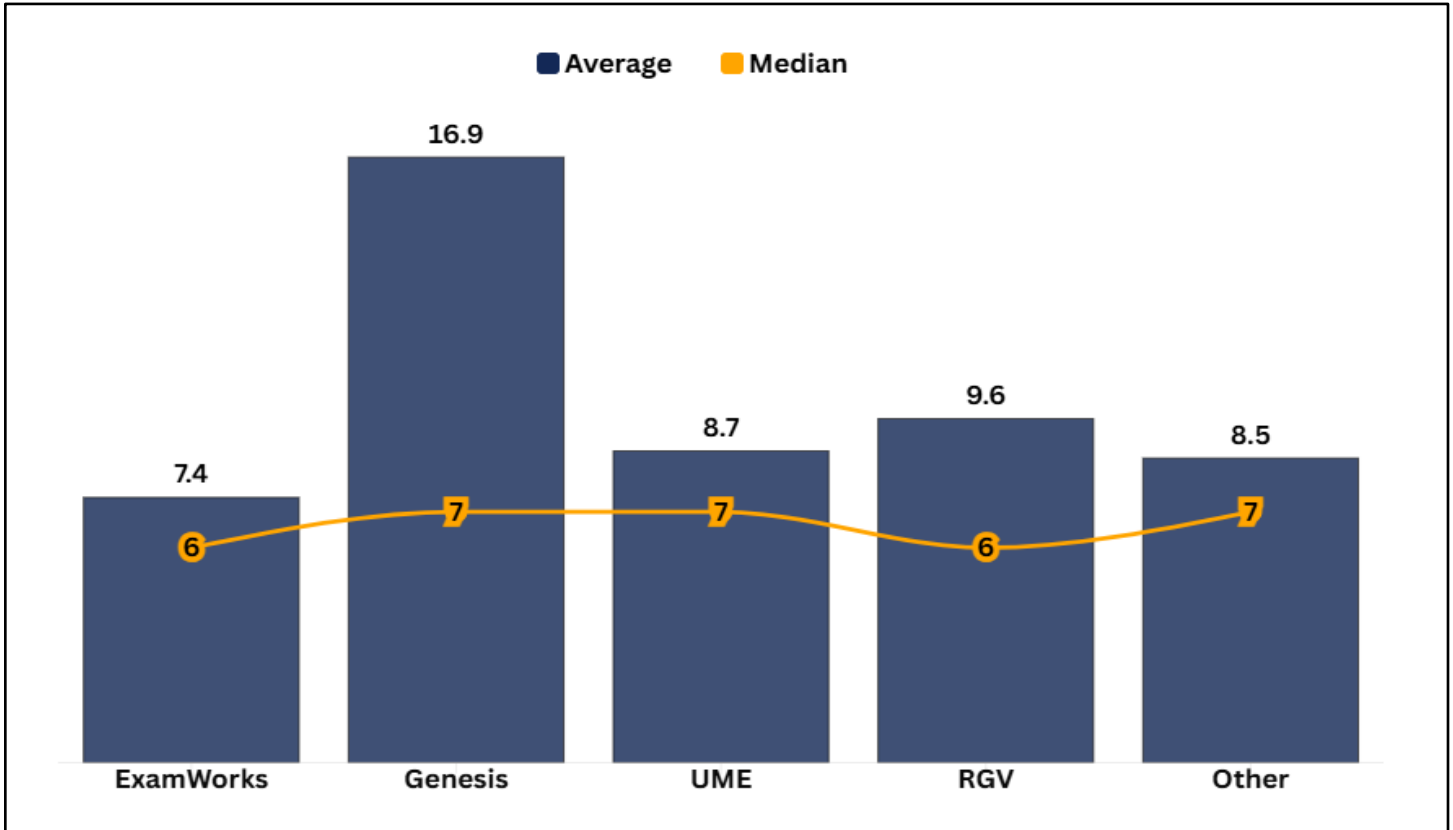
For both agent and independent, the average weekdays ranged from 6.9 to 12.2 days. In 2024, the average number of days was lowest for agent at 9.7 days and 6.9 days for independent.

