

2019

Texas Department of Insurance

# ANNUAL REPORT



Texas Department of Insurance  
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## **Fiscal Year 2019: Modernizing the agency**

In October 2017, Kent Sullivan became Insurance Commissioner, and the Texas Department of Insurance began a top-to-bottom review to improve services and modernize. That effort continued throughout fiscal year 2019.

Today, the agency answers calls, processes licenses, and resolves consumer complaints faster. We've reduced our reliance on paper processes, streamlined rule development, and undergone major organizational restructuring.

And more changes are coming because we believe government should work better. Read more about our efforts and the results at [www.tdi.texas.gov/commissioner/initiatives](http://www.tdi.texas.gov/commissioner/initiatives).







# **Section I:**

# **Agency Overview**







## Texas Department of Insurance

TDI regulates the state's insurance industry, oversees the administration of the Texas workers' compensation system, performs the duties of the State Fire Marshal's Office, and provides administrative support to the Office of Injured Employee Counsel – a separate agency.

The Texas Insurance Code requires TDI to:

- Regulate the business of insurance in Texas.
- Protect and ensure the fair treatment of consumers.
- Ensure fair competition in the insurance industry to foster a competitive market.
- Administer the Texas' workers' compensation system as provided by the Texas Labor Code.
- Ensure that the Insurance Code and other laws regarding insurance and insurance companies are executed.

The Insurance Commissioner is the agency's chief executive and administrative officer. The Commissioner administers and enforces state insurance laws and applicable laws that grant jurisdiction to TDI or the Commissioner.

The Division of Workers' Compensation (DWC), under the direction of the division's appointed Commissioner, oversees the administration and operation of the Texas workers' compensation system. The division monitors compliance of all parties, taking enforcement action when necessary, to ensure that the Texas Workers' Compensation Act, Texas Labor Code, and other regulations regarding workers' compensation are implemented and enforced.

The governor, with advice and consent of the Texas Senate, appoints both commissioners for two-year terms.

### **Agency vision**

TDI is a dynamic leader in responsible state, national, and global regulation, consumer protection, and market viability.

### **Agency mission**

TDI's mission is to protect insurance consumers by regulating the industry fairly and diligently, promoting a stable and competitive market, and providing information that makes a difference.



## **Regulatory approach**

TDI will exemplify friendly, courteous, ethical, and professional behavior in all areas of performance by:

- Providing the best value in services to the people of Texas.
- Applying the law and agency policy fairly and consistently throughout the state.
- Communicating openly and providing timely and accurate information to the public we serve, and to all our fellow employees.
- Communicating internally and externally, evaluating and adjusting the course of the agency in response to changes in conditions.

## **Offices**

TDI's headquarters are in Austin. To carry out insurance regulation responsibilities, the agency has offices across the state for financial and title examiners; fraud investigators; fire inspectors and investigators; windstorm inspectors; and workers' compensation claims specialists, benefit review officers, and administrative law judges. Most workers' compensation offices also provide health and safety information.

The agency determines office locations according to claim activity and service demands. For example, financial examiner staff are in areas with major corporation headquarters, while windstorm inspection staff are located along the coast to inspect and certify that construction complies with windstorm building codes. Title examiners live and work throughout the state. Workers' compensation offices are in areas with high demand for claims services, customer service, and dispute resolution.



# **Section II: Program Areas**







## Administrative Operations Division

The Administrative Operations Division is responsible for the agency's internal financial functions. Its responsibilities include:

- Provide operational support, including computer and database services, professional development, and training to TDI staff.
- Provide administrative support to the Office of Injured Employee Counsel (OIEC).
- Monitor compliance with legislative oversight requirements.

### FY 2019 highlights:

- Created a call center user group to share best practices across the agency and with OIEC.
- Upgraded call center to include new hardware with redundancy, new tools for resource management, and new features for email.
- Reviewed legislation and coordinated fiscal notes for the 86th Legislative session.
- Revamped agency contracting and procurement policies and procedures.
- Worked with the Texas Facilities Commission to modernize the Hobby Building's elevators and lobby.
- Eliminated legacy applications for cash receipts and open records.
- Strengthened cybersecurity practices to identify, protect, and detect threats.
- Launched an online application for retail fireworks permits with Texas.gov.
- Coordinated the development of a proof of concept for using artificial intelligence in reviewing personal auto policy forms.

### Maintenance tax rate comparison

Type	Max allowed	2014	2015	2016	2017	2018
Motor vehicle insurance	0.200%	0.060%	0.055%	0.056%	0.052%	0.049%
Fire insurance	1.250%	0.340%	0.341%	0.364%	0.345%	0.303%
Workers' compensation insurance	0.600%	0.066%	0.065%	0.064%	0.069%	0.069%
Casualty insurance	0.400%	0.080%	0.077%	0.072%	0.071%	0.053%
Title insurance	1.000%	0.076%	0.103%	0.103%	0.090%	0.078%
Life, accident, and health insurance	0.040%	0.040%	0.040%	0.040%	0.040%	0.040%
Third-party administrators	1.000%	0.010%	0.013%	0.010%	0.011%	0.008%
Prepaid legal services (nonprofit)	1.000%	0.020%	0.022%	0.021%	0.011%	0.010%
Workers' compensation evaluation	0.100%	0.016%	0.015%	0.016%	0.054%	0.034%
Division of Workers' Compensation	2.000%	1.533%	1.478%	1.800%	2.000%	2.000%
Single service HMO	\$ 2.00	\$ 0.28	\$ 0.28	\$ 0.23	\$ 0.24	\$ 0.24
Multiservice HMO	\$ 2.00	\$ 0.84	\$ 0.84	\$ 0.69	\$ 0.72	\$ 0.72
Limited service HMO	\$ 2.00	\$ 0.28	\$ 0.28	\$ 0.23	\$ 0.24	\$ 0.24



## Agency Affairs

Agency Affairs provides coordination and analysis to help executive leadership develop and monitor state and federal regulatory policy and legislative recommendations. Agency Affairs manages appointments to agency boards and committees and coordinates on issues and programs with the National Association of Insurance Commissioners. The division includes Government Relations, which directs and tracks responses to legislative inquiries, and monitors, tracks, and analyzes state and federal legislation and regulations affecting the agency and industry.

### **FY 2019 highlights:**

- Coordinated agency activities in the 86th Texas Legislature, tracking 539 insurance-related bills.
- Led outreach to stakeholders to get input on Senate Bill 1264, which protects consumers who have state-regulated health plans from surprise medical bills in certain situations.
- Provided legislative offices with updates on Commissioner's initiatives and implementation of insurance bills from the Texas legislature.
- Tracked agency's efforts to implement changes from the 2019 Texas legislative session.



## Customer Operations

The Customer Operations Division protects consumers by overseeing insurance companies, agents and adjusters, and their interactions with consumers. The division includes Complaints Processing, Consumer Protection, and Agent and Adjuster Licensing.

### Complaints Processing

The Complaints Processing office reviews, resolves, and closes complaints from consumers, providers, and third-party billing organizations. It also helps Texans by providing insurance information to the public through a Help Line at 1-800-252-3439.

### Consumer Protection

Consumer Protection helps consumers through disaster recovery efforts, monitoring early warning signs for issues with insurance companies and agents, and providing information through outreach events and publications.

### Agent and Adjuster Licensing

Agent and Adjuster Licensing is responsible for the licensing, registration, certification, and regulation of people who sell insurance or adjust property and casualty claims in Texas.

#### FY 2019 highlights:

- Implemented a new complaint processing and workflow system to improve efficiency.
- Reorganized front-line staff resulting in better cross training and more flexibility during high-volume events.
- Answered more than 412,000 consumer calls.
- Resolved more than 41,000 complaints, helping consumers get \$53 million in additional claim payments and premium refunds.
- Processed more than 1.5 million agent and adjuster transactions.

#### Agent and adjuster licensing activities

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Agent and adjuster licenses issued	99,156	104,228	107,390	127,631	125,004
Agent and adjuster licenses renewed	146,578	98,747	140,987	190,051	180,357
CE provider registrations and renewals	724	793	619	644	583
CE provider course certification and renewals	6,397	6,378	5,942	5,809	6,858
Company agent appointment activities	906,139	984,773	996,706	1,059,691	1,170,609
Telephone inquiries	192,739	169,272	167,926	188,623	163,430



**Agent and adjuster licenses, certificates, and registrations**

Type	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
County mutual	4,072	4,618	4,389	3,690	3,249
General lines: Life, accident, health, and HMO	206,868	226,348	236,521	240,844	251,850
General lines: Property and casualty	123,103	133,203	139,221	142,146	146,289
Life only agent	31,427	37,534	42,359	44,477	47,995
Personal lines agent	19,718	22,876	25,024	26,481	30,136
Insurance service representative	981	980	947	909	821
Life not to exceed \$25,000	865	898	895	867	852
Limited lines	5,670	6,566	7,116	7,048	7,320
Managing general agent	1,742	1,780	1,822	1,801	1,778
Funeral prearrangement life insurance agent	3,543	3,900	4,008	3,791	3,727
Surplus lines	6,403	6,737	6,964	7,075	7,266
Adjusters	109,067	119,848	130,855	145,328	153,413
Public insurance adjusters	778	824	859	1,024	975
Full-time home office salaried employees	519	754	826	965	1,121
Discount health care program operator	51	50	47	52	53
Specialty: credit	2,499	2,457	2,373	2,236	2,076
Specialty: travel	1,935	1,878	1,762	1,632	1,442
Specialty: rental car company	57	63	64	59	52
Specialty: self-service storage facility	256	275	307	342	325
Specialty: telecommunication equipment vendor	30	30	28	29	29
Life and health insurance counselors	626	648	659	679	713
Risk managers	1,124	1,137	1,118	1,113	1,076
Re-insurance intermediary	1,098	879	980	838	776
Title agents	559	568	582	587	604
Direct operations licenses	6	8	10	10	10
Escrow officers	6,494	6,950	7,191	7,314	7,398
Captive management companies	18	25	30	34	37
CE providers regulated	-	1,368	1,337	1,278	1,310
CE provider courses regulated	-	12,209	11,745	11,808	13,362
<b>Total</b>	<b>529,509</b>	<b>595,411</b>	<b>630,039</b>	<b>654,457</b>	<b>686,055</b>



## Fraud Unit

The Fraud Unit investigates allegations of insurance crimes and works with state and federal prosecuting agencies. Investigations typically involve one of the following types of fraud:

- Claim fraud committed by consumers or health care providers against insurance companies. This includes staged accidents, fake claims, exaggerated claims, and life insurance and annuity fraud.
- Agent crimes, such as issuing fictitious policies or stealing premium payments.
- Insurance company officers' and directors' fraudulent activities, including false financial statements to TDI and misuse of company funds.
- The sale of insurance products not authorized by TDI or work done by individuals not licensed to conduct the business of insurance in Texas.
- Mortgage fraud, including fraud by escrow officers, title insurance agents, and title insurance companies.

