



CMS 2025 Proposed Rule Excimer Laser Codes 96920-96922

STRATA Skin Sciences
10/24/2024



Key Takeaways

- + Proposed CMS 2025 Rule: Significant Reductions to Reimbursement for Excimer Laser Codes (96920-96922)
- + CMS 2025 Proposed Rule **Lacks Real-World Data Support:**
 - Current and proposed Practice Expense calculations do not reflect real-world excimer laser usage and cost.
 - Provider time estimates are not based on RUC survey data from excimer laser users.
 - Clinical necessity is not fully considered based on all available evidence for various indications.
- + Potential Impacts of the CMS 2025 Proposed Rule:
 - **Reduced patient access**, disproportionately affecting people of color
 - Patients may **migrate to more costly** and potentially less safe treatment options
 - Risk of **excimer laser treatments becoming unavailable**
 - Potential for **significant negative budget implications** for CMS and private payors.

Concerns regarding these changes are strongly supported by patients, patient advocacy groups, Healthcare providers, Academic institutions, AMA and AAD

2025 CMS rule proposes significant reduction in reimbursement of Excimer Laser Codes (96920 – 96922)

CPT Code	CPT Code Description	2024 National Average Medicare Payment Rate	2025 Proposed Rate Change
96920	<i>Excimer Laser Treatment for Psoriasis (<250 sq cm)</i>	\$155.45	-13%
96921	<i>Excimer Laser Treatment for Psoriasis (250 - 500 sq cm)</i>	\$170.43	-15%
96922	<i>Excimer Laser Treatment for Psoriasis (>500 sq cm)</i>	\$232.01	-21%

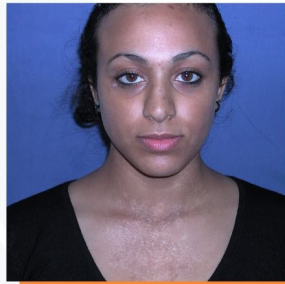


The 2025 rates will
devastate the ability to get
treatment

Who will be impacted?

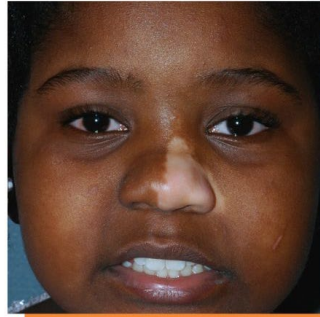


BEFORE

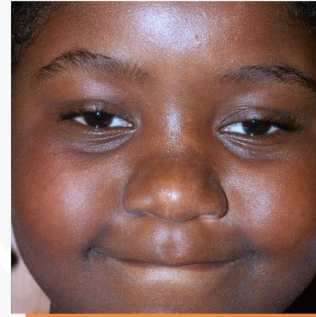


AFTER

After 6 months of 48 treatments

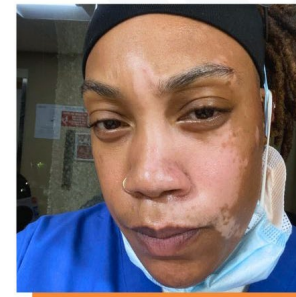


BEFORE

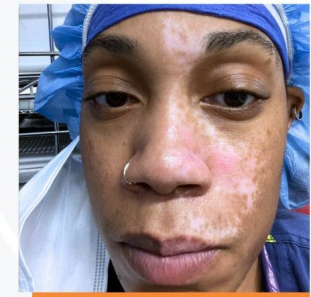


AFTER

After 20 treatments

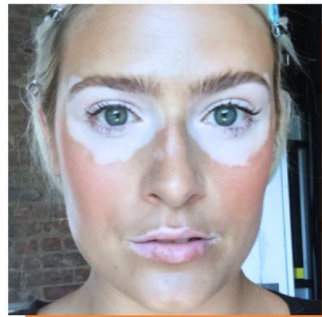


BEFORE

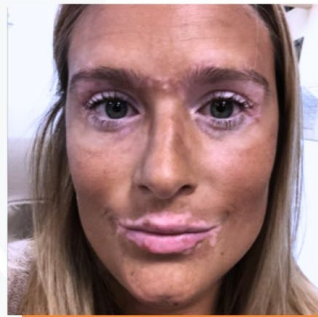


AFTER

After 3 months of treatment



BEFORE



AFTER



DERMATOLOGY EXPERTS

PhotoGrid



SadeghAminiKoves,MD

SadeghAminiKoves,MD

Who will be impacted?



