ACP does not support QPP measure 047: "Advance Care Plan." We support the measure concept and implementation could prevent overuse of unnecessary end of life care interventions; however, it is burdensome for clinicians to annually document an advance care plan for all patients aged 65 years and older. Although the measure is evidence-based and insurers reimburse clinicians for this practice, we object to the 12 month measurement period included in the denominator specifications because it is burdensome and lacks empirical support. While evidence supports the benefit of advanced care planning on patient outcomes, there is no evidence to guide optimal frequency and at what age to begin planning. Furthermore, it may be inappropriate for clinicians to perform this intervention during an initial office visit. We suggest the developers revise the specifications to limit the denominator population to established patient visits only.