

Justification for Non-material Modifications

0938-0930 (CMS-10106)

By statute, we cannot accept the HIPAA authorization form unless disclosures are made about the right to revoke authorization and the impact of authorizing disclosure (number 7 on form CMS-10106). We receive hundreds of these forms each week associated with freedom of information act (FOIA) requests. Frequently, the form is submitted without the signature. Due to the currently approved structure of the form, we constantly have to return the form back to the requestors to have them send the signed copy back to us with the last page attached. We have reorganized the form without changing any content to help prevent the aforementioned problem. This non-material modification is reflected in both the English language and Spanish language versions of the form.