BEFORE

AFTER



BEFORE

AFTER



Background

Excimer Laser Background

2001

FDA approval for psoriasis and vitiligo

2003

Indications expanded to include atopic dermatitis and leukoderma

2003

CPT Codes 96920 – 96922 established

Laser Treatment for Inflammatory Skin conditions (e.g. Psoriasis)

More than **4,000 dermatologists** across **1,200 offices** provide excimer laser treatments for multiple inflammatory skin conditions and have been billing insurance using these CPT codes since January 1, 2003

STRATA Skin Sciences Background

- + STRATA and its predecessor, PhotoMedex have manufactured the XTRAC excimer laser since 2001 and acquired the Pharos™ brand in 2021
- + XTRAC and Pharos are the only FDA-cleared excimer laser devices available in the U.S
- + STRATA sells XTRAC excimer lasers to dermatology practices and hospitals and provides clinical training and technical support under the 'direct sale' model
- + STRATA also places XTRAC lasers in offices at no upfront cost, charging per use under a 'usage agreement' model (aka **subscription model**)
- + The subscription model allows patients the access to a safe, efficacious and cost-effective treatment

Of the 1,200 excimer lasers in the U.S., approximately 900 (75%) operate under this subscription model

Excimer laser offers significant clinical and economic benefits over other therapies

	Excimer Laser	NB-UVB	Topical Steroids	Non-Biologic Systemics	Biologics
Approximate Costs (\$)	✓ 1K-3K	3K-9K	1K-7K	1K	32K-68K
Clinical Outcomes	✓ 92%	71%	75%	48%	50-70%
Speed of Onset	✓ 5	10	3	14	12
Days of Actual Care	✓ 18	80	294	52	12-65
Remission	✓ 2.5 Months	Continued with maintenance	Continued with maintenance	Continued with maintenance	Continued with maintenance
Adverse Events	✓ Mild Temp	Mild Temp	Mild-Mod Temp –Lasting	Mild-Severe Temp – Lasting	Mild-Severe Temp – Lasting

- + A recently published study* summarizes ...excimer laser ... translates into substantial clinical and economic benefits for patients with plaque psoriasis – excellent safety, rapid response, high likelihood of PASI%75 reductions, potential for clearance (PASI%92), relatively few care days, and a cost that is lower than biologics, NB-UVB, ... and possibly even some generic topicals ... Collectively, these benefits translate into improved cost efficiency.

*Marchetti A, Bhutani T, Lockshin B, Siegel DM, Behringer F. Therapies for Psoriasis: Clinical and Economic Comparisons. J Drugs Dermatol. 2020;19(11):1101-1108. doi:10.36849/JDD.2020.5510

Between 2018 - 2022, an estimated average of 13k+ CMS patients received excimer laser treatments/ year

- + In 2022, a total of **111,296** excimer laser treatments were billed through CMS
- + With an estimated average of 10 treatments per patient, this equates to approximately **11,130** patients

CMS Excimer Laser Treatments BY Code (2018 – 2022)

CPT Code	2018	2019	2020	2021	2022	Average
96920	108,553	116,646	79,671	88,673	75,369	93,782
96921	27,496	29,527	21,553	25,424	22,206	25,241
96922	16,055	15,379	11,568	14,024	13,721	14,149
Total Treatments	152,104	161,552	112,792	128,121	111,296	133,173
# of patients (Estimated)*	15,210	16,155	11,279	12,812	11,130	13,317

At an average cost of \$175 per treatment, each patient on excimer laser costs CMS approximately \$1,750 per year

*Estimated average 10 excimer treatments per patient

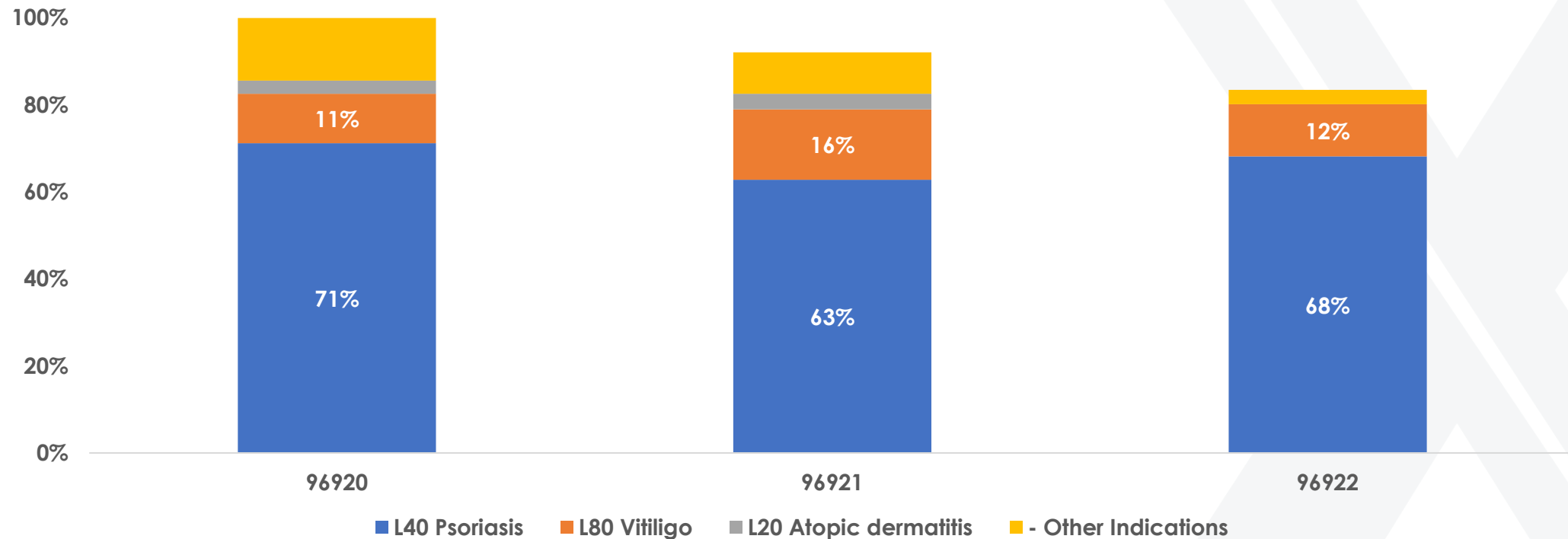
Budget Impact: each patient migrating from excimer laser to biologics increases CMS cost by \$48,000/year

