



ASE AI Procedures for CPT Designation

- ASE advises all developers of AI-based products or services (herein “AI technology”) to inform the ASE of their intent to file for CPT designation prior to such application.
 - If developers of AI technology would like ASE to review their AI technology and provide guidance for a potential CPT application, engaging ASE through its Industry Roundtable (IRT) Partners structure is strongly encouraged.
 - For all CPT applications, the Society has a process that requests a minimum of 8 weeks prior to the official AMA CPT submission date for ASE consideration.
- ASE cannot engage in discussion regarding a developer’s CPT code application process until FDA approval process has begun (initial discussions with the FDA), the service/procedure is offered at a minimum of one site on humans, and a description of a US clinical trial outlining the efficacy of the procedure or service is provided. (*this is the minimum criteria for a Cat III CPT code*)
 - *Note – FDA clearance is not required for Cat III CPT code application*
- ASE recommends that all developers classify their AI technology based on established taxonomy: assistive, augmentative, or autonomous.
 - Assistive technologies
 - ASE strongly advises that developers of assistive AI technology — i.e., AI technology designed solely to enhance workflow efficiency — refrain from pursuing CPT code designation. ASE believes that alternative business models independent of the CPT/RUC reimbursement process are more appropriate to support this type of technology.
 - Augmentative technologies
 - Developers seeking CPT code designation for augmentative technology should first familiarize themselves with the requirements for obtaining CPT code designation ([AMA CPT Appendix S](#)).
 - Category III CPT codes:
 - ASE will neither sponsor, support, nor interfere with CPT Category III application for augmentative AI technologies.
 - Category I CPT codes:
 - After awarded CPT Category III designation, ASE will engage with developers in the CPT Category I designation process.
 - Autonomous technologies
 - ASE will not engage in discussion regarding the pursuit of CPT code designation for any autonomous technology that does not also involve and recognize specific physician work.