

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL

I. Preface

The purpose of this Conflict of Interest Policy of the CPT® Editorial Panel (“**Policy**”) is to establish methods of identifying and disclosing potential conflicts of interest with respect to the operations of the CPT Editorial Panel (“**Panel**”). More specifically, this Policy provides guidance with respect to the Panel’s consideration of code set matters by requiring disclosure of interests that might benefit or appear to benefit the private interest of any participant in the Panel process, including Panel members (each a “**Member**”), or that do present an actual conflict of interest for such individual. The transparency of the Panel’s processes is critical and each Member and each other Panel participant must act with candor and use good judgment to maintain and further the public’s trust and confidence in the integrity of the Panel and its processes. This Policy acknowledges that potential and actual conflicts of interest are intrinsic to the collaborations required to advance best coding practices. While disclosure of interests held by Panel participants is required, only some interests of voting Panel Members rise to the level of a conflict that necessitates Panel action beyond interest disclosure.

II. Instructions and Structure

Instructions: Panel process participants serve in different roles. Each Panel role is subject a unique portion of this Policy, and only that portion of the Policy. Each individual in the Panel process must timely complete a Statement of Compliance that is appropriate for the individual’s role. The Panel roles are, generally, as follows:

- CPT Editorial Panel Members – Attachment A at page 2
- Primary and Alternate Advisors on the Advisory Committee and HCPAC Committee – Attachment B at page 7
- Committee and Workgroup members – Attachment C at page 11
- Applicants and Presenters – Attachment D at page 14, or
- Commenters – Attachment E at page 17. A Commenter is an individual who submits a written or oral comment to the Panel related to a code change application and who is not a Panel Member, Advisor, Workgroup Member, Applicant or Presenter. Refer to the attachments for additional definitions.

Structure: This entire document constitutes the Policy. In each attachment to the Policy, Section 1 contains the General Rules of the Policy for the Panel role at issue, Section 2 contains key definitions and Section 3 contains other definitions.

III. Interpretation and Application of the Policy

The AMA’s Office of General Counsel (“**OGC**”) reviews disclosures made pursuant to this Policy and makes recommendations to CPT staff and the Chair and Vice Chair of the Panel with respect to such disclosures. The OGC determines the legitimacy and extent of all disclosures and, upon request, the OGC will give interpretive guidance to Panel Members, Advisors, Workgroup Members, Applicants, Presenters, Commenters and CPT staff regarding the application of this Policy.

IV. Completed Disclosures

Completed written disclosure statements are made available to current Panel Members and select AMA staff for the purposes of fulfilling and assisting the work of the Panel. Upon reasonable request to the AMA, copies of completed written disclosure statements are made available to Advisors, Workgroup Members, Applicants, Presenters, Commenters and other Interested Parties to the extent the requesting individual is involved in a specific agenda item, issue, or other matter under consideration by the Panel. Disclosed information is confidential and may be used only in connection with the work of the Panel.

*Adopted: CPT Editorial Panel, October 15, 2011
Updated: March 29, 2013, October 1, 2016, September 27, 2018, August 14, 2019*

ATTACHMENT A

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL Applicable to CPT EDITORIAL PANEL MEMBERS

- 1) **General Rule Regarding Interests and Conflicts.** Interests addressed by this Policy are divided into Simple Interests and Conflicted Interests (collectively, “**Interests**”). Each Member shall disclose all Interests held by the Member or his or her Immediate Family Members. A Member shall not serve as a Reviewer of, and will not be permitted to discuss or vote on, any matter before the Panel with respect to which the Member has a Conflicted Interest.
 - a. **Written Disclosures of Interests by Members.** Written disclosures of all Interests must be made by each Member on the Statement of Compliance, which must be submitted to AMA staff annually and must be promptly updated any time a Member’s Interests change, including prior to a Panel meeting at which an Interest under Section 1.b.iii below may first arise. Members are required to disclose all Simple Interests and Conflicted Interests.
 - b. **Disclosure of Member Interests by Posting.** A brief biography of each Member shall be posted on a time-limited internet-accessible page that is viewable only by registered attendees of a Panel meeting (“**Posting**”). Accessibility to the Posting shall be promptly terminated after the conclusion of each Panel meeting. The Posting shall specify the following general information for each Member:
 - i. Relating to employment – current employer, job title and description of role;
 - ii. Relating to medical specialty society involvement – position/title of current elected or appointed leadership positions on a coding (or equivalent) committee; board of directors or trustees; or executive management team; and
 - iii. Relating to a specific code change application(s) pending before the Panel at the Panel meeting – a Member’s, or his or her Immediate Family Member’s, Conflicted Interest with respect to that application. (Only the occurrence of a Conflicted Interest, and not the specific details of that Interest, are included in the Posting.)

