



October 16, 2025

Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Section 232 Investigation on Imports of Personal Protective Equipment (PPE), Medical Consumables, and Medical Equipment - XRIN 0694-XC134

Dear Secretary Lutnick and Members of the Bureau of Industry and Security:

As members of the Heart Valve Disease Policy Task Force, a national group of 30 leaders including clinician and patient advocates, we appreciate the opportunity to comment on the Department's investigation into the national security implications of medical product imports under Section 232 of the Trade Expansion Act of 1962.

Cardiovascular care depends on timely access to advanced medical technologies, from diagnostic imaging systems and monitoring equipment to artificial valves, catheters, and surgical instruments. These devices are not optional; they are essential to detecting, repairing, and replacing diseased heart valves, often in time-sensitive or life-threatening circumstances. Any policy that increases costs or disrupts supply chains risks delaying care for patients whose health depends on immediate access to these technologies.

The potential imposition of tariffs on medical devices, consumables, and related equipment could significantly raise costs across the healthcare system¹. Hospitals, surgical centers, and cardiology practices, many already under strain from workforce shortages and rising operating expenses, would have limited ability to absorb new costs. As a result, patients could face higher out-of-pocket expenses, postponed procedures, or reduced access to the most advanced valve repair and replacement options. For individuals with progressive valve disease, even short delays in treatment can result in worsening symptoms, hospitalizations, or preventable deaths.

For people living with heart disease, access to safe and effective medical technology can mean the difference between life and death. Innovations in valve replacement, diagnostics, and other cardiovascular treatments have allowed millions to live longer, healthier lives. These advances rely on strong U.S. manufacturing and trusted global partnerships that supply essential components and research.

Broad tariffs could delay access to new or current devices. It is important to recognize that medical technologies are highly regulated by the FDA, therefore production changes require years of review to ensure patient safety. Policy changes that disrupt the current system could limit access to lifesaving care and put heart patients at risk.

For patients with heart valve disease, access to reliable and affordable medical technology is a matter of survival. We urge the Department to ensure that any findings or recommendations emerging from this investigation reflect the critical link between medical innovation, patient access, and national health security. Policies that recognize and preserve the strength of the U.S. medical technology sector while

¹ Zhang, J., & Zhou, Z. (2025). The impact of US tariff hikes on health care. *The Lancet*.
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maintaining affordability and availability for patients will ultimately best serve our nation's health and resilience.

Thank you for the opportunity to comment and for considering the needs of cardiovascular and heart valve disease patients as part of this important review.

Sincerely,

The Heart Valve Disease Policy Task Force

Alliance for Aging Research

Alliance for Patient Access

American Society of Echocardiography

Conquering CHD

Heart Valve Voice U.S.

Hypertrophic Cardiomyopathy Association

Men's Health Network

The Mended Hearts, Inc.

National Hispanic Health Foundation

Partnership to Advance Cardiovascular Health

Preventive Cardiovascular Nurses Association

WomenHeart: The National Coalition for Women with Heart Disease