AAHOMECARE
American Association for Homecare

Fact Sheet: 2025 Section 232 Investigation on DME and Other Medical Products

On Sept. 26, 2025, the U.S. Department of Commerce initiated a Section 232 National Security Investigation into broad imports of medical equipment, devices, and consumables. This sweeping review covers a wide range of products related to DME, including wheelchairs, hospital beds, portable oxygen concentrators, blood glucose monitors, IV bags, catheters, personal protective equipment, and other items.

The investigation could result in tariffs, quotas, or other trade restrictions as early as 2026, with the stated goal of reducing reliance on devices manufactured outside of the U.S. and on foreign supply chains. It is important for all DME stakeholders, including suppliers, manufacturers and distributors, to submit comments opposing these potential actions. Comments are due **Friday, Oct. 17** (11:59pm ET).

Messages for Comments and Discussions with Policymakers

The Dept. of Commerce must exclude home medical equipment and supplies from any Section 232 trade actions.

- **Rising Costs vs. Fixed Reimbursement** – Medicare, state Medicaid programs, and private/commercial payers pay a fixed reimbursement amount to DME providers for equipment and medical supplies. Additional product costs added by new tariffs cannot be passed on to consumers and would have to be fully absorbed by HME manufacturers and providers. HME suppliers are already subject to very tight product margins stemming from steep Medicare reimbursement cuts since 2008, as well as for other payers who are influenced by Medicare rates.

- **Impacts on Vulnerable Patient Cohorts** – DME supports many of America's most vulnerable and medically fragile patient cohorts, including seniors, people with disabilities, and individuals with severe chronic conditions such as chronic obstructive pulmonary disease. If rising product costs cause more DME suppliers to close or cut back product offerings, these patient groups will see reduced access to care and potential loss of trusted and experienced providers.

- **Limited Domestic Alternatives** – Many DME products are not manufactured at scale in the U.S., making tariffs punitive rather than protective. Investing in our domestic manufacturing capacity for medical products is a worthwhile priority, but using tariffs to help achieve this goal will have severe impacts on our healthcare infrastructure and millions of Americans in the near term.

- **Impacts on Overall Healthcare Costs** – DME and home-based care are exceptionally cost-effective when compared to costs associated with hospitalizations, short-term skilled nursing facility and rehab center stays, and other clinical interventions. Home-based care can also delay the need for moves to expensive retirement and long-term care facilities. Additional financial stress on the DME sector will increase the need for these costlier alternatives to homecare. Expanding tariff coverage without transitional relief for critical medical supply chains risks short-term harm to patients and the healthcare delivery system while domestic capacity ramps up.

- **Your Experience Makes the Strongest Case** – First-hand perspectives from DME stakeholders make for the strongest, most-credible comments. Share how higher tariff costs or other trade restrictions will impact your business and the patients, clinicians, and caregivers you support.

Where to Comment

Comment deadline: **Friday, October 17, 2025**
Submit comments via **Regulations.gov** – search there for ***BIS-2025-0258***
Direct link to docket here
Federal Register notice (pdf)

For More Information

See aahomecare.org/section-232

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