Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

No. 2026-10010

Official Order
of the
Texas Commissioner of Workers' Compensation

Date: 7/2/2026

Subject Considered:

Starr Indemnity and Liability Company
399 Park Avenue, Floor 3
New York, New York 10022-4686

Consent Order
DWC Enforcement File Nos. 38604 & 38727

General remarks and official action taken:

This is a consent order with Starr Indemnity and Liability 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 Pay Subsequent Quarters of Supplemental Income Benefits (SIBs)

File No. 38604

3. On Oct. 27, 2025, Respondent received a DWC Form-052, *Application for Supplemental Income Benefits*, for the ninth quarter, which began on Nov. 12, 2025.

4. Respondent's third payment for the ninth quarter was due by the 67th day of the quarter, or by Jan. 20, 2026.

5. On Jan. 27, 2026, Respondent paid $2,952.53 for the third SIBs payment of the ninth quarter seven days late.

6. On Feb. 11, 2026, Respondent paid accrued interest 15 days late.

Failure to Timely Act on a Medical Bill

File No. 38727

7. On Oct. 1, 2025, a health care provider (HCP) provided medical services to an injured employee in connection with a work-related injury.

8. On Oct. 29, 2025, Respondent received a completed $2,990 bill from the HCP.

9. Respondent was required to act on the bill within 45 days of receiving it. The deadline to act was Dec. 15, 2025.

10. On Feb. 20, 2026, Respondent paid $176.39 to the HCP 67 days late.

11. On Feb. 25, 2026, Respondent paid accrued interest five days late.

Assessment of Sanction

1. Failure to provide income benefits in a timely and cost-effective manner is harmful to injured employees and the Texas workers' compensation system.

2. Prompt payment of medical bills is imperative to DWC's goal of ensuring that injured employees have access to high-quality medical care. Failure to promptly

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

pay medical bills harms HCPs economically, increases disputes, and exhausts administrative resources in the workers' compensation system.

3. 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.

4. 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 seriousness of the violation, including $2,952.53 in SIBs delivered seven days late and a medical bill paid 67 days late;
    b. Respondent's recent history of similar violations, including two consent orders involving late SIBs and eight consent orders and one warning letter involving late action on medical bills;
    c. the penalty necessary to deter future violations;
    d. the negative impact on the delivery of $2,952.53 in benefits to an injured employee; and
    e. Respondent's size and sophistication, including Respondent's status as the fourth largest workers compensation carrier in Texas, which is evidence of Respondent's heightened awareness of the legal duty to comply with the Texas Workers' Compensation Act and DWC rules.

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

5. DWC is aware of no mitigating factors pursuant to Tex. Lab. Code § 415.021(c) and 28 Tex. Admin. Code § 180.26(e).

6. 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).

7. 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) & (22), an insurance carrier or its representative commits an administrative violation each time it violates a DWC rule or a provision of the Texas Workers' Compensation Act.

<u>Failure to Timely Pay Subsequent Quarters of SIBs</u>

File No. 38604

6. Pursuant to Tex. Lab. Code § 408.144, SIBs are calculated quarterly and paid monthly.

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

7. Pursuant to Tex. Lab. Code § 408.145, an insurance carrier must pay SIBs no later than the seventh day after the employee's impairment income benefit period expires and must continue to pay the benefits in a timely manner.

8. Pursuant to Tex. Lab. Code § 409.023, an insurance carrier must continue to pay benefits promptly as and when benefits accrue without a final decision, order, or other action from the commissioner, except as otherwise provided.

9. Pursuant to 28 Tex. Admin. Code § 130.107, an insurance carrier must make the first payment of SIBs for the ninth quarter by the 10th day after receiving the Application for Supplemental Income Benefits or the seventh day of the quarter. An insurance carrier must make the second payment by the 37th day of the quarter and the third payment by the 67th day of the quarter.

10. Respondent violated Tex. Lab. Code §§ 408.145; 409.023; 415.002(a)(20) & (22); and 28 Tex. Admin. Code § 130.107 by failing to timely pay SIBs.

Failure to Timely Pay Interest on Income Benefits

File No. 38604

11. Pursuant to Tex. Lab. Code § 408.064 and 28 Tex. Admin. Code § 126.12(b), accrued but unpaid income benefits and interest shall be paid in a lump sum.

12. Respondent violated Tex. Lab. Code §§ 408.064; 415.002(a)(20) & (22); and 28 Tex. Admin. Code § 126.12(b) each time Respondent failed to timely pay interest with accrued but unpaid income benefits.

Failure to Timely Act on a Medical Bill

File No. 38727

13. Pursuant to Tex. Lab. Code § 408.027 and 28 Tex. Admin. Code § 133.240, an insurance carrier is required to timely process and take final action on a completed medical bill within 45 days of receiving the bill.

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

14. Respondent violated Tex. Lab. Code §§ 408.027; 415.002(a)(20) & (22); and 28 Tex. Admin. Code § 133.240 by failing to pay, reduce, deny, or determine to audit a completed medical bill within 45 days of receiving the bill.

Failure to Timely Pay Interest on a Late Medical Bill

File No. 38727

15. Pursuant to Tex. Lab. Code § 413.019(a) and 28 Tex. Admin. Code § 133.240(l) all payments of medical bills that an insurance carrier makes on or after the 60th day after the insurance carrier originally received the complete medical bill shall include interest calculated in accordance with § 134.130 of this title without any action taken by DWC. Interest shall be paid at the same time as the medical bill.

16. Respondent violated Tex. Lab. Code §§ 413.019(a); 415.002(a)(20) & (22); and 28 Tex. Admin. Code § 133.240(l) by failing to timely pay interest on a late medical bill.

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

2026-10010

Order

It is ordered that Starr Indemnity and Liability Company must pay an administrative penalty of $2,500 within 30 days from the date the Commissioner signs the order.

After receiving an invoice from DWC, Starr Indemnity and Liability Company must pay the administrative penalty either: (1) by electronic transfer using the State Invoice Payment Service; OR (2) by company check, cashier's check, or money order.

To ensure proper check or money order processing:

- Make the check payable to "Texas Division of Workers' Compensation";
- Enclose a copy of the attached invoice with the check or money order; and
- Mail the check or money order 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

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092

2026-10010

Unsworn Declaration

STATE OF NY §
§
COUNTY OF NY §

Pursuant to the Tex. Civ. Prac. and Rem. Code § 132.001(a), (b), and (d), my name is Dave Fitzgerald. I hold the position of Global Chief Claims Officer and am the authorized representative of Starr Indemnity and Liability Company. My business address is:

399 Park Avenue, New York, NY, NY, 10022.
(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.

Signed by:
Dave Fitzgerald
0D2B581355874B9...
Declarant

Executed on 02 June 2026, 2026.

Confidential Information Redacted
Texas Labor Code §§402.083 and 402.092