

LEVITT
healthcare
affiliates

The CON document in its entirety
consisting of 450 pages is on file in
the Clerk of Council's Office

February 16, 2023

Sandra Davis
Clerk of Council
Columbus City Council
100 10th Street, 6th Floor
Columbus, GA 31901

**RE: Certificate of Need Application to Develop a Mobile PET Imaging Service at Columbus
Memory Center**

Dear Ms. Davis:

Enclosed please find a copy of the Certificate of Need application filed by Columbus Memory Center to develop a mobile PET imaging service. This copy is filed pursuant to Rule 111-2-2-.06(4)8 which states:

The applicant shall file one copy of the application with the office of the County Commissioner of the county in which the project exists or is proposed. The applicant shall submit with the application an exact copy of the letter addressed and submitted to the County Commission that accompanied the submittal of the application to the County Commission;

Please do not hesitate to contact me if you require further information.

Sincerely,



David Levitt
Managing Partner

Section 2: Project Description

14. Indicate the type of facility that will be involved in the project.

FACILITY TYPE							
<input type="checkbox"/> Birthing Center	<input type="checkbox"/> Hospital						
<input type="checkbox"/> Continuing Care Retirement Community (CCRC)	<input type="checkbox"/> Nursing or Intermediate Care Facility						
<input type="checkbox"/> Freestanding Ambulatory Surgery Center	<input type="checkbox"/> Personal Care Home						
<input type="checkbox"/> Home Health Agency	<input type="checkbox"/> Traumatic Brain Injury Facility						
<input type="checkbox"/> Freestanding Emergency Department							
<input checked="" type="checkbox"/> Diagnostic, Treatment or Rehabilitation Center (DTRC) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input checked="" type="checkbox"/> Freestanding Single-Modality Imaging Center</td> <td style="width: 50%; border: none;"><input type="checkbox"/> Freestanding Multi-Modality Imaging Center</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Mobile Imaging</td> <td style="border: none;"><input type="checkbox"/> Practice-Based Imaging</td> </tr> <tr> <td colspan="2" style="border: none;"><input type="checkbox"/> Other:</td> </tr> </table>		<input checked="" type="checkbox"/> Freestanding Single-Modality Imaging Center	<input type="checkbox"/> Freestanding Multi-Modality Imaging Center	<input type="checkbox"/> Mobile Imaging	<input type="checkbox"/> Practice-Based Imaging	<input type="checkbox"/> Other:	
<input checked="" type="checkbox"/> Freestanding Single-Modality Imaging Center	<input type="checkbox"/> Freestanding Multi-Modality Imaging Center						
<input type="checkbox"/> Mobile Imaging	<input type="checkbox"/> Practice-Based Imaging						
<input type="checkbox"/> Other:							

15. Indicate the services that will be involved or affected by this project.

SERVICES		
ACUTE	Hospital Inpatient <ul style="list-style-type: none"> <input type="checkbox"/> Medical/Surgical <input type="checkbox"/> Open Heart Surgery <input type="checkbox"/> Pediatric <input type="checkbox"/> Obstetrics <input type="checkbox"/> ICU/CCU <input type="checkbox"/> Newborn, ICU/INT <input type="checkbox"/> Newborn/Nursery <input type="checkbox"/> Rehabilitation <input type="checkbox"/> Acute, Burn, Other Specialty <input type="checkbox"/> Long Term Acute Care <input type="checkbox"/> Inpatient, Other <input type="checkbox"/> Psychiatric, Adult <input type="checkbox"/> Substance Abuse, Adult <input type="checkbox"/> Psychiatric, Child/Adolescent <input type="checkbox"/> Substance Abuse, Child/Adolescent <input type="checkbox"/> Psychiatric, Extended Care <input type="checkbox"/> Destination Cancer Hospital 	Diagnostic Services <ul style="list-style-type: none"> <input type="checkbox"/> Computerized Tomography (CT) Scanner <input type="checkbox"/> Magnetic Resonance Imaging (MRI) <input checked="" type="checkbox"/> Positron Emission Tomography (PET) <input type="checkbox"/> Diagnostic Center, Cancer/Specialty
		Other Outpatient Services <ul style="list-style-type: none"> <input type="checkbox"/> Ambulatory Surgery <input type="checkbox"/> Birthing Center
		Clinical/Surgical <ul style="list-style-type: none"> <input type="checkbox"/> Emergency Medical <input type="checkbox"/> Emergency Medical, Trauma Center <input type="checkbox"/> Adult Cardiac Catheterization <input type="checkbox"/> Gamma Knife <input type="checkbox"/> Lithotripsy <input type="checkbox"/> Pediatric Cardiac Catheterization <input type="checkbox"/> Megavoltage Radiation Therapy
LONG-TERM	<ul style="list-style-type: none"> <input type="checkbox"/> Skilled Nursing Care <input type="checkbox"/> Intermediate Nursing Care <input type="checkbox"/> Continuing Care Retirement Community (CCRC) 	<ul style="list-style-type: none"> <input type="checkbox"/> Personal Care Home <input type="checkbox"/> Traumatic Brain Injury (TBI) <input type="checkbox"/> Home Health
OTHER	<ul style="list-style-type: none"> <input type="checkbox"/> Administrative Support <input type="checkbox"/> Non-Patient Care, Other 	<ul style="list-style-type: none"> <input type="checkbox"/> Grounds/Parking <input type="checkbox"/> Medical Office Building

