



March 24, 2026

Noridian Healthcare Solutions, LLC.
4510 13th Avenue South
Fargo, ND 58103

Re: Targeted Probe and Educate (TPE) review for CPT 74177 and CPT 72148

Dear Noridian CMD Leadership:

The Radiology Business Management Association (RBMA)¹ and American College of Radiology (ACR)² request a modification to the current prepayment Targeted Probe and Educate (TPE) review for CPT [74177](#), computed tomography, abdomen and pelvis; with contrast material(s) and CPT [72148](#), magnetic resonance (e.g., proton) imaging, spinal canal and contents, lumbar; without contrast material. in Medicare Jurisdiction E.

According to Noridian's published quarterly edit results (October 1–December 31, 2025), the top denial reasons for CPT 74177 were:

1. Denial Reason 1: The requested records were not received.
1. Denial Reason 2: The documentation submitted was incomplete and/or insufficient.
2. Denial Reason 3: The documentation submitted does not support medical necessity as listed in coverage requirements in the National Coverage Determination or Local Coverage Determination.

Our members report that Noridian is conducting TPE audits on the professional component of these imaging services and requiring radiologists to provide medical records they do not control. In hospital settings, radiologists are obligated to interpret all completed scans. Because these groups are contractually required to interpret all completed tests, they cannot compel ordering physicians to provide the requested documentation. Radiologists rarely have direct contact with the patient or the ordering physician, and the scans themselves are almost universally completed before the radiologist is even involved. Radiologists also do not manage the medical records needed to respond to Noridian's documentation requests. In many cases, the ordering physician, who is the custodian of the patient's medical records, has failed to cooperate with the radiology group to provide the additional documentation requested by Noridian. When ordering clinicians do not supply these materials, radiology groups cannot comply resulting in claim denials despite their best efforts.

¹ Established in 1968, RBMA is a professional association that consists of over 2200 radiology practice business leaders who represent over 800 radiology practices in all 50 states. This includes diagnostic radiology, interventional radiology, nuclear medicine, Independent Diagnostic Testing Facilities (IDTFs) and radiation oncology.

² ACR is a professional medical society representing over 41,000 physicians practicing diagnostic radiology, interventional radiology, radiation oncology, and nuclear medicine, as well as medical physicists.

This TPE review is a matter of general applicability to all hospital-based radiology groups in the states where Noridian serves as the MAC. We write to request that:

Noridian exempt the professional component of radiology services, such as code 74177, "Computed tomography, abdomen and pelvis; with contrast material(s)," from prepayment review for hospital patients where the CMS-1500 form that has the -26 professional component modifier.

Ongoing denials expose these groups to further CMS actions, including 100% prepayment review, extrapolation, Recovery Auditor referral, or payment suspension. These risks create substantial operational and financial uncertainty. As a result, hospital-based radiology groups are concerned that continued audit rounds with elevated error rates may threaten their ability to bill and be reimbursed.

At the same time, Medicare appears to be paying for the technical component for these same services under the Hospital Outpatient Prospective Payment System OPSS, and we are not aware of any related OPSS prepayment review. This results in the technical portion being considered reasonable and necessary, while the professional portion based on the same study is denied. According to our members, Noridian auditors report that there are multiple radiology groups experiencing this problem.

Given these concerns, RBMA and ACR request that the *professional component of radiology services such as CPT 74177 and CPT 72148 for hospital patients* be exempted from prepayment review. Radiologists cannot reasonably obtain or compel the documentation being requested, and the current process does not reflect how hospital-based imaging services are delivered. Our hope is that a discussion with Noridian regarding the policy implications of these prepayment TPE audits will be more successful in bringing about a timely resolution.

We appreciate the opportunity to provide meaningful feedback on the Targeted Probe and Educate review of CPT 74177 and CPT 72148. We welcome the chance to discuss this issue further. Please contact Ashley Hunter, MBA, CHFP, CRCC at ashley.hunter@rccsinc.com or Alicia Blakey, MS at ablakey@acr.org with any questions.

Thank you for your consideration.

Sincerely,



Linda Wilgus, CPA, FRBMA
Co-Executive Director
Radiology Business Management Association



Dana Smetherman, MD, MPH, MBA,
FACR, FSBI
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