



Conflict of Interest Policy of the CPT Editorial Panel Applicable to CPT Editorial Panel Members, Workgroup members, CPT/HCPAC Advisors, and Presenters

I. Persons Covered by this Policy

Every CPT® Editorial Panel member (“Editorial Panel member”) shall disclose all individual and corporate **disclosable interests** as defined below prior to discussing or voting on an Editorial Panel agenda item. Every Editorial Panel member shall disclose all individual and corporate **disclosable interests** on an annual basis, and, if their **disclosable interests** should change during the course of the year, prior to consideration of an agenda item before the Editorial Panel. Disclosures are to be made on the Statement of Compliance attached to this Conflict of Interest Policy (“Policy”). Editorial Panel members may not participate in editorial discussions and decisions about any CPT® agenda item or issue that deals with a matter in which the Editorial Panel Member, or immediate family member, has an individual or corporate **material interest** as described below.

Every member of a CPT Workgroup, whether an ad hoc or standing Workgroup (“Workgroup member”) shall disclose all individual and corporate **disclosable interests** as defined below prior to the first meeting of the Workgroup and prior to discussing or voting on any matter under consideration by the Workgroup. Disclosures are to be made on the Statement of Compliance attached to this Policy, which shall be submitted annually and promptly updated and resubmitted if a Workgroup member’s **disclosable interests** should change during the term of the Workgroup. Voting Workgroup members may not participate in any Workgroup decisions (i.e. voting) about an issue that deals with a matter in which the Voting Workgroup member, or immediate family member, has an individual or corporate **material interest** as described below.

Every Primary Advisor and Alternate Advisor on the Health Care Professionals Advisory Committee (“HCPAC”) and CPT® Advisory Committee (collectively, CPT/HCPAC Advisor” or “Advisor”) submitting an opinion or comment to the CPT Editorial Panel related to a code change proposal shall disclose all individual and corporate **disclosable interests** as defined below. Disclosure shall be made electronically on the Advisor Response Form attached to this Policy during the Advisor comment period prior to a meeting of the CPT Editorial Panel at which the code change proposal will be addressed. Advisors may not express an opinion or comment, including as a Presenter or speaker from the floor at CPT Editorial Panel meetings, about any agenda item or issue that deals with a matter in which the Advisor, or immediate family member, has an individual or corporate **material interest** as described below. In the event a Primary Advisor cannot participate due to a **material interest**, the Alternate Advisor may provide an opinion or comment if such individual does not also have a **material interest**.



Every code change proposal applicant or their designee(s) making a presentation (“Presenter”) to the CPT® Editorial Panel on a code change proposal shall disclose all individual and corporate **disclosable interests** as defined below, but without regard to financial limit. Presenters who are applicants shall complete a written disclosure at the time of the code change proposal application. Presenters who are a designee(s) of the code change proposal applicant shall complete a written disclosure in response to the “presenter letter” sent to applicants approximately two weeks in advance of the meeting of the CPT Editorial Panel. All Presenters are also asked by the Chair of the CPT Editorial Panel to make a verbal disclosure of individual and corporate interests at the time of presentation. Any disclosable interest that is a **material individual interest** or a **material corporate interest** must be designated as such in the disclosure.

II. Definitions

“**Immediate family**” means a spouse, domestic partner, parent, child, brother or sister of an Editorial Panel member, Workgroup member, Advisor or Presenter. Requirements for disclosure of interests of immediate family apply to the extent such interests are known by such persons.

“**Disclosable individual interest**” means cash, goods or other value (e.g., consultancies, speaking honoraria, salary or salary support, research or other grant support, stock ownership or options, expert testimony, royalties or other intellectual property rights, service on a speakers bureau, gifts, or paid travel and vacation) [i] with respect to Editorial Panel members, or their immediate family members, the receipt or promise of which is related to the activities of the Editorial Panel; [ii] with respect to Workgroup members, or their immediate family members, the receipt or promise of which is related to the activities of the Workgroup; [iii] with respect to Advisors and Presenters, or their immediate family members, the individual may benefit financially (as described above) from the approval or denial of the code change; [iv] with respect to Editorial Panel and Workgroup members and Advisors, the interest exceeds \$1,000 in the aggregate for the past two years; and, [v] with respect to Presenters the interest exceeds \$1.00 in the past two years.

