ACP supports QPP measure 039: "Screening for Osteoporosis for Women 65-85 Years of Age" because implementation will likely result in meaningful and measurable improvements in clinical outcomes, measure developers cite a performance gap based on the 2012 PQRS claims data (mean = 57%), and the measure aligns with United States Preventive Services Task Force (USPSTF) recommendations on screening for osteoporosis. While we support this measure, we note that implementation could promote overuse of screening if patients receive care from multiple clinicians and/or have poor record continuity, and in women who are at lower risk for osteoporosis based on reasonably identifiable factors (e.g., BMI, ethnicity). Additionally, developers should consider updating the denominator specifications to include exclusion criteria for patients who have already been assessed with the FRAX tool and for patients receiving hospice and palliative care where the intervention has the potential to cause more harms than benefits.