



# Keys to Submitting Skin Substitute Product Data



## Background

The Consolidated Appropriations Act, 2021 (CAA) became law on December 27, 2020. With the passage of the CAA, manufacturers are required to report Average Sales Price (ASP) information for items, services, supplies, and products payable under the Medicare Part B Program to CMS regardless of whether they have a Medicaid Drug Rebate agreement. All manufacturers were required to report first quarter 2022 ASP data to CMS no later than April 30, 2022, with this data reflected in the July 2022 ASP Drug Pricing File.

In general, all manufacturers who are required to submit ASP information have the same reporting requirements. However, there are a few nuances to submitting quarterly skin substitute information, including using an Alternate ID and submitting specific product data.

### → Alternate ID

Skin Substitute products are tracked using Alternate IDs. An Alternate ID can be any number unique to the product (i.e., Stock Keeping Number (SKN), product catalog number, or other alternate IDs).

**TIP:** Whatever Alternate ID is used, please ensure it is consistent with the unique product identifier posted on the manufacturer's publicly available website to allow for easy verification.

### → Product Data

All skin substitute product data must be up-to-date and must match the product information listed on the manufacturer's publicly available website. Information required for Skin Substitute products includes any available FDA information, Alternate IDs, product size, and package descriptions.

### → Financial Data

Financial data is collected in the ASP Data Collection System to calculate ASP but does not need to be posted on the manufacturer's website. When submitting financial data in the ASP Data Collection System, consider the following:

- The Manufacturer's ASP price should be calculated after all price concessions, spread out over a 12-month period, are deducted, as defined in 42 CFR 414.804.
- The Number of ASP Units is the number of units sold based on the actual content of the package using the HCPCS unit measurement described in the HCPCS code description.

**For more information visit:**

<https://www.cms.gov/medicare/payment/fee-for-service-providers/part-b-drugs/average-drug-sales-price>

**Contact us at:** [sec303aspdata@cms.hhs.gov](mailto:sec303aspdata@cms.hhs.gov).