



GE Healthcare  
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March 30, 2012

Helen Lamont, Ph.D.  
Office of the Assistant Secretary for Planning and Evaluation  
Room 424E Humphrey Building  
Department of Health and Human Services  
200 Independence Avenue SW  
Washington, DC 20201.

***Re: Public Input on the Draft National Plan to Address Alzheimer's Disease***

Dear Dr. Lamont:

GE Healthcare appreciates this opportunity to provide input and comments on the draft National Plan to Address Alzheimer's Disease. Our comments focus on the use of diagnostics to help physicians diagnose and treat disease and to reduce the burden of Alzheimer's Disease (AD) and related dementias on patients and their caregivers.

GE Healthcare, a division of the General Electric Company, has decades of expertise in medical imaging and information technologies, medical diagnostics, patient monitoring systems, performance improvement, drug discovery, and biopharmaceuticals manufacturing technologies. GE Healthcare's broad range of products and services enables healthcare providers to offer patients earlier and better diagnosis and treatment of cancer, heart disease, neurological diseases, and other conditions that threaten the quality and length of life. Worldwide, GE Healthcare employs more than 53,000 people committed to serving healthcare professionals and their patients in more than 100 countries.

**Overview of Comments**

Our comments and recommendations focus on the following issues:

**Diagnosis, Monitor, Treatment and Prevention:** The magnitude of Alzheimer's disease and related dementia in the US is overwhelming; Alzheimer's disease affects 1 in every 8 older Americans and nearly half of those ages 85 and older. As the number of people with Alzheimer's disease and other dementias grows in the future, aggregate payments for their

care will increase dramatically from \$183 billion in 2011 to an estimated staggering \$1.1 trillion by 2050.

While an estimated 5.4 million Americans have Alzheimer's disease, the Alzheimer's Association reports that half of them lack a specific diagnosis. This represents a fundamental gap that is identified in the Draft National Plan. To address this gap, the Plan calls for increased efforts to identify disease, diagnose AD and monitor disease progression.

New diagnostic technologies suggest benefits in early screening and utility in determining treatment pathways. Specific diagnostic tests including brain imaging may aid practitioners and caregivers to implement care plans early in the disease process.

For treatment decisions, new diagnostic imaging technologies may help inform and guide healthcare providers when making decisions ranging from pharmacologic choices to duration of therapy. In addition, technological advancements in diagnostics using brain imaging may serve useful in drug development as they allow researchers to stratify patient populations according to the extent and anatomic distribution of pathophysiology and then to measure the effect of therapeutic intervention.

For non-medical purposes, diagnostic tests offer patients and caregivers information that may enable the initiation of preventive measures like exercise (both cognitive and physical), time to make life planning decisions and understanding of the course of the disease.

Because AD progresses in the brain for as long as a decade before classic signs and symptoms become clear to diagnosticians, early detection of the pathophysiology is crucial to effective intervention and better health for those affected.

**GE Healthcare's Effort To Address Alzheimer's Disease and Related Dementia (ADRD):** For decades, GE Healthcare has invested heavily in R&D to bring to market an increasing number of molecular medical diagnostic products; companies like GE Healthcare translate scientific and medical discoveries into innovative products and services that add objectivity to clinical trials and every day practice of medicine to help physicians prescribe the right drug at a dose which is right for their patients.

By example, these advances have begun to change the paradigm for treatment of diseases such as cancer.

**Access To New Technologies:** While predictive testing and risk assessment have evolved rapidly over the past decade, the adoption of new diagnostic imaging procedures comes with challenges. GE Healthcare is pleased that cognitive testing has been added to the routine physical exam in Medicare as a screening tool. Nevertheless, the benefits of new brain imaging or molecular imaging diagnostic tests have not been widely recognized by payers that see limited value in early diagnosis when treatment choices are limited. We support the many action items included in the draft plan that will accelerate the development and adoption of important diagnostic imaging tools.

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**Recommendation:** We encourage the inclusion of action items in the Plan that stress the need for Medicare to provide access to the health benefits of diagnostic imaging technologies, as well as other innovative technologies while under a doctor's care within the practice of medicine.

GE Healthcare also supports the draft Plan's focus on accelerating research aimed at preventing, diagnosing and treating this debilitating disease, and strengthening care quality and efficiency of care both before and after new treatments become available. Patients and their caregivers deserve no less.

GE Healthcare very much appreciates the opportunity to submit comments on these important issues and looks forward to HHS and the Advisory Council's final recommendations in the National Plan to Address Alzheimer's Disease. If you have any questions on our comments, please do not hesitate to contact me at [richard.frank@med.ge.com](mailto:richard.frank@med.ge.com)

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Frank', with a stylized flourish at the end.

Richard Frank, MD, PhD, FFPM

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