March 11, 2019

U.S. Citizenship and Immigration Services  
California Service Center

**Re: Petition for L-1B Status  
File: WAC1908350859**

**Petitioner: Optum Services, Inc.  
Beneficiary: Deepak Kumar**

Dear Sir or Madam:

This letter is submitted in response to the Request for Evidence (RFE) that was issued by your office on January 9, 2019, regarding Optum Services, Inc. (“Optum”)’s individual L-1B petition seeking to obtain Mr. Deepak Kumar’s temporary services in a specialized knowledge capacity as Applications Developer II. My name is Vijay D’Souza, Director of IT for Optum Services, Inc., and I am authorized to confirm the information contained herein for Optum Services, Inc.

**The Petitioner**

Optum Services, Inc. is part of UnitedHealth Group Incorporated (“UnitedHealth Group” or “Petitioner”), a leading healthcare company serving more than 85 million people worldwide. Optum Services, Inc. has its own federal taxpayer identification number and serves as the employer of many of the employees who work within UnitedHealth Group. However, for purposes of corporate identification and marketing, UnitedHealth Group stands as the identity of our corporate enterprise, which includes six major business units: UnitedHealthcare Employer & Individual, UnitedHealthcare Medicare & Retirement, UnitedHealthcare Community & State, OptumHealth, OptumInsight, and OptumRx. The business units are strategically linked, which allows us to offer exceptional service, broad capabilities, and enduring value in creating a modern healthcare system.

**Responses to Specific Questions/Requests**

1. **Proprietary Platform: Optum UHOne 2.0**

Optum would like to continue to employ Mr. Kumar in the Specialized Knowledge position of Applications Developer II for an initial period of three years. In this position, Mr. Kumar will work closely with business team in implementation and enhancement of Optum’s UHOne 2.0 application. The proprietary UHOne 2.0 application is Claims processing application for all the products launched by UHOne 2.0 in US market. The primary goal of the application is to support UHOne’s products like HPG2, Dental Gen3, and other short-term products in production pipeline by enabling the claim processing and payments to servicing provider.

The UHOne 2.0 application is essential to all UHOne claim processing for the products currently in market and others in production pipeline. UHOne’s commercial products like HPG2, Dental Gen3, and Lean Products generate claims which needs to be processed automatically within a the Service Level Agreement (SLA). If the SLA is not met, the Company could suffer interest or penalty to the practitioner/insured. The proprietary application is a critical business functionality for claims processing and UHOne products to succeed. The UHOne 2.0 application generates an **estimated revenue of $500 million per year**.

In addition to specialized knowledge of the UHOne 2.0 platform, the U.S. position also requires specialized knowledge in following proprietary UHOne 2.0 sub-applications:

* **Optum’s Claims Common OnRamp Application** is used to retrieve details of services rendered by service provider and calculate the amount to be paid to the Provider for the service performed. Using this information and additional data from FACETS, the application generates the Provider Remittance Advice and Explanation of Benefit for Providers and Patients respectively. This application informs the system the cost needed to be paid to the Provider or the Patient to settle a claim. This is one of the most complex and critical application, which was developed by Mr. Kumar in-house. If this application does not go live, claim processing will be hindered and it will result in vast economic losses for UHOne.
* **Facets UHOne Finance Transactions Application** is used for receipt processing of check payments received from Lockbox accounts including Fiserv, FIS, and Fifth Third Bank. The policy holder enrolled on UHOne products on Facets can make payments through checks. When a customer requests to pay their premium payment through a third party bill payment, and the third party bill payer sends a deposit file of the subscriber's payment detail to Facets, the system then uploads the premium payment file every business day. The system accepts and applies the funds accordingly.
* **Facets UHOne Eligibility CDB** is a proprietary application is used for loading Subscribers eligibility and Demographic details into FACETS. FACETS is a data model which is highly customized for UHOne2.0 use. This load is part of several customizations that is done to keep the database updated with correct eligibility information. Once the data is loaded several downstream applications use that data. This process is critical as many downstream applications are dependent on data loaded.
* **Health Allies Discount Card (“HADC”)** is a Company initiative that was created in response to the Affordable Care Act. The HADC that is projected to be launched this year as a simple plan where the consumer can avail discounts at hospitals, clinics, pharmacies, and other healthcare providers. The HADC initiative has an enrollment of approximately 10,000 customers that were all set up on Facets using Real time interaction with the E-store Enrollment portal. The 2018 forecast gross sales estimates over 580,000 new members. This innovative Company initiative has an operating budget of $9.1 million.
* **Custom Facets Batch Framework:** Facets is a Trizetto product that is highly customized to support UHOne business. The customization is done using proprietary in-house batches. Mr. Kumar has supported the implementation of these, including UHOne Claims Batch, UHOne Billing Batch, UHOne Enrollment Batch, UHOne Provider Load Batch, and UHOne Enrollment Batch.
* **UHOne Claims Process:** Once a claim is received, it is loaded into XC tables and then adjudicated by UHOne CKMM batch to store in FACETS core tables. These tables are used by many applications for accounting and reporting process.