### FY 2019 highlights:

- Initiated 126 insurance fraud investigations.
- Obtained \$1.7 million in court-ordered restitution for fraud victims.
- Worked on cases that resulted in 30 years in jail, 73 years of probation, 179 years of deferred adjudication, 4,756 hours of community service, and \$237,850 in fines.

### Key cases:

- In Bexar County, Arthur Portillo, a former insurance agent, pleaded guilty to falsifying life insurance applications to obtain commissions from the victim insurance company. He and an accomplice unlawfully collected more than \$200,000 in commissions. He received a jail term of 10 years and a \$2,000 fine.
- In Collin County, Karissa White submitted 111 health-related claims to her insurance company for medical treatments she did not receive. White pleaded guilty to insurance fraud, a first-degree felony, received 10 years of probation, and was ordered to repay \$313,068 in restitution.
- In Marion County, Chia "Bruce" Wang defrauded an 87-year old victim by preparing and delivering a fake \$400,000 life insurance policy to her. She paid him almost \$200,000 in premiums for a policy that didn't exist. Wang was ordered to pay back the entire amount taken from his victim and was sentenced to 10 years deferred adjudication.



## Financial Regulation Division

The Financial Regulation Division makes sure that insurers and HMOs have enough assets to pay their claims and treat consumers as required by statute and rule. It uses a proactive approach and early intervention strategy to protect consumers and minimize the risk and impact of company insolvencies. Division responsibilities include:

- Perform solvency and market conduct monitoring.
- Enforce managed care network adequacy standards.
- Conduct ongoing financial analysis and insurer monitoring.
- Perform on-site financial, market conduct, title agent, and quality-of-care examinations.
- Supervise insurers, insurance groups, and other risk-bearing entities.
- License, register, and certify insurers.
- Certify utilization review agents and independent review organizations.
- Lead regulatory interventions, including receivership, for rehabilitation or liquidation.

Financial statements filed by authorized insurers and HMOs for calendar year 2018 reflected \$175.8 billion in Texas premiums and \$134.2 billion in claim payments. Premiums reported by all other insurance companies for calendar year 2018 reflected \$6.45 billion in Texas premiums.

### FY 2019 highlights:

Coordinated with the Texas Health and Human Services Commission to streamline network adequacy reviews and with the Division of Workers' Compensation on utilization reviews to eliminate duplication of effort and improve efficiency.

### Texas Guaranty Association assessments

Type	2014	2015	2016	2017	2018
Life and health	\$ 3,899,715	\$ -	\$ 1,999,960	\$ 130,000,008	\$ -
Property and casualty	-	-	20,091,552	-	-
Title	-	-	-	6,000,000	-
Texas Self-Insurance Group	126,421	126,369	126,380	-	475,009
<b>Total</b>	<b>\$ 4,026,136</b>	<b>\$ 126,369</b>	<b>\$ 22,217,892</b>	<b>\$136,000,008</b>	<b>\$ 475,009</b>



## Texas policyholder premiums and claim payments

Type	2014	2015	2016	2017	2018
Premiums (in billions)	\$ 139.20	\$ 149.80	\$ 152.30	\$ 160.50	\$ 175.80
Claim payments (in billions)	\$ 97.90	\$ 108.10	\$ 119.30	\$ 134.40	\$ 134.20
Payments as a percent of premium	70.3	72.1	78.3	83.7	76.3

## Company licenses

Type	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
<b>Risk bearing*</b>					
Insurance companies	1,815	1,800	1,800	1,811	1,812
HMOs	56	57	61	64	70
Captive insurance companies	12	25	32	39	43
<b>Non-risk bearing‡</b>					
Premium finance companies	184	177	188	189	187
Continuing care retirement communities	33	34	34	36	36
Third-party administrators	672	691	700	680	700
<b>Total</b>	<b>2,772</b>	<b>2,784</b>	<b>2,815</b>	<b>2,819</b>	<b>2,848</b>

\* Does not include 119 foreign risk-retention groups, 215 alien and foreign surplus lines carriers, or four domestic surplus lines carriers.

‡ Does not include 25 premium finance branches.

## Financial regulation activities

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Financial analysis reviews	619	618	674	641	670
Financial and market conduct examinations	116	110	105	131	116
Quality of care examinations	31	25	26	22	16
Annual escrow audits reviewed	553	576	572	553	624
Title examinations conducted	308	266	289	265	295
Network adequacy reports*	47	181	224	239	149
Access plans*	17	107	173	205	180
Approved utilization review agent applications	187	234	291	318	360
Approved independent review org. applications	40	45	27	49	18

\* Information reported for FY 2015-16 included data for exclusive provider benefit plans and preferred provider benefit plans. Starting in FY 2017, the data includes reports filed by HMO plans, reflecting a change in rules adopted during the fiscal year.



## General Counsel/Chief Clerk Division

The General Counsel/Chief Clerk Division advises the Commissioner on legal matters including Commissioner's orders, appeals, agency policy, and the application of state and federal law. The division also represents the agency in employment, state purchasing, and contract matters. The division is headed by the general counsel and in FY 2019 included three assistant general counsels and an assistant general counsel/chief clerk who managed the Chief Clerk's Office and the Open Records Office.

The Chief Clerk's Office certifies records, sends rule filings and notices to the Texas Register, sets cases with the State Office of Administrative Hearings, requests Attorney General representation, and provides agency court reporting services.

The Open Records Office oversees the agency's open records process and includes the agency public information coordinator.

### **FY 2019 highlights:**

- Processed more than 9,000 requests for public information.
- Made additional customizations to the new open records system launched last year. The changes provide more transparency for complex requests and ensure consistent communication with the requestor.



## Internal Audit Division

The Internal Audit Division provides independent, objective assurance and consulting activities designed to improve the agency's operations. The division helps the agency accomplish its objectives by evaluating the effectiveness of risk management, controls, and governance throughout TDI. The Internal Audit Division provides analyses, appraisals, recommendations, counsel, and information that promotes effective control at reasonable cost.

### **FY 2019 highlights:**

- Completed five audits, three consulting engagements, and one investigation related to a hotline complaint referred by the State Auditor's Office.
- Improved staff knowledge, skills, and abilities by obtaining professional certifications, including one Certified Information Systems Auditor and one Certified Fraud Examiner.
- Obtained a peer review of the division and received the highest rating. This review assures that our work is conducted according to professional audit standards and the Texas Internal Auditing Act.



## Legal and Enforcement Division

The Legal and Enforcement Division provides legal services to the Commissioner and staff and takes enforcement action as needed. A deputy commissioner heads up the division, which has two sections, the Legal Section and the Enforcement Section.

The Legal Section drafts rules, orders, and bulletins; provides support for legislative issues, litigation, and subpoenas involving the agency; and advises the agency on rate and form issues for all lines of insurance and other issues.

The Enforcement Section investigates alleged law and rule violations by insurance agents and companies, HMOs, and other licensed and unlicensed entities, and takes disciplinary action as needed. The section also handles issues related to entities engaging in the business of insurance without the proper license, unfair or deceptive acts or practices, unfair claims settlement practices, and excessive rates. Penalties may include restitution to consumers, administrative penalties, cease and desist orders, license application denials, license revocations and suspensions, monitored probations, and rate reductions. The section also analyzes agency data to provide compliance monitoring and refers cases to the TDI Fraud Unit for criminal prosecution. The section works with the Office of the Attorney General on appeals of disciplinary actions and on other legal matters.

### **FY 2019 highlights:**

- Resolved approximately 700 cases, with 470 concluded with Commissioner's orders, license surrenders, or warning letters.
- Assessed \$25 million in restitution and \$4.6 million in penalties.
- Piloted a streamlined rule process, including using SharePoint electronic document editing and approval, to help ensure timely implementation of legislation.
- Worked with other divisions to research, analyze, and respond to requests for support on legislation during the 2019 legislative session.
- Worked with Financial Regulation Division to update the special deputy receiver qualification and selection process.



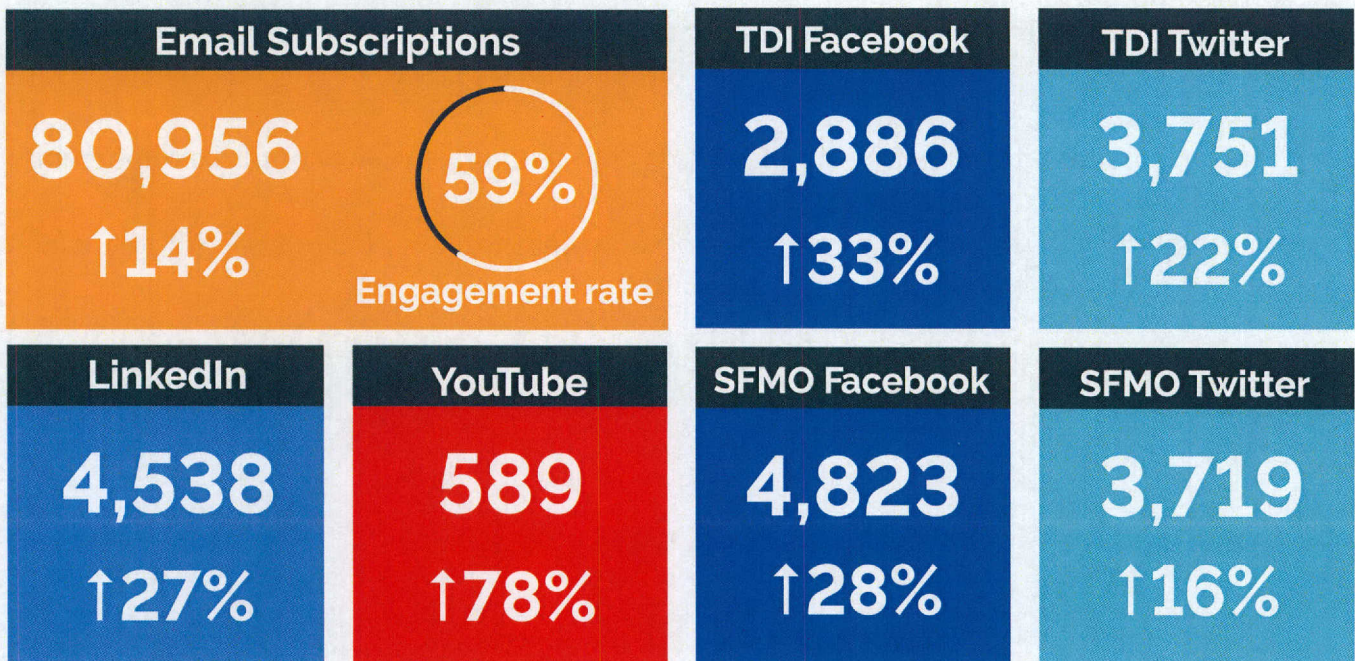
## Public Affairs Division

The Public Affairs Division is responsible for responding to media calls, issuing news releases, and developing content for social media and other proactive communications. The division manages the agency's website and social media accounts, produces videos, and oversees an email subscription service to send out agency news and updates. Public Affairs also provides editing and design services for other TDI divisions, handles organizational and logistical support for conferences, and produces a weekly internal newsletter, monthly workplace tips, and the agency's annual report.

