

November 3, 2025

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

*Submitted electronically via regulations.gov*

**Subject: Response to Request for Information on Non-Compete Agreements Docket ID FTC-2025-0463**

Dear FTC Staff,

The Association of Women in Rheumatology (AWIR) is submitting this letter in response to the Federal Trade Commission's Request for Information (RFI) regarding non-compete agreements. AWIR is an organization dedicated to supporting women in the field of rheumatology through education, mentorship, and advocacy.

To help support real-time data for the FTC RFI, AWIR conducted a survey of its members to assess the prevalence and impact of non-compete agreements on rheumatologists, with a specific focus on the experiences of women in the field.

The survey findings reveal a significant concern: non-compete agreements are common, and they are perceived to negatively impact rheumatologists' career mobility and, critically, patient access to care. Key findings include that a majority of rheumatologists have been subject to non-compete agreements, with a notable percentage reporting that these agreements have significantly or somewhat restricted their ability to change jobs or practice locations.

Alarming, over 70% of respondents believe that these agreements negatively impact patient access to care. Additionally, the prevalence of non-competes appears to be widespread, with most respondents reporting personal experience with non-competes or of a colleague having been impacted by a non-compete.

These limitations on career mobility disproportionately affect women, hindering their professional advancement and earning potential. These agreements not only limit the career opportunities of rheumatologists, but also restrict patients' access to specialized care, potentially exacerbating health disparities, especially in rural areas or underserved communities.

The majority of respondents identified as female (80.85%), representing a range of experience levels, practice settings, and geographic locations.

Regarding the terms and limitations of non-competes, responses varied. For the approximate distance or time restriction, 41.03% of respondents reported 25 miles or less, 17.95% reported 50 miles or less, 10.26%

[www.awirgroup.com](http://www.awirgroup.com)

**Principal Address:** 2125 Valleygate Drive, Suite 201, Fayetteville, NC 28304  
**Correspondence Address:** 345 E 37<sup>th</sup> Street, Suite 303C, New York, NY 10016



reported 1 hour or less travel time, 2.56% reported 2 hours or more travel time, and 28.21% reported even broader distance and time restrictions for their non-competes.

Of note, 25% of respondents stated that their ability to change jobs or practice locations were significantly affected by the non-compete agreements, while 22.5% stated that it was affected somewhat.

The survey also provided insights into the prevalence and perceived impact of non-competes. A significant portion of respondents (62.5%) indicated that their current or most recent employment contract included a non-compete agreement. Furthermore, a large majority (75%) reported having been advised or required to sign a non-compete agreement in their current or previous position, and 79.49% stated that they have experienced or know of a colleague who was unable to practice within their specialty or geographic area due to a non-compete. Most alarming, the responses indicated the belief that non-compete agreements in rheumatology negatively affect patient care or access as reported by 71.79% of respondents.

AWIR hopes that this information is helpful to the FTC in its analysis of non-compete agreements. We are concerned about the potential negative impacts of these agreements on rheumatologists, particularly women, and on patient access to care. We are available to provide further information or clarification as needed.

Sincerely,

Gwenesta Melton, MD  
Vice President and Advocacy Co-chair  
AWIR

Stephanie Ott, MD  
Advocacy Co-chair  
AWIR

*AWIR is dedicated to promoting the science and practice of Rheumatology, fostering the advancement and education of women in Rheumatology, and advocating access to the highest quality health care, and management of patients with Rheumatic diseases.*

[www.awirgroup.com](http://www.awirgroup.com)

**Principal Address:** 2125 Valleygate Drive, Suite 201, Fayetteville, NC 28304  
**Correspondence Address:** 345 E 37<sup>th</sup> Street, Suite 303C, New York, NY 10016

