

TDI Goldcarding FAQ

September 11, 2025



TDI updated their [Goldcarding FAQ](#) to provide information regarding [HB 3812](#). In their FAQ, they notified issuers that while rules are forthcoming, they expect compliance by September 1, 2025, to align with the effective date of the bill.

Key Details:

Evaluations:

- An issuer must conduct an evaluation **at least once every year**, and the evaluation period must be 12 months.
- The bill **does not** explicitly require the 12-month period begin on the first day of a calendar year, but the evaluation period must be no more than 12 months from the last day of the previous evaluation period.

Denials:

- A physician or provider who receives an exemption denial on or after September 1, 2025, **may request an independent review** of the exemption determination.
- The IRO will review the adverse determinations that led to the denial and if the IRO disagrees with an adverse determination, **the request will count as approved for the purposes of the evaluation.**

Rescissions:

- An issuer may rescind an exemption **only during January** of a year beginning on or after the first anniversary of the last day of the most recent evaluation period.
- For example, if an issuer grants an exemption based on an evaluation period that ended June 30, 2025, the first opportunity to rescind the exemption would occur during January 2027.
- A rescission determination **must be made by a Texas-licensed physician** who does not hold a license to practice administrative medicine.
- If fewer than five claims for a particular health care service are available for an evaluation in connection with a rescission, the issuer **must review all claims.**