

February 6, 2025

Kevin Hassett Director National Economic Council

Jeff Wu Acting Administrator Centers for Medicare & Medicaid Services

Sarah Brenner
Acting Commissioner
Food and Drug Administration

RE: Meeting to Discuss Tariff Impact on Medical Supply Chain

On behalf of our 60,000 pharmacist, student pharmacist, and pharmacy technician members, we ask that the administration provide tailored tariff exemptions for active pharmaceutical ingredients (API), prescription medications, and critical medical supplies imported from China, as well as from Canada and Mexico, if tariffs are imposed on those countries. We also recommend that the administration consider alternate incentives to encourage domestic manufacturing without causing supply chain disruptions or shortages that could disrupt patient care. We encourage you to convene a meeting with ASHP and other healthcare stakeholders (such as the American Hospital Association) to identify the products that should be exempted from tariffs to avoid unnecessary disruption to patient care.

ASHP supports efforts to strengthen supply chains by promoting investment in domestic manufacturing of pharmaceuticals and other critical medical supplies. However, establishing new manufacturing facilities will take several years, and in the interim, the impact of tariffs on medical supply chains should be carefully considered to limit supply disruptions.

ASHP maintains a drug shortage list that tracks drug availability and provides details (when available) about the reasons for shortages. In the past two years, providers have encountered shortages of essential medications, including components of intravenous (IV) bags, chemotherapeutic agents, attention deficit hyperactivity disorder (ADHD) medications, and critical injectable drugs.

Application of tariffs to API, key starting materials, and finished medical products could result in significant unintended consequences, including drug shortages. Tariffs imposed on APIs and key starting materials will increase costs for American manufacturers. Existing federal inflation penalties prevent manufacturers from recouping these higher costs to maintain profitability. As a result, these manufacturers may cease production of critical medications, particularly low-cost generic medications.

¹ ASHP shortage list, which is maintained in partnership with the University of Utah, is available at https://www.ashp.org/drug-shortages/current-shortages. FDA's shortage list is available at https://www.fda.gov/DrugS/DrugSafety/DrugShortages/default.htm.

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Resulting shortages could have serious ramifications for patient care in the United States. We encourage the administration to consult with healthcare stakeholders about the possibility of shortages before imposing any tariffs on API, key starting materials, and finished medical products.

We also urge the administration to avoid cost increases associated with tariffs for prescription medications and medical supplies necessary for drug administration (e.g., syringes, lancets, gloves). Prescription drugs and supplies are often expensive – even relatively minor increases in price may place some of these essential products out of reach for many Americans.

We look forward to working with you to ensure that patients have access to a safe and secure medical supply pipeline. Please do not hesitate to let us know if we can answer any questions or provide additional information.

Sincerely,

PIN, abramont Paul W. Abramowitz, PharmD, ScD (Hon), FASHP

Chief Executive Officer