### FY 2019 highlights:

- Developed an anti-scam toolkit for communities to use after a disaster.
- Organized multiple plain language training events featuring state and local experts.
- Improved the website with a new search function and improvements to the complaint pages.
- Increased our social media audiences to better inform the public of important consumer tips and alerts.
- Increased outreach to Spanish language media.
- Enhanced internal communication efforts to gather ideas and suggestions from staff and publish a monthly publication focused on workplace tips.
- Promoted flood insurance coverage through columns, news releases, and social media.
- Produced weekly Facebook Live events.
- Obtained advanced certifications in usability for the web team.
- Grew our subscription email list by 9,686 subscribers, a 13.6% increase.

### Email subscribers and social media followers





## Regulatory Policy Division

The Regulatory Policy Division regulates products and coverages offered by insurance companies and HMOs. Specifically, the division oversees and manages regulatory matters, reviews form and rate filings, researches and collects data, publishes reports to help policymakers and consumers with insurance-related decisions, and manages the TexasSure Vehicle Insurance Verification program and other special policy initiatives.

Detailed information about form filings received and processed in FY 2019 can be found in Section IV: Data Tables.

### Property and Casualty/Inspections FY 2019 highlights:

- Completed a process review project and began a continuous improvement project. This resulted in streamlined and paperless form filing procedures.
- Completed proof of concept testing for an artificial intelligence project.
- Analyzed results from a Hurricane Harvey data call to determine the storm's impact on the property and casualty industry.
- Used best practices and lessons learned to streamline data collection and reporting for future catastrophes.
- Reduced the number of property and casualty filings insurers need to submit by eliminating manual rule filings and requiring insurers to submit the information in their rate filings. This change also improved the efficiency of manual rule reviews.
- Implemented interface improvements to allow windstorm field inspectors to sketch on tablets, improving timeliness and accuracy.

### Life and Health FY 2019 highlights:

- Published a mental health parity report as part of House Bill 10, 85th Legislature.
- Participated in state work groups charged with promoting equal access to behavioral health care.
- Approved alternative health insurance products, including a new type of fixed indemnity plan.
- Finished the redesign of the reimbursement rates website, [TexasHealthcareCosts.org](http://TexasHealthcareCosts.org), which allows searching by ZIP code and is easier to use.



## Inspections Office

The Regulatory Policy Division includes the TDI Inspections Office, which oversees amusement rides and insurer loss control inspections, evaluates and recommends building code standards, and conducts oversight inspections of professional engineers certifying structures for windstorm coverage. It includes the Windstorm Inspections Program to ensure compliance with building specifications for commercial and residential structures covered by the Texas Windstorm Insurance Association.

### Voluntary Inspection Program licenses/certificates

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Licenses/certificates issued	85	74	72	80	63

### Windstorm operations

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Applications processed	24,773	44,320	33,983	50,341	30,959
Inspections completed	8,804	9,276	5,517	6,828	4,050
Certificates of compliance issued	31,734	41,604	32,020	41,784	29,044

### Amusement Ride Safety and Insurance Act activities

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Inspection certificates approved	9,558	9,334	10,521	9,597	9,946
Injuries reported	121	110	89	77	75
Non-compliant operators sent to enforcement	169	326	334	301	159

### Loss Control Inspection activities

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Completed evaluations	214	208	200	208	196
Companies rated adequate	213	206	194	203	183
Companies rated less than adequate	1	2	6	5	13
Loss control representative applications reviewed	304	379	346	265	-*

\* TDI no longer requires companies to complete a loss control representative qualifications review form.

### Engineering Services activities

Activity	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Building code interpretations provided	4,060	3,533	3,005	2,964	2,050
Product evaluations	2,154	1,985	1,464	1,409	1,443



## State Fire Marshal's Office

The State Fire Marshal's Office develops and promotes methods that help communities prevent and reduce fire losses through the principles of prevention, education, and enforcement. SFMO's responsibilities include:

- Investigating the origin and cause of fires.
- Conducting fire safety inspections of state buildings.
- Providing code enforcement.
- Regulating the fire protection industry.
- Providing licenses to the fire protection industry.
- Oversight of public protection classification.
- Developing and promoting fire prevention programs.
- Maintaining the Texas Fire Incident Reporting System (TEXFIRS).

### FY 2019 highlights:

- Referred 103 arson cases to prosecution, resulting in 48 arrests.
- Assessed \$30,750 in penalties for fire alarm, extinguisher, sprinkler, and fireworks violations.
- Completed move of SFMO headquarters to the Cameron Road Facility in November 2018.

### State Fire Marshal's Office activities

Activity	FY 2018	FY 2019	Annual Target
Completed fire investigations	721	592	600
Investigations/inspections of complaints against fire protection equipment/fireworks industries	780	494	550
Buildings inspected/re-inspected for fire safety hazards	5,830	5,451	5,200



**Section III:  
Division of Workers'  
Compensation**







## **Division of Workers' Compensation**

The primary duties of the Division of Workers' Compensation (DWC) are to regulate and administer the workers' compensation system in Texas, and to make sure that the workers' compensation law is implemented and enforced. The basic goals of the Texas workers' compensation system are to ensure that injured employees:

- Are treated with dignity and respect when injured on the job.
- Have access to prompt, high-quality medical care.
- Have access to a fair and accessible dispute resolution process.
- Receive services that help them return to work as soon as their health care provider considers it safe and appropriate.



## **Commissioner's Administration**

DWC consists of the Office of the Commissioner, which includes the Office of External Relations and General Counsel, as well as six other major program areas: Policy and Customer Services, Health and Safety, Compliance and Investigations, Hearings, Appeals Panel, and Business Process.

### **Office of External Relations**

This office handles all DWC government relations, legislative activities, and stakeholder outreach. It also coordinates DWC's external communications to ensure consistency and cultivates positive relationships with the Texas Legislature and other stakeholders.

#### **FY 2019 highlights:**

- Provided assistance to the 86th Legislature, which passed all DWC legislative recommendations.
- Secured new protections for injured employees treated at federal military treatment facilities.
- Completed educational training on workers' compensation basics and current issues with legislative and state government staff.
- Coordinated stakeholder outreach for DWC rule projects and gathered input from system participants on the impact of proposed rule changes.

### **Office of the General Counsel**

This office advises the Workers' Compensation Commissioner on legal matters affecting DWC, reviews litigation, and coordinates legal analysis of policy issues. It also advises on legal matters relating to rulemaking, open records, legislation, policy, and specific legal matters involving any of DWC's various program areas. DWC's General Counsel also works with the Office of the Attorney General on litigation involving challenges to the Texas Labor Code or DWC rules.

#### **FY 2019 highlights:**

- Managed the adoption of new and amended agency rules, including:
  - Designated Doctors – 28 Texas Administrative Code (TAC) Chapter 127
  - Work Hardening/Conditioning – 28 TAC Section 134.600
  - Work Status Reports – 28 TAC Section 129.5
  - Hearings – 28 TAC Chapters 101, 116, 140, 142, 143, and 152
  - Death Benefits – 28 TAC Section 132.7
  - Enforcement – 28 TAC Sections 180.8 and 180.26
  - Sanctions – 28 TAC Section 148.17
  - Certified Self-Insurance – 28 TAC Chapter 114
- Developed case strategies and responsive pleadings in state and federal court regarding air ambulance litigation, which involved federal law challenges to DWC's authority to settle fee disputes according to DWC fee guidelines.
- Developed case strategies and responsive pleadings in various state and federal court cases involving legal challenges to the workers' compensation law and rules.



## Policy and Customer Services

The deputy commissioner of Policy and Customer Services oversees the activities of Claims and Customer Services, DWC Communications, the Workers' Compensation Research and Evaluation Group, the Subsequent Injury Fund, and Self-Insurance Regulation. This deputy serves as DWC's primary liaison with the Insurance Commissioner and TDI operations, assists the Commissioner with strategic planning, and coordinates executive decision-making for DWC. The deputy commissioner also oversees the activities of the special advisor, who performs qualitative research and policy guidance on workers' compensation issues.

## Claims and Customer Services

Claims and Customer Services provides education and promotes informal dispute resolution by enabling communication between system participants. Injured employees and other consumers who need information and assistance can go to 20 DWC's field offices located across the state or call the DWC customer service line. Designated field office staff are assigned as the DWC single point of contact for injured employees receiving services from DWC.

### FY 2019 highlights:

- Provided assistance to about 147,000 injured employees and other system participants in the virtual call center; assisted about 4,000 injured employees at field offices; and processed more than 7,000 requests from insurance carriers or injured employees.
- Gained about 16,500 educational outreach views through online videos in English and Spanish.
- Conducted internal compliance workshops that resulted in the identification and referral of 3,750 potential administrative violations to Compliance and Investigations for further action.
- Initiated outreach to about 200 injured first responders.

## DWC Communications

DWC Communications develops and reviews internal and external communications, and produces visual and print media promoting DWC's mission, regulatory initiatives, safety programs, and health care provider training. DWC Communications creates strategic communication campaigns for upcoming events and new initiatives, edits DWC communications, oversees public distribution of those products, and manages DWC webpages. Communications houses DWC's media relations and social media administration. It is also responsible for the planning and marketing of the division's annual conference, the primary outreach and education event for the Texas workers' compensation system. The agency's translation services also operate out of DWC Communications.

### FY 2019 highlights:

- Continued long-term project to make plain language revisions to 100 letters that are sent to injured employees to make them easier to understand. The revisions should be complete by early 2020.
- Continued production of educational videos to educate system stakeholders. Those videos have been viewed more than 52,000 times.



- Organized the 2019 Texas Workers' Compensation Conference. The event drew almost 700 attendees and vendors, a record attendance. A new conference smartphone app replaced paper programs, saving almost \$7,000 in printing and enabling unprecedented engagement among attendees.
- Launched DWC social media pages as another method of outreach with accounts on Twitter, LinkedIn, and Facebook.

### **Workers' Compensation Research and Evaluation Group (REG)**

REG conducts research projects on systemwide issues, such as trends in medical costs and utilization of care, return-to-work outcomes for injured employees, and employer participation in the workers' compensation system. REG also produces an annual report card for certified workers' compensation health care networks and political subdivisions.

