



October 29, 2021

By Electronic Submission

Michael Shapiro
Deputy Assistant Secretary for Economic Development
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

**Re: Request for Information – America’s Supply Chains and the Transportation Industrial Base –
Docket No. DOT-OST-2021-0106**

Dear Mr. Shapiro:

The Health Industry Distributors Association (HIDA) would like to thank the United States Department of Transportation for the opportunity to provide input on practical solutions to address current and future challenges to supply chain resilience in the freight and logistics sector. A process to prioritize the movement of pandemic and essential medical supplies through the U.S. transportation system is needed to avoid significant delays in delivering to healthcare providers.

HIDA supports a Critical Cargo Program that prioritizes medical supplies during the COVID-19 response and future public health emergencies. The Administration’s recent work to align the ports to 24/7 operations is an essential first step to alleviate transportation bottlenecks. The next steps are to align all modes of transportation to 24/7 operations and prioritize critical cargo such as personal protective equipment (PPE) through ports, onto rail and truck for expedited delivery to healthcare providers. Specifically, HIDA recommends:

- Developing a “fast pass” system to expedite global transportation of essential medical products
- Utilizing “fast pass” with railroads, trucks, and small parcel carriers
- Aligning transportation operations to support healthcare during public health emergencies

Unprecedented transportation delays have severely limited reliable and timely movement of medical products. This restricts the supply chain's ability to support healthcare providers responding to COVID-19 and providing essential medical services. These transportation disruptions have become a healthcare issue.

The medical products supply chain relies on predictable transport to communicate product availability and delivery to providers. This allows them to provide appropriate clinical patient care. Continued delays will have negative consequences for patient care and public health.

Demand for PPE, ancillary vaccine products, and essential medical supplies remains high due to continuing COVID-19 cases, flu season preparation, and administering COVID-19 booster shots. This demand will further strain the transportation system. Experts forecast that COVID-related challenges across major transportation sectors will almost certainly continue into 2022. New policies are needed to address the immediate and long-term threats they pose to the nation's healthcare supply chain.

Medical Products Supporting COVID, Flu, & Essential Care Include:

Infection Prevention: PPE, hand sanitizer

COVID and Flu Vaccinations: needles, alcohol prep pads

Emergency Medicine: Patient monitoring equipment, IV sets

Essential Surgeries and Treatments: Correct components and sterile surgical kits

HIDA's Recommendations

Public and private stakeholders should be convened to identify a fast pass prioritization process to efficiently move product. The entire U.S. transportation system from ports to rail to trucks to small parcel carriers should be included.

Develop a "fast pass" system to expedite global transportation of essential medical products

- Use this system to prioritize critical supplies for container access and sea freight space
- Identify containers of critical supplies
- Use existing "peel off" capability for priority handling at ports

Utilize "fast pass" with railroads, trucks, and small parcel carriers

- Ensure first available railcar and chassis
- Ensure necessary equipment and labor are available

Align transportation operations to support healthcare during public health emergencies

- 24/7 operations during a public health emergency are needed for transport of medical products
- Develop intermodal communication plan on when and how medical products can be accessed

We must take immediate steps to develop a process that prioritizes the transportation of critical medical supplies and equipment. Additionally, more long-term solutions should include diversifying sources, expanding domestic manufacturing, recommending alternative products, and building a bigger cushion by increasing inventories and supporting public and private stockpiles.

Background on HIDA

HIDA is the industry trade association representing 111 distribution companies operating 500+ medical distribution centers across the care continuum nationwide. HIDA members deliver medical products and supplies, manage logistics, and offer customer services to virtually every healthcare provider. In 2020, they reliably delivered 51 billion units of PPE “the last mile” to providers.

HIDA members distribute items used in everyday medical services and procedures, ranging from gauze and gloves to diagnostic laboratory tests and capital equipment. The existing commercial distribution channel serves the nation’s 6,000 hospitals, 44,500 nursing homes and assisted living facilities, 230,000 physician offices, 267,000 laboratories, and 12,200 home health agencies. Collectively, HIDA members manage 76 million square feet of warehouse space. Medical product distributors process 650 million orders annually for their healthcare provider customers and carry over 550,000 FDA-approved products from 5,500 medical manufacturer partners.

We look forward to working with you to address the immediate and long-term threats to the nation’s healthcare supply chain. If you have any questions or need additional information, please contact me at rouse@hida.org.

Sincerely,



Linda Rouse O’Neill
Vice President of Supply Chain Policy & Executive Branch Relations
HIDA