1. **Specialized Knowledge Position in the U.S.:**

Mr. Kumar has been an integral part of the UHOn2 application and developed proprietary components such as the Common OnRamp Application, utilizing his specialized knowledge in the UHOne 2.0 Claims process. The Common OnRamp Application manages all claims processing for UHOne products launched in the United States. The primary goal of the application is to support UHOne’s products like HPG2, Dental Gen3 and other short-term products in pipeline by enabling the claim processing and payments to servicing provider. Whenever a provider (Practitioner or Facility) provides service to a patient, he submits claim (paper or electronic) to insurer i.e. UHOne. Based on the service rendered and the visit amount paid by the patient, a fair amount needs to be paid to provider or patient for each claim.

Consequently, Optum has decided to further enhance UHOne 2.0 to address the changes needs in US healthcare system and, hence, Mr. Kumar’s vast expertise is required to continue to improve the quality of services delivered to our consumers by updating and implementing new functionalities to this robust and reliable proprietary platform. Optum is currently engaged in increasing the number of UHOne products launched in US market in response to Affordable Care Act. To further this business need, the UHOne2.0 claim processing functionality will be implemented for the HPG2 (Health Protector Guard 2) product, with later plans to implement this functionality in Dental Gen3, Lean Products, and other Short Term products. All these UHOne commercial products will rely on the Common OnRamp Application developed by Mr. Kumar. As Mr. Kumar was the developer who created the Common OnRamp Application, he is the only employee inside or outside of Optum with the specialized knowledge required to implement these features into the new products.

Due to regulations related to the Personal Health Information protected data, these business critical projects cannot be conducted from offshore. Thus, Optum requires Mr. Kumar’s US presence to complete these critical product enhancements. Further, same time zone presence and availability will ensure accelerated and expedite delivery for stringent project schedules and enhancement of business knowledge. His presence is critical for the smooth delivery and implementation of all the above enhancements to production as it directly impacts the Company’s business interests and quality of service provided to the Optum and UnitedHealth Group’s customers.

Further, Mr. Kumar will work in parallel with business teams in the deploying the changes for below system enhancements which are still changing and requires Mr. Kumar expertise for 2019 Q1,Q2 and Q3 deliverables as already agreed to by Business:

* **HPG2:** HPG2 is the first medical product to be launched by UHOne which will generate claims. Whenever a provider (Practitioner or Facility) provides service to a patient, they submit a claim (paper or electronic) to the insurer through the UHOne application. Based on the service rendered and the visit amount paid by the patient, a fair amount needs to be paid to the provider or patient for each claim. The proprietary HPG2 application, developed in-house by Mr. Kumar, calculates the amounts to be paid to the provider or patient by UHOne. The proprietary application uses hundreds of business logics rules and algorithms specific to a product for this calculation. Once the calculation is done, the application tells the printing vendor to issue check for the amount to be paid along with PRA (Provider Remittance Advice) and EOB (Explanation Of Benefits). Without this application in place, the claim cannot be issued, which results in failure of the products launched in market.

