

National Impact of Skin Substitute Billing January 2022 – June 2025

October 23, 2025

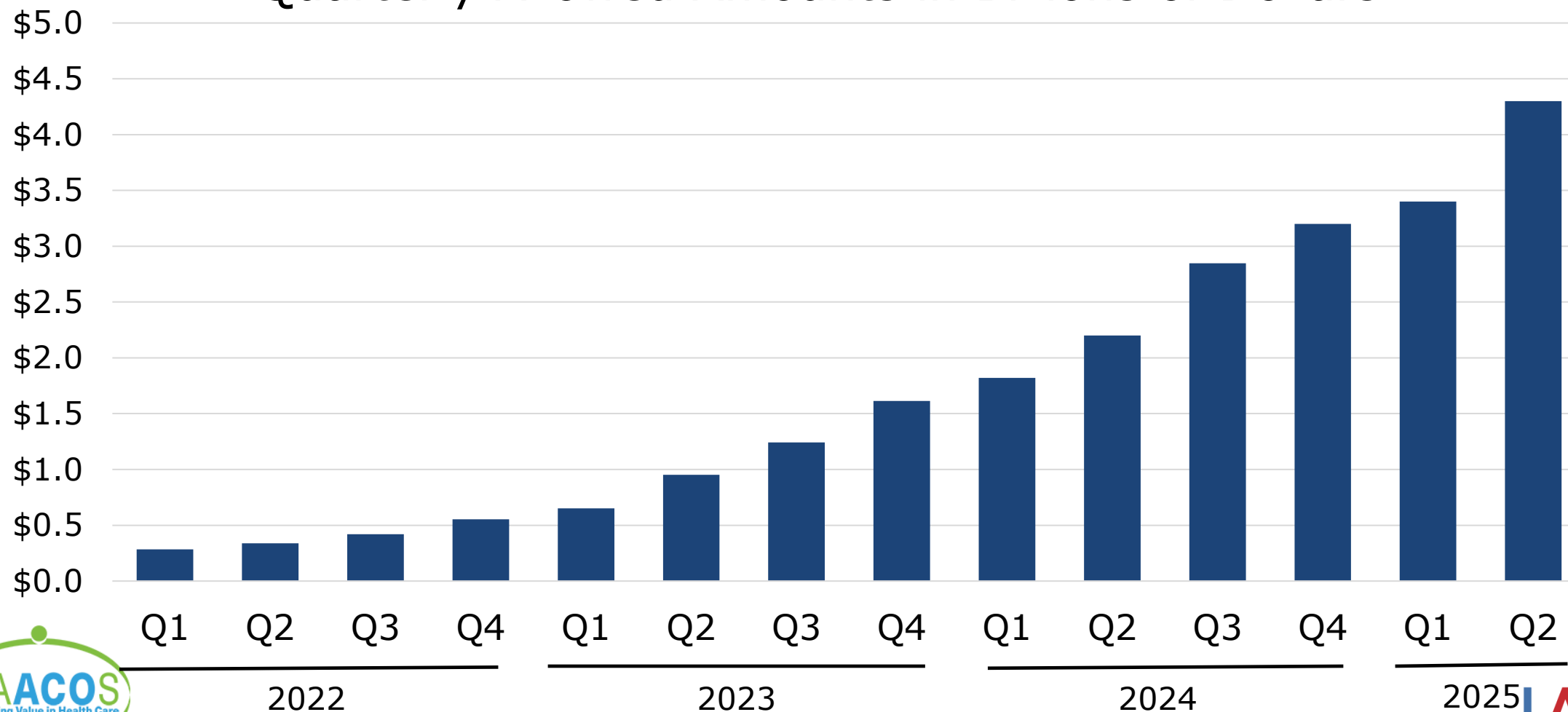


Background

- Medicare Part B allowed amounts for skin graft codes (Q4100-Q4367) increased from \$1.6 billion in 2022 to \$9.9 billion in 2024, with \$7.7 billion in the first 6 months of 2025
- These spikes in billing may adversely affect ACO shared savings if they experience more rapid growth than their regions

