

CROSSWALK DOCUMENT FOR CHANGES TO CMS-1696
(Appointment of Representative (AOR))
SUBMITTED FOR COLLECTION

SUMMARY OF CHANGES TO CMS-1696: In conjunction with statutory changes to the appeals process under BIPA and MMA (Benefits Improvement and Protections Act of 2000, and the Medicare Modernization Act of 2003, respectively), the requirements for appointing representatives for claims and appeals processed under 42 CFR Part 405 Subpart I were codified into regulation at 42 CFR 405.910. In summary, section 405.910 states an individual or entity may appoint a representative to act on their behalf in exercising their rights relative to an initial claim determination or an appeal. The appointment of representation must be in writing and must include all the required elements specified in 405.910(c). The burden associated with this requirement is the time and effort of the individual or entity to prepare an appointment of representation containing all the required information of this section. To reduce some of the burden associated with this requirement, we developed a standardized form that the individual/entity may opt (but is not required) to use. The AOR was last approved by OMB on December 31, 2025; however, with this submission, there are non- substantive changes to the form. There are no changes that will affect existing AOR users.

The following non-substantive changes have been made to the form:

- Revised to correct form field edits in the fillable pdf version.
- Reformatted sections and added clarifying language to help Medicare beneficiaries and Medicare Advantage enrollees understand where to send the AOR form after completion, to ensure the form gets filed appropriately.

The AOR is an existing collection and is in use. It is our expectation that the non-substantive changes to the form will have little effect on burden for all users.