



Secretary Howard Lutnick  
Bureau of Industry and Security  
Office of Strategic Industries and Economic Security  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, D.C. 20230

Oct. 17, 2025

*Re: XRIN 0694-XC134 Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices*

Dear Secretary Lutnick:

Thank you for your work under President Trump's leadership to stabilize our nation's medical supply chain. The Alliance for Home Dialysis (the Alliance) respectfully offers these comments to the Department of Commerce and the Bureau of Industry and Security as it conducts its investigation under Section 232 of the Trade Expansion Act to determine the effects on national security of imports of personal protective equipment, medical consumables, and medical equipment.

The Alliance is a coalition of kidney dialysis stakeholders representing individuals with kidney failure, clinicians, providers, and allied industry. We have come together to promote and advance policies to facilitate treatment choices in dialysis care while addressing barriers that limit access for individuals with kidney failure and their families to the many benefits of home dialysis.

About 815,000 Americans are currently living with kidney failure, and approximately 555,000 are on dialysis, whether in a dialysis center or on a home dialysis modality (either peritoneal dialysis or home hemodialysis).<sup>1</sup> Kidney failure falls within the top ten causes of death in the US, but home dialysis can make a positive difference for patient quality-of-life and health outcomes. For example, home hemodialysis (HHD) can be performed more frequently than in-center dialysis and for longer-lasting sessions, which can help patients avoid significant side effects and tolerate the treatment better, with faster recovery times. Peritoneal dialysis (PD) also often has fewer side effects than in-center care, and PD patients are subject to fewer dietary restrictions. Both modalities enhance mental health outcomes, including self-determination and social function. In measuring quality-of-life, home dialysis offers advantages like the ability to better maintain employment and/or family caretaking responsibilities,

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<sup>1</sup> <https://www.kidneyfund.org/all-about-kidneys/quick-kidney-disease-facts-and-stats>

pursue education, opportunities to travel, flexibility in the timing of treatments, and a reduced reliance on transportation to and from the dialysis clinic.

In short, home dialysis isn't just a change in location; it's a transformative treatment approach that empowers patients, improves outcomes, and restores personal freedom.

Over the past few decades, home dialysis uptake in the US has grown—in large part due to federal policy changes that incentivize access and government support for the modality. From 2012 to 2022, the latest years we have data for, the percentage of incident (newly diagnosed) end-stage renal disease (ESRD) patients performing home dialysis increased by over 70% from 8.5% to 14.5%.<sup>2</sup> This growth is encouraging, and we are committed to continuing to work with federal, state, and local governments to continue this upward trend.

This positive growth trajectory relies on a consistent and steady supply of necessary medical equipment, consumables, PPE and devices.<sup>3</sup> We are committed to supporting current U.S. manufacturers and appreciate the administration's efforts to incentivize the further development of a robust U.S. manufacturing base and strong domestic supply chain. A robust domestic production network is important across the health care sector, but is especially key for home dialysis patients who rely on weekly supply deliveries to sustain treatment and ensure they can perform their therapy.

At the same time, we also understand the role that foreign manufacturers<sup>4</sup> currently play in the dialysis space and the need for alternative sourcing options in the event of natural disasters or other supply chain disruptions. Sourcing in various geographic locations can help in these situations, and the kidney disease community currently relies on allies like Mexico and EU member states, among other, to produce devices, equipment and consumables required for home dialysis.

Further, in light of the humanitarian nature of medical products, most countries have committed for decades to binding tariff-free trade on these life-saving products.

In order to ensure that patients have uninterrupted access to home dialysis- and that both home dialysis modalities continue to grow- we urge you to consider the circumstances we have laid out above and elect not to apply tariffs to medical devices, consumables, and equipment used for dialysis.

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<sup>2</sup> <https://usrds-adr.niddk.nih.gov/2024/end-stage-renal-disease/2-home-dialysis>

<sup>3</sup> Among the most commonly used items are equipment that fall into the following HTS codes: 901890, 901831, 902300, 902610, 902620, 903033, 903180, 903289, 841391, 841360, 841350, 841480, 842129, 842121, 842390, 842381, 842330, 847160, 848180, 850110, 850440, 851762, 852859, 853710, 854442, 854449

The Alliance is eager to work with you as you work to protect the health care supply chain, U.S. national security, and patient access to key therapies. We appreciate your consideration of these comments. If we can be a resource for you, please don't hesitate to reach out to me at [mseger@vennstrategies.com](mailto:mseger@vennstrategies.com) or (202) 466-8700.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MSeger', with a stylized flourish at the end.

Michelle Seger  
Managing Director  
Alliance for Home Dialysis