

October 1, 2018

Mr. William Melofchik
Legislative Director
National Council of Insurance Legislators
2317 Route 34, Suite 2B
Manasquan NJ 08736

Dear Mr. Melofchik:

With over 2,600 members, the Medical Society of the District of Columbia (MSDC) is the largest medical organization representing metropolitan Washington physicians in the District of Columbia. The Medical Society, founded in 1817, is the leading voice of medicine and public health, advocating on issues impacting the diverse population of our nation's capital. MSDC is dedicated to ensuring the well-being of physicians and their patients in metropolitan Washington.

MSDC strongly opposes the National Council of Insurance Legislators' (NCOIL) model bill on physician dispensing.

MSDC does not understand the need to effectively outlaw physician dispensing nor the rationale to allow a physician to dispense only when an injured worker is seen within seven days of the injury and then only for a single seven day fill.

District of Columbia pain management and orthopaedic physicians regularly treat both acute and chronic pain, and office dispensing is a practical way to ensure patient compliance and recovery.

MSDC joined other state societies and medical organizations pushing for the successful passage of a physician dispensing resolution at the American Medical Association (AMA) meeting in June 2018. We joined the AMA in supporting physicians' right "to dispense drugs and devices when it is in the best interest of the patient and consistent with AMA's ethical guidelines."

Finally, MSDC strongly advocates for the right of physicians to participate in the public policy process. Consistent with this, we are concerned physicians were not involved in drafting this model bill. Similar with our efforts with DC legislation or regulations, we strongly object to any policy that impacts a physician's ability to practice medicine when physicians are not consulted.

I can be reached at (202) 466-1800 or hay@msdc.org for further questions or concerns.

Sincerely,


Robert Hay, Jr.
Executive Vice President