More specifically, in the U.S. role Mr. Kumar is needed to perform the following specialized knowledge duties:

|  |  |  |
| --- | --- | --- |
| **Specialized Knowledge Professional Position** | | |
| **Specialized Knowledge Duty** | **Specific, day-to day task involved in the completion of duty** | **Percentage of time spent performing each duty** |
| Implementation of the Common OnRamp Application until production. | * Mr. Kumar developed the Common OnRamp Application from scratch and will be working on implementation of the application with the go live. * Mr. Kumar will lead all testing initiatives and collaborate with a variety of business teams to incorporate any feature changes required in the application. * Upon completion of business and acceptance testing, Mr. Kumar will lead all implementations in the production phase. * As per the project policy, Mr. Kumar will be providing warranty support of the application for two months. * Once the proprietary application goes live for HPG2 application, Mr. Kumar will continue to support the product while working on enhancement for other products to be launched. * Because Mr. Kumar developed critical Common OnRamp application for UHOne 2.0, he is the only employee with the specialized knowledge to perform these duties. | 40% |
| Analyse Common OnRamp Application for enhancing it to support other future products | * Mr. Kumar will participate in the business requirement walkthroughs and discussions with business partners regarding complex changes needed on the application and will conduct feasibility analysis on the requirements needed for enhancement for future products. * He will lead the preparation of technical specification documents and detail design documents for all the changes that come as requirements in the project. * Mr. Kumar will prepare Technical Specification documents and conducts regular meeting with business to obtain the necessary approvals for the defined scope. * He will be responsible for coordinating with the offshore team for the end-to-end development, and will act as the Single Point of Contact in all questions regarding the application. * Mr. Kumar is the development lead for his team and will be responsible for removing any roadblocks or technical challenges the team faces. * Mr. Kumar will work with business to answer functional questions. * Mr. Kumar is the only resource with expertise on the application able to understand the requirements and verify the business standard point. * Mr. Kumar’s experience equips him to give feasibility checks in the stipulated timeframe. * His frequent interactions with application owners have given him the necessary knowledge and experience to develop a better understanding of the entire application. * Because Mr. Kumar developed critical Common OnRamp application for UHOne 2.0, he is the only employee with the specialized knowledge to perform these duties | 30% |
| **System Testing** | * Mr. Kumar will work with the Quality Analysis team to help them understand the test scenarios. * He will lead test case walkthrough and provide suggestions for validating all scenarios. * He will assist the QA team in creation of test data in all scenarios based on the requirement and will provide support in creation of test data for all the scenarios by providing the execution steps to the QA team for testing the process flow. * He will be responsible for tending the concerns raised by the QA team and taking necessary action on them. * Mr. Kumar will be responsible for resolving any defect or issue raised by QA or business team. * Because Mr. Kumar has been directly involved with many UHOne 2.0 applications, he is the only employee with the specialized knowledge to lead these QA duties. | 10% |
| **Deployment and Validation** | * Mr. Kumar has been associated with the UHOne project 40 months, which gave him a firm understanding of the processes used in almost all the modules of UHOne Facets. * Mr. Kumar will resolve all the production deployment and post-deployment issues. * He will provide post deployment support in the form of business change requests and ensure that all the required processes and standards have been followed to ensure that high quality deliverables to the business users. * Mr. Kumar will work with infrastructure team to conduct root cause analysis of any production failure. * As per the policy, Mr. Kumar will be supporting the application for continuous 2 months once it goes live. | 10% |
| **Onshore/offshore coordination** | * Mr. Kumar will act as the communication liaison between business and development teams at offshore. * He will provide updates to business partners, Application Leads and Solution Architects on the project’s progress and discusses any potential issues affecting the project implementation. * Mr. Kumar being dev lead, he is responsible for delivery and meeting the deadlines for a deliverable. He’ll be working with the team to remove any roadblock whether technical or functional * Mr. Kumar will work with business to discuss requirement gap and define a solution needed for the project. | 10% |

In order to perform these tasks, a minimum of 24 months training and hands on experience with the UHOne 2.0 application and all its tools and technologies is required for someone to come up at a minimal level for the position. It is extremely difficult to hire and train a new resource and get them adapted with the activities that are being performed in the application along with its vast technical and functional knowledge. UHOne 2.0 is a business-critical project and the services provided to the Company are impacted if the position is not filled with an experienced resource. The experience that Mr. Kumar possesses in the application are un-paralleled and can’t be transferred in terms of knowledge of Optum’s proprietary applications and designing robust solutions for quality and accuracy testing for UHOne 2.0 and its related applications. Detailed knowledge of the application and underlying processes gained during his role abroad enables him to identify the pain areas for Business and provide the solution quickly, so that UnitedHealth Group can compete in the market.

