ACP does not support MIPS measure #305 (NQF measure #0004): “Initiation and Engagement of Alcohol and Other Drug Dependence Treatment” because the specifications are flawed and the measure is not appropriately specified to evaluate performance at the level of the individual clinician.

Developers should consider dividing the numerator statement to form two discrete measures: 1) initiation of alcohol and other drug dependence treatment; and 2) engagement of alcohol and other drug dependence treatment. Also, it is unclear what constitutes a “new episode of drug or alcohol dependency.”

While it is appropriate for accreditors and regulators to use this measure in programs designed to assess quality at the level of the health system, regulators should not include this measure in accountability programs designed to assess performance of individual clinicians. It is unclear whether individual clinicians will be able to control the outcomes of this measure. Individual clinicians will likely face interoperability challenges to data collection.