In 2024, agents had varying averages and medians for timeliness of reports:

- ExamWorks, which had the most appointments of all the agents, had an average of 7.4 days and a median of 6 days. ExamWorks submitted 3,847 reports.
- Genesis handled the second largest number of appointments and had an average of 16.9 days and a median of 7 days. Genesis submitted 1,865 reports.
- UME had an average of 8.7 days and a median of 7 days. UME submitted 1,792 reports.
- RGV had an average of 9.6 days and a median of 6 days. RGV submitted 587 reports.
- Other agents had an average of 8.5 days and a median of 7 days. All other agents submitted 1,824 reports.

Figure 21 shows the average and median for the timeliness of reports for agents in 2024.

**Figure 21: Average and median number of days for when report was received after DD appointment, agent, 2024**



Source: Workers' Compensation Research and Evaluation Group, 2026.

## Performance-based oversight (PBO)

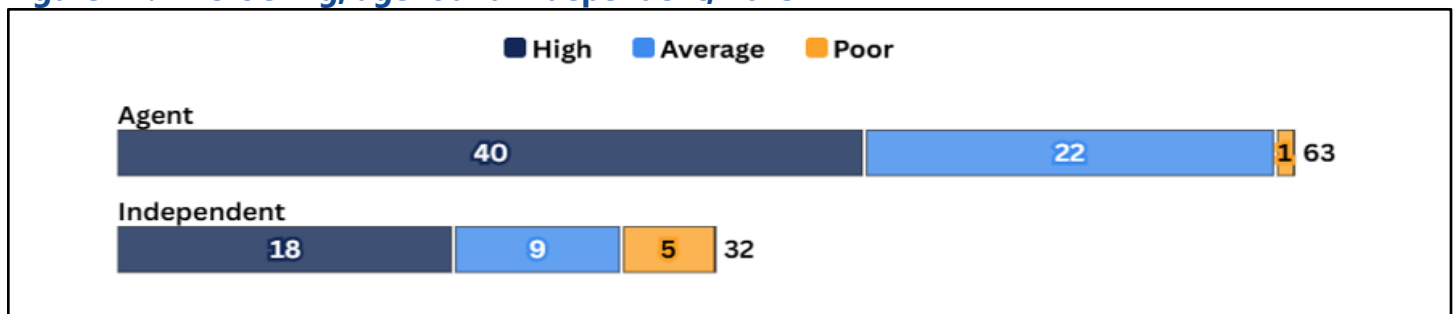
DWC assesses the performance of workers' compensation insurance carriers and health care providers based on key regulatory goals found in Labor Code Section [402.075](#) and 28 TAC Section [180.19](#). For this report, the PBO discussed is for the DWC Form-069 submitted by DDs. These DDs are placed into high, average, and low tiers based on the outcome of the assessment: how timely their reports were submitted and filed with DWC. For DDs to be included in the assessment, the DD must have filed more than 20 narrative reports in the assessment timeframe.

The tier rating for each category is based on the total score: high tier is 95.00 or greater, average tier is 80.00 through 94.99, and poor tier is below 80. The ratings are determined for each DD by the number of completed timely forms divided by their total number of forms. If a DD completed 35 reports and 30 were timely filed, the DD would have a rating of 85.7 and be in the average tier.

DDs who are in the high tier, are recognized on the DWC website and receive a signed certificate from the commissioner which can be used as a marketing tool. DDs in the high tier may be exempt from audits. Many DDs use an agent as an administrative tool to help write and submit these reports. DDs are still responsible for the content of the report and must sign it before submission.

There were 95 DDs, both agent and independent, who were assessed and given a PBO rating for 2023. Among scoring levels—high, average, and poor—high rating had the largest number: 40, or 42%, of DDs for agent and 18, or 19%, of independent DDs. Agents had one DD in the poor tier and independents had five. On average, more than 94% of all DDs received a high or average rating. Figure 22 shows the PBO ratings given in 2023 for agent and independent, including the total number of DDs who received rankings.

