



**AMERICAN MEDICAL ASSOCIATION/SPECIALTY SOCIETY  
RELATIVE VALUE SCALE UPDATE COMMITTEE ("RUC")**

**FINANCIAL DISCLOSURE POLICY ("POLICY")  
FOR RUC AND HCPAC MEMBERS AND ALTERNATE MEMBERS, AND MEMBERS  
OF RUC SUBCOMMITTEE OR WORKGROUPS**

No RUC Member or Alternate Member, Health Care Professionals Advisory Committee ("HCPAC") Member or Alternate Member, or other RUC Committee, Subcommittee or Workgroup member (collectively, a "Member") will vote or participate in any deliberation on a specific issue in the event the Member, or the Member's Family Member, has a Direct Financial Interest in the issue that is before the RUC. Every Member shall disclose such person's, and such person's Family Members', Direct Financial Interest(s) in an item before the RUC and the Member shall not vote or participate in the deliberation related to that item. Disclosure must be made to the Chair of the RUC orally or in writing prior to the relevant meeting.

For purposes of this Policy, "Direct Financial Interest" means the Member, or such person's Family Member's: (i) ownership interest of 5% or more in an Organization with an interest in the development of relative value recommendations that are before the RUC; or (ii) financial interest in an Organization with an interest in the development of relative value recommendations that are before the RUC which contributed "Materially" (i.e., at least \$10,000 excluding any reimbursement for travel expenses) to the individual's income in the past 24 months or as reasonably anticipated in the next 24 months; or (iii) ownership of stock options in an Organization that is related to the issue before the RUC, or (iv) a position as proprietor, director, managing partner, or key employee in an Organization with an interest in the development of relative value recommendations that are before the RUC; or (v) a role as a consultant, researcher expert witness (excluding professional liability testimony), speaker or writer for an Organization or participation in a clinical trial with an interest in the development of relative value recommendations that are before the RUC and where payment contributes Materially to the individual's income; or (vi) any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing individual in the context of RUC business. Direct Financial Interest does not mean the provision of the procedure or service at issue by the Member, or such person's Family Member, in the course of their practice.

For purposes of the Policy, "Family Member" means spouse, domestic partner, parent, child, brother or sister. Disclosure of a Family Member's interest applies to the extent known by the Member.

"Organization" means any entity that makes or distributes the service or product that is utilized in performing the service for which the RUC is considering relative value recommendations. Organization does *not* mean the physician group or facility in which the Member or such person's Family Member works or performs the service.

**MEMBER STATEMENT OF COMPLIANCE WITH THE RUC  
FINANICAL DISCLOSURE POLICY (“POLICY”)**

I, as a Member, understand that I must comply with the Policy of the RUC. To my knowledge, I am in compliance with the Policy. I will disclose to the RUC Chair any Direct Financial Interests that I and my Family Members have related to specific issues to be considered by that RUC (i.e., the RUC, HCPAC, or any Committee, Subcommittee or Workgroup of the RUC), and I will recuse myself from deliberation and vote on any such issue. I understand that I have a continuing responsibility to comply with the Policy.

Affirmed and Acknowledged:

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Signature

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Date

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Print Name

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Specialty Society



**AMERICAN MEDICAL ASSOCIATION/SPECIALTY SOCIETY  
RELATIVE VALUE SCALE UPDATE COMMITTEE (“RUC”)**

**FINANCIAL DISCLOSURE STATEMENT FOR  
SPECIALTY SOCIETY PRESENTERS**

I, as a RUC Advisor or other individual who is presenting or discussing relative value recommendations (collectively, a “Presenter”) before the RUC or the Practice Expense Subcommittee (collectively, a “RUC Meeting”), certify that my and my Family Members’ Direct Financial Interests in the specific issue on which I am presenting or discussing at this RUC Meeting are disclosed below. By my signature, I certify that, except as specifically identified below, neither I nor my Family Members have any Direct Financial Interests related to a specific issue on which I am presenting at this RUC Meeting.

I understand that I am required to complete this Financial Disclosure Statement prior to each RUC Meeting at which I am a Presenter.

If a Direct Financial Interest is identified on a Presenter’s Financial Disclosure Form, the individual is precluded from presenting.