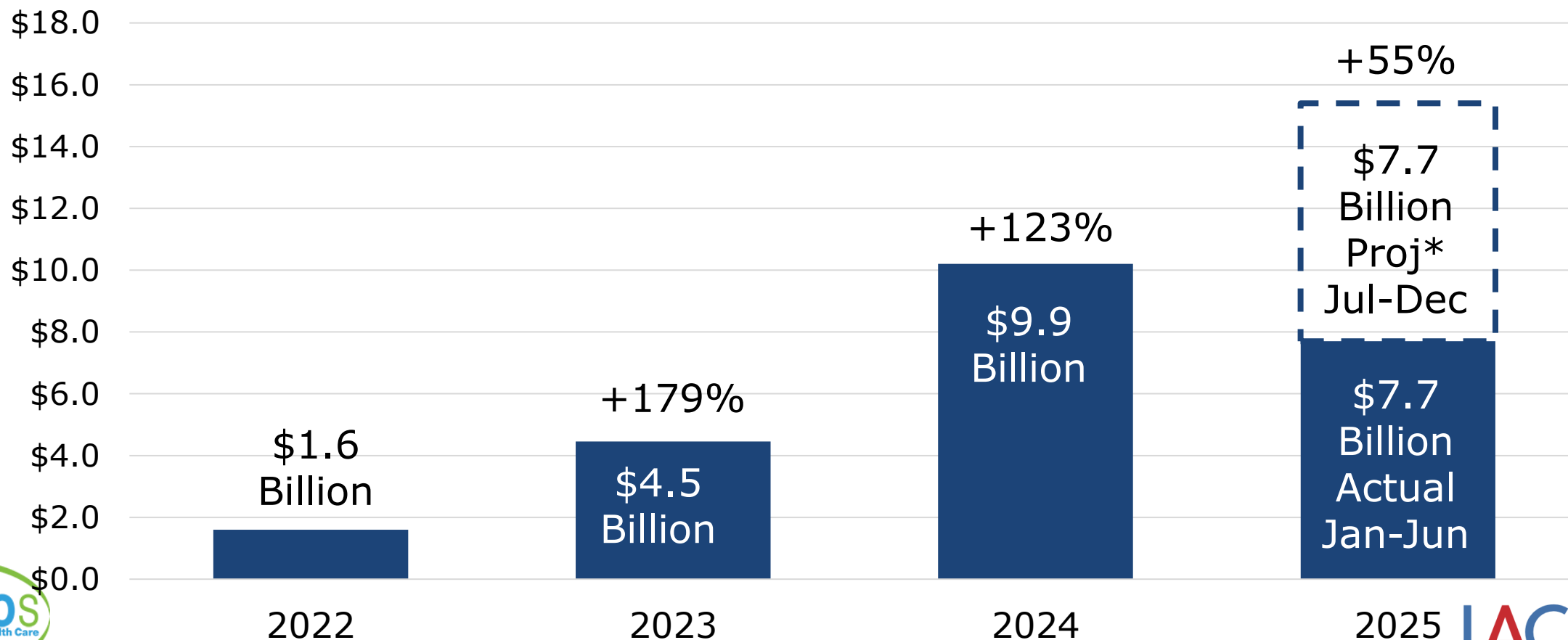
Medicare Allowed Amounts for Part B Skin Graft Products

