Statement on lobbying

Applicants and other interested parties must not engage in “lobbying” for or against code change requests. “Lobbying” means unsolicited communications of any kind made at any time (including during Editorial Panel meetings) for the purpose of attempting to improperly influence either:

- CPT/HCPAC Advisors’ or their societies’ evaluation of or comments upon a code change request or
- Voting by members of the Editorial Panel on a code change request

Any communication that can reasonably be interpreted as coercion, intimidation or harassment is strictly prohibited. Violation of the prohibition on lobbying may result in sanctions, such as being suspended or barred from further participation in the CPT process.

Information that accompanies a code change request, presentations or commentary to the Editorial Panel during an open meeting or to a workgroup during a workgroup meeting, and responses to inquiries from a Panel member or a CPT staff member, do not constitute “lobbying.”

View examples of permitted activities and impermissible activities (PDF).

In order for the CPT Editorial Panel to effectively review and act on proposed changes to the CPT code set, code change applications must be reviewed by CPT/HCPAC Advisors and the Editorial Panel based on the information contained in the application and available clinical literature. CPT staff is responsible for organizing and submitting information to CPT/HCPAC Advisors and the Editorial Panel for consideration. Information relating to a code change application must be submitted to CPT staff no later than 30 days prior to the start of the Editorial Panel meeting at which the code change application will be considered. In some cases, the chair of the Editorial Panel may establish rules which allow for supplemental submissions of information to workgroups or facilitation sessions established by the chair or for postponed or appealed agenda items. (A “facilitation session” is an informal meeting requested by the chair during a CPT Editorial Panel meeting to allow interested parties to confer and attempt to reach a consensus recommendation for presentation at the meeting).

During development of a code change application, an applicant may seek input or assistance from a medical specialty society but may not engage, either directly or via proxies, in “lobbying” as defined above. Requests for input or assistance should be directed to the society’s staff or leadership as indicated in the society’s guidelines. Such requests may not be made after the deadline for submission of applications for an upcoming meeting of the CPT Editorial Panel. Application deadlines
are posted on the Calendar for Upcoming Meetings of the CPT Editorial Panel page.

Medical specialty societies may have their own policies governing interactions with applicants or other interested parties regarding code-change requests. The AMA encourages medical societies to work with applicants, from both industry and other medical specialty societies, to assure that code-change applications are complete, coherent and consistent with current medical practice and does not discourage specialty society advisors from seeking advice or clarification of information from Panel members on new agenda items or items of old business through the process managed by AMA staff. Contacts with consulting medical societies should be limited to that which is necessary to construct and submit the code change application. After a code-change application is submitted to the AMA, contact between an applicant and medical society representatives should be confined to communications managed by the AMA CPT staff unless the medical society is a co-requester on the code-change application.

If an entity that does not have a CPT/HCPAC Advisor learns of an application as to which it may be an “interested party,” the entity may request an opportunity to review the code-change application and submit a written comment to the AMA for consideration by CPT/HCPAC Advisors and the CPT Editorial Panel. The entity must deliver such a request to AMA CPT staff and not contact the applicant or CPT/HCPAC Advisors or members of the CPT Editorial Panel. If an applicant or other interested party wishes the CPT/HCPAC Advisors or the Editorial Panel to consider additional information, that information must be submitted to AMA's CPT staff and not directly to CPT/HCPAC Advisors or the Editorial Panel.

Applicants and other interested parties are invited to participate in open CPT Editorial Panel meetings and present their views on code-change requests when recognized by the chair during the course of the meeting. The views of applicants and other interested parties may be sought during work group or facilitation sessions established by the chair and participation in a workgroup or a facilitation session is not considered lobbying.

Complaints about lobbying should be reported promptly in writing to the director, CPT Coding and Regulatory Affairs.

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