- + Between 2019 and 2022, approximately **5,000 patients**, representing about 50,000 excimer laser treatments, **migrated to potentially more expensive treatments** such as biologics
- + With an estimated annual cost of \$50,000 per patient for biologics (and \$1,750 for excimer laser), this migration could have **increased CMS spending by approximately \$240 million**
- + **CMS 2025 Proposed Rule will have a significant impact on the future direction of this migration**

Given the significant budget impact and clinical benefits of excimer laser, CMS should ensure appropriate reimbursement for clinicians to prioritize excimer laser as the preferred treatment option for psoriasis before biologics whenever possible

Additionally, >30% of CMS excimer laser treatments were performed for non-psoriasis indications

CMS Excimer Laser Treatments by CPT Code by Indication (2022)



2024 change and proposed 2025 changes

- 1 CPT Code Descriptor Changed**
*Laser Treatment for **Inflammatory Skin conditions (e.g. Psoriasis)*** → *Excimer Laser Treatment for **Psoriasis***
- 2 Provider Time and Work Intensity Reduced** significantly
- 3 Practice Expense Reduced** and not reflecting actual device purchase or use cost

These changes might result in elimination of excimer laser treatment availability with drastic patient and budget impact



STRATA Response
-
Descriptor Change

Non- psoriasis use supported by FDA, clinical studies, B/As & private payors

1

CPT Code Descriptor Changed

Laser Treatment for **Inflammatory Skin conditions (e.g. Psoriasis)**



Excimer Laser Treatment for **Psoriasis**

Excimer is:

- + Approved by **FDA** for Psoriasis, Vitiligo, Atopic Dermatitis and Leukoderma, used off label for multiple other indications as an alternative to other costly and less safe treatments
- + Backed by **hundreds** of peer-reviewed clinical studies for a variety of indications
- + Covered by multiple **commercial payors** for psoriasis and non-psoriasis conditions

308-nm monochromatic UVB excimer laser

Allows **targeted treatment of lesions** without exposing uninvolved areas to the beam of light
It can be used on all skin types, adults and children, and any area of body.

FDA INDICATIONS

- Psoriasis
- Vitiligo
- Atopic dermatitis
- Leukoderma

OFF LABEL USE

- Alopecia Areata
- Rosacea
- Chronic recalcitrant dermatitis
- Lichen planus
- Cutaneous T-cell Lymphoma (e.g. Mycosis fungoides/ Sezary Syndrome)
- Parapsoriasis
- Pityriasis lichenoides chronica
- Pruritus
- Urticaria pigmentosa
- Superficial mycoses (e.g., dermatophytosis [ringworm])
-



50+ clinical studies support the use of excimer laser for Psoriasis

Studies show psoriasis patients see significant improvement in an average of 10 excimer laser treatments

Study	Design	N	Number of treatments	Key outcomes
Feldman ¹	Open, multicenter	80	10	<ul style="list-style-type: none">72% patients had ≥75% clearing per modified PASI score over an average of 6.2 treatments and 84% patients after ≤10 treatments
Trehan ²	Nonrandomized controlled	15	11 (median)	<ul style="list-style-type: none">≥95% improvement in modified PASI score observed after mean of 10.6 treatments
Nisticò ³	Open	54	10 (mean)	<ul style="list-style-type: none">57% patients had ≥75% improvement in PASI
Taneja ⁴	Nonrandomized controlled	14	10 (mean)	<ul style="list-style-type: none">Treated plaques showed significant improvement in PASI scores compared with controls ($P<0.001$)

^aPatients had 4 discrete psoriatic plaques assigned to excimer laser, pulsed dye laser, salicylic acid, or untreated.⁴

PASI, Psoriasis Area and Severity Index.

1. Feldman SR et al. *J Am Acad Dermatol.* 2002;46:900-906. 2. Trehan M, Taylor CR. *J Am Acad Dermatol.* 2002;47:701-708. 3. Nisticò SP et al. *J Eur Acad Dermatol Venereol.* 2006;20:523-526. 4. Taneja A et al. *Arch Dermatol.* 2003;139..



**Patient and Provider
Experience with Excimer
Laser Treatments for
Psoriasis**

Before & Afters Psoriasis



BEFORE

AFTER



Laura Loveday

Assign this conversation ▾



After!



Before & Afters Psoriasis



BEFORE



AFTER



rosedermatology

Rose Dermatology and Laser Center, LLC



rosedermatology !? Why #xtrac?

👁️ Check out one of Dr. Rose's patients' results in just three months. She achieved great hair growth and huge clearance of plaque psoriasis on the scalp!

☀️ XTrac provides long-lasting relief through pain-free treatments with virtually no side effects to treat psoriasis, vitiligo and atopic dermatitis. It is even covered by most health insurance companies!