**Figure 22: PBO tiering, agent and independent, 2023**

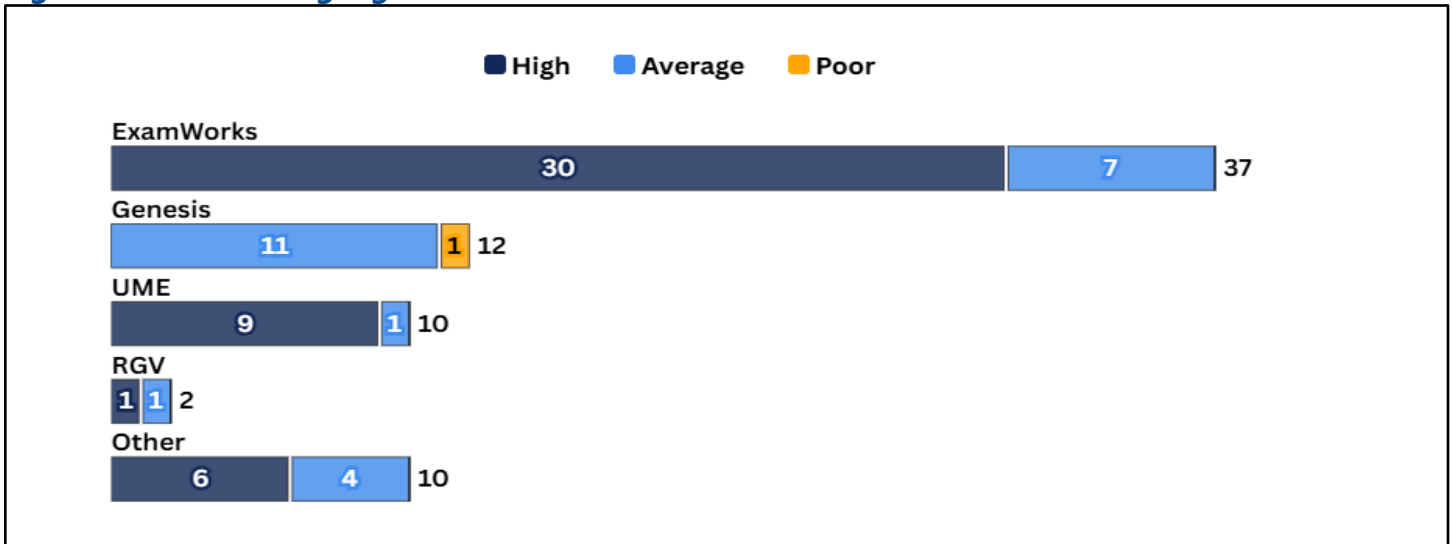


Source: Workers' Compensation Research and Evaluation Group, 2026.

Overall, agents have more high and average ratings than poor ratings. Out of the agents, ExamWorks had the most DDs with a high rating at 30. UME had the second most DDs with a high rating at nine.

Among DDs associated with an agent, ExamWorks had 37 out of 71<sup>2</sup> DDs who received a PBO rating. Figure 23 shows the number of DDs and the ratings received for each agent in 2023.

**Figure 23: PBO tiering, agent, 2023**



Source: Workers' Compensation Research and Evaluation Group, 2026.

<sup>2</sup> There were eight DDs who worked with more than one agent and are counted more than once in the PBO ratings.

## Conclusions and key takeaways

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The Texas workers' compensation system's administrative management of the DD program is vital for resolving disputes, especially regarding MMI and IR. Across the five-year period studied, DD activity levels and performance measures remained stable, despite a slight decline in the total number of participating doctors. On average, DDs had 26,750 appointments a year. From 2020-2024, the average number of DDs associated with an agent was 215 and the number of independent DDs was 108. Agents handled about two-thirds of appointments and claims. DDs who work independently handled about one-third of total appointments and claims.

Approved LOCs for agents were, on average, about 530 a year. For independents, approved LOCs were, on average, about 320 a year. There were on average 12,500 reschedule requests each year. Out of these reschedule requests, 91% were for DD is unavailable to reschedule within 21 days and that is agreed upon by the DD and the injured employee. This reschedule process is documented and maintained by the DD. Resignations because the DD was unable to reschedule within 21 days was highest across the years for both agent and independent. For agents, these requests had an average of about 1,500 per year. There were about 330 requests for independents across the years studied.

All DDs, on average, had 80% of their DD ratings upheld from about 2,300 disputes. More than 97% of all DD ratings were upheld throughout all the years studied. Timeliness of reports for all DDs were generally stable from 2020-2024 with a median of six to seven days. PBO rankings show 94% of all DDs received a high or average rating. Overall, each area of the DD program indicates consistent trends throughout the studied years for both agent and independent.



Texas Department of Insurance, Division of Workers' Compensation  
1601 Congress Avenue | Austin, Texas 78701  
800-252-7031 | [tdi.texas.gov/wc](http://tdi.texas.gov/wc)