

While the AAFP appreciates the opportunity to provide comments on the MUC list, we are concerned the MUC review process is not conducive to receiving thoughtful, well-researched, and insightful feedback. The AAFP advocates for improvements to this process in the future, including a greater amount of time for stakeholders to review and comment on each measure before the deadline. Furthermore, the MUC list contains a plethora of measures under consideration for addition to an already crowded space. We urge CMS to focus on the "big picture" and consider prioritization of a limited number of "measures that matter." Many of the proposed measures have been added to the MUC list prematurely. While the intention behind them is good, the current health care ecosystem and IT infrastructure, cannot support them. Additionally, some proposed measures are suitable only for internal quality improvement efforts within a clinician practice and/or facility and are not appropriate for accountability at the individual clinician level.