#### **FY 2019 highlights:**

- Completed seven research projects to examine the operational effectiveness of the workers' compensation system:
  - The Setting the Standard biennial report studies the impact of the House Bill 7 (2005) legislative reforms of the Texas workers' compensation system. This report presented results on the affordability and availability of workers' compensation insurance for Texas employers and the impact of certified workers' compensation health care networks on the system.
  - The 2018 Annual Network Report Card compared medical costs, utilization of care, access to care, satisfaction with care, return-to-work outcomes, and functional outcomes for 16 certified health care networks and political subdivision health plans with non-network claims. The report card, which included a survey of 3,200 injured employees, continued to show that networks generally treat injured employees at lower costs and produce better outcomes compared to non-network claims.
  - The biennial nonsubscription study estimated employer participation in the Texas workers' compensation system. This study included a survey of 2,300 Texas employers and presented results by industry sector, employer size, and subscription status.
  - An analysis of designated doctor exams in the Texas workers' compensation system studied shifts in trends by geographic region, injured body part, and doctor license type.
  - The Health Care Costs and Utilization study looked at trends by medical service type, claim type, bill type, and facility type. It included post-formulary changes in pharmaceutical prescription trends, such as "not-recommended drugs" (N-drugs) and opioids.
  - An analysis of injured employee outcomes since the pharmacy closed formulary compiled outcome measures pre- and post-formulary. The study showed general injured employee improvements in functional outcomes, return-to-work rates, and injured employee satisfaction.
  - The Access to Medical Care in the Texas Workers' Compensation System study measured the effectiveness of the workers' compensation system to deliver timely and appropriate medical care to injured employees in Texas.



**Subsequent Injury Fund (SIF)**

The SIF encourages employers to hire employees with preexisting conditions, by reducing the liability employers face should the employee receive a new injury while at work that would entitle them to lifetime income benefits. The SIF also includes reimbursement of overpaid, unrecoverable workers' compensation benefits under specific circumstances.

**FY 2019 highlights:**

- Processed 1,133 carrier reimbursement requests totaling \$18 million, eliminating a significant backlog.
- Developed new forms for carrier requests for reimbursement, which created significant clarity and efficiencies for customers.
- Converted the carrier reimbursement process from a paper to an entirely electronic process.

**Self-Insurance Regulation (SIR)**

SIR oversees certification and monitoring of certified self-insurers, which account for 8% of the workers' compensation market based on total written premium in Texas. This program provides an alternative to purchasing workers' compensation insurance for large private employers. As of August 31, 2019, there were 32 active certified self-insurers covering 211 companies that employ 135,000 employees.

**FY 2019 highlights:**

- Made presentations to the Texas Certified Self-Insurer Guaranty Association at its quarterly board meetings on 37 renewal applications, 68 status reports on former certified self-insurers, two new withdrawals, and one newly impaired employer.
- Monitored 68 former certified self-insurers, including one newly impaired employer and two previously impaired employers.
- Managed security deposits totaling \$385.14 million (including both active and withdrawn companies), consisting of \$92.55 million in letters of credit, \$283.34 million in surety bonds, and \$9.25 million in cash.
- Completed 26 on-site safety program inspections.



## **Health and Safety**

The deputy commissioner for Health and Safety oversees the Office of the Medical Advisor, Health Care Business Management, Medical Fee Dispute Resolution, Workplace Safety, and Return to Work sections.

### **Office of the Medical Advisor**

This office monitors health care quality in the workers' compensation system by conducting health care provider and other system participant reviews. It also recommends rules and policies regarding medical care and medical delivery systems to the Workers' Compensation Commissioner and determines which doctors qualify to serve as designated doctors.

### **Health Care Business Management**

Health Care Business Management supports the operations of the medical advisor and the Medical Quality Review Panel. The panel reviews the actions of doctors and other health care providers, insurance carriers, utilization review agents, and independent review organizations, and makes recommendations to the Office of the Medical Advisor. This section provides internal and external training on medical benefits, as well as outreach to encourage health care providers to participate in the Texas workers' compensation system. It also analyzes economic factors and treatment protocols to help the Commissioner develop rules and guidelines for medical treatments and return-to-work programs.

#### **FY 2019 highlights:**

- Improved quality-of-care by investigating 127 complaints, which led to 32 referrals to Enforcement, 23 letters of education, and seven medical quality reviews.
- Completed a neuromuscular plan-based audit of 10 subjects. The audit revealed that some health care providers referred injured employees for neuromuscular testing without the proper medical rationale. As a result, six of the 10 subjects were referred to Enforcement.
- Completed a lumbar spine MRI plan-based audit of 10 subjects. This audit evaluated the appropriateness of doctor decisions and recordkeeping in ordering lumbar spine MRIs prior to one month of conservative therapy. The audit revealed that health care providers referred injured employees for lumbar spine MRIs without the proper medical rationale. As a result, 10 subjects were referred to Enforcement.
- Completed an opioids plan-based audit of 10 subjects. This audit evaluated the appropriateness of health care provider decision-making and recordkeeping to support prescribing opioids for treatment plans tailored to specific injured employees. The audit revealed that some doctors prescribed opioids to injured employees without the proper medical rationale. As a result, seven of the 10 subjects were referred to Enforcement.
- Increased number of webinars held for health care providers, resulting in a higher number of attendees. There were 34 webinars held with more than 2,000 attendees.



## Medical Fee Dispute Resolution

Medical Fee Dispute Resolution resolves disputes over the amount of payment to providers for services determined to be medically necessary and appropriate for the treatment of a work-related injury or illness.

### FY 2019 highlights:

- Resolved more than 5,600 medical fee disputes totaling \$11 million. About \$4.5 million was resolved through education and agreements, and \$6.5 million by DWC decisions.
- Continued to reduce a backlog of pending medical fee disputes from 17,054 in August 2009 to about 700 in August 2019. This does not include about 1,500 air ambulance disputes that were suspended due to ongoing litigation. The reduction allows quicker resolution of new disputes. Resolving disputes quickly benefits health care providers, insurance carriers, and injured employees.

## Workplace Safety

Workplace Safety provides Texas employers and employees with health and safety resources and services to help prevent occupational injuries and illnesses. This includes occupational safety and health consultations, safety training and educational materials, insurance company loss control inspections, a safety violations hotline, and Texas injury and illness data collection for the U.S. Department of Labor, Bureau of Labor Statistics.

### FY 2019 highlights:

- Presented Lone Star Safety Program awards to 20 companies with excellent workplace safety programs and low rates of work-related injuries and illnesses. The program highlights employers that have made safety a priority and encourages others to participate in the program, which helps them save money and keeps employees safer on the job.
- Helped employers improve safety programs and assess their work sites for safety by performing 3,058 safety inspections and consultations.
- Reduced workplace risk for thousands of employees by working with employers to remove 6,454 safety hazards.
- Provided direct safety intervention to 66,134 employees through face-to-face training, DVDs, and other safety products and services.
- Improved construction workplace safety and health hazard awareness by training 1,453 employees in 79 free OSHA classes.
- Created course content for OSHA's 30-hour construction training in collaboration with the Texas Facilities Commission, to deliver instruction to historically underutilized business subcontractors working on the Texas Capitol expansion project. Conducted two of these new classes in August, instructing 29 employees in FY 2019.
- Hired and trained new Accident Prevention Services inspection staff. Conducted inspections of 10 insurance companies and contacted 90 policyholders for feedback on the quality of the loss-control services provided by their insurance companies.



## **Return to Work**

Return to Work provides internal and external training on the importance of bringing an injured employee back to work. This section also administers a grant program for small employers that provides reimbursement for workplace modifications that help employees return to work.

### **FY 2019 highlights:**

- Improved employee return-to-work rates by training 6,414 employers at 40 seminars and presentations across the state.
- Provided 260,598 injured employees with return-to-work resources and a checklist to enhance communication with their health care provider, insurance carrier, and DWC.
- Provided return-to-work education through easily accessible web publications that were viewed 45,576 times. System stakeholders also received 2,085 hard copies of DWC's return-to-work publications.
- The percentage of network injured employees who went back to work after their injury increased from 87% in 2011 to 94% in 2019. The return-to-work rate for non-network injured employees increased from 88% to 90% for the same timeframe.



## Compliance and Investigations

Compliance and Investigations monitors system compliance, pursues enforcement of violations under the Texas Labor Code, and oversees the investigation and prosecution of workers' compensation fraud. Compliance and Investigations includes Audits, Investigations, and Monitoring; Enforcement; the Fraud Unit; and the Fraud Prosecution Unit.

### Audits, Investigations, and Monitoring

This section is responsible for monitoring system participants for compliance with Texas Labor Code and DWC rules. Staff in this area process complaints, analyze system data, identify noncompliance, make referrals for enforcement proceedings, perform audits, and administer the Performance Based Oversight program (a legislatively required biennial report card for insurance carriers and health care providers).

#### FY 2019 highlights:

- Returned more than \$1 million to system participants by resolving more than 6,800 complaints.
- Returned more than \$489,000 to injured employees, their beneficiaries, and the Subsequent Injury Fund by completing 59 insurance carrier performance audits.
- Assessed 121 insurance carriers on five measures relating to timeliness of initial temporary income benefits, timely processing of medical bills and reconsideration bills, and the timeliness of electronic reporting of initial payment and medical bill processing. Of those, 55 insurance carriers scored in the high performer tier, 65 in the average performer tier, and one in the poor performer tier.

### Enforcement

Enforcement oversees the intake, investigation, and enforcement of alleged violations in the workers' compensation system. Enforcement actions are generally based on priorities set by the Workers' Compensation Commissioner but may also be the result of DWC's medical review process, complaints, direct referrals to Enforcement, or other monitoring initiatives. Enforcement cases may be resolved through a consent order, warning letter, fines, or may proceed to the State Office of Administrative Hearings for an evidentiary hearing. Medical review cases include an informal settlement process involving Medical Quality Review Panel members, respondents, and their attorneys.

#### FY 2019 highlights:

- Opened 631 enforcement cases.
- Assessed \$825,240 in fines for violations.
- Conducted 58 investigations.
- Resolved 49 DWC health care provider and designated doctor cases through monetary penalties, continuing education, and cease and desist orders.



## **Fraud Unit**

The Fraud Unit investigates allegations of workers' compensation insurance fraud. Its responsibilities include reviewing fraud reports from system participants, conducting investigations, and working with state and federal prosecuting agencies. Investigations typically involve one of the following types of fraud:

- Premium fraud committed by employers through misclassification and false certificates.
- Insurance carrier fraud, which includes insurance carrier officers and directors who commit fraudulent activities such as fictitious claims and kickbacks.
- Health care provider fraud, which includes overbilling, up-coding, and billing for services not provided.
- Attorney fraud, which includes overbilling, false claims, and kickbacks.
- Claimant fraud, committed by injured employees, which includes working and drawing benefits, malingering, and false claims.

## **Fraud Prosecution Unit**

The Fraud Prosecution Unit is embedded with the Travis County District Attorney's Office and consists of four employees, including a prosecutor and an investigator.

### **FY 2019 highlights:**

- Opened 156 workers' compensation fraud investigations.
- Referred nine workers' compensation fraud cases for prosecution.
- Obtained 10 indictments.
- Obtained eight convictions.
- Recovered more than \$355,000 in restitution to victims.



