

September 12, 2025

Submitted via regulations.gov

Dr. Mehmet Oz
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Medicare and Medicaid Programs; CY 2026 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; and Medicare Prescription Drug Inflation Rebate Program (CMS-1832-P)

Dear Administrator Oz,

On behalf of the undersigned organizations, we are writing to express our support for the proposal to address skin substitute payment in the Medicare Physician Fee Schedule. Our organizations are committed to improving health care delivery and health care experiences for people across the country. We are dedicated to advancing high quality care at a lower cost. As such, we are deeply concerned about the trajectory of skin substitutes utilization, spending, and health outcomes.

The patient harm from skin substitutes has been well-documented. For example, an 82 year old patient with an old surgical wound on her abdomen died of sepsis after receiving nine skin grafts over three months, when the wound became infected. The total cost to Medicare of these products was \$324,000. Other providers have reported that spending on these bandages has increased 400% over the course of one year. Individual patients have received as much as \$14 million of bandages over the course of year, including one patient who received as many as seven treatments in a single day.¹

We share your significant concerns about patient harm and expense to the Trust Fund flowing from skin substitutes. For these reasons, we strongly support the proposal in the Medicare Physician Fee Schedule that would classify skin substitute products as “incident to” supplies and establish a single, standardized rate payment for these products. We support the proposed rate of \$125 per square centimeter and recommend the Administration go no higher in setting the reimbursement rate.

We appreciate the opportunity to provide feedback on this important issue and look forward to continuing to work with the Administration to root out fraud and improve care for beneficiaries.

Sincerely,

Camden Coalition
The Coalition to Transform Advanced Care (C-TAC)
Health Care Transformation Task Force
National Alliance for Caregiving
National Partnership for Healthcare and Hospice Innovation
National Partnership for Women and Families
United States of Care
Accountable for Health

¹ <https://www.nytimes.com/2025/04/10/health/skin-substitutes-medicare-costs.html>