The Member shall provide to AMA staff promptly after a request the disclosures necessary for the Posting.
 - c. **Oral Disclosure of Conflicted Interests by Members.** The Chair shall, on behalf of any impacted Member, immediately prior to the first time the applicable code change application is heard at a Panel meeting, orally identify each occurrence of such Member’s Conflicted Interest that is directly related to such application pending before the Panel. (Only the occurrence of a Conflicted Interest, and not the specific details of that Interest, are to be disclosed.) Simple Interests need not be orally disclosed.
 - d. **Impact of a Simple Interest.** Following written disclosure of a Simple Interest of a Member or his or her Immediate Family Member that is directly related to a code change application pending before the Panel, the impacted Member is not restricted in any way in performing his or her duties as a Member.
 - e. **Impact of a Conflicted Interest.** Following written and oral disclosure of a Conflicted Interest of a Member or his or her Immediate Family Member that is directly related to a code change application pending before the Panel, the impacted Member may not:
 - i. Be a Reviewer of the application, nor
 - ii. Participate in any discussion or vote on the application.

The Chair of the Panel may, in his or her discretion, seek factual points of information and expertise from a Member with a Conflicted Interest with regards to an application.

2) **Key Definitions.**

a. **“Simple Interest”** means the following activities of or roles held by a Member or his or her Immediate Family Member (unless otherwise noted):

- i. *Employment* – The Member’s current employer, job title and description of role (in brief). This disclosure requirement does not apply to Immediate Family Members.
- ii. *Medical Specialty Society Involvement* – The Member is a participant, member or holds an elected/appointed leadership position on a medical specialty society’s:
 - a) Coding (or equivalent) committee;
 - b) Board of directors or trustees; and/or
 - c) Executive management team.

This disclosure requirement does not apply to an Immediate Family Member, unless directly relevant to a code change application pending before the Panel.

iii. *General Involvement in a Code Change Application* – The Member, or his or her Immediate Family Member, is Generally Involved in the development of a code change application that is before the Panel. **“Generally Involved”** means situations in which:

- a) a Member, or his or her Immediate Family Member, consults on, advises on or strategizes about coding questions or code creation prior to the drafting of a particular code change application (but which may later result in the drafting of an application that comes before the Panel); or
- b) (i) a Member’s Immediate Family Member is a recipient of any Value, (ii) the Value is from a medical specialty society (and not from a life sciences company or other commercial entity), and (iii) the Value is not dependent or contingent in any way on the Panel’s decision on a code change application.

iv. *Other* - Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing Member in the context of Panel business.

b. **“Conflicted Interest”** means any circumstance or situation in which a Member reasonably believes (i) it would be difficult or impossible for the Member to be completely unbiased with respect to a code change application pending before the Panel, or (ii) the situation or circumstance could create the appearance to an Applicant or Interested Party, that it would be difficult or impossible for the Member to be completely unbiased with respect to a code change application pending before the Panel.

Conflicted Interests also include, but are not necessarily limited to, the following activities or roles held by a Member or his or her Immediate Family Member (unless otherwise noted):

- i. *Employer as Applicant* – The Member’s current employer is the applicant on a code change application before the Panel. This disclosure requirement does not apply to Immediate Family Members.
- ii. *Developmental Interest* – The Member, or his or her Immediate Family Member, has a Developmental Interest in a code change application before the Panel.

