



CONFLICT OF INTEREST POLICY OF THE AMA GUIDES® EDITORIAL PANEL APPLICABLE TO AMA GUIDES® EDITORIAL PANEL MEMBERS, PANEL ADVISORS, PRESENTERS, AND COMMENTERS (“AMA GUIDES® CONFLICT OF INTEREST POLICY” OR “POLICY”)

I. Persons Covered by this Policy

AMA Guides® Editorial Panel

Members

Every AMA Guides® 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 submitted via DocuSign alongside the Panel Member Agreement upon acceptance of the position as AMA Guides® Editorial Panel Member. This Statement of Compliance 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 AMA Guides® 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 AMA Guides® 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.

AMA Guides® Editorial Panel Advisors

Every AMA Guides® Editorial Panel Advisor (“Panel Advisor”) submitting an opinion or comment to the AMA Guides® Editorial Panel related to a content proposal submission or any other AMA Guides® agenda item shall disclose all individual and corporate **disclosable interests** held by the Panel Advisor, or immediate family member, as defined below. Disclosure shall be made on the Statement of Compliance submitted via DocuSign alongside the Panel Advisor Agreement upon acceptance of the position as AMA Guides® Editorial Panel Advisor, and during the meeting of the AMA Guides® Editorial Panel at which the content proposal submission or other AMA Guides® agenda item 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 AMA Guides® 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.

Presenters

Every applicant for a content proposal submission or their designee(s) making a presentation (“Presenter”) to the AMA Guides® Editorial Panel on a content proposal submission 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 AMA Guides® Conflict of Interest Policy at the time of the submission of the content proposal. Presenters who are a designee(s) of the applicant(s) of a content proposal submission shall complete disclosures on the Statement of Compliance attached to this AMA Guides® Conflict of Interest Policy prior to the meeting of the AMA Guides® Editorial Panel at which the content proposal submission will be addressed, usually in response to the “presenter letter” sent to applicants approximately two weeks in advance of the meeting of the AMA Guides® 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 or Panel Advisor, submitting an opinion or comment to the AMA Guides® Editorial Panel (“Commenter”) related to a content proposal submission 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 AMA Guides® Editorial Panel at which the content proposal submission 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 AMA Guides® Conflict of Interest Policy during the written comment period prior to a meeting of the AMA Guides® Editorial Panel at which the content proposal submission 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, Panel 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 Panel 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; [iii] with respect to Editorial Panel Members or Panel Advisors, the interest exceeds \$1,000 in the aggregate for the past two years; and, [iv] 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:

(A) [i] the Editorial Panel Member or Panel 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 or Panel 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 or Panel 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 Panel Advisor, Presenter or Commenter, the person is a consultant, agent, or employee and the Panel 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 content proposal submission.



“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 do not include [i] any interest that is limited to providing clinical services to patients (including the service for which a content proposal submission has been submitted), or [ii] providing professional educational services or interpretative advice on proper coding.

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 AMA Guides® Conflict of Interest Policy and makes recommendations to AMA Guides® staff and the Co-Chairs of the AMA Guides® Editorial Panel with respect to such disclosures. Upon request, the Office of General Counsel will give advance, interpretive guidance to Editorial Panel Members, Panel Advisors, Presenters, Commenters, and AMA Guides® staff regarding the application of this AMA Guides® Conflict of Interest Policy.

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

IV. Specialty Society Disclosure for AMA Guides® Editorial Panel Members and Panel Advisors

If:

- (a) an Editorial Panel Member’s or Panel Advisor’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 the interest is not dependent or contingent in any way on the outcome of a content proposal submission;
- (c) the interest is not dependent or contingent in any way on the outcome of a content proposal submission;
- (d) then, after disclosure of such an interest related to a content proposal submission, 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 a Panel Advisor, the individual may participate as specified in this Policy.
- (e) 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 Co-Chair(s) at the start of each day of an AMA Guides® Editorial Panel meeting, with a corresponding written projected disclosure, and (2) orally by the Co-Chair(s) the first time that the agenda item in which the disclosing Editorial Panel Member has such an interest is considered by the AMA Guides® Editorial Panel.

Updated: September 16, 2019



PRESENTER

Statement of Compliance with the AMA Guides® Conflict of Interest Policy

I affirm that I have read and understand the AMA Guides® 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 AMA Guides® Conflict of Interest Policy and will update this form, as needed, prior to submission or discussion of any content proposal submission. Disclosure does not restrict or limit the ability of the presenter to support the applicant's content proposal submission.

DISCLOSABLE INTERESTS (INDICATE IF MATERIAL INTEREST)

If no disclosable interests, write "NONE."

Print Name _____

Signature _____

Title/Organization _____

Date _____

Please sign and return to AMA Guides® 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 content proposal submission or their designee(s) making a presentation ("Presenter") to the AMA Guides® Editorial Panel on a content proposal submission 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 AMA Guides® Conflict of Interest Policy at the time of the submission of the content proposal submission. Presenters who are a designee(s) of the applicant(s) of a content proposal submission shall complete disclosures on the Statement of Compliance attached to this AMA Guides® Conflict of Interest Policy prior to the meeting of the AMA Guides® Editorial Panel at which the content proposal submission will be addressed, usually in response to the "presenter letter" sent to applicants approximately two weeks in advance of the meeting of the AMA Guides® 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.