🔥 Bonus: XTrac has been clinically shown to drastically assist patients with hair loss.

☎️ Call us at 504-885-8363 or text the number in our bio today to see if XTrac is a good solution for you!

88w



_vicky_herdezzz Living with Herpes simplex was depression for me even with my doctor's advice and medication. My name is Vicky Moore I live in Chicago, Illinois and this is my story. I browsed the Internet in search of remedies or something but unfortunately nothing new, all still had the same results. Sadly I almost quit on myself, it was around 7:30 in the morning when my therapist called me over to her



19 likes

December 28, 2022

Before & Afters Psoriasis



revelusdermatology • Follow
Revelus Dermatology



revelusdermatology ✨ Look at these results from XTRAC laser ⚡ treatments! XTRAC uses ultraviolet light to 🌐 treat many form of psoriasis. Most insurance 📄 covers these treatments! Call 📞 us today to find out more! #showusyourxtrac #xtraclaser #austindermatology #austindermatologist #westgateskinatx #austinskin #psoriasis #psoriasisistreatment #dermatology #skinconditions #laser #lasertreatments #austinlaser #austinskincare #dermatologistrecommended #skin #skinexperts

Edited · 181w





xtrac_clear 🥰❤️
181w Reply



Before & Afters Psoriasis




 lasered_by_karie • [Follow](#) ⋮

 lasered_by_karie Warning: This isn't the typical before and after photo I would usually post, but wanted to show a little more of what I do besides beauty treatments:

There are a lot of people that struggle from psoriasis! This can appear anywhere on the body. It can be itchy, uncomfortable and make people feel insecure. These pictures are 2 months apart and this client is very happy with his results! Another reason why I love what I do! These laser treatments are SO effective and the photos show! 😊 this same laser can also treat Vitiligo!

#xtraclear #therapy #dermatology #aesthetician #skincare #beauty #psoriasis #vitiligo


Edited · 190w

 xtrac_clear WOW! These results are amazing!! ❤️ Thanks for sharing! ♡

190w 1 like Reply

❤️ 💬 📍 🔖

January 11, 2021

 Add a comment... Post

Before & Afters Psoriasis



 **drtriciabrown.dermatology** • Follow
The Woodlands, Texas

 **drtriciabrown.dermatology** Everyone knows that dermatologists treat psoriasis, but many don't realize that there is a laser that can safely treat it - no drugs and no side effects. And, many insurance companies cover much or all of the cost, particularly when the deductible has been met in the second half of the year. Call our office for an evaluation or check out XTRAC laser online to begin and finish your treatments before deductibles start over in January. #psoriasis #xtrac #livingwithpsoriasis #psoriasisrelief #thewoodlandsdermatologist #excimerlaser

270w

25 likes
June 28, 2019

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Before & Afters Psoriasis



hopkinsdermatology_
Hopkins Dermatology



hopkinsdermatology_ Itchy, scaly scalp? We can treat that!

Did you know at Hopkins Dermatology we treat scalp psoriasis with an excimer laser called XTRAC?!

This treatment, covered by most insurance companies including Medicare, helps clear up itchy, scaly, red patches of #psoriasis and #eczema

Our patients come in twice a week to have these quick, painless procedures done.

The #XTRAC is approved for all areas of the body & all ages.

In addition to treating psoriasis & eczema, these treatments are also beneficial for treating #vitiligo, a skin condition where the body's immune system attacks the pigment cells causing discoloration of the skin.

To find out more about your treatment options for psoriasis, atopic dermatitis, and vitiligo, call to schedule a consultation at Hopkins Dermatology. For our Monroe, Louisiana location call



26 likes

April 5, 2022



Add a comment...

Post

Before & Afters Psoriasis

before



after



fargodermatology



fargodermatology Today we are thankful for our XTRAC Laser and being able to make a difference in our patients' lives. This particular patient has nail psoriasis and made a goal to be able to get a manicure by the end of the year.

Thanks to our wonderful team and the amazing XTRAC, this patient is now able to get the manicure she's been dreaming of!

Our XTRAC Laser treats different kinds of psoriasis, eczema, and vitiligo. If this is something you're struggling with, give us a call or schedule a consult so our team can help you find the treatment that's best for you.

#fargoderm #psoriasis #xtraclaser #beforeandafter

147w



27 likes

November 8, 2021



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Post

Before & Afters Psoriasis



 **india_psoriasis** • Follow
United States

 **india_psoriasis** Confidence in clearing thanks to  @xtrac_clear  my skin is starting to get so smooth!!!
-
#psoriasis #psoriasisgirl #psoriasisflare #psa #psoriaticarthritis #autoimmunedisease #autoimmunewarrior #psoriasisdiet #chronicillness #findacure #skinconditions #skinconditionsarenormal #skinconditionsarebeautiful #showyourskin #skincare #eczema #rheumatology #rheumatologist #rheumatologyrocks #dermatology #dermatologist #loveyourskin #loveyourself #xtrac #guttatepsoriasis #plaquepsoriasis #psoriasisistreatment #getyourskinout #skinfluencer
19w

 **stephmitton** I looked like this! I no longer have any evidence because of Stelara. I was seriously 90% covered. 
18w 7 likes Reply

