

Update to the Final Local Coverage Determinations (LCDs) for Certain Skin Substitutes: FAQs

FAQ 1 - Has coverage changed for products on the MAC Discretion (12-month status quo) list?

Q: My product is on CMS’s “MAC Discretion” / 12-month status quo list in the updated skin substitute LCDs. Has Medicare coverage changed for these products as of January 1, 2026?

A: No new LCD coverage policy (positive or negative) has been established for products in the 12-month status quo category. Products in the status quo category will continue to be paid as they have been previously. What is notable about the LCDs is the 158 products that will no longer be covered.

FAQ 2 - Will products on the MAC Discretion list be reimbursed by the MACs?

Q: Will Medicare Administrative Contractors (MACs) reimburse claims for skin substitute products that are on the MAC Discretion list?

A: The LCDs will not make product-specific changes that affect payment for the items listed on the MAC Discretion list. During the 12-month status quo period, products in the status quo category will continue to be paid in accordance with statutory and regulatory criteria. It has always been the case that claims must demonstrate that the service is “reasonable and necessary” under section 1862(a)(1)(A) of the Social Security Act and satisfy all other applicable Medicare coverage, coding, and billing requirements. That requirement remains in place and should be interpreted as it has been historically.

FAQ 3 - Why is there a “status quo” category rather than just covered and non-covered?

Q: Why is there a “status quo” category rather than just covered and non-covered?

A: CMS previously issued a request that any additional clinical evidence for these products should be submitted by November 1, 2025. However, many product sponsors were not able to complete studies and submit final results in that timeframe. The intent of this policy is to establish a non-coverage LCD for the products that the MACs believe should not be covered while preserving access for beneficiaries for the other products for which additional evidence is being generated. After this 12-month status quo period, the MACs will reconsider the LCDs and review evidence submitted for products in the status quo category through December 31, 2026, with new LCDs under the reconsideration process scheduled for release in early 2027.

Artacent® Products Remain Reimbursable

Effective January 1, 2026

Q4190	Artacent AC	Reimbursable
Q4169	Artacent Wound	Reimbursable
Q4339	Artacent Vericlen	Reimbursable
Q4336	Artacent C	Reimbursable
Q4337	Artacent Trident	Reimbursable
Q4338	Artacent Velos	Reimbursable