



April 15, 2026

The Honorable Jamieson Greer
U.S. Trade Representative
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

Re: Comments of the Healthcare Supply Chain Association on USTR Section 301 Investigation of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors

Dear Ambassador Greer,

On behalf of the Healthcare Supply Chain Association (HSCA), which represents the nation's leading traditional healthcare group purchasing organizations (GPOs), we appreciate the opportunity to provide comments to the Office of the U.S. Trade Representative on its Section 301 investigation into structural excess capacity and production in manufacturing sectors. HSCA and its member GPOs appreciate your focus on strengthening the domestic supply chain and we look forward to working with you and the Administration on this pressing issue.

Traditional healthcare GPOs are the sourcing and contracting partners to American hospitals, long-term care facilities, surgery centers, clinics, and other healthcare providers. Initially formed in the early 1900s, traditional healthcare GPOs combine potential purchasing volume on behalf of healthcare providers, drive competition among suppliers, and reduce healthcare costs. The interests of GPOs are entirely aligned with those of their provider members. As such, GPOs are dedicated to ensuring a stable and resilient supply of medical products for patients.

HSCA recognizes that tariffs and other economic initiatives are designed to encourage investment in the U.S. marketplace and reshoring of overseas investments, with a key associated goal of addressing supply chain inefficiencies. HSCA commends the Administration's efforts to increase domestic capacity in the supply chain, and we are proud that our supplier partners are often able to offer hospital customers the opportunity to source necessary products domestically.

Traditional healthcare GPOs witness firsthand how overreliance on offshore production can jeopardize patient access to essential products, and HSCA members are leaders in working to encourage investments in domestic manufacturing. GPOs work alongside medical equipment manufacturers to recognize quality manufacturing processes, increase competition, and promote domestic and near-shore manufacturing, which is vital to ensuring access to essential products and PPE.

During the COVID-19 pandemic, for example, several HSCA member GPOs launched programs to invest in domestic and geographically diverse manufacturing, entering into strategic partnership agreements with a number of domestic suppliers. GPOs have also enabled U.S. manufacturers to bring products to market through durable contracting – a key component designed to support manufacturer investment and sustainability.

However, domestic manufacturing is not a panacea for challenges facing the healthcare supply chain. Drug and device shortages, emergency events, and other supply chain disruptions continue to place enormous stress on healthcare providers and the communities they serve, including in markets with a strong domestic manufacturing base. These events drive home the importance of having a multifaceted approach to sourcing and manufacturing capabilities. The global nature of the medical supply chain should be leveraged to build in redundancies, shoring up domestic production as well as sourcing in various geographical locations to help prevent supply disruptions.

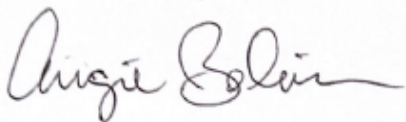
HSCA and its member GPOs support efforts to increase domestic production capacity as part of a resilient, geographically diverse global supply chain. Having manufacturing in a variety of locations helps suppliers scale up quickly, even if on a temporary basis as the impacted manufacturer works to resume operations. Increased redundancy also reduces the risk of bottlenecks and severe disruption in the case of regional events or other manufacturing challenges. Backup supply lines are particularly critical for pediatric facilities, as drugs intended for children often have fewer manufacturers and a less resilient supply chain due to risks associated with handling, niche formulations and dosing, and specialized delivery mechanisms.

HSCA remains concerned that imposing tariffs on medical imports could disrupt the healthcare supply chain, constrain the limited resources of providers, and ultimately hinder patient access to care. However, we appreciate that the Administration's recent [proclamation](#) updating pharmaceutical tariffs provided a mechanism for importing drugs and associated ingredients without tariffs if the medication meets an urgent United States health need. The emergency exemption offers policymakers a process to quickly respond in the case of an unintended event while continuing to prioritize domestic production.

As the USTR and the Secretary of Commerce begin to implement President Trump's proclamation, HSCA and its member GPOs urge you to work with healthcare industry stakeholders to determine which pharmaceutical products meet the criteria for an exemption. Traditional healthcare GPOs and the providers we serve have a unique line of sight over the entire healthcare supply chain, offering a critical opportunity for us to serve as a resource to your office and to assist with your work. Specifically, we recommend considering exemptions for medications used for specialized patient populations, such as pediatrics, and other essential medications that are prone to shortage.

HSCA and its member GPOs appreciate the opportunity to once again provide you with our comments and recommendations. We look forward to continuing to work with you to ensure patients and providers have affordable access to medications. Please do not hesitate to contact me directly if HSCA or our members can serve as a resource or answer any additional questions you may have. Should you or your staff want to speak further, I can be reached directly at aboliver@supplychainassociation.org.

Sincerely,

A handwritten signature in black ink that reads "Angie Boliver". The signature is fluid and cursive, with the first name "Angie" being more prominent than the last name "Boliver".

Angie Boliver
President & CEO
Healthcare Supply Chain Association (HSCA)