*Definitions:*

“Direct Financial Interest” means the Presenter’s, or such person’s Family Member’s:

- Ownership interest of 5% or more in an Organization with an interest in the development of relative value recommendations that are before the RUC; or
- Financial interest in an Organization with an interest in the development of relative value recommendations that are before the RUC which contributed “Materially” (i.e., at least \$10,000 *excluding any reimbursement for travel expenses*) to the subject person’s income in the past 24 months or as reasonably anticipated in the next 24 months; or
- Ownership of stock options in an Organization that is related to the issue before the RUC;
- A position as proprietor, director, managing partner, or key employee in an Organization with an interest in the development of relative value recommendations that are before the RUC; or
- A role as a consultant, researcher, expert witness (excluding professional liability testimony), speaker or writer for an Organization or participation in a clinical trial with an interest in the development of relative value recommendations that are before the RUC and where payment contributes Materially to the subject person’s income; or
- Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing individual in the context of RUC business.

Direct Financial Interest does not mean the provision of the procedure or service at issue by the Presenter, or such person’s Family Member, in the course of their practice.

“Family Member” means spouse, domestic partner, parent, child, brother or sister. Disclosure of Family Member’s interests applies to the extent known by the Presenter.

“Materially” or “Material” means at least \$10,000, excluding any reimbursement for travel expenses, to the Presenter’s income or such person’s Family Member’s income in the past 24 months or as reasonably anticipated in the next 24 months.

“Organization” means any entity that makes or distributes the service or product that is utilized in performing the service for which the RUC is considering relative value recommendations. Organization does *not* mean the physician group or facility in which the Presenter or such person’s Family Member works or performs the service.

**Include only Direct Financial Interests that relate to the specific issue that you are presenting at this RUC meeting.**

<b>Material Direct Financial Interests Disclosure</b> (Identify the type of interest, who holds the interest, whether the interest is stock ownership, etc.)	<b>Explain the relationship between the service(s) or product(s) on which you are presenting and your disclosure</b>	<b>Did the interest contribute at least \$10,000 to the individual in the past 24 months OR is it anticipated to contribute at least \$10,000 to the individual in the next 24 months?</b>	<b>Indicate cumulative lifetime interest amount</b>	<b>If disclosure relates to stock, please list number of shares owned, options or warrants</b>

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Agenda Tab/Issue

Affirmed and Acknowledged:

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Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Specialty Society

## **AMA/Specialty Society RVS Update Committee (“RUC”)**

### **Review Processes for Presenter Financial Disclosure Statements**

- Specialty Societies must ensure that each RUC Advisor and other individual who is presenting or discussing relative value recommendations before the RUC (collectively, a “Presenter”) submits such person’s Financial Disclosure Statement with the Specialty Society’s summary of recommendation (“SOR”) submissions prior to each RUC meeting. AMA staff will review all Financial Disclosure Statements that are submitted. AMA staff will accept all Financial Disclosure Statements as complete if disclosed information clearly does or clearly does not meet the definition of a “Direct Financial Interest” and no further information or clarification is necessary. If a “Direct Financial Interest” is identified on a Presenter’s Financial Disclosure Form, the individual is precluded from presenting.
- AMA staff determinations are made on a case-by-case basis and determinations are final. If a Presenter indicates that he or she owns stock options related to the specific service or procedure at issue, he or she may not present to the Practice Expense Subcommittee or the RUC.
- In the event that AMA staff determines that a Financial Disclosure Statement(s) is unclear as to whether or not a disclosure meets the definition of a “Direct Financial Interest,” AMA staff will convene the Administrative Subcommittee’s Financial Disclosure Review Workgroup (“Workgroup”) via email or conference call to review and make a final determination related to such Financial Disclosure Statement(s). AMA staff may, in its discretion, solicit the Workgroup’s feedback on other issues related to disclosures. The Workgroup’s meeting will be held as soon as possible (less than a week) after the SOR/Financial Disclosure due date.
- On a case-by-case basis, the Workgroup will come to consensus regarding whether a proposed Presenter’s disclosure constitutes a “Direct Financial Interest” related to the issue on which such person seeks to be a Presenter. If the Workgroup determines that a proposed Presenter has a “Direct Financial Interest”, the individual is precluded from presenting to the Practice Expense Subcommittee or the RUC with respect to the matter(s) for which the Direct Financial Interest exists.
- If necessary, AMA staff will contact specific Presenters to obtain more information for the benefit of AMA staff and/or as requested by the Workgroup.
- AMA staff will immediately contact the Presenter and Specialty Society in writing regarding final decisions related to the Financial Disclosure Statement and the Presenter’s participation in the upcoming RUC meeting.
- If a Presenter is prohibited from presenting to the RUC, the Specialty Society may immediately facilitate the submission of a Financial Disclosure Statement form of an alternate Presenter. AMA staff, and the Workgroup, if necessary, will review the alternate’s form immediately.