In performing each of these day-to-day job duties, Mr. Kumar must directly apply the extensive, highly specialized knowledge of Optum’s proprietary frameworks, applications, products, and/or technologies, that he acquired in our organization abroad.

1. **Beneficiary’s Specialized Knowledge:**

Mr. Kumar has worked on the UHOne 2.0 application for Optum since November 2015. Mr. Kumar has a profound understanding of the importance of the UHOne 2.0 application and how it relates to Optum and UnitedHealth Group’s vital business goals. Through his more than 40 months working on UHOne 2.0 Mr. Kumar gained highly specialized knowledge the proprietary platform and its associated proprietary tools. Mr. Kumar emerged as the Subject Matter Expert and key contributor accountable for the design, development, and solution coordination for this platform and its applications. In addition to his extensive experience with the UHOne 2.0 application team, he has obtained extensive training exclusive to UHOne 2.0 projects that is unique to him and his experience with the application. Mr. Kumar has been involved in more than 10 individual UHOne 2.0 development projects representing more than $500 million in total project funding. The specialized knowledge in this proprietary application is imperative to handling the future development and integration projects for the UHOne 2.0 application, for which Optum is requesting authorization for Mr. Kumar work on in the United States.

The U.S. position has the dual responsibility of understanding and participating in the technical application development initiatives for the platform as well understanding the business efforts by Optum. Mr. Kumar has proven to be exceptionally talented and understanding how Optum’s business technologies are utilized by Optum and UnitedHealth Group’s business staff, and has developed tools to facilitate business utilization of UHOne 2.0’s technical capacity.

Specifically, Mr. Kumar has innovated and developed the following UHOne 2.0 tools:

1. **KeyBank Holiday Calendar:** Keybank has different holiday calendar from Federal holidays. There was a challenge as existing federal holiday calendar could not be used for Keybank and it required huge amount of manual work to keep the application working properly. Mr. Kumar developed and implemented this automated process which helped the application run without any manual intervention.
2. **Talend dynamic context:** While deploying Talend application one had to take different versions or different environment like test, stage, or production. Mr. Kumar developed a ways for a test application to be deployed and triggered in various application just by passing parameters. This helped reduce the manual work involved in deploying application in various environments.

The position also requires an advanced level of expertise in handling business stakeholders and clients during application demos, requirement understanding, answering queries/questions, meeting their expectations, and resolving conflicts and issues; advanced knowledge in handling complex and unique technical, infrastructure, database, performance, monitoring, reporting and security issues during production deployments; and expertise in handling day to day user issues related to working, availability, and access of the application and its resources.

This level of expertise cannot be attained through trainings only, but also requires extensive relevant work experience. Mr. Kumar has a strong technical background as he possesses a Bachelor’s of Engineering in Mechanical Engineering from Annamalai University. He also has acquired advanced technical knowledge in the healthcare and insurance technology industry through working in this industry for nearly 6 years, most of which involved working with Optum’s proprietary applications, tools, and technologies. Using these unique set of skills, he ensures development, quality testing, and serves as the Subject Matter Expert for UHOne 2.0. His strong expertise in Optum’s technologies, as well as specialized knowledge in our proprietary applications, facilitates client interaction, analysis of software and hardware engineering requirements, and onsite and offshore product development. It also helps him to easily understand the changing requirements for enhancing the application. Mr. Kumar has developed the application in-house and is uniquely qualified to implement the business-critical enhancements on the upcoming products. The upcoming products will have distinct pricing logic, and Mr. Kumar is the only employee with the specialized knowledge of the UHOne 2.0 and Common OnRamp Applications required to support the new products.

Mr. Kumar **has been asked to perform this specialized role in the U.S. because no Optum employee in the U.S. or abroad possesses the same level and *combination* of experience, training, and knowledge to be able to perform these critical project tasks.**

Mr. Kumar is the Subject Matter Expert for UHOne 2.0 and has been the only team member to serve in his function for the last 40 months. Currently we do not have any more-qualified candidates to meet these criteria that will be available to support and maintain the momentum that is needed to deploy all these key programs for Optum and UnitedHealth Groups’ needs.

