



U S Steel Tower Floor 41 • 600 Grant Street • Pittsburgh, PA 15219-2704 • 412-255-4640

August 1, 2007

CMS, Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attn: Bonnie L. Harkless
Room C4-26-05
Security Boulevard
Baltimore, MD 21244-1850

RE: Comments to - Agency Information Collection Activities: Proposed Collection;
Comment Request
Document Identifier: CMS-10106

Dear Ms. Harkless:

Gateway Health Plan (H5932, H8031) would like to submit the following regarding the posting identified above as posted in the Federal Register / Vol. 72, No. 110 / Friday, June 8, 2007 / Notices.

CMS-10106 – Medicare Authorization to Disclose Personal Health Information.

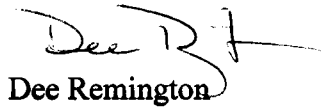
- It isn't clear if CMS is indicating that sponsors will be required to use this standard form instead of the sponsor's own authorization form.
- If there is a generic form for all sponsors to use, will each sponsor be responsible for keeping those completed forms for their own beneficiaries or will there be a **centralized repository for the completed forms**? A **centralized repository** may be cumbersome and costly.
- It isn't stated that the form will include information with respect to the process to be followed for revoking the authorization should a beneficiary later change their mind. It is our understanding that the revocation process must be a part of the form.
- Authorizations can be for a set time or dependent upon services or conditions vs. a blanket authorization to share all information with a particular individual. Will these provisions still be applicable to the proposed standard form?
- It isn't stated how CMS intends to handle incomplete authorizations.

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- Special Needs Plans encounter some challenging situations with beneficiaries and completion of these forms that other sponsors may not see or not see as frequently. Please consider the unique circumstance of dealing with Special Needs populations.

Please contact me with any questions regarding these comments by phone at 412-255-7198 or by email at dremington@gatewayhealthplan.com.

Sincerely,

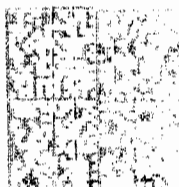
A handwritten signature in black ink, appearing to read "Dee R. H.", with a stylized flourish extending to the right.

Dee Remington
Government Affairs Specialist
Gateway Health Plan



GATEWAY Health Plan

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