 **rafa.gina** Go carnivore it heals!! 
18w 5 likes Reply

610 likes
April 20

 Add a comment... [Post](#)

90+ clinical studies support use of excimer laser for Vitiligo

Studies show vitiligo patients experience significant repigmentation in 20 excimer laser treatments

Study	Design	N	Number of treatments	Proportion of patients achieving repigmentation		
				≤25% repigmentation	25%–75% repigmentation	≥75% repigmentation
Shi ¹	Investigator-blinded	14	20 (maximum)	NR	NR	XTRAC 79% Excimer lamp 87.5%
Esposito ²	Open	24	20 (mean)	25%	25%	29%
Hong ³	Comparative	8	20	XTRAC 26% NB-UVB 65%	47% 4%	NR
Taneja ⁴	Open	15	60	Hands and feet 80%	Hands and feet 20% (26-50%) Axillae 67% (26-50%) Face 40% (51-75%)	Axillae 33% Face 60%

NR=not reported.

1. Shi Q et al. *Photodermatol Photoimmunol Photomed*. 2013;29(1):27-33. 2. Esposito M et al. *Clin Exp Dermatol*. 2004;29:133-137. 3. Hong SB et al. *J Korean Med Sci*. 2005;20:273-278.

4. Taneja A et al. *Int J Dermatol*. 2003;42:658-662.



**Patient and Provider
Experience with Excimer
Laser Treatments for Vitiligo**

Before & Afters VITILIGO



PhotoGrid

dermexperts • Follow

dermexperts Incredible results achieved with #xtrac on this #vitiligo patient 😊 Call the office for a consultation 954-726-2000

#skin #dermatology #white #spots #vitiligo# discoloration #eczema #psoriasis #skincare #tamarac #parkland #miami #dermexperts #AngeloAyarMD

Edited · 187w

jennas5031 How many sessions did he have please
19w Reply

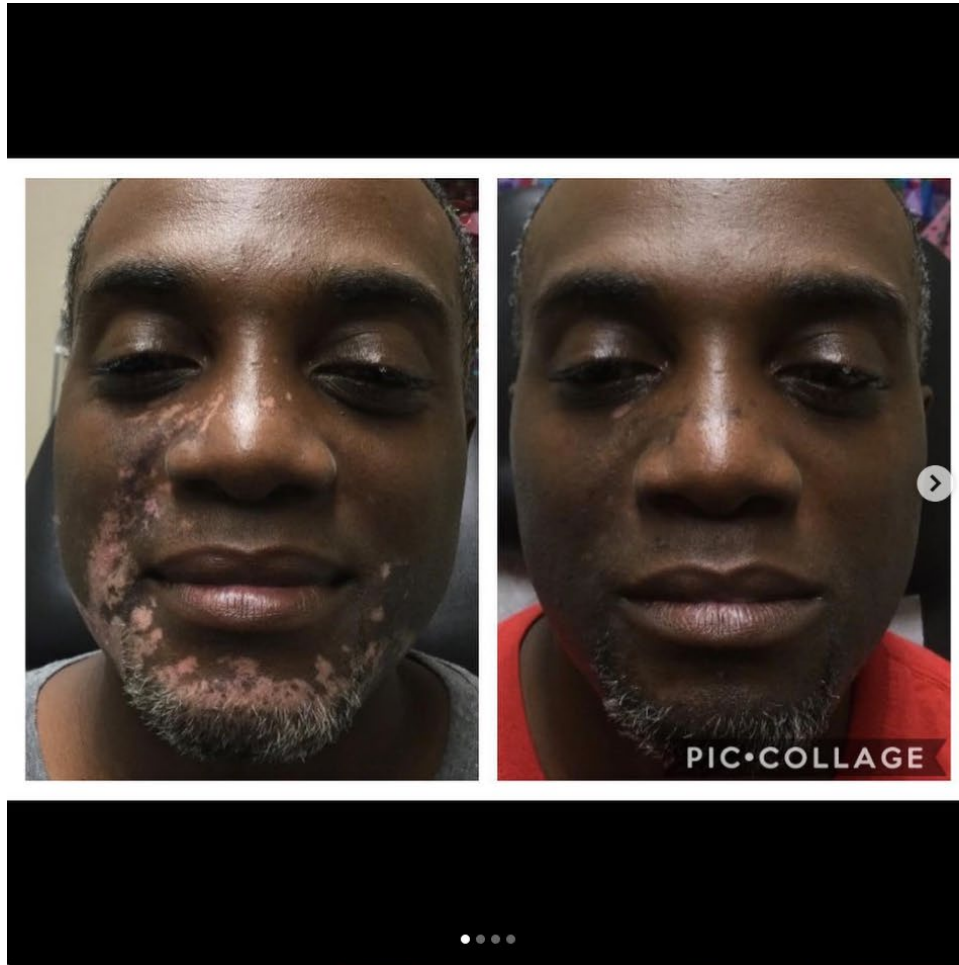
batistanna My old patient . I am soooo happy for him !!! Great job!!!
187w Reply


xtrac_clear WOW! Look at those results! 🥰❤️
187w Reply


32 likes
January 29, 2021

Add a comment... Post

Before & Afters VITILIGO




 **associateddermatologists** • [Follow](#)
Associated Dermatologists

 **associateddermatologists** Vitiligo is a skin condition in which the skin loses its pigment... here at Associated Dermatology we use the XTRAC Excimer laser to help with the treatment of vitiligo. The Xtrac laser utilizes a specific wavelength of light which stimulates the re-pigmentation of the skin.


