

No. **2026-9977**

**Official Order
of the
Texas Commissioner of Insurance**

Date: 06/17/2026

Subject Considered:

Texas Department of Insurance

v.

Triada Health LLC

SOAH Docket No. 454-24-12595.C

Order Denying Motion for Rehearing

General remarks and official action taken:

The subject of this order is the motion for rehearing filed by Triada Health, LLC (Triada). This order denies Triada's motion for rehearing.

Background

On April 24, 2026, Commissioner's Order No. 2026-9895 was issued. The order requires that Triada pay an administrative penalty of \$50,000 and that it cease and desist from all activity in violation of the Insurance Code.

Triada submitted a motion for rehearing on May 15, 2026. Triada's motion for rehearing (1) repeated arguments it made during the contested case hearing that it only offered plans governed by ERISA,¹ (2) repeatedly disputed and argued against the penalty amount set by Order No. 2026-9895, (3) asserted that there was not substantial evidence to support the findings in Order No. 2026-9895, (4) argued that the commissioner should not have considered observations by the administrative law judge in the proposal for decision regarding apparently made-up case law that Triada used in defense of its violations, (5) complained that the requirement to cease and

¹ Employee Retirement Income Security Act of 1974.

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desist from activity in violation of the Insurance Code is too broad, and (6) asserted that the requirement to pay the penalty amount should be stayed.

On June 3, 2026, Texas Department of Insurance (TDI) Enforcement staff submitted a reply to Triada's motion for rehearing opposing it. TDI Enforcement staff identified discussion in Order No. 2026-9895 and information, findings, and conclusions from the hearing and the proposal for decision that refuted Triada's arguments.

Discussion

Government Code § 2001.146(g) requires that a motion for rehearing "identify with particularity findings of fact and conclusions of law that are the subject of the complaint and any evidentiary or legal ruling claimed to be erroneous." The motion must also state the legal and factual basis for the claimed error.

Triada did not, with particularity, identify any findings of facts or conclusions of law from Order No. 2026-9895 that were the subject of its complaint, though some of Triada's arguments could be correlated to conclusions of law, and Triada referenced proposed Findings of Fact Nos. 4–7 and 10–14 from the proposal for decision as "cites" following some of its arguments.

However, Triada's arguments are either a repeat of arguments already made during the contested case hearing or in Triada's exceptions to the proposal for decision and addressed by the administrative law judge, or they are matters that could not be addressed through a rehearing. The administrative law judge developed a full record with sufficient evidence to support the factual findings and conclusions of law adopted by Order No. 2026-9895, and Triada's motion fails to provide a valid basis for a rehearing.

Order

It is ordered that the motion for rehearing filed by Triada Health, LLC is denied.

Signed by:

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Amanda Crawford
Commissioner of Insurance

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Recommended and reviewed by:

Signed by:

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Jessica Barta, General Counsel

Signed by:

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Justin Beam, Chief Clerk