



CPT® EDITORIAL PANEL PROCESS FOR RECONSIDERATION

If an applicant or other interested party believes an action of the CPT Editorial Panel (“Panel”) was in error, that individual or entity may request reconsideration of the Panel action. An “interested party” is an individual or entity that may potentially be impacted by the Panel’s decision, regardless of whether they participated in the Panel’s original consideration of the matter.

Standards for Reconsideration. A final action of the Panel may be reversed or modified pursuant to a request for reconsideration only upon a clear demonstration, in the opinion of the Panel, that either:

- (i) information existing at the time the matter was originally considered by the Panel: (a) was not presented to the Panel, and (b) such information was relevant to the merits of the code change application and the applicable coding criteria (*Prong i*); or
- (ii) there was a material procedural irregularity that, more likely than not, had an impact on the Panel action (*Prong ii*).

A request for reconsideration will not be granted if based solely on the grounds that new information has become available for the first time after the code change application deadline (i.e. it did not exist prior to that date). In that event, the appropriate step is to submit a new application. Generally, requests for reconsideration may not be granted based solely on technical issues experienced by individuals attending the Panel meeting remotely.

If you believe at least one of the above standards for reconsideration can be met, you may submit a request for reconsideration in accordance with the process delineated below. In all other circumstances, the appropriate step is to submit a new application.

Submitting the Request. Requests for reconsideration must be received by AMA staff no later than fourteen (14) days after the posting of the Summary of Panel Actions on the CPT website. The applicants and interested parties are responsible for monitoring postings to the CPT website with respect to requests for reconsideration. The request must contain (1) the specific action requested for reconsideration; (2) the standard(s) for reconsideration the requestor believes has been met and why; and (3) as applicable, all information relevant to the matter, including any literature related to the requestor’s position. Requests for reconsideration and relevant information must be in writing and submitted to:

Samantha Ashley
Director, CPT Editorial & Regulatory Services
American Medical Association
samantha.ashley@ama-assn.org

Compliance with Lobbying Statement. Requestors may not communicate directly with members of the Panel regarding a request for reconsideration. The rules set forth in the [Statement on Lobbying](#) apply to all matters in the CPT process including requests for reconsideration.

Review by the CPT Editorial Panel Executive Committee. All timely requests for reconsideration of Panel actions are forwarded to the Executive Committee of the CPT Editorial Panel (“Executive Committee”). The Executive Committee will convene to review whether the request meets the standard(s) for reconsideration set forth by the requestor. The Chair of the Executive Committee may, but is not required to, invite the primary Panel reviewers to participate in the Executive Committee’s review of the matter. The requestor is not permitted to attend the Executive Committee’s meeting. The Chair may implement Special Procedures (as defined below).

Timing. If the Executive Committee recommends that a matter merits reconsideration because it satisfies at least one of the standards for reconsideration, the Executive Committee shall refer the matter to the Panel for consideration at a special Panel meeting or the next regularly scheduled Panel meeting. If the Executive Committee recommends that the matter does not merit reconsideration because it does not satisfy at least one of the standards for reconsideration, the matter shall be referred to the Panel for consideration at the next regularly scheduled Panel meeting, typically held in February, May, and September.

Review by the CPT Editorial Panel. The Panel considers all requests for reconsideration. The Chair may implement Special Procedures (as defined below). Upon receipt of a recommendation from the Executive Committee, the Panel’s acceptance of a request for reconsideration may involve two steps:

Step 1: Panel Review of Request for Reconsideration. The Panel must vote whether to reconsider its prior action based on whether a standard for reconsideration has been met. If that vote is affirmative, the request for reconsideration is accepted and has the effect of nullifying the Panel’s prior action. The Panel then moves to Step 2. If that vote is not affirmative, the Panel has rejected the request for reconsideration, the Panel’s prior action stands as previously established, and the matter is closed.

Step 2: Panel’s Review of the Coding Application. The Panel next reconsiders the merits of the code change application. If reconsideration is granted due to meeting Prong i of the standards for reconsideration, the Panel will reconsider the original code change application and the information existing at the time the matter was originally considered, but that was not presented to the Panel. If reconsideration is granted due to meeting Prong ii of the standards for reconsideration, the Panel will consider the original code change application as previously presented. The possible Panel actions include: (1) affirmation, rejection or modification of the prior Panel action, (2) approval of a new action in lieu of the prior Panel action, or (3) postponement of consideration until time certain. The Panel may take any action it considers appropriate, regardless of whether the action has been requested by the original code change applicant, the party seeking reconsideration or by other interested parties. Upon taking a vote, the matter is closed.

The process and timing of a request for reconsideration is summarized in the chart below:

Executive Committee Recommendation	Panel Review of Request for Reconsideration (Step 1)	Panel Review of the Coding Application (Step 2)
Executive Committee recommends that a request for reconsideration satisfies a standard(s) for reconsideration.*	Panel votes on reconsideration at a special (virtual) Panel meeting or the next regularly scheduled Panel meeting.	<p>→ If Panel voted to approve a reconsideration, the application will be reconsidered at the immediate upcoming regularly scheduled Panel meeting.**</p> <p>→ If Panel voted to reject a reconsideration, the matter is closed.</p>
Executive Committee recommends that a request for reconsideration does not satisfy a standard for reconsideration.	Panel votes on reconsideration at the next regularly scheduled Panel meeting.	<p>→ If Panel voted to approve a reconsideration, the application will be reconsidered at the next regularly scheduled Panel Meeting.**</p> <p>→ If Panel voted to reject a reconsideration, the matter is closed.</p>

* If the Executive Committee recommends a reconsideration is merited and the recommendation is to be considered by the Panel at a special Panel meeting, AMA staff shall post notice of a special meeting on its webpage and allow for registration for the meeting.

** If the Panel approves the reconsideration, the matter shall be added as a “tab” and heard at the next regularly scheduled Panel meeting.

Special Procedures. As established at the discretion of the Panel Chair, “Special Procedures” may address, but are not limited to, submission of statements of positions and replies, distribution of materials, and ground rules for presentation of the issue to the Panel. Special Procedures may be implemented for the Executive Committee, the Panel or both. Notice of Special Procedures, if established, will be given to the requestor and interested parties in advance of the meeting at which the matter will be heard.

Effective Date of Panel’s Disposition of Requests for Reconsideration. If an application is reconsidered by the Panel, the action taken by the Panel will be incorporated in the CPT code set’s normal publication cycle. Panel actions based on a request for reconsideration do not affect the scheduled publication or the posting of codes, unless extraordinary circumstances warrant a change.