

# Audit Report

## Electroencephalogram (EEG) Services in Texas Medicaid

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University of Texas Southwestern  
Medical Center



**Inspector  
General**

Texas Health  
and Human Services

September 26, 2024  
OIG Report No. AUD-25-002



Texas Health and Human Services Office of Inspector General Audit and Inspections Division

## Electroencephalogram (EEG) Services in Texas Medicaid

University of Texas Southwestern Medical Center

September 26, 2024

Dear Dr. Daniel Podolsky:

Encounters that represent paid claims the University of Texas Southwestern Medical Center (UT Southwestern) submitted for 30 tested ambulatory EEG services complied with selected Texas Medicaid Provider Procedures Manual (TMPPM) guidelines.

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) selected 30 encounters from a risk-based sample of ambulatory EEG encounters between September 1, 2022, and August 31, 2023, with professional EEG procedure codes without corresponding set-up procedure codes. Our testing identified no instances of noncompliance or opportunities for improvement for this audit.

The attachment to this letter contains a summary of audit results and details on the objective, scope, methodology, criteria, and standards.

Sincerely,

Anton Dutchover, CPA  
Deputy Inspector General of Audit and Inspections

Attachment

cc: Cecile Erwin Young, HHS Executive Commissioner  
Raymond Charles Winter, HHS Inspector General

### Background

During state fiscal year 2023 (September 1, 2022, through August 31, 2023), UT Southwestern provided selected EEG services to Texas Medicaid members. UT Southwestern received reimbursements from Parkland Community Health Plan and Superior HealthPlan for professional EEG services totaling \$136,210 for these services.

OIG Audit conducted this audit to determine whether UT Southwestern delivered and submitted claims for selected EEG services in accordance with applicable guidelines.

# Attachment

## Section 1: Summary of Audit Results

Claims the University of Texas Southwestern Medical Center (UT Southwestern) submitted for 30 selected ambulatory EEG<sup>1</sup> services complied with selected Texas Medicaid Provider Procedures Manual (TMPPM) guidelines.

### Background

Per the TMPPM, an EEG study “includes one unit of procedure code 95700 (set-up, education, and takedown) and any appropriate combination of the corresponding technical and professional procedure codes.”<sup>2</sup> An EEG technologist performs the technical components, including set-up, and a physician or other qualified health care professional performs the professional component which includes review and analysis of the test results.

### Encounters Without Set-Up Codes Were Submitted Correctly

OIG analyzed encounter data to identify ambulatory EEG claims that contained professional procedure codes but did not have corresponding set-up codes from the same provider. OIG Audit reviewed medical records supporting the 30 selected EEG encounters, which represent paid claims, to determine whether ambulatory set-up was performed with the corresponding test. These records included the patients’ reason for visit, visit information, imaging performed, and professional analysis of the testing results.

UT Southwestern performed the professional component of the ambulatory EEG for the 30 sampled EEGs, while the set-up and technical components were performed and submitted for reimbursement during inpatient hospitalization by a separate provider. UT Southwestern submitted EEG claims with professional

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<sup>1</sup> Ambulatory EEGs allow for monitoring outside an office or a hospital setting. This test can record brain activity over several days.

<sup>2</sup> Texas Medicaid Provider Procedures Manual, Vol. 2, “Medical and Nursing Specialists, Physicians, and Physician Assistants Handbook,” § 9.2.26.2 (Sep. 2022 through Aug. 2023).

procedure codes and was paid for the claims by the managed care organizations in compliance with the TMPPM.

## **Methodology**

OIG Audit issued an engagement letter to UT Southwestern on July 12, 2024, providing information about the upcoming audit, and conducted fieldwork from July 12, 2024, through August 20, 2024.

To accomplish the audit objectives, auditors:

- Conducted interviews with UT Southwestern management and staff responsible for policies, procedures, and processes relating to Texas Medicaid claims submission practices.
- Performed selected tests of the relevant evidence.

OIG Audit selected a risk-based, nonstatistical sample of 30 ambulatory EEG encounters. This sample design was chosen to address specific risk factors identified in the population. The sample items were generally not representative of the population; therefore, it would not be appropriate to project the test results to the population.

This report does not address compliance beyond the scope and objective of this audit.

