

## Guidelines for the Avoidance of Inadvertent Anticompetitive Conduct

These guidelines apply to all the North American Neuro-Ophthalmology Society's fellow, members, trustees, officers, committee members, representatives, and employees.

1. Members must not make any agreement to fix, raise, or stabilize prices or fees (or any element of prices or fees) or restrict services that a member can offer.
2. Members must not make any agreement to allocate or divide geographic or service markets, customers, or patients.
3. Members must not make any agreement to collectively refuse (or encourage others to refuse) to do business with a provider, a third-party payer, managed care organization, a supplier, a purchaser, a patient, or any groups of such persons or companies.
4. Members must not make any agreement to discourage entry into or competition in any segment of the health care market.
5. Members must not make any agreement to restrict, limit, or prohibit truthful advertising.
6. Members should use caution in discussing whether the practices of a particular member or other person (that is, an actual or potential competitor) are "unethical" or "anticompetitive" – this might be perceived as an attempt to unlawfully exclude someone from providing health care services.
7. Members should also be cautious in any group discussions about the safety, quality, or efficacy of the products or services or other health care providers. This does not mean that members should avoid reasonable discussion and assessment of the safety or efficacy of technology, drugs, and devices – but the discussion should not sound like members will collectively refuse to refer business.
8. Members should not discuss the benefits of jointly withholding business from some firm or group of people, or discouraging others from doing business with one or more people. This can be misconstrued as a group boycott.

All NANOS meetings should be conducted in a manner consistent with these guidelines. Meetings should follow written outlines or an agenda, and minutes should be prepared and preserved.

Note: NANOS members compete with one another to provide quality care to the public. Anticompetitive conduct occurs when two or more separate economic entities act together to restrict competition (fix prices, boycott a supplier, etc.). Physicians in a partnership or a professional corporation are considered one economic entity.