Quarterly Allowed Amounts in Billions of Dollars



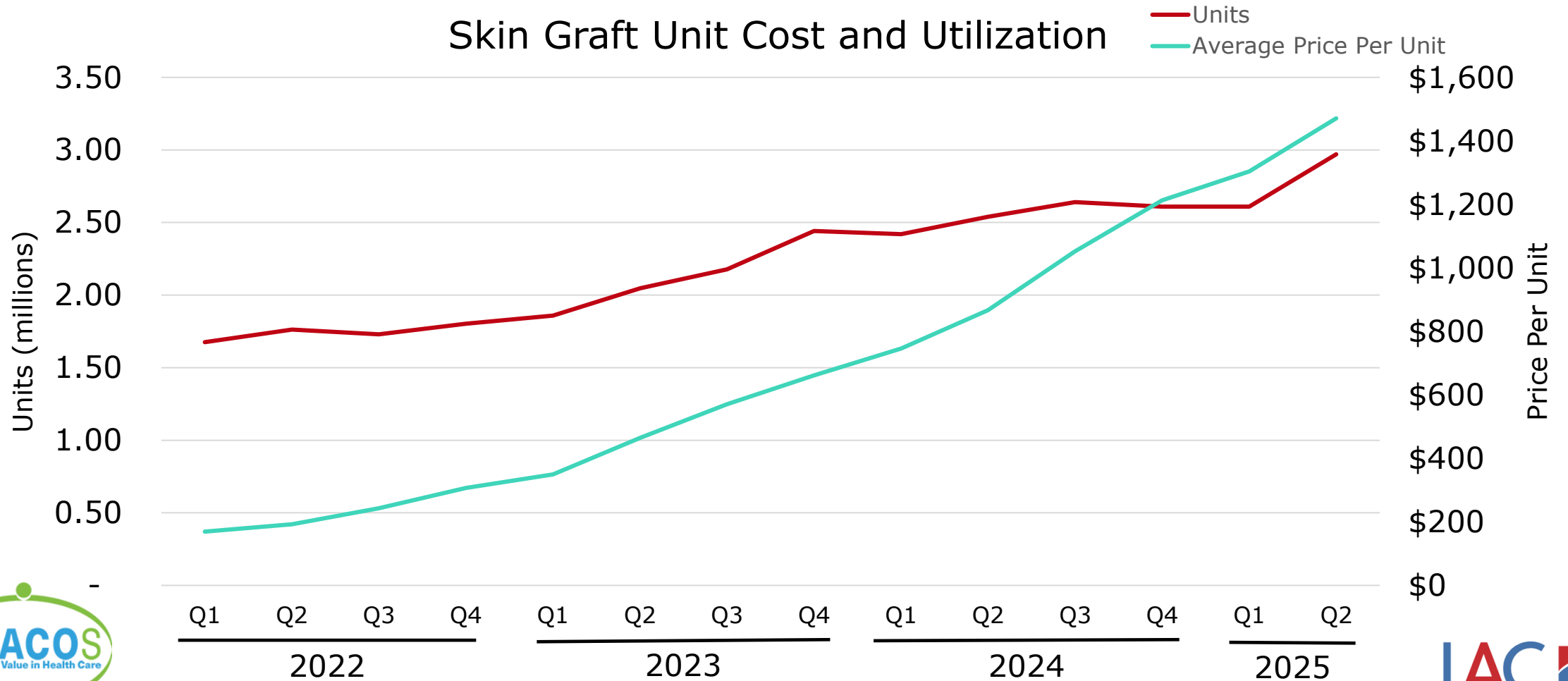
Medicare Allowed Amounts for Part B Skin Graft Products