“**Disclosable corporate interest**” means cash, goods or other value (e.g., increased sales, decreased sales of competitors, increased value of intellectual property, increased grant support, etc.) which in the aggregate exceeds \$5,000 within the past two years or is reasonably expected to exceed \$5,000 in the next two years, only where:

(A)[i] the Editorial Panel or Workgroup member, Advisor, or their immediate family is an owner, director, officer, employee, consultant or agent of a company, partnership or other business entity (“business”), and [ii] the Editorial Panel member, Workgroup member, Advisor or their immediate family is responsible for developing, producing or marketing a product or service of the business that may be affected by decisions of the Editorial Panel, and [iii] the Editorial Panel member, Workgroup member or Advisor is or reasonably should be aware the business may receive such interest as a result of a decision of the Editorial Panel, or



(B) with respect to Advisors and Presenters, the person is a consultant, agent, or employee and the Advisor or Presenter should reasonably be aware that their client or employer have or may receive such interest as a result of the approval or denial of the code change proposal.

“Material individual interest” means a disclosable individual interest the value of which exceeds \$10,000 in the aggregate within the past two years.

“Material corporate interest” means disclosable corporate interest the value of which in the aggregate exceeds \$10,000 within the past two years or is reasonably expected to exceed \$10,000 in the next two years.

The above disclosure of interests does not include [i] any interest that is limited to providing clinical services to patients (including the service for which a code change proposal has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

For Panel members nominated by payers, an individual or corporate **disclosable interest** or **material interest** does not include any interest arising in connection with employment (e.g., compensation and benefits) and relating to the individual’s employment responsibilities including consideration of the fiscal interests of those payers.

Please sign and return the attached Statement of Compliance in accordance with this Policy.

III. Interpretation and Application of the Policy

The AMA’s Office of General Counsel reviews disclosures made pursuant to this Conflict of Interest Policy and makes recommendations to CPT staff and the Chair of the Editorial Panel with respect to such disclosures. Upon request, the Office of General Counsel will give advance, interpretive guidance to Editorial Panel members, Workgroup members, Advisors, and CPT staff regarding the application of this Policy.

This Conflict of Interest Policy supersedes all prior conflict of interest policies pertaining to CPT Editorial Panel and Workgroup members, CPT/HCPAC Advisors, and Presenters

Adopted: CPT Editorial Panel
October 15, 2011



Statement of Compliance of CPT *Editorial Panel Members* with the Conflict of Interest Policy of the CPT Editorial Panel (“Conflict of Interest Policy”).

I affirm that I have read and understand the Conflict of Interest Policy, a copy of which is appended to this statement. I have no individual or corporate **disclosable interests** at this time, except as set forth below. I understand that I have a continuing obligation to comply with the Conflict of Interest Policy and will update this form [i] during the course of the year, [ii] prior to discussion or voting on a Panel agenda item, and [iii] annually at the request of the Chair of the Editorial Panel.

DISCLOSABLE INTERESTS

(INDICATE IF MATERIAL INTEREST)

Print Name _____

Signature _____

Date _____

For convenience, key elements of the Conflict of Interest Policy applicable to CPT ***Editorial Panel Members*** are summarized below. The Conflict of Interest Policy in its entirety is controlling (please refer to the appended Conflict of Interest Policy in its entirety):

- CPT Editorial Panel members must disclose all individual and corporate disclosable interests as defined in the Policy held by the member or the member’s immediate family.
- “***Immediate family***” means a spouse, domestic partner, parent, child, brother or sister of an Editorial Panel member. Requirements for disclosure of interests of immediate family apply to the extent such interests are known by the Editorial Panel Member.
- “***Disclosable individual interest***” means cash, goods or other value (e.g., consultancies, speaking honoraria, salary or salary support, research or other grant support, stock ownership or options, expert testimony, royalties or other

