



March 30, 2026

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2026-0298-0001
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: **Initial Comments** of AIM North America UDI Work Group: Support for GS1 US Comments on Medicare Program; Ensuring Safety Through Domestic Security With Made in America Personal Protective Equipment (PPE) and Essential Medicine Procurement (CMS-2026-0298)

We are writing on behalf of AIM North America to express our strong support for the comments submitted by GS1 US regarding the Advance Notice of Proposed Rulemaking (ANPRM) for ensuring safety through domestic security with "Made in America" PPE and essential medicine procurement.

Since 1970, AIM has served as the neutral authority for technologies that capture, manage, and integrate data to improve business processes. As a chapter of AIM, Inc., AIM North America promotes the adoption of AIDC technologies through education and strategic advocacy. We work alongside industry leaders—including the FDA, DOW, GS1, and MHI—to define standards and enhance connectivity.

AIM serves as the secretariat for the U.S. Technical Advisory Group (TAG) to ISO/IEC JTC 1/SC 31, driving international standards for Automatic Identification and Data Capture (AIDC) techniques. We formulate U.S. positions on data structures, encoding, and capture technologies that power inter-industry applications and global trade.

AIM North America provides unrivaled expertise in asset tracking technologies, from RFID and IoT to advanced barcode systems. We stand ready to support the Centers for Medicare & I Medicaid Services (CMS) in navigating AIDC technical requirements, ensuring robust standards and seamless implementation.

Sincerely yours,

A handwritten signature in black ink that reads "Don Ertel".

Don Ertel
AIM North America Board Chair

A handwritten signature in blue ink that reads "Jay Crowley".

Jay Crowley
AIM North America UDI Work Group Chairperson

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INTRODUCTION

As the global voice of AIDC technologies, AIM Global represents technology providers, integrators, and users across the supply chain. We foster excellence in automatic identification—spanning barcodes, NFC, and RFID—by advocating for standards that ensure accurate, interoperable data and enhanced product traceability.

AIM North America, a key chapter of AIM Global, drives the adoption of AIDC technologies by advocating for, educating on, and implementing industry mandates in cooperation with regulatory bodies. Our UDI Work Group brings together a dedicated coalition of manufacturers, distributors, hospitals, and industry stakeholders to advance compliance and best practices

We appreciate the opportunity to submit comments to the Medicare Program; Ensuring Safety Through Domestic Security With Made in America Personal Protective Equipment (PPE) and Essential Medicine Procurement (CMS-2026-0298)

We support the GS1 US comments on the CMS Advance Notice of Proposed Rulemaking (ANPRM) to strengthen domestic supply chains for PPE and essential medicines. Utilizing GS1 global standards is critical for implementing the "Secure American Medical Supplies" designation, reducing reporting friction, ensuring accurate tracking of domestic sourcing, and enhancing auditability for Medicare participating hospitals

COMMENTS

As CMS moves toward establishing a "Secure American Medical Supplies" designation for Medicare participating hospitals, it is vital that the methods for tracking and validating domestic procurement are standardized, scalable, and automated to minimize administrative burden.

We agree with GS1 US that leveraging globally recognized, standardized data attributes and product identifiers is the most effective way to:

- **Validate Domestic Sourcing:** Link globally unique product identifiers with data attributes that document domestic sourcing status, reducing ambiguity in supply chain reporting.
- **Reduce Administrative Burden:** Replace manual, error-prone attestation methods with interoperable, machine-readable data that allows hospitals to easily identify and report on American-made products.
- **Ensure Auditability:** Provide the necessary transparency for CMS to verify compliance and enhance the resilience of the healthcare supply chain.

By partnering with organizations like AIM and GS1 US, CMS can ensure that the "Made in America" requirements are practical for manufacturers, distributors, and hospitals, ultimately ensuring a secure supply of essential medical materials without disrupting clinical care.

We urge CMS to fully incorporate GS1 standards into the framework of this rulemaking to ensure the long-term success of these vital domestic security goals.