Allowed Amounts in Billions of Dollars

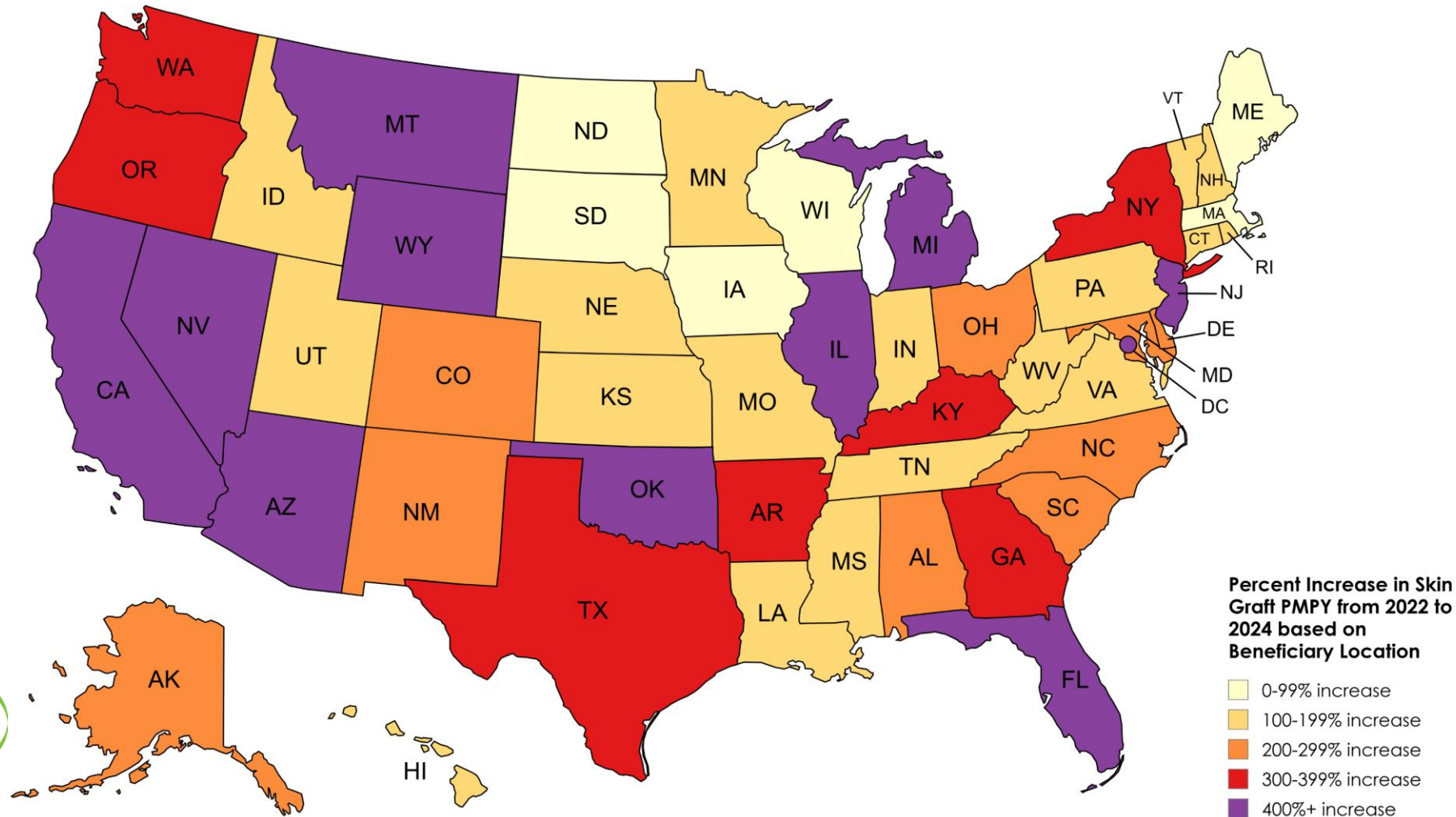


*Projection based on simple annualization of first 6 months
Allowed amount includes Medicare payment and beneficiary financial responsibility.

