CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL
APPLICABLE TO CPT EDITORIAL PANEL MEMBERS, WORKGROUP MEMBERS, CPT/HCPAC ADVISORS, PRESENTERS, AND COMMENTERS
(“CPT CONFLICT OF INTEREST POLICY” OR “POLICY”)

I. Persons Covered by this Policy

CPT Editorial Panel Members
Every CPT Editorial Panel member (“Editorial Panel Member”) shall disclose all individual and corporate disclosable interests held by the Editorial Panel Member, or immediate family member, as defined below prior to discussing or voting on an Editorial Panel agenda item. Disclosures are to be made on the Statement of Compliance attached to this CPT Conflict of Interest Policy, which shall be submitted annually and promptly updated and resubmitted if an Editorial Panel Member’s disclosable interests should change during the year. Verbal disclosures are required prior to discussion of any matter under consideration by the CPT Editorial Panel in which the Editorial Panel Member, or immediate family member, has a disclosable interest. 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 a material individual interest or material corporate interest as defined below.

Workgroup Members
Every member of a CPT workgroup or committee, whether an ad hoc or standing workgroup established by the CPT Editorial Panel (“Workgroup Member”) shall disclose all individual and corporate disclosable interests held by the Workgroup Member, or immediate family member, 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 CPT Conflict of Interest 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. Verbal disclosures are required prior to commenting on any agenda item or issue in which the Workgroup Member, or immediate family member, has a disclosable interest. 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 a material individual interest or material corporate interest as defined below.

CPT/HCPAC Advisors
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 application shall disclose all individual and corporate disclosable interests held by the Advisor, or immediate family member, as defined below. Disclosure shall be made on the Statement of Compliance attached to this CPT Conflict of Interest Policy and on the Advisor Response Form, if applicable, during the Advisor comment period prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Advisor, or immediate family member, has a disclosable interest. 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 a material individual interest or a material corporate interest as defined 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.
Presenters
Every applicant for a code change application or their designee(s) making a presentation ("Presenter") to the CPT Editorial Panel on a code change application shall disclose all individual and corporate disclosable interests held by the Presenter, or immediate family member, as defined below, but without regard to financial limit. Presenters who are applicants shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy at the time of the submission of the code change application. Presenters who are a designee(s) of the applicant(s) of a code change application shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy prior to the meeting of the CPT Editorial Panel at which the code change application will be addressed, usually in response to the "presenter letter" sent to applicants approximately two weeks in advance of the meeting of the CPT Editorial Panel. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Presenter, or immediate family member, has a disclosable interest. Any disclosable interest that is a material individual interest or a material corporate interest must be designated as such in the disclosure.

Commenters
Every commenter who is not an Editorial Panel Member, Workgroup Member, or Advisor, submitting an opinion or comment to the CPT Editorial Panel ("Commenter") related to a code change application shall disclose all individual and corporate disclosable interests held by the Commenter, or immediate family member, as defined below, but without regard to financial limit. Commenters who are Interested Parties shall complete disclosures on the Interested Party Response Form prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. All other Commenters, including designated representatives of specialty societies, consultants and lawyers, shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy during the written comment period prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Commenter, or immediate family member, has a disclosable interest. 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, Presenter or Commenter. 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, Presenters or Commenters, 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 Members, Workgroup Members or Advisors, the interest exceeds $1,000 in the aggregate for the past two years; and, [v] with respect to Presenters or Commenters, 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:

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(A)[i] the Editorial Panel Member, Workgroup Member, or CPT/HCPAC 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, or CPT/HCPAC 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 CPT/HCPAC 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 a CPT/HCPAC Advisor, Presenter or Commenter, the person is a consultant, agent, or employee and the CPT/HCPAC Advisor, Presenter, or Commenter 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 application.

"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 a 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 disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

For Editorial 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 CPT 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, Presenters, Commenters, and CPT staff regarding the application of this CPT Conflict of Interest Policy.

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

IV. Specialty Society Disclosure for CPT Editorial Panel Members, Advisors and Workgroup Members

If:
(a) an Editorial Panel Member, Advisor or Workgroup member’s immediate family member is a recipient of disclosable or material individual interest, or a disclosable or material corporate interest, and
(b) the interest comes from a medical specialty society (and not from a life sciences company or any other commercial entity), and
(c) the interest is not dependent or contingent in any way on the outcome of a code change application,
then, after disclosure of such an interest related to a code change application, an Editorial Panel Member may participate in any discussion and vote on the item; provided, however, such Editorial Panel Member may not be a designated reviewer of the application. Upon disclosure by an Advisor or Workgroup member, the individual may participate as specified in this Policy.

Disclosure by an Editorial Panel Member of an interest described in this Section must occur in both of the following ways: (1) orally by the Chair at the start of each day of a CPT Editorial Panel meeting, with a corresponding written projected disclosure, and (2) orally by the Chair the first time that the agenda item in which the disclosing Editorial Panel Member has such an interest is considered by the CPT Editorial Panel.

Adopted:  CPT Editorial Panel, October 15, 2011
Updated: March 29, 2013, October 1, 2016, September 27, 2018
CPT® EDITORIAL PANEL MEMBER
Statement of Compliance with the CPT Conflict of Interest Policy

I affirm that I have read and understand the CPT 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 CPT Conflict of Interest Policy and will update this form, as needed, during the course of the year and annually at the request of the Chair of the Editorial Panel.

DISCLOSABLE INTERESTS  (INDICATE IF MATERIAL INTEREST)

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If no disclosable interests, write “NONE.”