The number of treatments needed vary from patient to patient.

🌟 Call to schedule your appointment today with any of our doctors to see if this treatment is right for you 🌟

209w


 **everybodyloveslo** BEAUTIFUL ❤️❤️

209w Reply

 **amyb445** Amazing!

209w Reply

54 likes
August 31, 2020

 Add a comment... [Post](#)

Before & Afters VITILIGO



 **sadeghaminimdderm** • Follow
Miami, Florida

 **sadeghaminimdderm** Muy buena respuesta de repigmentación obtenida en nuestra querida paciente con vitiligo a la combinación de Xtrac Laser y ruxolitinib tópico. También un premio a la constancia y paciencia. Fotos publicadas con permiso de la paciente.

Very good repigmentation response obtained in our dear patient with vitiligo. This patient had a combination of Xtrac Laser and topical ruxolitinib. Also an award for perseverance and patience. Photos published with permission of the patient.

#vitiligo #vitiligotreatment #tratamientodevitiligo #vitiligotratamiento #xtracelaser #ruxolitinib #excimerlaser
132w See translation

 **jamieblank11** Incredible!
132w Reply

 **alianasofia** Amazing
132w Reply

♡ 🔍 📌

49 likes
February 23, 2022

😊 Add a comment... Post

Before & Afters VITILIGO



deerfield_dermatology • Follow

deerfield_dermatology More amazing results from the Xtrac laser. Don't delay your treatment today.

#worldclassdermatology #juneisvitiligo #deerfielddermatologists #juneisvitiligoawarenessmonth #skincare #cosmeticdermatologists #cosmeticdermatologist #cosmeticdermatology #cosmeticdermatolog #chicagolanddermatologist #chicagolanddermatology #skin #surgicaldermatology #deerfieldillinois #xtrac

63w

2 likes
June 21, 2023

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Before & Afters VITILIGO

BEFORE

AFTER

@ MI.SKINCENTER

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mi.skincenter Amazing results! 🤩

Struggling with psoriasis, vitiligo, or atopic dermatitis? Looking for alternative treatments other than topicals, and biologics?

Xtrac can be a great option for you! 🙌 Xtrac is a precisely targeted therapeutic laser using UVB light, and the results speak for themselves 🤩

Interested in Xtrac light therapy?
Need a dermatologist? We are here to help!
📞 248-963-5915
✉ info@drkartono.com
📍 133 W Main St, Suite 251, Northville MI 48167
🌐 www.miskincenter.com/schedule-an-appointment

*All images are the exclusive property of:
Francisca Kartono DO, FAOCD, FAAD
Board Certified Dermatologist

#beforeandafter #xtrac #vitiligo #xtractreatment #xtracclear #vitiligotreatment #vitiligobeauty #dermatology

16 likes
March 31, 2023

Add a comment... Post



Because of available clinical evidence and proven clinical results, multiple private payers cover excimer laser for non-psoriasis indications



Use of an FDA-approved excimer laser (308 nm) meets the definition of medical necessity for the treatment of vitiligo for members who have failed to respond to a consecutive 2 month trial of conservative treatment (i.e. topical agents, non-laser ultraviolet therapy).



Psoralen plus ultraviolet A (PUVA), narrowband ultraviolet B (NB-UVB), and targeted phototherapy with excimer laser, with or without the use of oral or topical medications for the treatment of vitiligo are considered established treatments. They may be useful therapeutic options when indicated.

Nonprofit corporations and independent licensees of the Blue Cross and Blue Shield Association



MASSACHUSETTS

Blue Cross Blue Shield of Massachusetts is an Independent Licensee of the Blue Cross and Blue Shield Association

*Targeted phototherapy for the treatment of vitiligo may be considered **MEDICALLY NECESSARY** when the following criteria are met:³

- The area being treated cannot be adequately reached during light box therapy (eg, face, scalp, fingers/toes, neck, intertriginous areas), or
- There is contraindication to total body phototherapy (eg, pregnancy or a history of skin cancer).



Aetna considers the following established methods medically necessary for the treatment of vitiligo:

- Excimer laser (e.g., XTRAC, PhotoMedex, Radnor, PA; EX-308, Ra Medical Systems, Inc., Carlsbad, CA)



Vitiligo

An initial regimen (i.e., for up to 12 weeks) of office-based targeted excimer laser therapy (i.e., 308 nanometers [nm]) is considered medically necessary for the treatment of localized vitiligo when BOTH of the following criteria are met:

Policy/Criteria

- It is the policy of health plans affiliated with Centene Corporation[®] that excimer laser based targeted phototherapy is **medically necessary** for the following indications after the failure of topical treatments:
 - Localized plaque psoriasis with <10% body surface area (BSA) involvement, individual lesions, or more extensive disease;
 - Vitiligo;
 - Atopic dermatitis;
 - Cutaneous T-cell lymphoma (e.g., mycosis fungoides/ Sézary Syndrome).