- iii. *Direct Involvement in a Code Change Application* – The Member, or his or her Immediate Family Member, is Directly Involved in the development of a code change application that is before the Panel. “**Directly Involved**” means situations in which the Member, or Immediate Family Member:
 - a) Drafts, researches, edits, submits as an applicant, advocates for or has another active role with regards to a code change application that is before the Panel (unless specifically identified as a Simple Interest in the definition of “Generally Involved” in Section 2.a.iii.b) above); or
 - b) Consults on, advises on or strategizes about a code change application after the drafting of that application is initiated, with respect to an application pending before the Panel (unless specifically identified as a Simple Interest in the definition of “Generally Involved” at Section 2.a.iii.b) above).
- iv. *Receipt of Value* – The Member, or his or her Immediate Family Member, received Value totaling \$1,000 or more within the prior 24 months or anticipates receiving Value totaling \$1,000 or more in the next 24 months. The Value is separated into three categories:
 - a) *Corporate* – The Member, or his or her Immediate Family Member, is an owner, director or officer of; or an employee or agent who has decision-making authority in, a corporate entity, the Value of which will or is likely to be impacted by a code change application that is before the Panel.
 - b) *Individual* – The Member, or his or her Immediate Family Member, will or is likely to receive the Value, based on the decision on a code change application before the Panel.
 - c) *Specialty Society* – The Member, or his or her medical specialty society, will receive the Value for the Member’s consulting on, advising on or strategizing about a code change application that is pending before the Panel.

3) **Other Definitions.**

- a. “**Applicant**” means each individual and corporate entity identified as an applicant or co-applicant on a code change application.
- a. “**Developmental Interest**” means the Member’s, or his or her Immediate Family Member’s, involvement in study or research development, execution of testing or studies, or authorship of published literature related to code change application before the Panel and in connection with which such has received Value or a promise of future Value from a pharmaceutical, biological or medical device manufacturer outside of a research grant in which the individual’s literature will be cited. Developmental Interest excludes the subject individual’s membership on a safety or a monitoring committee (or its equivalent) for a research grant.
- b. “**Immediate Family Member**” means a spouse, domestic partner, parent, child, brother or sister. Requirements for disclosure of interests of Immediate Family Members apply to the extent such interests are known by the disclosing person.
- c. “**Interested Party**” means an individual or entity that may potentially be impacted by the Panel’s decision on an application that is before the Panel.
- d. “**Reviewer**” means the designated reviewer of a code change application that is before the Panel.

- e. **“Value”** means money, goods or any other item or service of value, whether the same increases or decreases. Value is aggregate, and includes but is not limited, to:
- i. Sales
 - ii. Intellectual property valuation, royalties or other rights
 - iii. Funding support, including grants
 - iv. Stock value, only if the stock is included in an actively managed personal investment account
 - v. Consulting fees
 - vi. Gifts including meals, paid travel and speaking bureau participation
 - vii. Fees or other compensation for speaking engagements, including honoraria
 - viii. Salary or salary support
 - ix. Expert testimony payment

Value excludes any payment or reimbursement of expenses received from a medical specialty society for services that are educational or generally applicable to all members of such society and that are otherwise not for the benefit of any individual of such society.

ATTACHMENT B

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL Applicable to PRIMARY ADVISORS AND ALTERNATE ADVISORS ON THE CPT ADVISORY COMMITTEE AND HEALTH CARE PROFESSIONALS ADVISORY COMMITTEE