## Hearings

Hearings oversees a multitiered administrative dispute-resolution system for indemnity (benefit) disputes and certain medical disputes. This system starts with benefit review conferences (BRCs), in which the parties mediate their disputes, and then moves on to formal contested case hearings (CCHs) if parties are unable to reach an agreement. At a CCH, the parties present evidence in support of their argument to an administrative law judge (ALJ), who issues a written decision on the disputed issues. These proceedings are held at DWC offices and other sites across the state. Issues not resolved at a CCH may be appealed to DWC's Appeals Panel.

### **FY 2019 highlights:**

- Conducted 11,565 BRCs and 5,594 CCH dispute proceedings.
- Continued reducing length of time required to resolve disputes from an average of 151 days in FY 2017 to 122 days in FY 2018 and 110 days in FY 2019.
- Reduced clerical errors of DWC Decisions and Orders (D&Os), which are the final decisions made by ALJs in dispute resolution. During FY 2019, just under 2% of D&Os required clerical corrections. The rate fell from 2.6% during the first half of the fiscal year to 1.1% during the second half as improvements were made.
- Implemented amendments to the rules for dispute resolution to improve communication and efficiency. The amendments make sure that:
  - Parties copy the Office of Injured Employee Counsel (OIEC) on documents filed in disputes in which OIEC assists the injured worker.
  - Parties consult with each other before asking DWC to rule on motions.
  - Parties have an opportunity to respond to motions before an ALJ rules.
  - New hearings are held after a party fails to attend a scheduled hearing only if the absent party had a good reason for not attending the first hearing.



## **Appeals Panel**

The Appeals Panel is the highest level in the workers' compensation administrative dispute resolution process. It is headed by the deputy commissioner, who supervises six appeals judges. The appeals judges review appeals of decisions of ALJs in DWC Contested Case Hearings, except for appeals of decisions in medical necessity disputes.

If the Appeals Panel does not issue a written decision in a case, a letter is sent to the parties notifying them that the ALJ's decision has become final and has become the decision of the Appeals Panel. Beyond the Appeals Panel, the next step in the dispute resolution process is a request for judicial review.

In addition to reviewing appeals and issuing decisions, the Appeals Panel posts updates to its decision manual on the DWC website. The decision manual is required by statute.

### **FY 2019 highlights:**

- Issued 2,433 decisions, consisting of 2,361 final letters and 72 written affirmed and reversed decisions.
- Issued 58 notices for untimely appeal or cross-appeal.



## Business Process

Business Process is responsible for activities that support DWC's administration of the workers' compensation system. This program area oversees Designated Doctor Education and Operations, Information Management Services, and Records Management and Support.

### Designated Doctor Education and Operations

Designated Doctor Education and Operations provides education, training, resources, and direction to designated doctors and other system participants to make sure qualified doctors evaluate injured employees. This section also oversees designated doctor exam scheduling and testing, including test development and administration. In FY 2019, 440 doctors attended DWC-sponsored designated doctor certification courses, and 293 doctors attended other designated doctor training events.

#### FY 2019 highlights:

- Provided new features for administrative service companies to manage designated doctors' account profiles in TXCOMP, DWC's web-based claims management system.
- Implemented real-time notification to designated doctors about reports that were not accepted at a contested case hearing. The notifications help designated doctors identify areas for improvement in their report writing.
- Conducted 117 reviews of designated doctors to monitor the quality of their reports. The information provides the designated doctor with feedback about their performance during the recertification process.
- Offered 20 case-based and three webinars for designated doctors, reducing training costs for doctors.

### Information Management Services

Information Management provides workers' compensation claim data requested by system participants and delivers automated solutions for DWC's business process needs.

#### FY 2019 highlights:

- Moved the TXCOMP provider system to a more current technological platform. The system features a new paperless system for requesting system access and improved account management features for external users.
- Increased use of DWC's electronic document processing services. These services, including faxback receipt and secure file transfer, increase the security of information submitted to DWC and further the goal of creating a paperless claims environment.



### **Records Management and Support**

Records Management and Support maintains records associated with injured employee claim files and insurance coverage information. The section also facilitates the exchange of electronic records from external customers to DWC.

#### **FY 2019 highlights:**

- Improved the open records request process for claim file information, including rewriting all correspondence in plain language.
- Streamlined delivery of documents to DWC program areas, reducing turnaround times for responding to service requests from system participants.



# **Section IV: Data Tables**







## Form filings

### Life and health filings received

Type	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Annuity	680	633	519	576	503
Credit	22	27	41	11	19
Health	3,968	3,558	3,278	3,245	2,651
Life	828	807	796	637	718
Life settlement	116	64	49	36	9
Long-term care	219	240	270	180	177
Medicare	1,085	1,103	1,087	920	1,039
<b>Total filing submissions*</b>	<b>6,918</b>	<b>6,432</b>	<b>6,040</b>	<b>5,605</b>	<b>5,116</b>
Forms received	16,985	15,159	13,526	14,528	12,350
Rates received	4,855	3,591	1,688	1,954	1,672

### Life and health filings completed, final disposition

Type	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Annuity	682	639	521	594	477
Credit	22	31	39	13	19
Health	4,024	3,499	3,196	3,179	2,652
Life	824	805	790	645	719
Life settlement	115	71	47	38	8
Long-term care	200	238	284	174	152
Medicare	1,112	1,092	1,115	929	995
<b>Total filing submissions*</b>	<b>6,979</b>	<b>6,375</b>	<b>5,992</b>	<b>5,572</b>	<b>5,022</b>
Forms received	17,245	15,433	13,243	13,766	13,049
Rates received	3,658	4,088	3,905	3,416	3,512

Note: a single submission may contain multiple related forms and rates; life and health filings can also contain both related forms and rates in a single submission.

\* Totals reflect the number of company submissions, regardless of the number of forms or rates included in the submission.



### Property and casualty form filings received

Type	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Personal liability/umbrella	57	66	51	40	35
Bond and miscellaneous lines	394	403	398	237	190
Certificate of insurance (added in 2017)	-	-	10	6	5
Commercial automobile	488	482	483	254	358
Commercial property	487	463	448	302	183
General liability	1,723	1,180	1,349	788	681
Homeowners	415	365	395	276	179
Inland marine	416	284	180	161	120
Interline filing	224	135	144	85	74
Identity theft	3	10	11	1	4
Commercial multiperil	1,316	1,108	1,087	750	568
Other personal and commercial lines	5	3	11	3	3
Personal automobile	403	450	426	189	271
Professional liability	615	534	512	369	266
Workers' compensation	111	93	98	104	108
Cyber risk (added in 2017)	-	-	20	28	20
<b>Total form filing submissions</b>	<b>6,657</b>	<b>5,576</b>	<b>5,623</b>	<b>3,593</b>	<b>3,065</b>
<b>Actual policy forms received†</b>	<b>31,416</b>	<b>24,519</b>	<b>26,131</b>	<b>28,688</b>	<b>25,171</b>

### Property and casualty rate filings received

Type	FY 2015†	FY 2016†	FY 2017	FY 2018	FY 2019
Personal liability/umbrella	25	33	30	31	45
Bond and miscellaneous lines	161	186	185	208	153
Commercial automobile	272	298	361	365	391
Commercial property	289	207	147	232	193
General liability	517	344	451	467	548
Homeowners	233	202	212	289	321
Inland marine	92	120	93	112	104
Interline filing	22	13	26	28	25
Identity theft	2	6	3	-	3
Commercial multiperil	494	491	396	540	474
Other personal and commercial lines	1	3	7	3	2
Personal automobile	434	531	497	509	581
Professional liability	146	158	134	146	136
Workers' compensation	184	152	194	192	206
Cyber risk (added in 2017)	-	-	12	16	11
<b>Total</b>	<b>2,872</b>	<b>2,744</b>	<b>2,748</b>	<b>3,138</b>	<b>3,193</b>

† A single form filing submission may contain multiple policy forms and endorsements.



## Property and casualty form filings completed

Type	FY 2015	FY 2016	FY 2017	FY 2018*	FY 2019
Personal liability/umbrella	57	61	55	43	42
Bond and miscellaneous lines	327	470	363	304	197
Certificate of insurance (added in 2017)	-	-	12	8	6
Commercial automobile	498	487	487	286	345
Commercial property	450	495	437	316	178
General liability	1,711	1,222	1,348	824	649
Homeowners	409	311	414	319	188
Inland marine	415	295	173	169	100
Interline filing	201	144	134	103	73
Identity theft	1	11	13	1	4
Commercial multiperil	1,279	1,145	1,082	798	566
Other personal and commercial lines	4	4	9	3	6
Personal automobile	373	461	431	256	271
Professional liability	546	584	512	375	288
Workers' compensation	115	96	103	98	109
Cyber risk (added in 2017)	-	-	15	27	19
<b>Total form filing submissions</b>	<b>6,386</b>	<b>5,786</b>	<b>5,588</b>	<b>3,930</b>	<b>3,041</b>
<b>Actual policy forms completed‡</b>	<b>31,184</b>	<b>26,022</b>	<b>28,744</b>	<b>28,042</b>	<b>26,744</b>

## Property and casualty rate filings completed

Type	FY 2015	FY 2016	FY 2017	FY 2018*	FY 2019
Personal liability/umbrella	24	31	35	27	43
Bond and miscellaneous lines	133	216	201	230	130
Commercial automobile	368	273	348	360	346
Commercial property	275	227	130	228	207
General liability	499	401	448	470	500
Homeowners	242	174	233	275	296
Inland marine	110	118	81	128	80
Interline filing	12	11	27	28	23
Identity theft	14	5	4	-	2
Commercial multiperil	531	505	389	529	448
Other personal and commercial lines	1	4	8	2	3
Personal automobile	465	535	488	530	488
Professional liability	119	163	176	153	101
Workers' compensation	213	153	200	193	206
Cyber risk (added in 2017)	-	-	7	21	6
<b>Total</b>	<b>3,006</b>	<b>2,816</b>	<b>2,775</b>	<b>3,174</b>	<b>2,879</b>

\* In December 2017, TDI required insurers to include rule filings in rate filings instead of through separate submissions.

‡ A single form filing submission may contain multiple policy forms and endorsements.



## Rehabilitation and liquidation oversight

### Receiverships

Status	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Beginning balance	28	26	27	27	29
New receiverships	-	2	-	2	1
Receiverships closed	2	1	-	-	3

### Companies in receivership for rehabilitation or liquidation at end of FY 2019:

- Access Insurance Company
- American Founders Financial Corporation
- Capson Physicians Insurance Company
- Family Life Insurance Company of America
- Good Samaritan Life Insurance Company
- Gramercy Insurance Company
- Grand Court Order of Calanthe
- Highlands Insurance Company
- Lincoln Memorial Life Insurance Company
- Lone Star Life Insurance Company
- Memorial Service Life Insurance Company
- Millennium Closing Services LLC, dba Millennium Title
- Mi Tierra Title, LLC
- National Charity Title, Inc.
- National Prearranged Services, Inc.
- Peters Burial Association
- San Antonio Indemnity Company
- Santa Fe Auto Insurance Company
- Shelby Casualty Insurance Company
- Shelby Insurance Company
- Select Insurance Services, Inc.
- Texas Select Lloyds Insurance Company
- Universal HMO of Texas, Inc.
- Universal Insurance Exchange
- Vesta Fire Insurance Corporation
- Vesta Insurance Corporation
- W.I.N. Association



## Texas insurance market

### Carriers subject to TDI requirements (2018)

Type	Texas Premiums
Life	\$ 12,499,478,517
Annuity	26,343,491,137
Accident and health	43,323,341,023
Property and casualty*	60,553,120,113
HMO	37,363,525,289
Title	2,164,266,854
Other†	10,191,708
<b>Total</b>	<b>\$ 182,257,414,641</b>
Total admitted market	175,811,151,375
Total alternative market	6,446,263,264

\* Includes the alternative market total.