Laser Therapies

- Laser therapy is **COVERED** for treatment of:
 - Localized plaque psoriasis
 - Vitiligo
 - Atopic dermatitis
 - Port wine stain (nevus flammeus), including Sturge-Weber syndrome



STRATA requests related to excimer laser code descriptor

1

CPT Code Descriptor Changed

Laser Treatment for **Inflammatory Skin conditions (e.g. Psoriasis)**



Excimer Laser Treatment for **Psoriasis**

- + CMS to request AMA CPT Editorial Panel to **develop a new code for 'Excimer laser treatment for inflammatory skin diseases'**
- + The code should cover current conditions like psoriasis, vitiligo, atopic dermatitis, leukoderma, alopecia areata, chronic recalcitrant dermatitis, lichen planus, and cutaneous T-cell lymphoma, among others, while allowing flexibility for new conditions where excimer laser proves effective.
- + In the interim, we ask CMS to create a G code based on the 2022 CPT codes to replace the 2024 revisions, ensuring Medicare beneficiaries with non-psoriasis indications can continue accessing excimer laser therapy



STRATA Response
-
Provider Time

STRATA emphasizes there is no change in technology that would reduce treatment time

2

Provider Time and Work Intensity Reduced significantly

- + CMS and RUC should resolve their differences in physician work calculations by using new survey data relying on Real World experience **from dermatologists familiar with excimer laser treatments**



STRATA Response
-
Practice Expense

Proposed direct PE cost of excimer (\$21.22 to \$25.94) is not viable for a typical office

Code	Description	Usable Life	CMS Assumption	Actual (Real World Data)
EQ161	laser, excimer	5 Years	\$155,580	\$189,000
EQ154	laser gas cylinder (for excimer)	Depends on consumption	\$1500 in 2013 -> currently \$0	\$6000 (not including labor and delivery)
EQ155	laser optical delivery system (for excimer)	Depends on consumption	\$1100 in 2013 -> currently \$0	\$5,000 (not including labor and delivery)
	Maintenance			\$20,000/ Year
	# of Procedures/ excimer laser/ year		1,200 to 1,466	344 (Based on 2018-2023 Data)
	Direct PE cost of Excimer Laser		\$21.22 to \$25.94	\$90.45

Most dermatology offices in the US cannot cover the cost of purchase of an excimer laser device

On average, offices perform 344 treatments/ excimer laser/ year

Based on 2018-2023 Real World data from 1,232 unique lasers

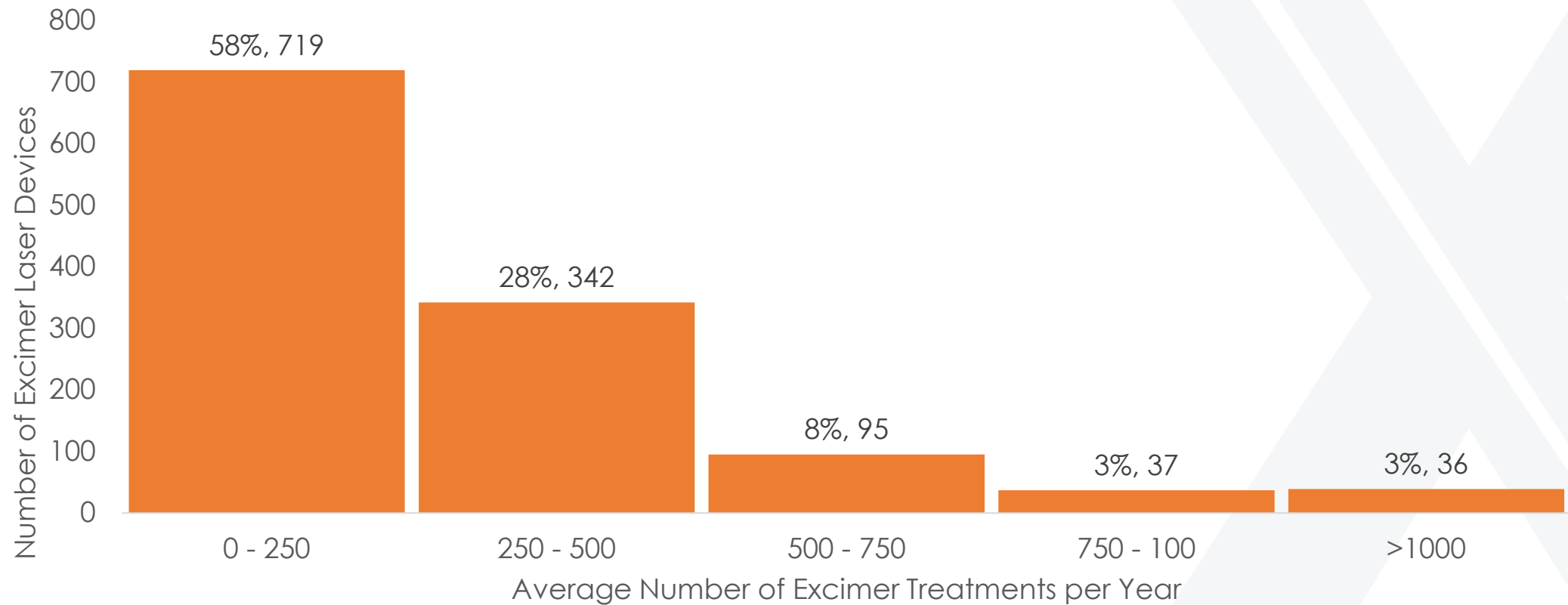
Number of treatments per excimer laser (2018- 2023)