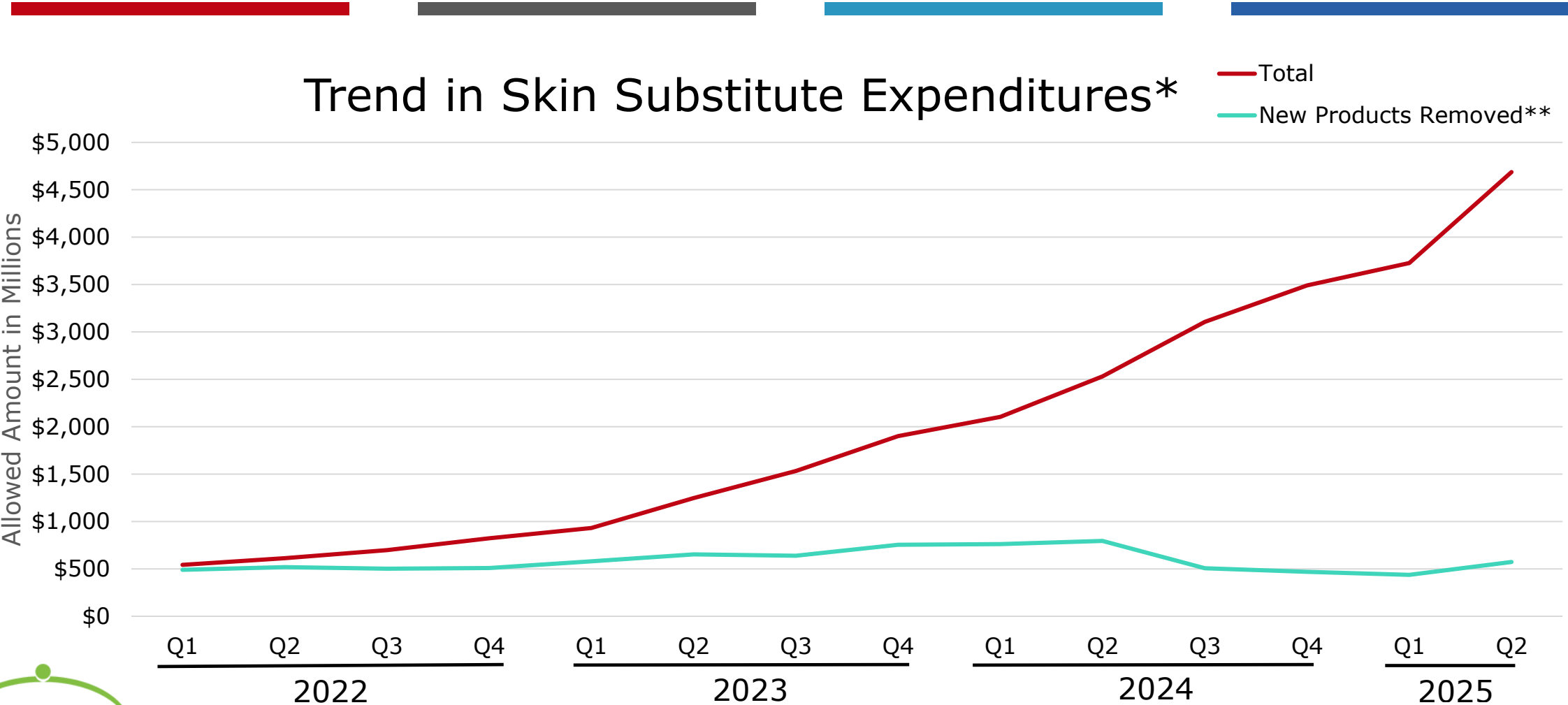
Growth in Volume and Cost Per Unit for Part B Drug Skin Grafts



Percentage Change in Medicare Allowed Charges for Skin Substitutes from 2022 to 2024



Impact of New Skin Substitute Products on Medicare Allowed Amounts: 2022 – 2025 Q2



*Includes CPTs for Part B Drug Skin Substitutes, Application, and Wound Matrices

**Removed all CPT codes that had ASP>\$1,000 and were identified in ASP pricing guide as new in 2023, 2024 or 2025



Skin Substitute Products with Highest Allowed Amounts: January 2022 – June 2025

CPT	Name	Oct2025 Average Sales Price	Total Spending 2022 - 2025Q2 in Millions
Q4205	Membrane graft or wrap	\$1,237	\$2,235
Q4271	Complete ft	\$1,141	\$1,862
Q4262	Dual layer impax	\$99	\$1,774
Q4275	Esano Aca	\$2,707	\$1,105
Q4280	Xcell amino matrix	\$2,356	\$1,071
Q4253	Zenith amniotic membrane psc	\$76	\$823
Q4265	Neostim tl	\$1,386	\$790
Q4191	Restorigin	\$655	\$775
Q4164	Helicoll	\$1,641	\$714
Q4250	Amnioamp-mp	\$2,979	\$692

