



April 19, 2018

The Honorable Orrin Hatch  
Chair  
Committee on Finance  
U.S. Senate  
Washington, DC 20510

The Honorable Ron Wyden  
Ranking Member  
Committee on Finance  
U.S. Senate  
Washington, DC 20510

The Honorable Greg Walden  
Chair  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Kevin Brady  
Chair  
Committee on Ways and Means  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Richard Neal  
Ranking Member  
Committee on Ways and Means  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairmen and Ranking Members:

I write to make you aware of a new American College of Physicians (ACP) perspectives [article](#), written by members of ACP's Performance Measurement Committee, which assessed and rated many of the performance measures included in the Medicare Merit-based Incentive Payment System (MIPS)/Quality Payment Program (QPP) with respect to five domains: importance, appropriateness, clinical evidence, specifications, and feasibility and applicability. Of measures considered relevant to ambulatory general internal medicine, 32 (37%) were rated as valid, 30 (35%) as not valid, and 24 (28%) as of uncertain validity.

Based on this assessment, ACP's Performance Measurement Committee calls for improving the measure development process so they help physicians provide the best possible care to their patients without creating unintended adverse consequences.

While ACP is not calling for MIPS to be repealed or suspended, we are asking for the next generation of performance measures to be based on high quality methodological rigor, follow uniform standards of measure development integrated into care delivery, and move away from easy-to-obtain data designed for billing and not user friendly when it comes to improving care or filling performance gaps.

We appreciate CMS's Meaningful Measures initiative and will continue to work with CMS to improve measures consistent with the recommendations in the new paper. We believe that physicians should not be penalized based on poorly designed measures. We also call for other improvements to the QPP that are needed, including a simplified scoring system.

ACP continues to support the original goals of MACRA and the QPP, and we urge Congress to continue to exercise its oversight authority to support our call for improvements in the measures used for MIPS, consistent with the recommendations offered by our Performance Measurement Committee.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Ende", with a long, sweeping horizontal flourish extending to the right.

Jack Ende, MD, MACP  
President