16. Check the most appropriate category(ies) for this project. Check all that apply.

PROJECT CATEGORY	
<p>Construction</p> <input type="checkbox"/> New Facility <input type="checkbox"/> Expansion of Existing Facility <input type="checkbox"/> Renovation of Existing Facility <input type="checkbox"/> Replacement of Existing Facility	<p>Service Change</p> <input checked="" type="checkbox"/> New Service <input type="checkbox"/> Expansion of Service <input type="checkbox"/> Expansion or Acquisition of Service Area <input type="checkbox"/> Consolidation of Service <input type="checkbox"/> Relocation of Facility <input type="checkbox"/> Other
<p>Procurement of Medical Equipment</p> <input type="checkbox"/> Purchase <input checked="" type="checkbox"/> Lease <input type="checkbox"/> Donation (fair market value must be used)	

17. Please provide the following site information for the facility and services identified in this application. Check the appropriate box to indicate the current status of the site acquisition. Attach the appropriate documents that provide for the Applicant's entitlement to the site at **APPENDIX D**.

NOTE: If an unsigned lease is attached, include a letter documenting both parties' commitment to participate in the lease once the CON is approved, if applicable.

PROJECT SITE INFORMATION		
Street Address: 7196 North Lake Drive		
City: Columbus	County: Muscogee	Zip: 31909
Number of Acres: 1.516 acres		
Status of Site Acquisition		
<input type="checkbox"/> Purchased (attach deed)	<input checked="" type="checkbox"/> Leased (attach lease)	
<input type="checkbox"/> Under Option (attach option agreement)	<input type="checkbox"/> Under Contract (attach contract or bill of sale)	
<input type="checkbox"/> Other; please specify:		
Zoning		
Is the site appropriately zoned to permit its use for the purpose stated within the application?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If NO → Describe what steps have been taken to obtain the correct zoning and the anticipated date of re-zoning:		
Encumbrances		
Are there any encumbrances that may interfere with the use of the site, such as mortgages, liens, assessments, easements, rights-of-way, building restrictions, or flood plains?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

18. Provide a detailed description of the proposed project including a listing of the departments (e.g. ED, ICU), services, (e.g. Home Health, Cardiac Cath), and equipment (e.g. MRI, PET, Cath) involved.

NOTE: If your description exceeds this blocked space, attach additional 8-½ by 11-inch pages, number the first sheet Page 9.1, the second Page 9.2 and so on. Do not alter the main page numbers of this application. Once printed, insert your additional pages 9.1, etc. behind this Page 9.

Columbus Memory Center (CMC), a world leader in memory care, is a Dementia and Alzheimer's disease treatment, prevention and research center. The center specializes in helping seniors practice better brain health, memory preservation, dementia prevention, and Alzheimer's care. As a full-service memory care center with three decades of experience in treating patients in and around the Columbus, GA region, services include comprehensive cognitive evaluations and FDA approved clinical research trials pertaining to Alzheimer's disease treatment and prevention as well as medical infusions, phlebotomy, EKGs, and lumbar punctures. As a memory center, over half of the patient population is elderly Medicare recipients as well as patients from traditionally underserved populations.