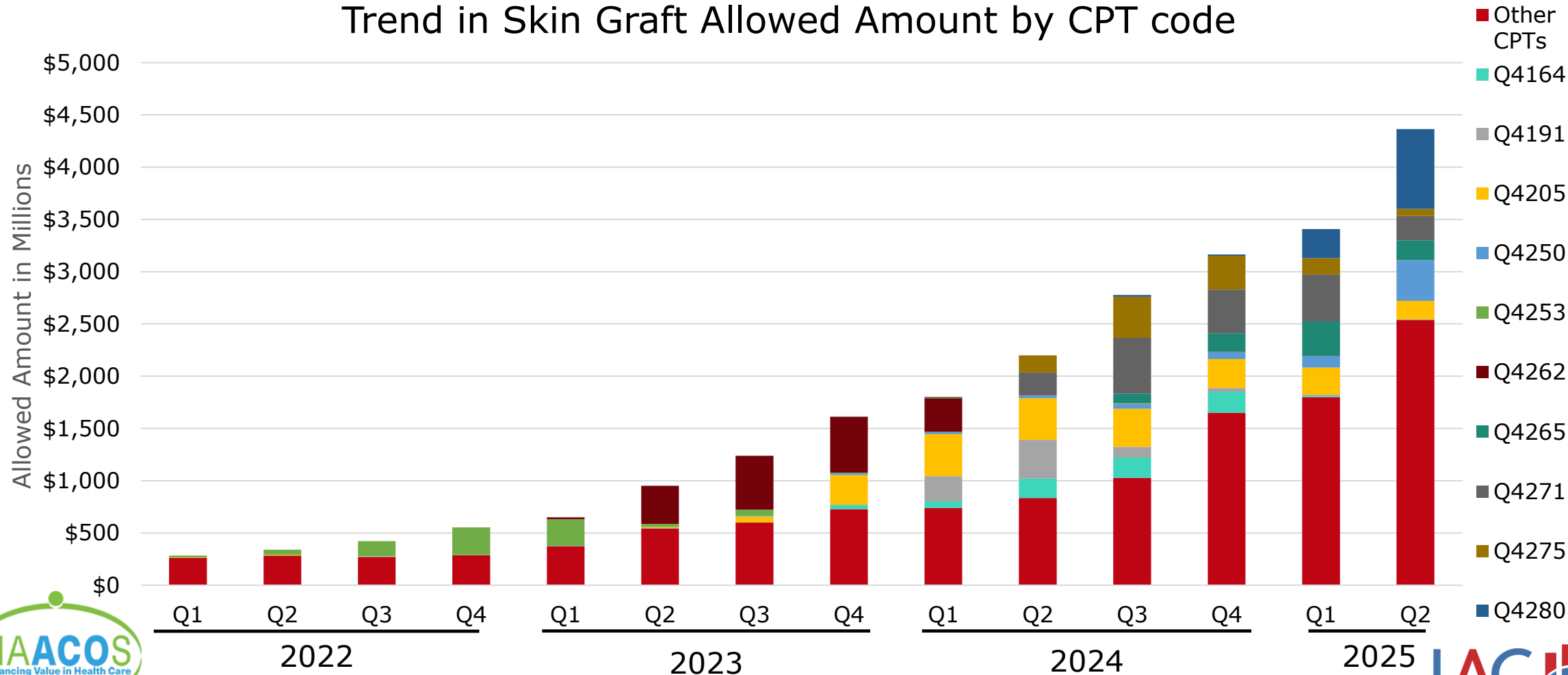


Based on the ASP pricing files: 102 Skin Graft products were introduced from Jan 2023-Oct 2025 that had an ASP of greater than \$1,000 when added to the file. For certain products the ASP drops quite rapidly. For example, Q4262 and Q4253 both had ASP prices of several hundred dollars in the July 2024 ASP pricing file.



Total Skin Substitute Amounts and Top Ten Products by Total Spending from 2022 through 2025 Q2

Trend in Skin Graft Allowed Amount by CPT code



Methods

- Skin Graft payments are based on Medicare allowed amounts from carrier claims and outpatient claims.
- Charges were included only if the line processing indicator was an A, R, or S.
- Analysis is based on Part B Drug Skin Graft CPT codes Q4100-Q4367
- CPT Codes A2001 – A2035 were not included in the analysis. The claims amounts are sufficiently small that it does not have a material impact on the overall analysis.
- Allowed Amount from Medicare Claims used in this analysis include both the portion paid by Medicare and the patient responsibility portion.