- 1) **General Rule Regarding Interests.** Each Primary Advisor and Alternate Advisor on the CPT Advisory Committee and the Health Care Professionals Advisory Committee (“HCPAC”) (collectively, “Advisor”) shall disclose all Interests held by the Advisor or his or her Immediate Family Members.
 - a. **Written Disclosures of Interests by Advisors.** Written disclosures of all Interests must be made by each Advisor on a Statement of Compliance, which must be submitted to AMA staff annually and must be promptly updated any time an Advisor’s Interests change. Additionally, if an Advisor submits written comments on a code change application during the comment period prior to a meeting of the Panel, the Advisor shall disclose any Interests held by the Advisor, or his or her Immediate Family Members, that are directly related to that application concurrently with his or her comments, on a form provided by AMA staff.
 - b. **Oral Disclosure of Interests by Advisors.** Oral disclosure of Interests that are directly related to an application that is pending before the Panel is required by an Advisor prior to addressing the Panel about that application.
 - c. **Impact of an Interest.** Following written disclosure of an Interest of an Advisor, or his or her Immediate Family Member, that is directly related to a code change application that is pending before the Panel, the impacted Advisor is not limited in his or her ability to offer written comments on such application. Following oral disclosure of such an Interest, and clarification as to whether the Advisor is speaking as an Advisor/medical society representative or in an individual capacity, the impacted Advisor is not limited in his or her ability to orally comment on such application from the floor at a Panel meeting.
 - d. **Other.** If an Advisor is also an Applicant or Presenter for a code change application, he or she must comply with the disclosure requirements for both Advisors and Applicants/Presenters.
- 2) **Key Definitions.**
 - a. **“Interest(s)”** means the following activities of or roles held by an Advisor or his or her Immediate Family Member (unless otherwise noted):
 - i. **Employment** – The Advisor’s current employer, job title, description of role (in brief) and whether the employer is the applicant on the current code change application that is pending before the Panel. This disclosure requirement does not apply to Immediate Family Members.
 - ii. **Receipt of Value** – The Advisor, or his or her Immediate Family Member, received Value totaling \$1,000 or more within the prior 24 months or anticipates receiving Value totaling \$1,000 or more in the next 24 months. The Value is separated into three categories:
 1. **Corporate** – The Advisor, or his or her Immediate Family Member, is an owner, director or officer of; or an employee or agent who has decision-making authority in, a corporate entity, the Value of which will or is likely to be impacted by a code change application that is pending before the Panel.

2. *Individual* – The Advisor, or his or her Immediate Family Member, will or is likely to receive the Value based on the decision on a code change application that is pending before the Panel.
3. *Specialty Society* – The Advisor, or his or her medical specialty society, will receive the Value for the Advisor’s consulting on, advising on or strategizing about a code change application that is pending before the Panel.
- iii. *Developmental Interest* – The Advisor, or his or her Immediate Family Member, has a Developmental Interest in a code change application that is pending before the Panel.
- iv. *Involvement in a Code Change Application* – The Advisor, or his or her Immediate Family Member, is Involved in the development of a code change application that is pending before the Panel. “**Involved**” means situations in which the Advisor, or his or her Immediate Family Member:
 1. Consults on, advises on or strategizes about coding questions, code creation or a code change application, whether prior to or after the initiation of drafting of a particular code change application; or
 2. Drafts, researches, edits, submits as an Applicant, advocates for or has another active role with regards to a code change application that is pending before the Panel.
- v. *Other* – Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing Advisor in the context of Panel business.

3) **Other Definitions.**

- a. “**Applicant**” means each individual and corporate entity identified as an applicant or co-applicant on a code change application.
- b. “**Developmental Interest**” means the Advisor’s, or his or her Immediate Family Member’s, involvement in study or research development, execution of testing or studies, or authorship of published literature related to code change application that is pending before the Panel and in connection with which such has received Value or a promise of future Value from a pharmaceutical, biological or medical device manufacturer outside of a research grant in which the individual’s literature will be cited. Developmental Interest excludes the subject individual’s membership on a safety or a monitoring committee (or its equivalent) for a research grant.
- c. “**Immediate Family Member**” means a spouse, domestic partner, parent, child, brother or sister. Requirements for disclosure of interests of Immediate Family Members apply to the extent such interests are known by the disclosing person.
- d. “**Presenter**” means an Applicant’s designee to make an oral or written presentation to the Panel on a code change application. Presenter includes a Preparer who prepares all or a portion of a code change application for presentation to the Panel.
- e. “**Value**” means money, goods or any other item or service of value, whether the same increases or decreases. Value is aggregate, and includes but is not limited, to:
 - i. Sales
 - ii. Intellectual property valuation, royalties or other rights
 - iii. Funding support, including grants
 - iv. Stock value, only if the stock is included in an actively managed personal investment

- account
- v. Consulting fees
 - vi. Gifts including meals, paid travel and speaking bureau participation
 - vii. Fees or other compensation for speaking engagements, including honoraria
 - viii. Salary or salary support, and
 - ix. Expert testimony payment.