#### **Financial Disclosure Review Workgroup**

- The five individuals on the Workgroup will be assigned by the Administrative Subcommittee Chair. Any individual RUC member that may have a conflict will not be assigned to this Workgroup.
- The individuals comprising the Workgroup will rotate each RUC meeting, except for one permanent member per year, as determined by the Administrative Subcommittee Chair.

### Appeals Process

- If a Presenter or such person's Specialty Society requests an appeal of a decision of the Workgroup, the Financial Disclosure Review Workgroup will meet via telephone conference prior to the RUC meeting.
- All requests for appeals of decisions based on Financial Disclosure Statements must be in writing and received by the AMA staff within one (1) week after the Presenter and Specialty Society received notification of the original decision.
- The Administrative Subcommittee shall invite appellants to meet via telephone to discuss the rationale of the Workgroup decision and the appellant's reason for the appeal.
- The Administrative Subcommittee will come to consensus regarding whether to affirm or reverse the Workgroup's decision. AMA staff will provide this decision to the appellant Presenter and the Specialty Society in writing.
- The Administrative Subcommittee decision is final.
- If a Specialty Society requests an appeal of a decision that was made by AMA staff (not the Workgroup), the Workgroup will meet via telephone conference prior to the RUC meeting and shall follow the process indicated above for the Administrative Subcommittee. Upon the Workgroup's decision and notification to the Presenter and Specialty Society of the same, the decision may be appealed to the Administrative Subcommittee, which shall follow the process indicated above and whose decision shall be final and non-appealable. Appeals will be expedited to the extent possible to meet timelines.

### Discovery of False Disclosures/Failure to Disclose prior to the RUC Meeting

- If a Presenter's Direct Financial Interest is not disclosed or discovered until the RUC meeting, that individual must immediately leave the RUC meeting.
- The remaining Presenters will continue with the presentation.

### Discovery of False Disclosures/Failure to Disclose after the RUC Meeting

- The Workgroup reviews any discovered false disclosures or failures to disclose Direct Financial Interests and determines the extent to which these may have affected the RUC's evaluation of the code. The Workgroup develops a recommendation for action.
- The Administrative Subcommittee reviews the Workgroup's recommendation, modifies it as needed and develops a recommendation for the RUC.
- The RUC reviews the Administrative Subcommittee's recommendation.
- If the RUC recommendation has already been submitted to CMS, the RUC Chair will notify CMS and outline recommended course of action.

**AMA/Specialty Society RVS Update Committee (“RUC”)**  
**Financial Disclosure Statement in the RUC Survey Instrument**

**Financial Disclosure:**

Please answer the following questions by checking yes or no.

**For the following questions, please indicate whether you and/or a “Family Member” (spouse, domestic partner, parent, child, brother, or sister) have a known, direct financial interest in this/these procedure(s), other than providing these services in the course of patient care. Disclosure of Family Member’s interests applies to the extent known by the survey respondent.**

- For the purposes of this survey, “Organization” means any entity that makes or distributes the service or product that is utilized in performing the service for which the RUC is considering relative value recommendations. Organization does *not* mean the physician group or facility in which you or such person’s family member works or performs the service.
- “Materially” or “Material” means at least \$10,000, excluding any reimbursement for travel expenses, to your income or such person’s family member’s income in the past 24 months or as reasonably anticipated in the next 24 months.
- Ownership interest of 5% or more in an organization with an interest in the development of relative value recommendations that are before the RUC:  
Yes ☐ / No ☐
- Financial interest in an organization with an interest in the development of relative value recommendations that are before the RUC which contributed Materially\*\*\* (i.e., at least \$10,000 *excluding any reimbursement for travel expenses*) to the subject person’s income in the past 24 months or as reasonably anticipated in the next 24 months:  
Yes ☐ / No ☐
- Ownership of stock options in an organization that is related to the issue before the RUC: Yes ☐ / No ☐
- A position as proprietor, director, managing partner, or key employee in an organization with an interest in the development of relative value recommendations that are before the RUC: Yes ☐ / No ☐
- A role as a consultant, researcher, expert witness (excluding professional liability testimony), speaker or writer for an organization or participation in a clinical trial with an interest in the development of relative value recommendations that are before the RUC and where payment contributes materially to the subject person’s income: Yes ☐ / No ☐
- Any other interest that a reasonable person would consider relevant to or potentially impacting the judgment or decisions of the disclosing individual in the context of RUC business: Yes ☐ / No ☐