† Includes local mutual aid and burial associations, exempt associations, and nonprofit legal service companies.

### Admitted market (carriers holding a TDI-issued license in 2018)

Type	Texas companies	Non-Texas companies	Total admitted market
Life	1,108,602,265	1,1390,876,252	12,499,478,517
Annuity	5,883,006,689	20,460,484,448	26,343,491,137
Accident and health	5,205,633,813	38,117,707,210	43,323,341,023
Property and casualty*	26,609,634,320	27,497,222,529	54,106,856,849
HMO	32,855,624,167	4,507,901,122	37,363,525,289
Title	870,918,367	1,293,348,487	2,164,266,854
Other†	4,754,094	5,437,614	10,191,708
<b>Total</b>	<b>72,538,173,715</b>	<b>103,272,977,662</b>	<b>175,811,151,377</b>

\* Excludes the alternative market total.

† Includes local mutual aid and burial associations, exempt associations, and nonprofit legal service companies.

### Alternative market (carriers eligible or holding other form of TDI approval in 2018)

Type	Texas Premiums
Surplus lines insurers	\$ 6,078,597,317
Foreign risk retention groups	113,893,204
Certified self-insurers	240,529,712
Workers' compensation self-insurance groups	13,243,031
<b>Total*</b>	<b>\$ 6,446,263,264</b>

\* The majority of this business is property and casualty insurance. However, the surplus lines market includes some accident and health business.



## Texas market premiums

### Texas property and casualty premiums

Type	2017	2018
<b>Primary lines</b>		
Automobile (personal and commercial)	\$ 24,473,557,554	\$ 26,559,652,599
Workers' compensation	2,343,929,734	2,519,219,319
Homeowners	8,747,056,947	9,347,589,651
Fire and allied lines	6,835,258,288	7,347,136,996
Liability	5,738,788,443	6,103,883,114
Medical professional liability	186,823,348	191,722,190
<b>All other lines*</b>	<b>1,932,106,541</b>	<b>2,037,652,993</b>
<b>Total</b>	<b>\$ 50,257,520,855</b>	<b>\$ 54,106,856,862</b>

\* Does not include \$846,477,672 in accident and health premiums for 2018 and \$812,101,830 for 2017 written by property and casualty companies that are included in total accident and health premiums reflected below.

### Texas life, annuity, and accident and health premiums

Type	2017	2018
<b>Life</b>		
Ordinary	\$ 9,185,821,711	\$ 9,524,908,430
Group	2,873,848,424	2,891,969,521
Industrial	700,083	626,814
Credit	84,289,877	81,973,752
<b>Subtotal</b>	<b>\$ 12,144,660,095</b>	<b>\$ 12,499,478,517</b>
<b>Annuity</b>		
Annuities	\$ 15,423,337,048	\$ 17,998,947,862
Other considerations	3,333,829,412	3,189,926,771
Deposit type contracts	3,609,832,872	5,154,616,504
<b>Subtotal</b>	<b>\$ 22,366,999,332</b>	<b>\$ 26,343,491,137</b>
Accident and health*	\$ 39,969,195,147	\$ 43,323,341,023
<b>Total</b>	<b>\$ 74,480,854,574</b>	<b>\$ 82,166,310,677</b>

\* Includes \$846,477,672 in accident and health premiums for 2018 and \$812,101,830 for 2017 written by property and casualty companies.



## Texas group market

Based on written premium and market share percentage.

\* Companies with positive premiums

### Health insurance (excludes credit and other accident)

Overview	Totals	Top group writers	Premium	MS %
Companies*	474	UnitedHealth	\$ 16,235,553,415	20.15
Groups	191	Health Care Service Corp.	13,793,334,152	17.12
Insured Texans	23,240,298	Centene Corp.	7,510,630,666	9.32
Uninsured Texans	5,002,893	Humana	7,044,965,320	8.74
Texas population estimate	28,243,191	Anthem Inc.	5,246,776,075	6.51
Written premium	\$ 80,575,291,607	Cigna Health	4,280,185,555	5.31
		CVS	4,000,084,930	4.96
		Molina Healthcare Inc.	3,326,618,647	4.13
		Harris Health	1,671,353,372	2.07
		Scott & White	1,416,436,271	1.76

### Annuities

Overview	Totals	Top group writers	Premium	MS %
Companies*	295	American International	\$ 4,827,345,317	18.32
Groups	127	Prudential of America	1,692,126,719	6.42
Written premiums	\$ 26,343,491,137	Allianz Insurance	1,132,422,525	4.30
		Jackson National	977,057,256	3.71
		New York Life	940,924,649	3.57
		Lincoln National	931,826,774	3.54
		Nationwide	924,768,595	3.51
		John Hancock	918,888,378	3.49
		Mass Mutual Life Insurance	860,664,415	3.27
		AXA Insurance	837,299,534	3.18



## Life insurance

Overview	Totals	Top group writers	Premium	MS %
Companies*	432	Metropolitan	\$ 742,086,401	5.94
Groups	163	New York Life	731,750,259	5.85
Written premiums	\$ 12,499,478,515	Northwestern Mutual	650,408,957	5.20
		Lincoln National	642,794,158	5.14
		Prudential of America	551,783,732	4.41
		Minnesota Mutual	440,355,897	3.52
		State Farm	412,430,249	3.30
		Mass Mutual Life Insurance	397,135,079	3.18
		Pacific Life	394,799,063	3.16
		Aegon US Holding	345,925,144	2.77

## Personal auto insurance

Overview	Totals	Top group writers	Premium	MS %
Companies*	175	State Farm	\$ 3,399,131,002	14.99
Groups	63	Berkshire Hathaway	2,971,256,140	13.10
Policies (liability)	19,098,940	Allstate Insurance	2,641,888,366	11.65
Written premiums	\$ 22,673,781,433	Progressive	2,535,002,288	11.18
		USAA	1,913,652,466	8.44
		Farmers Insurance	1,852,273,758	8.17
		Liberty Mutual	1,180,982,501	5.21
		Texas Farm Bureau Mutual	739,359,173	3.26
		Nationwide Corp.	404,216,804	1.78
		Orpheus	369,301,695	1.63

## Homeowners insurance

Overview	Totals	Top group writers	Premium	MS %
Companies*	149	State Farm	\$ 1,847,041,191	19.76
Groups	66	Allstate Ins	1,234,929,061	13.21
Policies in force		Farmers Ins	981,914,362	10.50
Homeowners	4,801,387	USAA	916,464,328	9.80
Dwelling	787,289	Liberty Mutual	696,105,857	7.45
Tenants	1,658,041	Travelers	378,691,789	4.05
Written premiums	\$ 9,347,589,651	Texas Farm Bureau Mutual	246,143,013	2.63
		Progressive	235,391,363	2.52
		Nationwide Corp.	224,427,272	2.40
		Chubb Limited	191,831,650	2.05



## Company market share

\*Based on written premium and market share percentage

### Top 40 companies | Accident and health

Rank	NAIC	Company	Premium	MS %
1	70670	BCBSTX, A Division of Health Care Service Corp.	\$ 10,262,980,617.00	23.69
2	79413	Unitedhealthcare Insurance Company	6,330,236,807.00	14.61
3	73288	Humana Insurance Company	5,020,915,420.00	11.59
4	60054	Aetna Life Insurance Company	2,772,346,921.00	6.40
5	71013	Superior Healthplan Network	2,096,263,885.00	4.84
6	12558	Care Improvement Plus of Texas Insurance Company	1,678,006,143.00	3.87
7	67369	Cigna Health and Life Insurance Company	1,556,215,536.00	3.59
8	80799	Celtic Insurance Company	1,075,085,150.00	2.48
9	14078	Amerigroup Insurance Company	1,015,508,033.00	2.34
10	12307	Dentaquest USA Insurance Company, Inc.	754,929,586.00	1.74
11	65978	Metropolitan Life Insurance Company	694,243,867.00	1.60
12	14063	MCNA Insurance Company	563,199,268.00	1.30
13	71420	Sierra Health and Life Insurance Company, Inc.	508,126,313.00	1.17
14	15777	Oscar Insurance Company	383,622,366.00	0.89
15	60380	American Family Life Assurance Company of Columbus	358,845,926.00	0.83
16	64246	Guardian Life Insurance Company of America, The	302,788,120.00	0.70
17	62235	UNUM Life Insurance Company of America	302,414,452.00	0.70
18	78611	HCSC Insurance Services Company	251,246,503.00	0.58
19	80802	Sun Life Assurance Company of Canada	194,005,150.00	0.45
20	65498	Life Insurance Company of North America	187,633,182.00	0.43
21	39616	Vision Service Plan Insurance Company	185,815,325.00	0.43
22	69868	United of Omaha Life Insurance Company	174,947,947.00	0.40
23	12575	Silverscript Insurance Company	173,744,294.00	0.40
24	12567	Care Improvement Plus South Central Insurance Company	158,733,046.00	0.37
25	61271	Principal Life Insurance Company	152,458,168.00	0.35
26	65676	Lincoln National Life Insurance Company, The	147,808,426.00	0.34
27	70025	Genworth Life Insurance Company	146,627,955.00	0.34
28	61301	Ameritas Life Insurance Corp.	143,360,188.00	0.33
29	70815	Hartford Life and Accident Insurance Company	139,802,994.00	0.32
30	81396	Delta Dental Insurance Company	137,928,975.00	0.32
31	82406	All Savers Insurance Company	130,203,613.00	0.30
32	68241	Prudential Insurance Company of America, The	129,535,912.00	0.30
33	62286	Golden Rule Insurance Company	128,248,571.00	0.30
34	69019	Standard Insurance Company	124,804,012.00	0.29
35	65315	Lincoln Life Assurance Company of Boston	121,339,855.00	0.28
36	68500	Continental Life Insurance Company of Brentwood, TN	119,579,308.00	0.28
37	67105	Reliastar Life Insurance Company	118,348,822.00	0.27
38	62324	Freedom Life Insurance Company of America	109,477,052.00	0.25
39	60534	American Heritage Life Insurance Company	107,340,741.00	0.25
40	62049	Colonial Life and Accident Insurance Company	106,069,941.00	0.24
<b>Top 40 total</b>			<b>\$ 39,064,788,390</b>	<b>90.17</b>
All other accident and health companies			4,258,552,633	9.83
<b>Total</b>			<b>\$ 43,323,341,023</b>	<b>100.00</b>



