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To: Texas Workers' Compensation System Participants

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

Date: July 23, 2026

Subject: Input needed for developing *Topical Analgesic Plan-Based Audit*

The Texas Department of Insurance, Division of Workers' Compensation seeks input for the *Topical Analgesic Plan-Based Audit*. This audit will evaluate 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.

The medical advisor approved the plan-based audit category as part of the Calendar Year 2026 Medical Quality Review Annual Audit Plan (Annual Audit). Information about the Medical Quality Review Process, Annual Audit, and the proposed *Topical Analgesic Plan-Based Audit* is on our website at www.tdi.texas.gov/wc/hcprovider/medadvisor.html.

Input and deadline

Please email your suggestions for the proposed *Topical Analgesic Plan-Based Audit* to OMA@tdi.texas.gov. The deadline for emailing your suggestions is 5 p.m., Central time, on August 6, 2026.

Questions?

Contact Jennifer Self at Jennifer.Self@tdi.texas.gov or 512-804-4852.