



Marcia Nusgart's oral remarks
HCPCS Public Meeting for Non-Drug and Non-Biological Items and Services
December 22, 2020

Agenda item #6 on 12/22/20

Application 20.120

Request to establish a new Level II HCPCS code to identify Restrata Wound Matrix

My name is Marcia Nusgart and I am the Executive Director of the Alliance of Wound Care Stakeholders, a nonprofit multidisciplinary trade association representing physician specialty societies, clinical and patient associations whose mission is to promote quality care and access to products and services for people with wounds. I first would like to congratulate Marge Watchorn in her new role as Acting Director in this new division of Coding and Diagnosis Related Groups and look forward to working with her. I also would like to thank Cindy Hake for her dedicated leadership with the HCPCS Workgroup and its coding process all these years.

I am here speaking today to support the need for the CMS HCPCS Workgroup to create a product specific Q code for Restrata and any other product who meets the newly created skin substitute definition that now includes synthetic products. Please note that I do not receive any financial compensation from any of the synthetic skin substitute manufacturers including Restrata.

In the recently released OPPS final rule, CMS expanded a new definition for skin substitutes which now includes synthetic products. It is our understanding that several synthetic products have applied for Q codes over the years – including Restrata. Instead of giving Q codes for these products, the HCPCS Workgroup had issued them surgical dressing A codes under the code descriptor- “synthetic, resorbable wound dressing...” with the codes A6460 or A6461 instead.

However, now that the new definition has been finalized and these products are now defined as “skin substitutes” and not “surgical dressings”, the Alliance submits that the Agency should appropriately issue a product specific Q code for Restrata and all synthetic resorbable products. This should include all synthetic skin substitutes that are entering the marketplace as well as CMS revisiting the products that are currently in the A6460 and A6461 codes (Synthetic, resorbable wound dressing...) and reassign them Q codes or request that the companies reapply through the HCPCS coding process to be reassigned Q codes when appropriate. In addition, we believe that CMS should delete A6460 and A6461.

We strongly recommend that Restrata should be issued a HCPCS Q code by the panel in this coding cycle if possible.

5225 Pooks Hill Rd | Suite 627S | Bethesda, MD 20814

T 301.530.7846 | C 301.802.1410 | F 301.530.7946

marcia@woundcarestakeholders.org