CMC is dedicated to ending Alzheimer's in this generation and strives to combat the disease by sharing realistic hopes, eliminating defeatism and increasing the use of annual cognitive screenings for seniors. CMC has one mission: Battling Alzheimer's by Preserving Independence. This is done, in part, by the Columbus Memory Project™ which is a partnership between CMC and Columbus Consolidated Government to have every senior in and around the Columbus, GA region receive a free memory screening, called the Memory Number®. CMC also participates in FDA approved clinical research trials aimed at modifying and ultimately eradicating Alzheimer's disease. In March of 2023, CMC is expected to be welcomed into the Georgia Memory Net, a statewide effort to offer quality dementia care, under Emory University's guidance, throughout Georgia.

In this application, CMC proposes to develop a new mobile PET service through an agreement with Shared Medical Services, a mobile vendor. PET scans have greatly improved the diagnosis and medical care of individuals with dementia and Alzheimer's disease. The proposed unit will enable patients in need of diagnosis and treatment for dementia and Alzheimer's disease as well as those in need of scans related to FDA approved clinical research trials pertaining to Alzheimer's disease treatment and prevention.

According to the 2027 PET Need Projections, there is currently no numerical need for an additional PET scanner in HPA 8. However, CMC's proposed project meets the exception listed in Rule 111-2-2-.41 (3)(b) as the center seeks to remedy an atypical barrier to PET services for its patient population. Currently, patients are referred to two area hospitals for scans; however, one of the scanners is dedicated to a cancer center resulting in limited access and the other scanner is outdated resulting in subpar images. Furthermore, the aging scanner cannot service research patients as it's not able to utilize the latest software packages. Research patients often have to travel 164 miles roundtrip to obtain scans at a facility in Fayetteville, and at times 288 miles roundtrip to the University of Alabama at Birmingham, presenting major hardship for this patient population and families. Patients often receive multiple scans over their treatment, resulting in further hardship. Unfortunately, these two facilities are no longer willing to accept new trials. Other options have been explored, but all present hardships to the patient and their families as well as complications related to the tracer agents used for the necessary PET scans (tracer agents have a significant failure rate, very short shelf life, and are only available on weekdays). It's also important to note that referring outside of the center does not promote continuity of care, rather it results in fragmented patient care, which is particularly challenging for this patient population.

The development of the mobile PET service will bring an imaging technology recognized as the quality standard for this patient population, not only for the diagnosis and treatment of those in need of memory care but also the FDA approved clinical research trials. Through the proposed project, Columbus Memory Center will improve access to PET services for patients while promoting efficiencies of care for physicians, staff, patients, and their families. Additionally, the project is cost effective as the costs for implementing this service are primarily for the site pad and related electrical, preparation fees for the application, and service costs for the vendor.


Section 3: General Review Considerations

All Certificate of Need applications are evaluated to determine their compliance with the general review considerations contained in Rule 111-2-2-.09. Please document how the proposed project conforms with the following general review considerations.

Rule 111-2-2-.09(1)(a): Consistency with State Health Plan

The proposed new institutional health service is reasonably consistent with the relevant general goals and objectives of the State Health Plan.

19. Explain how the project is consistent with the State Health Plan or why it does not apply. Also explain how the application is consistent with the Applicant's own long range plans.

 **NOTE:** *If your explanation exceeds this blocked space, attach additional 8-½ by 11-inch pages, number the first sheet Page 10.1, the second Page 10.2 and so on. Do not alter the main page numbers of this application. Once printed, insert your additional pages 10.1, etc. behind this Page 10.*

NOTE: The current Certificate of Need form does not allow for formatting of text or the use of tables in the response spaces allotted. As such, the remainder of this response is provided on the following pages.

The establishment of mobile PET services at Columbus Memory Center is consistent with the goal and objectives of the Georgia State Health Plan Component Plan for Positron Emission Tomography, which was adopted by the Health Strategies Council on February 15, 2002 and issued in May 2002. The Plan outlines the specific goal and objectives related to the provision of care and utilization of PET/CT technology. The following narrative addresses the specific goal and objectives of The Plan as it relates to the proposed project.

GOAL: To support the Department of Community Health/Division of Health Planning in its efforts to produce a Positron Emission Tomography Services plan which addresses regulatory mandates, changing treatment patterns and the state's vision for access to high-end diagnostic equipment and services.