*If you have answered yes to any of the above questions, do not complete this survey.*

**Additional Disclosure:**

Have you been contacted by anyone other than your specialty society, other specialty societies sponsoring this survey (or any of their representatives) or the American Medical Association with respect to this survey? Yes ☐ / No ☐

*If you have answered yes to the above question, do not complete this survey. d*

**AMA/Specialty Society RVS Update Committee  
Attestation Statement**

This form needs to be completed by any **RUC Advisor** whose specialty society is developing a recommendation to be reviewed by the RUC.

As a RUC Advisor, I attest that the integrity of the RUC survey, summary of recommendation forms and practice expense recommendations are based on accurate and complete data to the best of my knowledge. As a RUC advisor, I acknowledge that violations would be addressed by the executive committee (i.e., RUC Chair, AMA Representative and Alternate AMA Representative.)

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Tab Number

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Issue

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Specialty Society

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Signature

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Date

**AMA/Specialty Society RVS Update Committee (RUC)  
Vendor/Company Attestation Statement**

This form needs to be completed by an authorized representative of any **Vendor or Company** that makes, markets or distributes a product or device utilized in performing the service being surveyed by the AMA/Specialty Society RVS Update Committee (RUC), as part of its CPT® code survey and valuation process, and which has supplied a list of users of such products or devices in connection with the survey and valuation process.

By submitting to the RUC a list of users of the undersigned's product or device as part of the RUC's CPT® code survey and valuation process, I attest that no employee, affiliate, or agent of the undersigned has contacted, and further covenant that they will not contact, any such user in connection with the survey. I hereby represent and warrant that I have the authority to sign this statement on behalf of the undersigned company and that the information herein is true and accurate. I understand that any false or inaccurate information will render the survey invalid, harming both the undersigned and the physicians who use the product or device.

\_\_\_\_\_  
CPT® Codes

\_\_\_\_\_  
Vendor/Company Name

By: \_\_\_\_\_

\_\_\_\_\_  
Printed Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

## AMA/Specialty Society RVS Update Committee Lobbying Policy

Lobbying of members of the AMA/Specialty Society RVS Update Committee (“RUC”), members of the HCPAC Review Board, RUC/HCPAC Advisors or the staff or leadership of medical and healthcare professional societies (including consultants engaged by such societies), either directly or via third parties, is prohibited. *(Note: References to “RUC” herein, where appropriate, apply equally to the HCPAC Review Board as though expressly stated.)*

“Lobbying” means **unsolicited** communications of any kind made at any time (including, except as permitted below, during meetings) for the purpose of attempting to improperly influence voting by members of the RUC on valuation of CPT® codes or any other item that comes before the RUC, one of its workgroups or one of its subcommittees. **Any communication that can reasonably be interpreted as inducement, coercion, intimidation or harassment is strictly prohibited. Violation of the prohibition on lobbying may result in sanctions, such as being suspended or barred from further participation in the RUC process.**

Information that accompanies a recommendation, presentation or commentary to the RUC or a workgroup or a subcommittee during meetings of those groups, and responses to inquiries from a RUC member, RUC/HCPAC Advisor or a RUC staff member, do not constitute “lobbying.”

In order for the members of the RUC and HCPAC Review Board and for RUC/HCPAC Advisors to function effectively, their review of medical specialty societies’ recommendations for valuation of CPT® codes made to the RUC or to one of its workgroups or subcommittees (“RVU Submission”) must be based on the information contained in the RVU Submission and the RUC members’ independent judgment. RUC staff is responsible for organizing and submitting information to the RUC/HCPAC Advisors, workgroups and committees, and the RUC for consideration. Information relating to a RVU Submission must be initially submitted to RUC staff no later than twenty-one (21) days prior to the start of the meeting at which the recommendation will be considered. Information submitted outside of this process or beyond the deadline will not be considered unless approved and disseminated by RUC staff.

In some cases, the Chair of the RUC may convene a “facilitation committee” which is an informal group that meets during a RUC meeting to allow selected RUC members, with input from RUC/HCPAC Advisors and other invited participants, to confer and attempt to reach consensus on a recommendation for presentation at the RUC meeting. The expression of views during meetings of facilitation committees is not considered lobbying.

Complaints about lobbying should be reported promptly in writing to the Director, Physician Payment Policy and Systems.

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