Value excludes any payment or reimbursement of expenses received from a medical specialty society for services that are educational or generally applicable to all members of such society and that are otherwise not for the benefit of any individual of such society.

ATTACHMENT C

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL Applicable to CPT COMMITTEE AND WORKGROUP MEMBERS

- 1) **General Rule Regarding Interests.** Each member of a CPT committee or workgroup, whether an ad hoc or standing workgroup established by the Panel (collectively, “**Workgroup**” and together, “**Workgroup Member(s)**”), shall disclose all Interests held by the Workgroup Member, or his or her Immediate Family Members, prior to the first meeting of the Workgroup.
 - a. **Written Disclosures of Interests by Workgroup Members.** Written disclosures of all Interests must be made by each Workgroup Member on a Statement of Compliance, which must be submitted to AMA staff when a Workgroup is initiated or when the member joins the Workgroup, whichever is earlier and annually thereafter, and must be promptly updated any time a Workgroup Member’s Interests change during the term of the Workgroup.
 - b. **Oral Disclosure of Interests by Workgroup Members.** Oral disclosure of Interests that are directly related to the agenda item or issue before a Workgroup is required by a Workgroup Member immediately prior to the first time such Workgroup Member addresses the Workgroup about that item or issue at a Workgroup meeting.
 - c. **Impact of an Interest.** Following written disclosure of all Interests of a Workgroup Member, or his or her Immediate Family Member, and oral disclosure of Interests that are directly related to an agenda item or issue before a Workgroup, the impacted Workgroup Member is not restricted in any way in performing his or her duties as a Workgroup Member.

- 2) **Key Definitions.**
 - a. “**Interest(s)**” means the following activities of or roles held by a Workgroup Member or his or her Immediate Family Member (unless otherwise noted):
 - i. ***Employment*** – The Workgroup Member’s current employer, job title, description of role (in brief) and whether the Workgroup Member’s current employer is the applicant on a code change application that is pending before the Panel and the application is directly related to the business of the Workgroup. This disclosure requirement does not apply to Immediate Family Members.
 - ii. ***Receipt of Value*** – The Workgroup Member, or his or her Immediate Family Member, received Value totaling \$1,000 or more within the prior 24 months or anticipates receiving Value totaling \$1,000 or more in the next 24 months. The Value is separated into three categories:
 1. ***Corporate*** – The Workgroup Member, or his or her Immediate Family Member, is an owner, director or officer of; or an employee or agent who has decision-making authority in, a corporate entity, the Value of which will or is likely to be impacted by an agenda item or issue that is pending before the Workgroup.
 2. ***Individual*** – The Workgroup Member, or his or her Immediate Family Member, will or is likely to receive the Value based on the decision on an agenda item or issue that is pending before the Workgroup.
 3. ***Specialty Society*** – The Workgroup Member, or his or her medical specialty society, will receive the Value for the Workgroup Member’s consulting on, advising on or strategizing about a Workgroup agenda item or issue.

- iii. *Developmental Interest* – The Workgroup Member, or his or her Immediate Family Member, has a Developmental Interest in a Workgroup agenda item or issue.
- iv. *Direct Involvement* – The Workgroup Member, or his or her Immediate Family Member, is Directly Involved in an issue or matter that is directly related to the business of the Workgroup. “**Directly Involved**” means situations in which the Member, or his or her Immediate Family Member drafts, researches, edits, advocates for or has another active role with regards to a matter that is pending before the Workgroup.
- v. *Other* – Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing Workgroup Member in the context of Workgroup business.