- intellectual property rights, service on a speakers bureau, gifts, or paid travel and vacation) that, with respect to Editorial Panel members, or their immediate family members, the receipt or promise of which is related to the activities of the Editorial Panel, and the value of which exceeds \$1,000 in the aggregate for the past two years.
- **“Disclosable corporate interest”** means cash, goods or other value (e.g., increased sales, decreased sales of competitors, increased value of intellectual property, increased grant support, etc.) which in the aggregate exceeds \$5,000 within the past two years or is reasonably expected to exceed \$5,000 in the next two years, only where: [i] the Editorial Panel member or the member’s immediate family is an owner, director, officer, employee, consultant or agent of a company, partnership or other business entity (“business”), [ii] the Editorial Panel member or the member’s immediate family is responsible for developing, producing or marketing a product or service of the business that may be affected by decisions of the Editorial Panel, and [iii] the Editorial Panel member is or reasonably should be aware the business may receive such interest as a result of a decision of the Editorial Panel.
 - Editorial Panel members may not participate in editorial discussions and decisions about any *CPT*[®] agenda item or issue that deals with a matter in which the Editorial Panel member, or immediate family member, has an individual or corporate **material interest, i.e.** the value of such interest exceeds \$10,000 in the aggregate over a two year period.
 - Disclosure form must be submitted annually and updated if disclosable interests change during the year. Disclosable interests must be orally disclosed prior to discussing or voting on an Editorial Panel agenda item.
 - Individual and corporate **disclosable interests** do not include [i] any interest that is limited to providing clinical services to patients (including the service for which a code change proposal has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
 - **“Material individual interest”** means a disclosable individual interest the value of which exceeds \$10,000 in the aggregate within the past two years.
 - **“Material corporate interest”** means disclosable corporate interest the value of which in the aggregate exceeds \$10,000 within the past two years or is reasonably expected to exceed \$10,000 in the next two years.
 - For Editorial Panel members nominated by payers, an individual or corporate **disclosable interests** does not include any interest arising in connection with employment (e.g., compensation and benefits) and relating to the individual’s employment responsibilities including consideration of the fiscal interests of those payers.



Statement of Compliance of CPT Workgroup Members with the Conflict of Interest Policy of the CPT Editorial Panel (“Conflict of Interest Policy”)

I affirm that I have read and understand the Conflict of Interest Policy, a copy of which is appended to this statement. I have no individual or corporate **disclosable interests** at this time, except as set forth below. I understand that I have a continuing obligation to comply with the Conflict of Interest Policy and will update this form prior to every Workgroup meeting.

DISCLOSABLE INTERESTS (INDICATE IF MATERIAL INTEREST)

Print Name _____

Signature _____

Workgroup _____

Date _____

For convenience, key elements of the Conflict of Interest Policy applicable to CPT **Workgroup Members** are summarized below. The Conflict of Interest Policy in its entirety is controlling (please refer to the appended Conflict of Interest Policy in its entirety):

- Workgroup members, whether members of an ad hoc or standing Workgroup, must disclose all individual and corporate disclosable interests as defined in the Policy held by the member or the member’s immediate family.
- “**Immediate family**” means a spouse, domestic partner, parent, child, brother or sister of a Workgroup member. Requirements for disclosure of interests of immediate family apply to the extent such interests are known by a Workgroup member.
- “**Disclosable individual interest**” means cash, goods or other value (e.g., consultancies, speaking honoraria, salary or salary support, research or other grant support, stock ownership or options, expert testimony, royalties or other intellectual property rights, service on a speakers bureau, gifts, or paid travel

and vacation) that, with respect to Workgroup members or their immediate family members, the receipt or promise of which is related to the activities of the Workgroup, and the value of which exceeds \$1,000 in the aggregate for the past two years.