**Top 40 companies | Annuities**

Rank	NAIC	Company	Premium	MS %
1	60488	American General Life Insurance Company	\$ 4,073,759,532	15.46
2	68241	Prudential Insurance Company of America, The	1,208,705,272	4.59
3	90611	Allianz Life Insurance Company of North America	1,132,422,525	4.30
4	65056	Jackson National Life Insurance Company	977,057,256	3.71
5	65676	Lincoln National Life Insurance Company, The	925,337,661	3.51
6	65838	John Hancock Life Insurance Company (U.S.A.)	918,888,378	3.49
7	62944	AXA Equitable Life Insurance Company	836,555,529	3.18
8	61271	Principal Life Insurance Company	818,945,894	3.11
9	91596	New York Life Insurance and Annuity Corporation	790,289,583	3.00
10	65935	Massachusetts Mutual Life Insurance Company	785,763,873	2.98
11	86509	Voya Retirement Insurance and Annuity Company	780,758,730	2.96
12	70238	Variable Annuity Life Insurance Company, The	753,235,329	2.86
13	67466	Pacific Life Insurance Company	649,896,672	2.47
14	61689	Athene Annuity and Life Company	582,063,278	2.21
15	60895	American United Life Insurance Company	500,163,996	1.90
16	65978	Metropolitan Life Insurance Company	497,464,681	1.89
17	91642	Forethought Life Insurance Company	444,787,549	1.69
18	66869	Nationwide Life Insurance Company	427,979,315	1.62
19	66044	Midland National Life Insurance Company	382,927,072	1.45
20	69345	Teachers Insurance and Annuity Association of America	382,774,563	1.45
21	86231	Transamerica Life Insurance Company	376,719,023	1.43
22	92657	Nationwide Life and Annuity Insurance Company	338,608,684	1.29
23	79227	Pruco Life Insurance Company	332,383,405	1.26
24		College Retirement Equities Fund	308,730,216	1.17
25	92738	American Equity Investment Life Insurance Company	290,111,493	1.10
26	65528	Life Insurance Company of The Southwest	277,652,852	1.05
27	63312	Great American Life Insurance Company	251,056,076	0.95
28	69019	Standard Insurance Company	247,084,168	0.94
29	87726	Brighthouse Life Insurance Company	242,452,281	0.92
30	88072	Talcott Resolution Life Insurance Company	242,133,035	0.92
31	68136	Protective Life Insurance Company	238,563,887	0.91
32	63274	Fidelity & Guaranty Life Insurance Company	230,324,340	0.87
33	65005	Riversource Life Insurance Company	220,388,873	0.84
34	70688	Transamerica Financial Life Insurance Company	219,956,463	0.83
35	68322	Great-West Life & Annuity Insurance Company	211,374,106	0.80
36	68608	Symetra Life Insurance Company	208,426,768	0.79
37	69663	USAA Life Insurance Company	207,247,755	0.79
38	68675	Security Benefit Life Insurance Company	192,234,841	0.73
39	66974	North American Company for Life and Health Insurance	173,025,482	0.66
40	93696	Fidelity Investments Life Insurance Company	161,286,301	0.61
<b>Top 40 total</b>			<b>\$ 22,839,536,737</b>	<b>86.70</b>
All other annuities premium			3,503,954,400	13.30
<b>Total</b>			<b>\$ 26,343,491,137</b>	<b>100.00</b>



**Top 40 companies | HMOs**

Rank	NAIC	Company	Premium	MS %
1	95647	Superior Healthplan, Inc.	\$ 4,328,285,500	11.58
2	95314	Amerigroup Texas, Inc.	4,225,137,952	11.31
3	95174	Unitedhealthcare Benefits of Texas, Inc.	3,570,247,666	9.56
4	10757	Molina Healthcare of Texas, Inc.	3,289,358,881	8.80
5	70670	BCBSTX, A Division of Health Care Service Corp	3,170,526,303	8.49
6	11141	Unitedhealthcare Community Plan of Texas, L.L.C.	2,562,463,400	6.86
7	12902	Healthspring Life & Health Insurance Company, Inc.	2,261,664,650	6.05
8	95329	Texas Children's Health Plan, Inc.	1,678,937,239	4.49
9	95885	Humana Health Plan, Inc.	1,196,719,390	3.20
10	11494	Physicians Health Choice of Texas, LLC	979,415,763	2.62
11	16133	Community Health Choice Texas, Inc.	959,876,042	2.57
12	10096	Selectcare Of Texas, Inc.	870,889,278	2.33
13	95024	Humana Health Plan of Texas, Inc.	749,879,888	2.01
14	95099	Scott And White Health Plan	726,511,289	1.94
15	95615	Community Health Choice, Inc.	711,477,330	1.90
16	95809	Driscoll Children's Health Plan	669,387,128	1.79
17	95138	Sha, L.L.C.	592,706,775	1.59
18	95414	Parkland Community Health Plan, Inc.,	576,208,810	1.54
19	95822	Cook Children's Health Plan	554,916,257	1.49
20	95248	Community First Health Plans, Inc.	539,593,799	1.44
21	95490	Aetna Health Inc.	485,208,157	1.30
22	12964	Wellcare Of Texas, Inc.	422,848,972	1.13
23	12827	Ks Plan Administrators, LLC	376,242,614	1.01
24	95040	Aetna Better Health of Texas Inc.	314,486,796	0.84
25	15485	Children's Medical Center Health Plan	266,099,546	0.71
26	52635	El Paso First Health Plans, Inc.	196,194,166	0.53
27	14154	Christus Health Plan	153,526,877	0.41
28	95765	Unitedhealthcare Of Texas, Inc.	128,287,718	0.34
29	14151	Sendero Health Plans, Inc.	124,928,995	0.33
30	13151	Care N' Care Insurance Company, Inc.	108,989,525	0.29
31	15143	Blue Shield of California Promise Health Plan	87,800,742	0.23
32	15489	Memorial Hermann Health Plan, Inc.	79,466,403	0.21
33	95383	Cigna Healthcare of Texas, Inc.	77,205,003	0.21
34	95240	Seton Health Plan, Inc.	61,886,543	0.17
35	29718	GHS Insurance Company	52,854,687	0.14
36	95037	Cigna Dental Health of Texas, Inc.	33,822,845	0.09
37	95161	Denticare, Inc.	25,831,328	0.07
38	95163	Alpha Dental Programs, Inc.	25,658,393	0.07
39	10768	Selectcare Health Plans, Inc.	22,817,855	0.06
40	95910	Aetna Dental Inc.	22,475,209	0.06
<b>Top 40 total</b>			<b>\$ 37,280,835,714</b>	<b>99.78</b>
All other HMO companies			82,689,575	0.22
<b>Total</b>			<b>\$ 37,363,525,289</b>	<b>100.00</b>



**Top 40 companies | Homeowners**

Rank	NAIC	Company	Premium	MS %
1	43419	State Farm Lloyds	\$ 1,847,041,191	19.76
2	21695	Texas Farmers Insurance Company	821,439,987	8.79
3	37907	Allstate Vehicle and Property Insurance Company	666,954,861	7.14
4	25941	United Services Automobile Association	367,564,824	3.93
5	26530	Allstate Texas Lloyd's	337,792,921	3.61
6	11215	Safeco Insurance Company of Indiana	324,657,052	3.47
7	42404	Liberty Insurance Corporation	315,653,118	3.38
8	25968	USAA Casualty Insurance Company	293,719,570	3.14
9	27998	Travelers Home and Marine Insurance Company, The	238,823,504	2.55
10	11059	ASI Lloyds	233,725,122	2.50
11	25380	Texas Farm Bureau Mutual Insurance Company	190,086,856	2.03
12	19976	Amica Mutual Insurance Company	173,712,878	1.86
13	27774	Chubb Lloyds Insurance Company of Texas	161,893,906	1.73
14	11008	Auto Club Indemnity Company	141,940,555	1.52
15	18600	USAA General Indemnity Company	138,054,371	1.48
16	29688	Allstate Fire and Casualty Insurance Company	126,686,465	1.36
17	12536	Homeowners of America Insurance Company	124,400,767	1.33
18	21253	Garrison Property and Casualty Insurance Company	117,125,563	1.25
19	23760	Nationwide General Insurance Company	111,938,092	1.20
20	10969	United Property & Casualty Insurance Company	103,796,302	1.11
21	28860	Clear Blue Insurance Company	101,180,745	1.08
22	41688	Foremost Lloyds Of Texas	90,666,457	0.97
23	41564	Travelers Lloyds of Texas Insurance Company	89,056,053	0.95
24	13938	Metropolitan Lloyds Insurance Company of Texas	83,135,793	0.89
25	23353	Meridian Security Insurance Company	65,581,015	0.70
26	10111	American Bankers Insurance Company of Florida	65,391,282	0.70
27	23248	Occidental Fire & Casualty Company Of North Carolina	62,849,237	0.67
28	11543	Texas Fair Plan Association	61,277,292	0.66
29	13207	Lighthouse Property Insurance Corporation	59,393,068	0.64
30	19240	Allstate Indemnity Company	58,754,505	0.63
31	25399	Texas Farm Bureau Underwriters	56,056,157	0.60
32	37257	Praetorian Insurance Company	55,961,828	0.60
33	12831	State National Insurance Company, Inc.	55,306,444	0.59
34	11578	Cypress Texas Insurance Company	54,496,997	0.58
35	12573	Centauri Specialty Insurance Company	52,934,575	0.57
36	12873	Privilege Underwriters Reciprocal Exchange	52,717,050	0.56
37	23469	American Modern Home Insurance Company	51,438,415	0.55
38	19402	AIG Property Casualty Company	49,353,033	0.53
39	15474	National Lloyds Insurance Company	48,835,120	0.52
40	10205	Mountain Valley Indemnity Company	46,745,384	0.50
<b>Top 40 total</b>			<b>\$ 8,098,138,355</b>	<b>86.63</b>
All other homeowners companies			1,249,451,296	13.37
<b>Total</b>			<b>\$ 9,347,589,651</b>	<b>100.00</b>



