



PENNSYLVANIA
CHAPTER

AMERICAN COLLEGE of CARDIOLOGY®

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April 14, 2023

The Honorable Lina M. Khan
Chair
Federal Trade Commission
600 Pennsylvania Ave, NE
Washington, DC 20580

RE: Notice of Proposed Rulemaking, Federal Trade Commission, Non-compete clause; Clause Rule; 88 Fed. Reg. 3482 (RIN: 3084-AB74) (January 19, 2023)

Dear Chair Khan:

On behalf of the 2,800 cardiovascular professionals who practice in academic, hospital, and private practice settings in the Commonwealth of Pennsylvania, we are writing to support the FTC proposal to consider non-compete clauses (restrictive covenants) as unfair methods of competition, especially in the medical field, and viewed through the lens of patient care as well as continued effectiveness of our clinical workforce. We cite the American College of Cardiology Board of Governors' workgroup report conclusions that non-compete clauses:

- Disrupt the continuity of patient care, especially concerning in a specialty field such as cardiology where longitudinal care is critical
- Reduce patient access to care as clinicians must leave a geographic area
- Contribute to clinician burnout and job dissatisfaction that can lead to loss of clinicians from the workforce
- Put an unnecessary burden on those clinicians who do leave by uprooting families as well as requiring reestablishing licensure and insurance

We welcome patient and clinician centered reform of this practice and appreciate the opportunity to provide input as the FTC considers this proposed rule.

Sincerely,

Srinath Adusumalli, MD, FACC
President