

November 2, 2022

Submitted electronically via: www.regulations.gov

Secretary Gina M. Raimondo
United States Department of Commerce
1401 Constitution Ave. NW
Washington, D.C. 20230

Re: Draft Harmonized System Code List of Critical Supply Chains (ITA-2022-0010)

Dear Secretary Raimondo,

Vizient, Inc. appreciates the opportunity to comment on the Department of Commerce's draft harmonized system code list of critical supply chains. As provided by the Department, the list of critical goods and materials will serve as a tool to facilitate ongoing targeted analysis of trade data and the evaluation of policies to strengthen these supply chains.

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 60% of the nation's acute care providers, which includes 97% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$130 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

While Vizient's initial review of the draft list primarily considered pharmaceuticals, we encourage the Department to regularly seek feedback to refine the entire draft list of critical goods and materials. In support of providers, Vizient maintains a [list](#)¹ of essential medications for high-quality patient care which is utilized to help inform mitigation strategies. Iodinated Contrast Media (ICM) enhances the ability to see blood vessels and organs on medical images such as X-rays or computed tomography (CT) scans.² Also, ICM is used in cardiac catheter labs and interventional suites.^{3,4} More recently, shortages^{5,6} demonstrated the importance of these products to patient care, which was disrupted when there was not adequate supply. We encourage the Department to include ICM and its critical inputs, such as iodine, on the list of critical goods and materials given its critical role in patient care.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. In closing, on behalf of Vizient, I would like to thank the Department for providing us the opportunity to comment. Please feel free to contact me, or Jenna Stern at jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider this recommendation.

Respectfully submitted,



Shoshana Krilow
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Vizient, Inc.

¹ https://www.vizientinc.com/-/media/documents/sitecorepublishingdocuments/public/essential_meds.pdf

² <https://www.fda.gov/drugs/information-drug-class/iodinated-contrast-media-icm>

³ https://citoday.com/articles/2008-jan-feb/CIT0108_08.php

⁴ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6780384/>

⁵ [https://www.accessdata.fda.gov/scripts/drugshortages/dsp_ActiveIngredientDetails.cfm?AI=Iohexol%20\(Omnipaque%20\)%20Injection&st=c](https://www.accessdata.fda.gov/scripts/drugshortages/dsp_ActiveIngredientDetails.cfm?AI=Iohexol%20(Omnipaque%20)%20Injection&st=c)

⁶ https://www.accessdata.fda.gov/scripts/drugshortages/dsp_ActiveIngredientDetails.cfm?AI=Iodixanol+%28Visipaque%29+Injection&st=c&tab=tabs-4&panels=0