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October 17, 2025

Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
United States Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

RE: Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices [XRIN 0694-XC134]

Dear Director Astle:

The Alliance for Aging Research (“Alliance”) appreciates the opportunity to provide comments on the Bureau of Industry and Security’s (BIS) investigation into the national security implications of imports of personal protective equipment (PPE), medical consumables, and medical equipment including devices. The Alliance is the leading nonprofit organization dedicated to changing the narrative to achieve healthy aging and equitable access to care. The Alliance strives for a culture that embraces healthy aging as a greater good and values science and investments to advance dignity, independence, and equity.

The United States is the world leader in the development of novel medical technologies and the largest medical device market in the world. The MedTech industry supports nearly two million jobs across all fifty states. According to trade.gov, in 2023, the US exported nearly \$103 billion worth of medical devices,¹ and the industry is responsible for nearly 2 million jobs in the U.S., including both direct and indirect employment. Medical technology directly accounts for nearly 519,000 U.S. jobs.²

As you know, Section 232 of the Trade Expansion Act of 1962 authorizes the President to impose tariffs when specific imports pose a threat to national security. While the Alliance affirms the President’s stance that the US should strengthen our domestic production of

¹ International Trade Administration. “Medical Technology Industry: The United States remains the largest medical device market in the world.” 2023. <https://www.trade.gov/selectusa-medical-technology-industry#:~:text=SelectUSA%20Home,innovative%20and%20high%20technology%20products>.

² AdvaMed. “Medical device industry facts: Job creation.” 2024. <https://www.advamed.org/medical-device-industry-facts/job-creation/#:~:text=Tremendous%20progress%20has%20occurred%20in,two%20times%20the%20national%20average>.

medical technologies, tariffs are a blunt instrument that would likely lead to shortages, inaccessibility of care, price increases for consumers, and worse relationships with allied countries.

Tariff Impact on Price Inflation and Consumer Access

The MedTech and Medical Device industry improves healthcare outcomes for patients. Innovative diagnostic and treatment devices empower patients to manage chronic conditions, enable clinicians to detect diseases earlier, and allow people to live longer, healthier lives. A 2023 U.S. News & World Report survey noted that more than half of adults age 55 and older use assistive technology to stay healthier so they can age in place.³ Tariffs would drive up the price of essential items that older adults rely on to live independently like wheelchairs, oxygen equipment, and diabetes supplies.

The costs of tariffs are almost always passed down the supply chain to consumers. In the medical technology sector, this means hospitals, clinics, and patients will ultimately pay those costs. When tariffs raise the cost of imported components or finished devices, manufacturers must either absorb the expense or pass those costs along through higher prices. A May 2023 United States International Trade Commission report found that tariffs on steel and aluminum were almost entirely passed through to import prices, showing that U.S. importers bore the costs of tariffs through reduced profit margins and by raising prices for consumers and downstream purchasers.⁴

Reduced Access as a Result of Tariffs

In healthcare, where cost increases compound rapidly across insurers, providers, and patients, even modest tariff-induced price hikes can have outsized effects. Devices such as wheelchairs, insulin pumps, and diagnostic imaging components could see measurable price increases, straining household budgets and hospital procurement alike. In an era where early detection and targeted treatments are critical to quality care, such disruptions would directly threaten patient outcomes and strain health systems already operating on tight margins.

Tariffs would also hit rural health systems especially hard. More than 60 million Americans (~ one-fifth of the population) live in rural areas, and nearly one in five are age 65 or older. Older adults represent approximately 19.2 percent of the rural population, compared to 15.7 percent in non-rural areas.⁵ Rural communities rely on roughly 1,800 rural hospitals for their care. Even before potential tariff-related cost increases, over 700 of these hospitals, representing one-third of all rural facilities, were at risk of closure due to financial

³ Rachel Hisle. "Aging in Place with Assistive Tech Survey." US News and World Report. 2023. <https://www.usnews.com/360-reviews/services/senior-tech-aging-in-place-survey>

⁴ United States International Trade Commission. "Economic Impact of Section 232 and 301 Tariffs on U.S. Industries." 2023. https://www.usitc.gov/publications/332/pub5405.pdf?source=govdelivery&utm_medium=email&utm_source=govdelivery

⁵ Federal Housing Finance Agency. "Who Lives in Rural America?". 2024. <https://www.fhfa.gov/blog/insights/who-lives-in-rural-america>

shortfalls. Tariffs that raise the cost of essential medical supplies and devices could accelerate this crisis. For rural hospitals already operating on razor-thin margins, even modest increases in supply costs could force reductions in services or, in extreme cases, complete closures, depriving millions of Americans of local access to emergency care.

Recommendations to Protect Older Adults and Strengthen Health Security

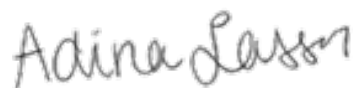
To protect older adults and ensure that all Americans maintain access to essential medical technologies, federal policy should focus on affordability, innovation, and resilience. Policymakers should prioritize measures that keep prices stable and predictable for patients and health care providers alike. Older adults cannot absorb higher costs or supply disruptions without serious consequences for their health and quality of life.

The Administration can strengthen national and health security by investing in domestic manufacturing, workforce development, and advanced production technologies that enhance resilience without reducing access. Expanding programs that support innovation through research funding and streamlined regulatory pathways will ensure that new devices reach patients efficiently.

Conclusion

The Alliance urges the Department of Commerce to reaffirm that medical devices do not constitute a threat to national security and should remain exempt from Section 232 tariffs. Older adults and their caregivers must be able to work with their health care providers to determine which medical devices best support their health, safety, and independence. Tariff policy should not interfere with those decisions by inflating costs or restricting access to the technologies clinicians rely on to deliver high-quality, patient-centered care.

Sincerely,

A handwritten signature in cursive script that reads "Adina Lasser".

Adina Lasser
Director of Public Policy & Government Relations