

September 24, 2025

Carl Li, M.D.
Coverage and Analysis Group
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Subject: Request to Update NCD 210.3 Colorectal Cancer Screening Tests to Reflect Expanded Coverage for CT Colonography

Dear Dr. Li,

The American College of Radiology (ACR), a professional medical specialty society representing over 41,000 physicians practicing diagnostic radiology, interventional radiology, radiation oncology, and nuclear medicine as well as medical physicists, appreciates the opportunity to submit comments to the Centers for Medicare & Medicaid Services (CMS) on the National Coverage Determination (NCD) for Colorectal Cancer Screening Tests.

CMS recently updated the NCD dashboard to reflect changes to NCD 210.3 – Colorectal Cancer Screening Tests,¹ a topic that had been on the waitlist for several months. While we appreciate the progress, **we are requesting that the NCD be comprehensively revised to reflect the important expansion of coverage for screening computed tomographic colonography (CTC), as finalized in the 2025 Medicare Physician Fee Schedule final rule, effective January 1, 2025.**

CMS issued Change Request (CR) 13939 / Transmittal 13097², instructing Medicare Administrative Contractors (MACs) to begin covering CPT code 74263 for screening CTC, with an implementation date of July 1, 2025. This guidance also specifies that coinsurance and deductible should be waived for this service.

However, the current language in NCD 210.3 still includes the following nationally non-covered indication:

(2) Screening computed tomographic colonography (CTC), effective May 12, 2009.

Additionally, **the original non-coverage decision (CAG-00396N: Screening Computed Tomography Colonography (CTC) for Colorectal Cancer)**³ remains publicly available in the Medicare Coverage Database.

¹ <https://www.cms.gov/medicare-coverage-database/view/ncd.aspx?NCIDid=281>

² <https://www.cms.gov/files/document/r13097otn.pdf>

³ <https://www.cms.gov/medicare-coverage-database/view/nca.aspx?ncid=220>



To avoid confusion among providers and beneficiaries, we respectfully request that:

1. **NCD 210.3 be updated** to reflect the expanded coverage for CTC as outlined in CR 13939.
2. **CAG-00396N be retired or removed** to align with the current CMS policy and ensure clarity for stakeholders.

We believe these updates are essential to support appropriate access to colorectal cancer screening and to ensure consistency across CMS policy documents. Thank you for your attention to this matter. If you have any questions or comments on this letter or any other issues with respect to radiology, please contact Alicia Blakey, MS, Principal Economic Policy Analyst at ablakey@acr.org.

Sincerely,

Dana H. Smetherman, MD, MPH, MBA, FACR, FSBI
Chief Executive Officer

cc: JoAnna Baldwin, CMS/CCSQ
Kimberly Long, CMS/CCSQ
Kevin J. Chang, MD, FACR, FSAR, ACR
Judy Yee, MD, FACR, ACR
Katie Keysor, ACR
Alicia Blakey, ACR