3) **Other Definitions.**

- a. “**Developmental Interest**” means the Workgroup Member’s, or his or her Immediate Family Member’s, involvement in study or research development, execution of testing or studies, or authorship of published literature related to an agenda item or issue that is pending before the Workgroup and in connection with which such individual has received Value or a promise of future Value from a pharmaceutical, biological or medical device manufacturer outside of a research grant in which the individual’s literature will be cited. Developmental Interest excludes the subject individual’s membership on a safety or a monitoring committee (or its equivalent) for a research grant.
- b. “**Immediate Family Member**” means a spouse, domestic partner, parent, child, brother or sister. Requirements for disclosure of interests of Immediate Family Members apply to the extent such interests are known by the disclosing person.
- c. “**Value**” means money, goods or any other item or service of value, whether the same increases or decreases. Value is aggregate, and includes but is not limited, to:
 - i. Sales
 - ii. Intellectual property valuation, royalties or other rights
 - iii. Funding support, including grants
 - iv. Stock value, only if the stock is included in an actively managed personal investment account
 - v. Consulting fees
 - vi. Gifts including meals, paid travel and speaking bureau participation
 - vii. Fees or other compensation for speaking engagements, including honoraria
 - viii. Salary or salary support, or
 - ix. Expert testimony payment.

Value excludes any payment or reimbursement of expenses received from a medical specialty society for services that are educational or generally applicable to all members of such society and that are otherwise not for the benefit of any individual of such society.

- d. “**Workgroup**” means a CPT committee or workgroup, including an ad hoc or standing workgroup established by the Panel.
- e. “**Workgroup Member(s)**” means members of or participant in a Workgroup.

**CPT® EDITORIAL PANEL WORKGROUP AND COMMITTEE 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. Each of my, and my Immediate Family Members', Interests at this time are 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.

IDENTIFY ALL "INTERESTS"

Print Name _____
Signature _____
Title/Organization _____
Date _____

Please sign and return to CPT staff.

ATTACHMENT D

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL Applicable to CPT APPLICANTS AND PRESENTERS

- 1) **General Rule Regarding Interests.** Each code change application Applicant and each Applicant-designee making a presentation to the Panel about a code change application (“**Presenter**”), shall disclose all Interests held by the Applicant or Presenter and his or her Immediate Family Members.
 - a. **Written Disclosures of Interests by Applicant and Presenters.** Written disclosures of all Interests must be made by each Applicant on a Statement of Compliance at the time of submission of the code change application. Written disclosures of all Interests must be made by each Presenter on a Statement of Compliance prior to the meeting of the Panel at which a Presenter will present his or her code change application.
 - b. **Oral Disclosure of Interests by Applicant and Presenters.** Oral disclosure of Interests that are directly related to a code change application that is pending before the Panel is required by an Applicant and Presenter prior to addressing the Panel about that application.
 - c. **Impact of an Interest.** Following written disclosure of all Interests of an Applicant or Presenter, or his or her Immediate Family Member, and oral disclosure of Interests that are directly related to a code change application that is pending before the Panel, the impacted individual is not restricted in any way in performing his or her role as an Applicant or Presenter.

- 2) **Key Definitions.**
 - a. **“Interest(s)”** means the following activities of or roles held by an Applicant and Presenter or his or her Immediate Family Member (unless otherwise noted):
 - i. **Employment** – The Applicant or Presenter’s current employer, job title, description of role (in brief) and whether the employer is the applicant on the code change application that is pending before the Panel. This disclosure requirement does not apply to Immediate Family Members.
 - ii. **Receipt of Value** – The Applicant or Presenter, or his or her Immediate Family Member, received any Value within the prior 24 months or anticipates receiving any Value in the next 24 months. The Value is separated into three categories:
 1. **Corporate** – The Applicant or Presenter, or his or her Immediate Family Member, is an owner, director or officer of; or an employee or agent who has decision-making authority in, a corporate entity, the Value of which will or is likely to be impacted by the code change application that is pending before the Panel.
 2. **Individual** – The Applicant or Presenter, or his or her Immediate Family Member, will or is likely to receive any Value based on the decision on the code change application that is pending before the Panel.
 3. **Specialty Society** – The Applicant or Presenter, or his or her medical specialty society, will receive any Value for the Applicant or Presenter’s consulting on, advising on or strategizing about the code change application that is pending before the Panel.