The development of the mobile PET service will bring an imaging technology recognized as the quality standard for this patient population, not only for the diagnosis and treatment of those in need of memory care but also patients enrolled in FDA approved clinical research trials.

According to the 2027 PET Need Projections, there is currently no need for an additional PET scanner in HPA 8. However, CMC's proposed project meets the exception listed in Rule 111-2-2-.41 (3)(b) as the center seeks to remedy an atypical barrier to PET services for its unique patient population. Currently, patients are referred to two area hospitals for scans which don't have optimal access or appropriate technology. Other options have been explored, including research patients traveling to facilities requiring 164 miles to 288 miles roundtrip to obtain scans, presenting major hardships for this patient population and families and representing a barrier to access to care. However, these PET providers are no longer willing to accept new trials. In addition, complications related to obtaining the required tracer agents present challenges with travel. Furthermore, referring outside of the center does not promote continuity of care, rather it results in fragmented patient care, which is particularly challenging for this patient population. Locating the proposed mobile PET scanner directly on the CMC site will ensure patients are scheduled in a timely manner in a place they have come to trust and enable physicians to access scan results expeditiously.

Through the proposed project, Columbus Memory Center will improve access to PET services for patients while promoting efficiencies of care for physicians, staff, patients, and their families. Additionally, the project is cost effective as the costs for implementing this service are primarily for the site pad and related electrical, preparation fees for the application, and service costs for the vendor.

Objective 1: To reflect the rapid technological advances in the diagnosis and treatment of cancer, Alzheimer's and other dementias and cardiovascular diseases.

The proposed project reflects the rapid technological advances in the diagnosis and treatment of dementia and Alzheimer's disease. The development of the mobile PET service will bring an imaging technology recognized as the quality standard for this patient population, not only for the diagnosis and treatment of those in need of memory care but also FDA approved clinical research trials.

The Georgia Department of Community Health's PET need methodology is based solely on cancer cases, as the vast majority of clinical PET exams are performed in Oncology. This methodology does not consider the dementia and Alzheimer's disease patient population. While a smaller patient population for PET services in comparison to Oncology, it is a growing subset that is underserved as the population ages. According to the *2022 Alzheimer's Disease Facts and Figures* published by the Alzheimer's Association (**Appendix E**), it's estimated that more than six million Americans of all ages have Alzheimer's, the most common cause of dementia. In 2022 an estimated 6.5 million Americans in the elderly cohort are living with Alzheimer's, and by 2050 this number is projected to increase 95 percent to 12.7 million unless groundbreaking medical research is able to reverse the trend. This source also states that between 2000 – 2019, deaths from Alzheimer's has more than doubled, experiencing an increase of 145 percent over this time period. It's also important to note that deaths are most likely higher than shown in data; per the

Alzheimer's Association there is a "...blurred distinction between death with dementia and death from dementia." (Appendix E).

Despite the growing number of people living with Alzheimer's or other dementias throughout the world as well as Georgia and CMC's home county of Muscogee, the number of patients receiving PET scans, a vital diagnostic imaging tool, is minimal. According to the *2022 Alzheimer's Disease Facts and Figures*, the number of individuals with Alzheimer's disease age 65-plus in Georgia was 150,000. Per the Georgia Governor's Office of Planning and Budget, population for the 65-plus age cohort in Georgia was approximately 1.57 million. This results in a prevalence use rate per 1,000 of 95.26 for this age cohort. Assuming 20 percent of this patient population had one PET scan, there should have been an estimated 30,000 PET scans in Georgia with a primary diagnosis of dementia/Alzheimer's disease. However, only 48 PET scans were reported in Georgia for this diagnosis in 2020. Due to the Covid pandemic it's important to also analyze the following year; however, only 291 PET scans in Georgia for this diagnosis were reported in 2021. This represents a minor fraction of the optimal number that should have been scanned.

Applying this to the age 65-plus population in Muscogee County results in an estimated 2,646 Alzheimer's individuals in the county. Assuming 20 percent of this patient population required one PET scan, it's estimated that at least 529 scans should have been completed for patients originating from Muscogee County. It's important to note that these estimates do not take into account the research patient population; with this in mind, these estimates are highly conservative.

