



COLLEGE of AMERICAN PATHOLOGISTS

August 22, 2025

The Honorable Howard Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Secretary Lutnick,

As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP is deeply concerned about the impact of tariffs on laboratory products, including diagnostic medical supplies, equipment, and devices.

The College of American Pathologists (CAP) serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide. As physicians specializing in the diagnosis of disease through laboratory methods, pathologists have a long track record of using diagnostic products to deliver high quality diagnostic services to patients and their physicians. Pathologists consistently rely on access to supplies like test kits, plastic pipette tips, specimen acquisition swabs and transport media, much of which is impacted by the medical supply chain, to diagnose cancer, infectious diseases and other disorders. These products are necessary for pathologists to deliver the timely, accurate, and necessary testing Americans need for diagnosis and care planning.

Given the extreme importance of these products to pathologists, the patients they serve, and the health of our great nation, the CAP urges the administration to exempt medical device products from the imposed tariffs, particularly those products necessary for the development and provision of critical diagnostic services. Further, the CAP urges the Administration to pursue an exemption for these products, in its negotiations, from any retaliatory tariffs other countries might impose.

Since the tariffs were announced, we have heard concerns from pathologists, and other physicians, about the inability to absorb the increased costs associated with tariffs. Without an exemption for medical device products, the CAP is concerned that cost increases for these products will negatively impact clinical laboratory testing, particularly in rural and other medically underserved areas. These additional costs, on top of federal and private payer reimbursement cuts, could delay and/or limit necessary testing, decrease innovation in laboratory medicine, and compound the difficulties pathologists currently face in managing declining and shifting resources as they continue to care for the communities they serve. Ultimately, increased financial pressure on providers, hospitals, and health systems, particularly those located in rural and other medically underserved areas, will threaten patient access and care.



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The CAP understands the Administration's desire to incentivize domestic manufacturing. Until that happens in sufficient quantities, in order to allow pathologists to continue to provide top-quality care for their patients the CAP urges the Administration to exempt medical device products from any tariffs. We look forward to working with the Administration, Congress, and other agencies to help promote and advance policies that achieve the best care possible for our nation's most valuable assets, its people. Please contact Michael Hurlbut at mhurlbu@cap.org if you have any questions or would like to discuss our request.

Sincerely,

Donald S. Karcher, MD, FCAP
President, College of American Pathologists