- iii. *Developmental Interest* – The Applicant or Presenter, or his or her Immediate Family Member, has a Developmental Interest in the code change application that is pending before the Panel.
- iv. *Other* - Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing Applicant or Presenter in the context of Panel business.

3) **Other Definitions.**

- a. “**Applicant**” means each individual and corporate entity identified as an applicant or co-applicant on a code change application.
- b. “**Developmental Interest**” means the Applicant and Presenter’s, or his or her Immediate Family Member’s, involvement in study or research development, execution of testing or studies, or authorship of published literature related to the code change application that is pending before the Panel and in connection with which such has received Value or a promise of future Value from a pharmaceutical, biological or medical device manufacturer outside of a research grant in which the individual’s literature will be cited. Developmental Interest excludes the subject individual’s membership on a safety or a monitoring committee (or its equivalent) for a research grant.
- c. “**Immediate Family Member**” means a spouse, domestic partner, parent, child, brother or sister. Requirements for disclosure of interests of Immediate Family Members apply to the extent such interests are known by the disclosing person.
- d. “**Presenter**” means an Applicant’s designee to make an oral or written presentation to the Panel on a code change application. Presenter includes a Preparer who prepares all or a portion of a code change application for presentation to the Panel.
- e. “**Value**” means money, goods or any other item or service of value, whether the same increases or decreases. Value is aggregate, and includes but is not limited, to:
 - i. Sales
 - ii. Intellectual property valuation, royalties or other rights
 - iii. Funding support, including grants
 - iv. Stock value, only if the stock is included in an actively managed personal investment account
 - v. Consulting fees
 - vi. Gifts including meals, paid travel and speaking bureau participation
 - vii. Fees or other compensation for speaking engagements, including honoraria
 - viii. Salary or salary support
 - ix. Expert testimony payment

Value excludes any payment or reimbursement of expenses received from a medical specialty society for services that are educational or generally applicable to all members of such society and that are otherwise not for the benefit of any individual of such society.

ATTACHMENT E

CONFLICT OF INTEREST POLICY OF THE CPT® EDITORIAL PANEL Applicable to CPT COMMENTERS

- 1) **General Rule Regarding Interests.** Each individual who submits a written or oral comment to the Panel related to a code change application and who is not a Panel Member, Advisor, Workgroup Member, Applicant or Presenter (“**Commenter**”) shall disclose Interests held by the Commenter or his or her Immediate Family Members.
 - a. **Written Disclosures of Interests by Commenters.** If a Commenter submits written comments on a code change application during the comment period prior to a meeting of the Panel, the Commenter shall disclose any Interests held by the Commenter, or his or her Immediate Family Members, that are directly related to that application concurrently with submission of his or her comments, on a form provided by AMA staff.
 - b. **Oral Disclosure of Interests by Commenters.** Oral disclosure of Interests that are directly related to a code change application that is pending before the Panel is required by a Commenter prior to addressing the Panel about that application.
 - c. **Impact of an Interest.** Following written disclosure of Interests that are directly related to a code change application that is pending before the Panel, the impacted Commenter is not limited in his or her ability to offer written comments on that application. Following oral disclosure of such Interests, the impacted Commenter is not limited in his or her ability to orally comment on that application from the floor at a Panel meeting.