Locally, there are two PET imaging providers in the immediate area, Piedmont Columbus and PET America serving St. Francis. The scanner for St. Francis serves the Women's Center and was on-site for 100 days in 2021. Note that a third mobile PET scanner is located within the health planning area (HPA 8), but it is located at Crisp Regional Medical Center in Crisp County which is approximately four hours roundtrip from CMC and only serviced the facility for 13.5 days in 2021; as such it is not a viable option and was excluded from the analysis.

According to the 2021 GA DCH PET Services Survey, the two local providers only performed 93 PET scans for patients originating from any county and with a primary diagnosis of dementia/Alzheimer's disease. Data is not available to determine which of those patients were from the proposed service area. Per the patient origin for these two local facilities, the volume of patients originating from Muscogee County in 2021 are 465 patients at Piedmont Columbus (59 percent of Piedmont Columbus' total patients served) and 204 patients at PET America/St. Francis serving the Women's Center at St. Francis (46 percent of PET America's total patients served). While patient origin by primary diagnosis is not available, according to CMC's experience with these facilities their primary patient population does not include those with dementia/Alzheimer's disease. As previously mentioned, one of the scanners is dedicated to a cancer center (Piedmont Columbus) and overburdened, resulting in limited access. The second local scanner is outdated resulting in subpar images (St. Francis).

Clearly the dementia/Alzheimer's patient population is underserved and would significantly benefit from enhanced access to PET imaging services. As such, providers such as CMC, which provides high quality, innovative memory care services, are not able to provide optimal access to the necessary diagnostic imaging required for this patient population. The proposed project will enable CMC to greatly improve access to PET services for patients while promoting continuity of care and efficiencies of care for physicians, staff, patients, and their families.

The mobile unit that will be deployed at CMC is a United imaging uMI 550 Digital PET/CT unit (Appendix G). This unit is a high-resolution PET/CT scanner that represents the latest PET technology, and therefore is reflective of the latest technological advances in disease diagnosis and treatment. Note that while the equipment has both PET and CT capabilities, CMC will only be using the equipment for PET scans.

Objective 2: To ensure access to high-end diagnostic equipment and services by promoting geographic planning and mandating the provision of services on a non-discriminatory basis.

CMC's proposed mobile PET service will improve access to these services and improve continuity of care for the memory center's patients. CMC has an established record of serving all clinically appropriate patients on a non-discriminatory basis. As previously described, patients are currently referred to two area hospitals for scans which don't have optimal access or appropriate technology. Other options have been explored, including research patients traveling to facilities requiring 164 miles to 288 miles roundtrip to obtain scans (often multiple scans are required per patient), presenting major hardships for this patient population and families. However, these options are no longer willing to accept new trials plus complications related to the required tracer agents present challenges with travel. Furthermore, referring outside of the center does not promote continuity of care, rather it results in fragmented patient care, which is particularly challenging for this patient population. Locating the proposed mobile PET scanner directly on the CMC site will ensure patients are scheduled in a timely manner in a place they have come to trust and enable physicians to access scan results expeditiously. With this in mind, the proposed project would greatly improve geographic accessibility for this patient population.

As a memory center, over half of the patients are elderly Medicare recipients as well as patients from traditionally underserved populations. CMC is fortunate to be able to serve traditionally underserved populations through community outreach projects, and the center's physical location, which abuts Columbus' Social Security office and a city bus stop steps away, provides enhanced geographic and financial access for those patients who are not able to drive or do not have an automobile. CMC also conducts regular "Ask the Memory Doctor" town halls and uses its Think Tank mobile outreach van to meet individuals directly in their community (**Appendix E**). Furthering outreach to underserved populations is being an active leader of the Columbus Memory Project™ which is a partnership between Columbus Memory Center and Columbus Consolidated Government to have every senior in and around the Columbus, GA region receive a free memory screening, called the Memory Number®. Memory Number® is an innovative breakthrough from CMC, demonstrating that CMC is a world leader by conducting the first and only region-wide free cognitive screening program (**Appendix E**).

