

No. **2026-9861**

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

Date: 3/31/2026

Subject Considered:

James Ray Edwards, D.C.
1628 Lockhill Selma Road
San Antonio, Texas 78213

Consent Order
DWC Enforcement File Nos. 38011, 38038, 38059 & 38112

General remarks and official action taken:

This is a consent order with James Ray Edwards, D.C. (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. On March 5, 2007, the Texas Board of Chiropractic Examiners issued Chiropractic License No. 10558 to Respondent.
2. Respondent is a designated doctor (DD) in the Texas workers' compensation system. Respondent was first certified as a DD to rate maximum medical improvement (MMI) and assign impairment ratings (IR) on June 25, 2013. Respondent's DD certification to rate MMI and assign IR expires on Nov. 26, 2026.

3. Respondent was classified as "high" in the 2025_69 and the 2023_69 Performance Based Oversight (PBO) assessment. Respondent was not selected to be tiered in the 2021 PBO assessments.

Failure to Timely File a DD Report

File No. 38011

4. On July 8, 2025, a DWC presiding officer issued a DWC Form-OA32, *Presiding Officer's Directive to Order Designated Doctor Exam* (DWC-OA32). The DWC-OA32 ordered Respondent to conduct a DD exam in preparation for a contested case hearing (CCH) scheduled for Aug. 27, 2025.
5. On Aug. 14, 2025, Respondent performed a DD examination of the injured employee to determine MMI, IR, and the extent of the injury (EOI).
6. Respondent's DD Report was due within seven working days of the exam, or by Aug. 25, 2025.
7. On Aug. 22, 2025, the CCH was rescheduled for Oct. 6, 2025, to allow time for the DD Report to be submitted as evidence prior to the CCH.
8. However, Respondent did not submit the DD Report until Oct. 7, 2025, which was 43 days late and one day after the CCH was scheduled.
9. On Oct. 9, 2025, the CCH was rescheduled because Respondent failed to submit his DD Report in time.

File No. 38038

10. On Aug. 20, 2025, a DWC presiding officer issued a DWC-OA32 ordering Respondent to conduct a DD exam in preparation for a benefit review conference (BRC) scheduled for Oct. 14, 2025.
11. On Sept. 18, 2025, Respondent performed a DD examination of the injured employee to determine MMI and IR.

- 12. Respondent's DD Report was due within seven working days of the exam, or by Sept. 29, 2025.
- 13. However, on Oct. 16, 2025, the BRC had to be rescheduled because Respondent failed to submit his DD Report in time.
- 14. On Oct. 22, 2025, Respondent submitted the DD Report 23 days late.

File No. 38112

- 15. On Sept. 4, 2025, Respondent performed a DD examination of an injured employee to determine MMI, IR, and EOI.
- 16. Respondent's DD Report was due within seven working days of the exam, or by Sept. 15, 2025.
- 17. On Nov. 4, 2025, Respondent submitted the DD Report 50 days late.

File No. 38059

- 18. On Sept. 25, 2025, Respondent performed a DD examination of an injured employee to determine MMI, IR, and return-to-work.
- 19. Respondent's DD Report was due within seven working days of the exam, or by Oct. 6, 2025.
- 20. On Oct. 22, 2025, Respondent submitted the DD Report 16 days late.
- 21. Respondent's failure to timely submit DD reports constitutes a pattern of practice under Tex. Lab. Code § 415.023 and Tex. Admin. Code § 180.26(c).

Assessment of Sanction

- 1. Failure to timely file required reports related to a DD examination unnecessarily delays the resolution of medical disputes and the injured employee's ability to obtain income benefits in a timely and cost-effective manner. This is harmful to injured employees and the Texas workers' compensation system.

2. The examinations and reports from a DD have significant consequences on workers' compensation claims, the benefits of injured employees, and the Texas workers' compensation system. DWC relies on DDs to comply with the rules to provide a fair and accessible dispute resolution process.

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 (EDI) 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 violations, involving four reports submitted up to 50 days late which also caused two separate delayed hearings;
 - b. Respondent has a history of similar administrative violations, including one warning letter issued September 13, 2024, involving late DD Reports;
 - c. a penalty is necessary to deter future violations; and
 - d. there is evidence of a heightened awareness of the legal duty to comply with the Texas Workers' Compensation Act and DWC rules.

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 §§ 401.021, 402.001, 402.00111, 402.00114, 402.00116, 402.00128, 408.0041, 408.1225, 413.002, 413.044, 413.0511, 413.0512, 414.002, 415.021, and 415.0215; 28 Tex. Admin. Code § 180.26; and Tex. Gov't Code §§ 2001.051-2001.178.
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, 402.00128(b)(6)-(7), and 415.034; 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 § 415.003(5) and 28 Tex. Admin. Code § 127.210(a)(18), the commissioner may sanction a DD for violating applicable statutes or rules while serving as a DD.
6. Pursuant to 28 Tex. Admin. Code §§ 127.210 and 180.26, the commissioner may revoke or suspend a DD's certification as a DD or impose an additional sanction

such as a reduction in fees, public or private reprimand, or administrative penalty against DD for not complying with DWC rules.

Failure to Timely File a DD Report


7. Pursuant to Tex. Lab. Code § 415.0035(b)(1), a health care provider commits an administrative violation if it fails or refuses to timely file required reports or records.
8. Pursuant to 28 Tex. Admin. Code § 102.3(e), any required filing must be received before the end of the normal business hours on the last permissible day to file the required paperwork.
9. Pursuant to 28 Tex. Admin. Code § 102.3(d), any communications received outside of normal business hours is considered received on the next business day.
10. Pursuant to 28 Tex. Admin. Code § 127.10(e), a DD who determines the injured employee has reached MMI, who assigns an IR, or who determines the injured employee has not reached MMI, shall complete and file a report as required by 28 Tex. Admin. Code §§ 130.1 and 130.3.
11. Pursuant to 28 Tex. Admin. Code § 127.10(f), a DD who examines an injured employee pursuant to any question relating to return-to-work is required to file a report that complies with the requirements of §127.220(a) of this title within seven working days of the DD exam.
12. Pursuant to 28 Tex. Admin. Code § 127.10(g), a DD who resolves issues other than those listed above is required to file a DD report within seven working days of the DD exam.
13. Pursuant to 28 Tex. Admin. Code § 130.1(d)(2)(A), and 130.3, a DD Report shall be filed with DWC, the injured employee, the injured employee's representative, if any, and the insurance carrier within seven working days of the DD exam.
14. Respondent violated Tex. Lab. Code § 415.003(5); 415.0035(b)(1); and 28 Tex. Admin. Code §§ 127.10(e), (f), and (g); 127.210(a)(18); 130.1; and 130.3 each time Respondent failed to timely file a DD report with DWC.

Order

It is ordered that:

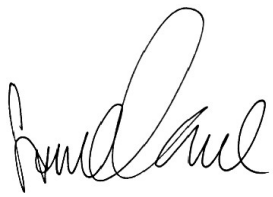
1. This consent order shall constitute a public reprimand of James Ray Edwards, D.C. for repeated violations of a DWC rule. James Ray Edwards, D.C is expected to comply with the law, as described above.
2. James Ray Edwards, D.C. must pay an administrative penalty of \$1,750 within 30 days from the date the Commissioner signs the order.

After receiving an invoice, James R. Edwards, D.C. 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, 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
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