The table below lists the resources, along with their specialization, who perform similar type of work in the organization:

|  |  |  |  |
| --- | --- | --- | --- |
| **Team Member** | **Months of Experience with UHG Technology** | **Education**  **Specialized Training or**  **Certifications** | **Description of job duties noting unique skillset** |
| Deepak Kumar  Applications Developer II | 40 Months | Education: Bachelor’s of Engineering  Certified in:  AHM250 certified  Specialized training in:  UHOne 2.0 Claims and Finance processing, Talend, Mulesoft | * Analyze project requirements. * Develop applications based on the business requirements. * System testing. * Lead the Scrum team to develop project deliverables. * Test automation for developed application * Answer any question that the team has while working on the deliverable   Mr. Kumar is the only resource with specialized knowledge of the UHOne 2.0 application required to develop the Common OnRamp application from scratch and implement these claims process into future state products. |
| Nitin Singh  Applications Developer II | 24 months | Education: Bachelor’s of Engineering.  Specialized training in:  Talend | * Development and support based on requirements given.   This resource cannot perform the Beneficiary’s job duties because does not have complete functional knowledge of the UHOne 2.0 Claims process and has not been involved in the development of the application. |
| Rishabh Joshi  Associate Applications Developer II I | 24 months | Education: Bachelor’s of Engineering.  Specialized training in:  Talend | * Development and support based on requirements given.   This resource cannot perform the Beneficiary’s job duties because does not have complete functional knowledge of the UHOne 2.0 Claims process and has not been involved in the development of the application. |
| Shilpa Hosahalli Chikkegowda  [Title] | 27 months | Education: Bachelor’s of Engineering.  Certified in: FAHM | * System Analyst. * Gathers requirements.   This resource cannot perform the Beneficiary’s job duties becauseshe is a system analyst with no development experience. She has not worked on the development of Optum’s claims processes or the Common OnRamp Application. |

Mr. Kumar has been associated with the UHOne 2.0 for around 40 months. He is the Subject Matter Expert and is the key contributor who is accountable for design, development, support, and enhancement of Optum’s proprietary UHOne 2.0 and Common OnRamp applications. He is also the expert on related subsystems like Payment Engine, EPS system, and others. Throughout his experience with Optum, Mr. Kumar gained highly specialized knowledge which is extremely important to provide the best solution for enhancing and updating for new products and additional requirements. Along with his technical expertise, he has gained functional specialization some of the most crucial segments of Optum Business, and has innovated tools to help Optum and UnitedHealth Group’s business staff fully utilize them. His knowledge of these key business areas is essential in building the Common OnRamp Application and is vital to the success of the Company’s continued business. He has designed and architected major components in the proprietary application and is responsible for many major releases in the UHOne 2.0 application making him the only resource having complete end to end exposure to this application both in technical and functional aspects.

Mr. Kumar is the expert on UHOne 2.0 process due to his extensive working session with business while developing the Common OnRamp Application. Mr. Kumar is the key resource on the team and supports critical test automation batch processes for the proprietary application. He is relied upon to fix major issues in a timely manner to minimize impact on other development actions. By working on these batch issues, Mr. Kumar has attained a very special and valuable knowledge on how to resolve any errors that may occur in the UHOne 2.0 claims process.

**Conclusion**

Mr. Kumar’s experience with Optum has provided him with in-depth knowledge and understanding of Optum’s specialized procedures, products, operations and technologies, that cannot be found in the general workforce. Such knowledge would be difficult to impart to another individual without significant economic harm to the company, especially in light of the stringent timelines for the massive planned updates to UHOne 2.0. In addition, Mr. Kumar’s extensive, directly-related experience and role at our foreign subsidiary ensures that he is highly qualified to assume this important specialized knowledge position at our offices in the United States. It is evident that Mr. Kumar’s specialized knowledge experience with Optum Global Solutions (India) Private Limited relates directly to the core of our organization.

We respectfully request that you favorably adjudicate the L-1B petition on behalf of Mr. Kumar. Please contact our counsel directly if you require additional information.

Thank you in advance for your assistance.

Sincerely,

Optum Services, Inc.

Vijay D’Souza  
Director of IT, Optum