



National Uniform Billing Committee

June 28, 2023

Optum
11000 Optum Circle
Eden Prairie, MN 55344-2503

To Whom It May Concern,

On behalf of the members of the National Uniform Billing Committee (NUBC), we are writing to express concern regarding inaccurate limitations placed on UB-04 Revenue Code 0761, Treatment Room within Optum's Uniform Billing Editor.

The NUBC is a Data Content Committee named in the Health Insurance Portability and Accountability Act of 1996 (HIPAA). In this role, we maintain and update the Official UB-04 Data Specifications Manual and the UB-04 claim form. The UB-04 claim form, also known as the CMS-1450 form, is the uniform bill for institutional providers, and the data elements referenced in the UB-04 Manual are incorporated into the electronic claims standard as called upon by HIPAA. The NUBC is composed of a diverse group of health care stakeholders representing providers, health plans, designated standards maintenance organizations, public health organizations, and vendors. Our goal is to promote the development of the data needs reported within a uniform claim for use by institutional health care communities and transmitted to all third-party payers.

It has been brought to our attention that the Optum Uniform Billing Editor may instruct payers to limit the use of Revenue Code 0761 by requiring that procedural CPT or HCPCS codes in the surgical range be coupled with the revenue code for reimbursement. This instruction conflicts with the UB-04 Manual. At its meeting in May, the NUBC conducted a thorough review of Revenue Code 0761 and discussed whether it was ever intended to be limited to specific CPT or HCPCS codes. The NUBC concluded that the committee has neither contemplated the need for Revenue Code 0761 to be coupled with a procedural CPT or HCPCS code in the surgical range nor has it intended to limit use of Revenue Code 0761 to surgical settings.

Optum promotes the Uniform Billing Editor as a resource that "provides detailed, accurate, and timely information about Medicare and UB-04 billing rules and assists the user with 5010 data and UB-04 and 837i requirements." In order to be consistent with the UB-04 and deliver the accurate information as promoted, we urge Optum to remove the conflicting information provided for Revenue Code 0761.

Thank you for your consideration of these comments. Please let me know if you have any questions or feel free to have a member of your staff contact me at tcunningham@aha.org.

Sincerely,

/s/

Terrence Cunningham, Chair
National Uniform Billing Committee