

Justification of Non-material Change

During our August 23, 2007 PERM conference call, HHS and OMB agreed that HHS would resubmit the CAP SHO letter that includes the forms with the control numbers on the forms. Attached please find the collection instrument for OMB review and approval under the following OMB control numbers: 0938-0974; 0938-0994, and 0938-1012. Per the discussion with you during that call, the aforementioned collections already account for the burden associated with gathering the required information for submission to CMS. We are forwarding the attached collection instrument for immediate review and approval. However, upon instruction from OMB, we will also submit the forms through the standard change worksheet (83-C) process for each of the respective information collections.