

January 6, 2026

To the CMS Measures Management System Team:

WiserCare appreciates the opportunity to comment in support of CMS's proposed Advance Care Planning (ACP) quality measure, MUC2025-020. We commend CMS for elevating ACP as a core element of high-quality, person-centered care and for recognizing its importance across multiple care settings.

WiserCare, led by our Respecting Choices® division, supports provider organizations in delivering high-quality ACP to patients and families and ensuring that preferences are documented and accessible when they are needed most. We have seen the value of timely, high-quality ACP conversations in shaping the care trajectory to align with patient goals and preferences—from earlier engagement through serious illness and end of life.

We support the intent of MUC2025-020 and strongly agree that measuring ACP documentation will reinforce the importance of these conversations and encourage organizations to invest in the processes and infrastructure needed to support them. Establishing a standardized quality measure is an important step toward making advance care planning a routine part of care.

At the same time, we encourage CMS to pair quality measurement with updated reimbursement policies that make the measure realistic to achieve in practice. Advance care planning takes time and skilled conversation, and clinicians across settings are already stretched. While the ACP billing codes introduced in 2016 were an important start, limiting reimbursement to physicians, nurse practitioners, and physician assistants restricts access and scalability.

To meaningfully expand access to high-quality ACP, CMS should consider allowing additional members of the care team—particularly social workers and registered nurses—to conduct and bill directly for advance care planning conversations. In many settings, these professionals are already leading or supporting these discussions and are well positioned to engage patients and families. Aligning reimbursement with real-world care delivery would make it more feasible for organizations to meet the goals of this measure and to do so equitably.

Quality measures are an important tool for improvement, but their impact depends on whether they can be implemented in everyday clinical practice. Coupling MUC2025-020 with reimbursement policies that reflect the interdisciplinary nature of advance care planning would strengthen the measure and support broader access to patient-centered, goal-concordant care.

Thank you for your leadership on this issue and for the opportunity to provide comment.

Sincerely,
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