- “**Disclosable corporate interest**” means cash, goods or other value (e.g., increased sales, decreased sales of competitors, increased value of intellectual property, increased grant support, etc.) which in the aggregate exceeds \$5,000 within the past two years or is reasonably expected to exceed \$5,000 in the next two years, only where (A)[i] the Workgroup member or the member’s immediate family is an owner, director, officer, employee, consultant or agent of a company, partnership or other business entity (“business”), [ii] the Workgroup member or the member’s immediate family is responsible for developing, producing or marketing a product or service of the business that may be affected by decisions of the Editorial Panel, and [iii] the Workgroup member is or reasonably should be aware the business may receive such interest as a result of a decision of the Editorial Panel.
- Voting Workgroup members may not participate in any Workgroup decisions (i.e. voting) about an issue that deals with a matter in which the Voting Workgroup member, or immediate family member, has an individual or corporate **material interest**, i.e. the value of such interest exceeds \$10,000 over a two year period.
- The disclosure form shall be submitted prior to the first meeting of the Workgroup and prior to discussing or voting on any matter under consideration by the Workgroup. Disclosures are to be made on the Statement of Compliance attached to this Policy, which shall be submitted annually and promptly updated and resubmitted if a Workgroup member’s **disclosable interests** should change during the term of the Workgroup.
- Individual and corporate **disclosable interests** do not include [i] any interest that is limited to providing clinical services to patients (including the service for which a code change proposal has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
- “**Material individual interest**” means a disclosable individual interest the value of which exceeds \$10,000 in the aggregate within the past two years.
- “**Material corporate interest**” means disclosable corporate interest the value of which in the aggregate exceeds \$10,000 within the past two years or is reasonably expected to exceed \$10,000 in the next two years.



CPT/HCPAC Advisors Response Form

I affirm that I have read and understand the Conflict of Interest Policy Applicable to the CPT Editorial Panel and Workgroup Members, Advisors and Presenters, a copy of which is appended to this statement. I have no individual or corporate **disclosable interests** at this time, except as set forth below. I understand that I have a continuing obligation to comply with the Conflict of Interest Policy and will update this form prior to submitting an opinion or comment to the CPT Editorial Panel related to a code change proposal.

DISCLOSABLE INTERESTS (INDICATE IF MATERIAL INTEREST)

Print Name _____

Signature _____

Specialty Society _____

Date _____

For convenience, key elements of the Conflict of Interest Policy applicable to CPT/HCPAC Advisors, including Alternates (“Advisors”) are summarized below. The Conflict of Interest Policy in its entirety is controlling (please refer to the appended Conflict of Interest Policy in its entirety):

- Advisors must disclose all individual and corporate disclosable interests as defined in the Policy held by the Advisor or the Advisor’s immediate family.
• “Immediate family” means a spouse, domestic partner, parent, child, brother or sister of an . . . Advisor Requirements for disclosure of interests of immediate family apply to the extent such interests are known by the Advisor.
• “Disclosable individual interest” means cash, goods or other value (e.g., consultancies, speaking honoraria, salary or salary support, research or other grant support, stock ownership or options, expert testimony, royalties or other intellectual property rights, service on a speakers bureau, gifts, or paid travel and vacation) that, with respect to Advisors or their immediate family members, the individual may benefit financially (as described above) from the approval or

denial of the code change, and the value of which exceeds \$1,000 in the aggregate for the past two years.

