ACP does not support NQF measure #0709: “Proportion of Patients with a Chronic Condition that have a Potentially Avoidable Complication during a Calendar Year.” This measure represents an important clinical concept; however, the specifications are flawed and we note some potential issues with feasibility. The specifications are not clearly defined and the outcome is subject to individual patient factors; specifications should include some element of risk-adjustment; and developers cite limited evidence to form the basis of the measure. Additionally, the denominator population is too broad. As written, the denominator population includes all hospitalized patients with any complication of every chronic condition. Furthermore, developers limited testing samples to patients who were treated in Vermont healthcare systems; therefore, reliability may be low in other areas of the country. Finally, it is unclear how well this measure will work at smaller levels of attribution. As currently specified, the measure pulls from large plan data to generate results and developers admit that coding may be an inaccurate method for data collection. A more meaningful measure for inclusion in quality improvement programs may focus on preventing potentially avoidable complications of particular conditions.