Print Name
Signature
Title/Organization
Date

Please sign and return to CPT staff.

For convenience, key elements of the CPT Conflict of Interest Policy applicable to 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):

Every CPT Editorial Panel member (“Editorial Panel Member”) shall disclose all individual and corporate disclosable interests held by the Editorial Panel Member, or immediate family member, prior to discussing or voting on an Editorial Panel agenda item. Disclosures are to be made on the Statement of Compliance attached to this CPT Conflict of Interest Policy, which shall be submitted annually and promptly updated and resubmitted if an Editorial Panel Member’s disclosable interests should change during the year. Verbal disclosures are required prior to discussion of any matter under consideration by the CPT Editorial Panel in which the Editorial Panel Member, or immediate family member, has a disclosable interest. 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 a material individual interest or material corporate interest.

The above disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

For Editorial 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.
WORKGROUP MEMBER
Statement of Compliance with the CPT® Conflict of Interest Policy

I affirm that I have read and understand the CPT 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 CPT Conflict of Interest Policy and will update this form, as needed, prior to every Workgroup meeting.

DISCLOSABLE INTERESTS  (INDICATE IF MATERIAL INTEREST)

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If no disclosable interests, write “NONE.”

Print Name
Signature
Title/Organization
Workgroup
Date

Please sign and return to CPT staff.

For convenience, key elements of the CPT Conflict of Interest Policy applicable to 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):

Every member of a CPT workgroup or committee, whether an ad hoc or standing workgroup established by the CPT Editorial Panel (“Workgroup Member”) shall disclose all individual and corporate disclosable interests held by the Workgroup Member, or immediate family member, 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 CPT Conflict of Interest 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. Verbal disclosures are required prior to commenting on any agenda item or issue in which the Workgroup Member, or immediate family member, has a disclosable interest. 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 a material individual interest or material corporate interest.

The above disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
CPT®/HCPAC ADVISOR
Statement of Compliance with the CPT Conflict of Interest Policy

I affirm that I have read and understand the CPT 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 CPT Conflict of Interest Policy and will update this form, as needed, prior to submitting an opinion or comment to the CPT Editorial Panel related to a code change application.

DISCLOSABLE INTERESTS (INDICATE IF MATERIAL INTEREST)

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If no disclosable interests, write “NONE.”

Print Name
Signature
Title/Specialty Society
Date

Please sign and return to CPT staff.

For convenience, key elements of the CPT 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):

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 application shall disclose all individual and corporate disclosable interests held by the Advisor, or immediate family member. Disclosure shall be made on the Statement of Compliance attached to this CPT Conflict of Interest Policy and on the Advisor Response Form, if applicable, during the Advisor comment period prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Advisor, or immediate family member, has a disclosable interest. 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 a material individual interest or a material corporate interest. 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.

The above disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

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PRESENTER
Statement of Compliance with the CPT® Conflict of Interest Policy

I affirm that I have read and understand the CPT 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 CPT Conflict of Interest Policy and will update this form, as needed, prior to submission or discussion of any code change application. Disclosure does not restrict or limit the ability of the presenter to support the applicant’s code change application.

DISCLOSABLE INTERESTS  (INDICATE IF MATERIAL INTEREST)

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If no disclosable interests, write “NONE.”

Print Name
Signature
Title/Organization
Date

Please sign and return to CPT staff.

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):

Every applicant for a code change application or their designee(s) making a presentation (“Presenter”) to the CPT Editorial Panel on a code change application shall disclose all individual and corporate disclosable interests held by the Presenter, or immediate family member, but without regard to financial limit. Presenters who are applicants shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy at the time of the submission of the code change application. Presenters who are a designee(s) of the applicant(s) of a code change application shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy prior to the meeting of the CPT Editorial Panel at which the code change application will be addressed, usually in response to the “presenter letter” sent to applicants approximately two weeks in advance of the meeting of the CPT Editorial Panel. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Presenter, or immediate family member, has a disclosable interest. Any disclosable interest that is a material individual interest or a material corporate interest must be designated as such in the disclosure.

The above disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.
COMMENTS

Statement of Compliance with the CPT® Conflict of Interest Policy

I affirm that I have read and understand the CPT 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 CPT Conflict of Interest Policy and will update this form, as needed, prior to submitting an opinion or comment to the CPT Editorial Panel related to a code change application. Disclosure does not restrict or limit the ability of the Commenter to support or oppose a code change application.

DISCLOSABLE INTERESTS (INDICATE IF MATERIAL INTEREST)

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If no disclosable interests, write “NONE.”

Print Name
Signature
Title/Organization
Date

Please sign and return to CPT staff.

For convenience, key elements of the Conflict of Interest Policy applicable for Commenters 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):

Every commenter who is not an Editorial Panel Member, Workgroup Member, or Advisor, submitting an opinion or comment to the CPT Editorial Panel (“Commenter”) related to a code change application shall disclose all individual and corporate disclosable interests held by the Commenter, or immediate family member, but without regard to financial limit. Commenters who are Interested Parties shall complete disclosures on the Interested Party Response Form prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. All other Commenters, including designated representatives of specialty societies, consultants and lawyers, shall complete disclosures on the Statement of Compliance attached to this CPT Conflict of Interest Policy during the written comment period prior to a meeting of the CPT Editorial Panel at which the code change application will be addressed. Verbal disclosures are required prior to addressing the Panel about any agenda item or issue as to which the Commenter, or immediate family member, has a disclosable interest. Any disclosable interest that is a material individual interest or a material corporate interest must be designated as such in the disclosure.

The above disclosures 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 application has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

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