## **Objective and Scope**

The audit objective was to determine whether claims submitted by UT Southwestern for ambulatory EEG tests followed selected TMPPM guidelines.

The audit scope covered the period from September 1, 2022, through August 31, 2023.

## Data Reliability

OIG Audit reviewed UT Southwestern's system of internal controls, including components of internal control,<sup>3</sup> within the context of the audit objectives. OIG Audit assessed the reliability of data provided by UT Southwestern by tracing sample documentation support to Parkland Community Health Plan and Superior HealthPlan encounters and interviewing relevant UT Southwestern personnel knowledgeable about the systems and data. OIG Audit determined that the data was sufficiently reliable for the purpose of this audit.

## Criteria

OIG Audit used the following criteria to evaluate the information provided:

- Texas Medicaid Provider Procedures Manual, Vol. 2, "Medical and Nursing Specialists, Physicians, and Physician Assistants Handbook," § 9.2.26.2 (2022 through 2023)

## Auditing Standards

### Generally Accepted Government Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>3</sup> For more information on the components of internal control, see the United States Government Accountability Office's *Standards for Internal Control in the Federal Government*, (Sept. 2014), <https://www.gao.gov/assets/gao-14-704g.pdf> (accessed Aug 14, 2024).

## Section 2: Resources for Additional Information

The following resources provide additional information about the topics covered in this report.

### For more information on University of Texas Southwestern Medical Center:

Homepage, University of Texas Southwestern Medical Center,  
<https://www.utsouthwestern.edu/> (accessed Aug. 12, 2024)

### For more information about EEG service types:

Epilepsy Foundation, "Which EEG Type Is Best"?  
<https://www.epilepsy.com/diagnosis/eeg/which-eeg-type-best-you>  
(accessed Aug. 12, 2024)

Epilepsy Foundation, "Ambulatory EEG,"  
<https://www.epilepsy.com/diagnosis/eeg/ambulatory> (accessed Aug. 9, 2024)

## Section 3: Report Team and Distribution

### Report Team

OIG staff members who contributed to this audit report include:

- Anton Dutchover, CPA, Deputy Inspector General of Audit and Inspections
- Cody Redmond, CPA, CFE, Audit Director
- Ronald Cintron, CIA, CISA, CGAP, CRMA, Audit Project Manager
- John Poynor, Staff Auditor
- James Hicks, CISA, Quality Assurance Reviewer
- Kimberly Lee, Quality Assurance Reviewer
- Mo Brantley, Senior Audit Operations Analyst

### Report Distribution

#### Health and Human Services

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- Michael Lopez, Deputy Executive Commissioner for Operations, Medicaid and CHIP Services

## University of Texas Southwestern Medical Center

- Dr. Daniel Podolsky, President, UT Southwestern Medical Center
- Natalie Ramello, Vice President, Chief Institutional Compliance Officer and Interim Chief Audit Executive
- Angela Magee, Director, Health Systems Compliance



## Section 4: OIG Mission, Leadership, and Contact Information

The mission of OIG is to prevent, detect, and deter fraud, waste, and abuse through the audit, investigation, and inspection of federal and state taxpayer dollars used in the provision and delivery of health and human services in Texas. The senior leadership guiding the fulfillment of OIG's mission and statutory responsibility includes:

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- Susan Biles, Principal Deputy Inspector General
- Kacy J. VerColen, Chief of Audit and Inspections
- Eugenia Krieg, Chief of Staff, Chief of Policy and Performance
- Erik Cary, Chief Counsel
- Diane Salisbury, Chief of Data Reviews
- Matt Chaplin, Chief of Operations
- Steve Johnson, Chief of Investigations and Utilization Reviews

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- OIG website: [ReportTexasFraud.com](http://ReportTexasFraud.com)

### To Report Fraud, Waste, and Abuse in Texas HHS Programs

- Online: <https://oig.hhs.texas.gov/report-fraud-waste-or-abuse>
- Phone: 1-800-436-6184

### To Contact OIG

- Email: [oig.generalinquiries@hhs.texas.gov](mailto:oig.generalinquiries@hhs.texas.gov)
- Mail: Texas Health and Human Services  
Office of Inspector General  
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