**Top 40 companies | Life**

Rank	NAIC	Company	Premium	MS %
1	65978	Metropolitan Life Insurance Company	\$ 700,088,929	5.60
2	67091	Northwestern Mutual Life Insurance Company, The	650,408,957	5.20
3	66915	New York Life Insurance Company	588,370,576	4.71
4	65676	Lincoln National Life Insurance Company, The	551,055,881	4.41
5	69108	State Farm Life Insurance Company	412,430,249	3.30
6	67466	Pacific Life Insurance Company	394,687,737	3.16
7	65935	Massachusetts Mutual Life Insurance Company	382,565,406	3.06
8	66168	Minnesota Life Insurance Company	350,103,551	2.80
9	60488	American General Life Insurance Company	306,756,149	2.45
10	68241	Prudential Insurance Company of America, The	279,557,546	2.24
11	79227	Pruco Life Insurance Company	272,145,846	2.18
12	65838	John Hancock Life Insurance Company (U.S.A.)	249,505,452	2.00
13	86231	Transamerica Life Insurance Company	206,057,582	1.65
14	62235	Unum Life Insurance Company of America	200,385,471	1.60
15	64246	Guardian Life Insurance Company of America, The	197,064,264	1.58
16	65919	Primerica Life Insurance Company	196,127,290	1.57
17	63177	Farmers New World Life Insurance Company	192,006,136	1.54
18	69868	United of Omaha Life Insurance Company	186,195,112	1.49
19	60739	American National Insurance Company	177,386,334	1.42
20	68896	Southern Farm Bureau Life Insurance Company	166,448,468	1.33
21	66869	Nationwide Life Insurance Company	143,303,168	1.15
22	87726	BrightHouse Life Insurance Company	142,020,339	1.14
23	69663	USAA Life Insurance Company	141,744,027	1.13
24	91596	New York Life Insurance and Annuity Corporation	140,421,560	1.12
25	66281	Transamerica Premier Life Insurance Company	138,759,529	1.11
26	71129	Dearborn Life Insurance Company	129,482,784	1.04
27	68136	Protective Life Insurance Company	126,109,779	1.01
28	65498	Life Insurance Company of North America	119,602,871	0.96
29	62944	AXA Equitable Life Insurance Company	117,239,323	0.94
30	65595	Lincoln Benefit Life Company	110,684,200	0.89
31	65528	Life Insurance Company of The Southwest	109,466,308	0.88
32	67105	Reliastar Life Insurance Company	106,926,066	0.86
33	67989	American Memorial Life Insurance Company	104,015,709	0.83
34	92657	Nationwide Life and Annuity Insurance Company	102,901,746	0.82
35	65005	Riversource Life Insurance Company	92,605,026	0.74
36	93742	Securian Life Insurance Company	90,252,346	0.72
37	66044	Midland National Life Insurance Company	89,802,291	0.72
38	61271	Principal Life Insurance Company	84,828,524	0.68
39	80802	Sun Life Assurance Company of Canada	84,327,885	0.67
40	65315	Lincoln Life Assurance Company of Boston	82,901,216	0.66
<b>Top 40 total</b>			<b>\$ 8,916,741,633</b>	<b>71.34</b>
All other life companies			3,582,736,882	28.66
<b>Total</b>			<b>\$ 12,499,478,515</b>	<b>100.00</b>



**Top 40 companies | Passenger auto**

Rank	NAIC	Company	Premium	MS %
1	25178	State Farm Mutual Automobile Insurance Company	\$ 3,238,431,778	14.28
2	29203	Progressive County Mutual Insurance Company	2,535,002,288	11.18
3	29181	Geico County Mutual Insurance Company	2,097,316,261	9.25
4	29688	Allstate Fire and Casualty Insurance Company	1,815,384,875	8.01
5	24392	Farmers Texas County Mutual Insurance Company	1,582,053,953	6.98
6	19544	Liberty County Mutual Insurance Company	1,146,223,431	5.06
7	25941	United Services Automobile Association	625,349,602	2.76
8	29246	Consumers County Mutual Insurance Company	578,666,092	2.55
9	25968	USAA Casualty Insurance Company	565,783,286	2.50
10	22063	Government Employees Insurance Company	436,006,005	1.92
11	18600	USAA General Indemnity Company	393,394,276	1.74
12	29378	Old American County Mutual Fire Insurance Company	369,301,695	1.63
13	29327	Auto Club County Mutual Insurance Company	361,938,148	1.60
14	25380	Texas Farm Bureau Mutual Insurance Company	352,681,189	1.56
15	29297	Home State County Mutual Insurance Company	347,472,002	1.53
16	29262	Colonial County Mutual Insurance Company	343,957,919	1.52
17	21253	Garrison Property and Casualty Insurance Company	329,125,302	1.45
18	19240	Allstate Indemnity Company	315,075,703	1.39
19	10730	American Access Casualty Company	275,523,599	1.22
20	29335	Allstate County Mutual Insurance Company	253,352,518	1.12
21	29254	Foremost County Mutual Insurance Company	235,254,060	1.04
22	11198	Loya Insurance Company	228,314,083	1.01
23	10807	ACCC Insurance Company	214,547,486	0.95
24	13004	Texas Farm Bureau Casualty Insurance Company	205,655,561	0.91
25	14138	Geico Advantage Insurance Company	190,359,793	0.84
26	27863	Southern County Mutual Insurance Company	189,858,028	0.84
27	11521	Germania Select Insurance Company	189,213,057	0.83
28	13820	Infinity County Mutual Insurance Company	186,899,193	0.82
29	29300	Redpoint County Mutual Insurance Company	170,340,913	0.75
30	26816	State Farm County Mutual Insurance Company of Texas	160,699,224	0.71
31	19976	Amica Mutual Insurance Company	157,272,685	0.69
32	25399	Texas Farm Bureau Underwriters	130,696,097	0.58
33	22055	Geico Indemnity Company	120,218,595	0.53
34	15449	Alinsco Insurance Company	113,051,687	0.50
35	25712	Esurance Insurance Company	111,480,505	0.49
36	40150	MGA Insurance Company, Inc.	100,555,213	0.44
37	10891	CEM Insurance Company	100,398,275	0.44
38	13938	Metropolitan Lloyds Insurance Company of Texas	100,348,237	0.44
39	13688	Elephant Insurance Company	97,174,798	0.43
40	26441	Dairyland County Mutual Insurance Company of Texas	80,189,341	0.35
<b>Top 40 total</b>			<b>\$ 21,044,566,753</b>	<b>92.81</b>
All other passenger auto companies			1,629,214,680	7.19
<b>Total</b>			<b>\$ 22,673,781,433</b>	<b>100.00</b>



**Top 23 companies | Title**

Rank	NAIC	Company	Premium	MS %
1	51586	Fidelity National Title Insurance Company	\$ 339,070,338	15.67
2	50121	Stewart Title Guaranty Company	312,916,252	14.46
3	50814	First American Title Insurance Company	269,355,059	12.45
4	50229	Chicago Title Insurance Company	250,998,374	11.60
5	50016	Title Resources Guaranty Company	162,668,046	7.52
6	50520	Old Republic National Title Insurance Company	161,335,276	7.45
7	51624	First American Title Guaranty Company	156,876,299	7.25
8	14240	First National Title Insurance Company	103,945,304	4.80
9	51152	WFG National Title Insurance Company	78,792,824	3.64
10	50598	Alamo Title Insurance	76,127,426	3.52
11	12309	Alliant National Title Insurance Company, Inc.	56,850,319	2.63
12	50083	Commonwealth Land Title Insurance Company	50,616,804	2.34
13	50050	Westcor Land Title Insurance Company	41,745,813	1.93
14	50130	North American Title Insurance Company	41,001,148	1.89
15	50377	National Investors Title Insurance Company	25,574,443	1.18
16	11974	Amrock Title Insurance Company	14,160,722	0.65
17	50026	Premier Land Title Insurance Company	10,059,781	0.46
18	12591	Sierra Title Insurance Guaranty Company	7,571,464	0.35
19	12522	Agents National Title Insurance Company	2,121,573	0.10
20	15305	Southwest Land Title Insurance Company	1,018,630	0.05
21	51578	Amtrust Title Insurance Company	686,928	0.03
22	50440	Real Advantage Title Insurance Company	605,704	0.03
23	51632	Radian Title Insurance, Inc.	168,327	0.01
<b>Total</b>			<b>\$ 2,164,266,854</b>	<b>100.00</b>



**Top 40 companies | Workers' compensation**

Rank	NAIC	Company	Premium	MS %
1	22945	Texas Mutual Insurance Company	\$ 1,097,243,791	43.55
2	16535	Zurich American Insurance Company	74,623,016	2.96
3	42404	Liberty Insurance Corporation	48,975,823	1.94
4	43389	Service Lloyds Insurance Company, A Stock Company	46,409,381	1.84
5	25658	Travelers Indemnity Company, The	45,124,776	1.79
6	38318	Starr Indemnity & Liability Company	34,346,326	1.36
7	19038	Travelers Casualty and Surety Company	33,532,379	1.33
8	30104	Hartford Underwriters Insurance Company	31,894,897	1.27
9	23035	Liberty Mutual Fire Insurance Company	29,046,774	1.15
10	22667	Ace American Insurance Company	27,990,625	1.11
11	40142	American Zurich Insurance Company	27,793,645	1.10
12	43575	Indemnity Insurance Company of North America	26,103,476	1.04
13	25682	Travelers Indemnity Company of Connecticut, The	22,517,817	0.89
14	10166	Accident Fund Insurance Company of America	22,292,818	0.88
15	24147	Old Republic Insurance Company	21,864,802	0.87
16	20281	Federal Insurance Company	20,846,764	0.83
17	23841	New Hampshire Insurance Company	20,132,101	0.80
18	29424	Hartford Casualty Insurance Company	19,547,871	0.78
19	27855	Zurich American Insurance Company of Illinois	19,351,658	0.77
20	33600	LM Insurance Corporation	18,041,770	0.72
21	24082	Ohio Security Insurance Company	16,487,344	0.65
22	19682	Hartford Fire Insurance Company	15,307,785	0.61
23	23396	Amerisure Mutual Insurance Company	15,268,191	0.61
24	25674	Travelers Property Casualty Company of America	14,726,349	0.58
25	11000	Sentinel Insurance Company, Ltd.	14,661,840	0.58
26	27120	Trumbull Insurance Company	14,409,931	0.57
27	19429	Insurance Company of The State of Pennsylvania, The	13,427,201	0.53
28	25615	Charter Oak Fire Insurance Company, The	13,261,258	0.53
29	25623	Phoenix Insurance Company, The	12,759,198	0.51
30	42376	Technology Insurance Company, Inc.	12,337,551	0.49
31	20508	Valley Forge Insurance Company	12,190,269	0.48
32	25666	Travelers Indemnity Company of America, The	11,598,468	0.46
33	20427	American Casualty Company of Reading, Pennsylvania	11,214,435	0.45
34	38970	Markel Insurance Company	11,006,059	0.44
35	19488	Amerisure Insurance Company	10,940,373	0.43
36	20095	Bitco General Insurance Corporation	10,770,941	0.43
37	30120	Znat Insurance Company	10,649,764	0.42
38	37885	XI Specialty Insurance Company	10,494,593	0.42
39	12304	Accident Fund General Insurance Company	10,250,722	0.41
40	21458	Employers Insurance Company of Wausau	10,138,221	0.40
<b>Top 40 total</b>			<b>\$ 1,939,581,003</b>	<b>76.99</b>
All other workers' compensation companies			579,638,316	23.01
<b>Total</b>			<b>\$ 2,519,219,319</b>	<b>100.00</b>









Texas Department of Insurance  
2019 Annual Report

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