- 2) **Key Definitions.**
 - a. “**Interest(s)**” means the following activities of or roles held by a Commenter or his or her Immediate Family Member (unless otherwise noted):
 - i. ***Employment*** – The Commenter’s current employer, job title, description of role (in brief) and whether the employer is the Applicant on the code change application that is pending before the Panel. This disclosure requirement does not apply to Immediate Family Members.
 - ii. ***Receipt of Value*** – The Commenter, or his or her Immediate Family Member, received any Value within the prior 24 months or anticipates receiving any Value in the next 24 months. The Value is separated into three categories:
 1. ***Corporate*** – The Commenter, or his or her Immediate Family Member, is an owner, director or officer of; or an employee or agent who has decision-making authority in, a corporate entity, the Value of which will or is likely to be impacted by the code change application that is pending before the Panel.
 2. ***Individual*** – The Commenter, or his or her Immediate Family Member, will or is likely to receive any Value based on the decision on the code change application that is pending before the Panel.
 3. ***Medical Specialty Society*** – The Commenter, or his or her medical specialty society, will receive any Value for the Commenter’s consulting on, advising on or strategizing about the code change application that is pending before the Panel.

- iii. *Developmental Interest* – The Commenter, or his or her Immediate Family Member, has a Developmental Interest in the code change application that is pending before the Panel.
- iv. *Involvement in the Code Change Application* – The Commenter, or his or her Immediate Family Member, is Involved in the development of the code change application that is pending before the Panel. “**Involved**” means situations in which the Commenter, or his or her Immediate Family Member:
 - 1. Consults on, advises on or strategizes about the code change application pending before the Panel; or
 - 2. Drafts, researches, edits, advocates for or has another active role with regards to the code change application that is pending before the Panel.
- v. *Other* - Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing Commenter in the context of Panel business.

3) **Other Definitions.**

- a. “**Advisor**” or “**CPT/HCPAC Advisor**” means each Primary Advisor and Alternate Advisor on the CPT Advisory Committee and the Health Care Professionals Advisory Committee (“HCPAC”), collectively.
- b. “**Applicant**” means each individual and corporate entity identified as an applicant or co-applicant on a code change application.
- c. “**Commenter**” means each individual who submits written comments and/or makes an oral comment to the Panel related to a code change application and who is not a Panel Member, CPT/HCPAC Advisor, Workgroup Member, Applicant or Presenter. Commenters may include, but are not limited to, Interested Parties, designated representatives of specialty societies, consultants and lawyers.
- d. “**Developmental Interest**” means the Commenter’s, or his or her Immediate Family Member’s, involvement in study or research development, execution of testing or studies, or authorship of published literature related to code change application that is pending before the Panel and in connection with which such has received Value or a promise of future Value from a pharmaceutical, biological or medical device manufacturer outside of a research grant in which the individual’s literature will be cited. Developmental Interest excludes the subject individual’s membership on a safety or a monitoring committee (or its equivalent) for a research grant.
- e. “**Immediate Family Member**” means a spouse, domestic partner, parent, child, brother or sister. Requirements for disclosure of interests of Immediate Family Members apply to the extent such interests are known by the disclosing person.
- f. “**Interested Party/Parties**” means an individual or entity that may potentially be impacted by the Panel’s decision on an application that is pending before the Panel.
- g. “**Presenter**” means an Applicant’s designee to make an oral or written presentation to the Panel on a code change application. Presenter includes a Preparer who prepares all or a portion of a code change application for presentation to the Panel.

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- h. **“Value”** means money, goods or any other item or service of value, whether the same increases or decreases. Value is aggregate, and includes but is not limited, to:
- i. Sales
 - ii. Intellectual property valuation, royalties or other rights
 - iii. Funding support, including grants
 - iv. Stock value, only if the stock is included in an actively managed personal investment account
 - v. Consulting fees
 - vi. Gifts including meals, paid travel and speaking bureau participation
 - vii. Fees or other compensation for speaking engagements, including honoraria
 - viii. Salary or salary support
 - ix. Expert testimony payment

Value excludes any payment or reimbursement of expenses received from a medical specialty society for services that are educational or generally applicable to all members of such society and that are otherwise not for the benefit of any individual of such society.

- i. **“Workgroup Member”** means each member of a CPT committee or workgroup, whether an ad hoc or standing workgroup established by the Panel.