- **Disclosable corporate interest**⁷ means cash, goods or other value (e.g., increased sales, decreased sales of competitors, increased value of intellectual property, increased grant support, etc.) which in the aggregate exceeds \$5,000 within the past two years or is reasonably expected to exceed \$5,000 in the next two years, only where (A)[i] the Advisor or the Advisor's immediate family is an owner, director, officer, employee, consultant or agent of a company, partnership or other business entity ("business"), [ii] the Advisor or the Advisor's immediate family is responsible for developing, producing or marketing a product or service of the business that may be affected by decisions of the Editorial Panel, and [iii] the Advisor is or reasonably should be aware the business may receive such interest as a result of a decision of the Editorial Panel or (B) the Advisors is a consultant, agent, or employee and the Advisor should reasonably be aware that the Advisor's client or employer may receive such interest as a result of the approval or denial of the code change proposal.
- Advisors may not express an opinion or comment, including as a Presenter or speaker from the floor at CPT Editorial Panel meeting, about any agenda item or issue that deals with a matter in which the Advisor, or immediate family member, has an individual or corporate **material interest**, i.e. the value of such interest exceeds \$10,000 over a two year period. In the event an Advisor cannot participate due to a **material interest**, the alternate Advisor may provide an opinion or comment if such individual does not also have a **material interest**.
- Disclosure shall be made electronically on the Advisor Response Form . . . during the Advisor comment period prior to a meeting of the CPT Editorial Panel at which the code change proposal will be addressed.
- Individual and corporate **disclosable interests** do not include [i] any interest that is limited to providing clinical services to patients (including the service for which a code change proposal has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
- **"Material individual interest"** means a disclosable individual interest the value of which exceeds \$10,000 in the aggregate within the past two years.
- **"Material corporate interest"** means disclosable corporate interest the value of which in the aggregate exceeds \$10,000 within the past two years or is reasonably expected to exceed \$10,000 in the next two years.



**CODE CHANGE PROPOSAL APPLICANT OR DESIGNEE (“PRESENTER”)
DISCLOSURE OF INTEREST**

I affirm that I have read and understand the Conflict of Interest Policy of the CPT Editorial Panel and Workgroup Members, Advisors and Presenters, a copy of which is appended to this statement. I have no individual or corporate **disclosable interests** at this time, except as set forth below. I understand that I have a continuing obligation to comply with the Conflict of Interest Policy and will update this form prior to any code change proposal application. Disclosure does not restrict or limit the ability of the presenter to support the applicant’s code change proposal.

DISCLOSABLE INTERESTS **(INDICATE IF MATERIAL INTEREST)**

Print Name _____

Signature _____

Date _____

For convenience, key elements of the Conflict of Interest Policy applicable for **Presenters** are summarized below. The Conflict of Interest Policy in its entirety is controlling (please refer to the appended Conflict of Interest Policy in its entirety):

- Presenters members must disclose all individual and corporate disclosable interests as defined in the Policy held by the member or immediate family without regard to financial limit.
- “**Immediate family**” means a spouse, domestic partner, parent, child, brother or sister of a Presenter. Requirements for disclosure of interests of immediate family apply to the extent such interests are known by the Presenter.

- “**Disclosable individual interest**” means cash, goods or other value (e.g., consultancies, speaking honoraria, salary or salary support, research or other grant support, stock ownership or options, expert testimony, royalties or other intellectual property rights, service on a speakers bureau, gifts, or paid travel and vacation) that, with respect to the Presenter or the Presenter’s immediate family members, the individual may receive such interest as a result of the approval or denial of the code change, the value of which exceeds \$1.00 in the past two years.
- “**Disclosable corporate interest**” means cash, goods or other value (e.g., increased sales, decreased sales of competitors, increased value of intellectual property, increased grant support, etc.) which in the aggregate exceeds \$5,000 within the past two years or is reasonably expected to exceed \$5,000 in the next two years, only where the Presenter is a consultant, agent, or employee and the Presenter should reasonably be aware that their client or employer may receive such interest from the approval or denial of the code change proposal.
- Individual and corporate **disclosable interests** do not include [i] any interest that is limited to providing clinical services to patients (including the service for which a code change proposal has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
- “**Material individual interest**” means a disclosable individual interest the value of which exceeds \$10,000 in the aggregate within the past two years.
- “**Material corporate interest**” means disclosable corporate interest the value of which in the aggregate exceeds \$10,000 within the past two years or is reasonably expected to exceed \$10,000 in the next two years.
- Presenters who are applicants shall complete a written disclosure at the time of the code change proposal application. Presenters who are a designee(s) of the code change proposal applicant shall complete a written disclosure in response to the “presenter letter” sent to applicants approximately two weeks in advance of the meeting of the CPT Editorial Panel. All Presenters are also asked by the Chair of the CPT Editorial Panel to make a verbal disclosure of individual and corporate interests at the time of presentation. Any disclosable interest that is a **material interest** or a **material corporate interest** must be designated as such in the disclosure.