Year	2018	2019	2020	2021	2022	2023	Average
N = Number of unique Excimer Lasers under Strata Usage Agreement (Basis for Data Below)	697	753	733	822	853	807	778
Average number of Excimer Treatments per Device	403	421	276	343	328	291	344
Number of excimer laser devices with more than 1000 Treatments	47	54	16	36	34	26	36

On average, only 36 offices were closer to breakeven the cost of excimer laser purchase

Typical excimer laser performs less than 250 excimer treatments/ year

Average Utilization of 1,232 Excimer Laser Devices Per Year (2018- 2023)



STRATA request related to practice expense calculation



Practice Expense Reduced and not reflecting actual device purchase and use cost

- + Request that the CMS and AMA RUC, when valuing the revised codes, include **actual Real World use data**, device cost, and the minimum procedures needed for clinic viability. This will help set more accurate practice expense RVUs

STRATA requests to revert to 2023 Code descriptor and RVUs

- + Recognizing that all these actions can take time, we request that CMS make no changes to coding, billing, or payment for the excimer laser treatment under consideration and revert to the 2023 codes and RVU calculations
- + Such an interim step will avoid disruption of patient care not only for Medicare beneficiaries but also for other patients covered by commercial health plans, Medicaid, Tricare, and any other health plans that use the Medicare calculations as the basis for their reimbursement

**CMS proposed changes
will impact Patients and
their families,
specifically people of
color, physicians and the
US budget**



Vitiligo is particularly prevalent in populations with darker skin, where the Excimer laser has shown to be a highly effective therapy. However, the proposed coding changes and Medicare payment reductions will limit access to this treatment, especially for underserved populations. I have presented research demonstrating that patients with skin of color are often diagnosed with psoriasis at a later age than their white counterparts. The costs associated with laser therapy, as captured by the AMA RUC analysis, nor do they account for the true expenses incurred by medical practices based on manufacturer invoices. The result will be payments that fall below the cost of providing this therapy, potentially leading to increased reliance on more expensive biologics and reducing patients' treatment options.



an effective therapy for this condition, providing significant improvements in skin repigmentation and patient quality of life. However, the proposed coding changes and associated Medicare payment reductions will create substantial barriers for physicians trying to offer this essential treatment. These changes will inevitably reduce access to proper medical care for many patients who need it most.



The decisions outlined in the 2024 CPT codes and the 2025 fee schedule proposal limit patient access to essential treatments, thereby exacerbating health disparities and increasing the overall cost of care. I urge CMS to reconsider these changes to ensure that all patients, regardless of their condition, have access to the full range of effective and necessary treatments.



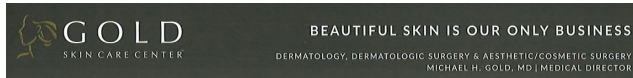
Amir Garg, M.D.
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and 96922. These changes make the economics of operating a dermatology practice untenable for phototherapy, a safe and highly effective treatment modality to treat various burdensome inflammatory skin diseases as well as pigmentary disorders including vitiligo. In addition, as I will address below, the recent changes to the code descriptor limiting the use of the codes for psoriasis only and thereby eliminating use of phototherapy for other inflammatory skin diseases, is devastating to a significant segment of the population which can benefit from phototherapy and excimer laser therapy.



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treatments. Patients will be forced to turn to costlier options, which not only heightens the financial burden on them but also on the healthcare system as a whole. By revising the CPT codes to include vitiligo, atopic dermatitis, and leukoderma, and by reconsidering the proposed



Second, as a practicing physician who owns and runs my own dermatology practice, I can assuredly state that the reduced reimbursement rates proposed by CMS will almost certainly lead to the elimination of excimer laser treatments from my practice. This would be a terrible but necessary choice, as to continue the treatment would be counter-productive to the economics of running a practice. The changes in reimbursement proposed by CMS in no way

Patient Impact



John

I've been treated off and on since 2013 for Psoriasis with Xtrac. When I first started my hands were covered in scabs, I could not open my hands or move my fingers without bleeding. Xtrac cleared up my hands. Periodically I have treatments on my scalp and elbows. It works. A much better solution than using drugs.

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...



Raymond

I have had bad psoriatic arthritis since I was diagnosed in 1990I have tried every pill, cream, salve, tar under the Sun....I was a dermatological disaster. Started Xtrac treatments and in about 6 weeks, I was approximately 90% better. Skin healed nicely.

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Deveron

This really works! I've been in remission for 11 years since I had my Xtrac sessions. I wish more dermatologists had this machine in their office!

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María

After suffering from psoriasis of the scalp for many years, I decided to try XTRACT therapies. The treatment yielded excellent results. Two years later I'm still cleared of the ailment. Amazing results.

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People of color - Impact



Provider: “Happy little patient with Vitiligo, she recovered 80% pigment in only 20 excimer laser treatments”

THANK YOU!