Recently, Columbus Memory Center was selected to receive a \$150,000 grant to promote the safeguards, benefits, and honesty of today's FDA approved Alzheimer's research trials to Columbus' minority communities. CMC became the nation's first dementia research center to receive the educational grant for improving minority participation in Alzheimer's research. As noted by CMC:

Columbus Memory Center has been chosen to receive a \$150,000 grant to promote the safeguards, benefits, and honesty of today's FDA approved Alzheimer's research trials to Columbus' minority communities. "Columbus Memory Center already out-performs most of the nation's Alzheimer's research centers in both patient recruitment and minority inclusion" according to its Medical Director, Dr. Jonathan Liss. "For this reason, along with our innovative approaches that include: 'Ask the Memory Doctor' town halls, 'Think Tank' outreach van, 'Columbus Memory Project', and the invention of the first ever vital sign for the brain, the 'Memory Number,' that we have been awarded this grant", noted Dr. Liss. Successful outreach practices that are funded by this grant will be shared with medical centers around this country and the world.

Last year the Alzheimer's Association acknowledged that the African American community is nearly twice as likely, and the Hispanic community is one and a half times as likely to develop Alzheimer's Disease or other dementias than the white population of the same age. However, both African American and Hispanic communities are less likely to participate in Clinical Research due to lack of information and distrust towards the system.

For the recent FDA approved Alzheimer's drug, Aduhelm, only three percent of participants were Latino, and less than one percent Black. "As a nation, and as a community, we must do better", noted Dr. Liss. "Columbus Memory Center is pleased to note that our typical enrollment of minorities ranges from 19-24%. We can do better for our community and have created an innovative plan to do so. I believe this is why we were the first site to receive this grant."

In the coming months, Columbus Memory Center will be collaborating with city leaders, Georgia educators, area churches, as well as hosting Town Hall meetings to flood the community with important information about meaningful Alzheimer's research safeguards and opportunities. These encounters will acknowledge past injustices, review patient's rights, discuss mandatory components of consent, "Good Clinical Practices," and the role of an Internal Review Board. Multiple \$5,000 grants will be awarded to area churches and community centers that form processes to help their memory impaired members.

Furthermore, CMC in association with its sister organization, Columbus Memory Center and Health Education Foundation, donates \$40,000 — \$80,000 annually to organizations that include but are not limited to: Columbus State University, Alzheimer's Association, religious institutions of various faiths, and Project Christmas.

CMC is committed to serving the community and enhancing geographic and financial access for this patient population.

Objective 3: To support the Georgia Cancer Coalition.

As a comprehensive memory care center, CMC does not participate in the Georgia Cancer Coalition. However, CMC supports a similar mission for dementia and Alzheimer's disease patients. CMC has one mission: Battling Alzheimer's by Preserving Independence. This is done, in part, by the Columbus Memory Project™ which is a partnership between Columbus Memory Center and Columbus Consolidated Government to have every senior in and around the Columbus, GA region receive a free memory screening, called the Memory Number®. CMC also participates in FDA approved clinical research trials aimed at modifying and ultimately eradicating Alzheimer's disease.

In March of 2023, CMC is expected to be welcomed into the Georgia Memory Net, a statewide effort to offer quality dementia care, under Emory University's guidance, throughout Georgia. Made possible by a mandate from the Georgia State Legislature, Georgia Memory Net is dedicated to providing physicians with the resources needed to obtain quick, accurate diagnoses for their patients who exhibit signs of memory loss or cognitive impairment. Additionally, this resource provides planning and connection to community services to support physicians in the ongoing patient care process.

CMC aims to be a premier provider in memory care. Actively leading and participating in these important initiatives promotes CMC's mission, ensuring that the memory center meets the missions and standards of these highly regarded programs. For example, the Georgia Memory Net is an earned affiliation, requiring that programs such as CMC's meets certain quality standards. Another example is the Columbus Memory Project™ which is designed to combat memory loss and make Columbus, GA a world-wide leader in the fight to eradicate Alzheimer's disease, working to educate area residents on proven ways in which is keep the brain healthy and to delay the onset of the disease. Through high quality of care and progressive education, diagnosis, treatment, and research, CMC in turn strives to battle this disease.

The proposed project is a further effort by CMC to improve access to PET services. PET imaging is the primary diagnostic tool used to detect and monitor dementia and Alzheimer's disease, which in turn impacts the treatment and monitoring of patients. Furthermore, PET imaging is also essential for those patients participating in FDA approved clinical research trails. As such, enhancing access to PET services promotes the missions of the community initiatives CMC actively leads and participates in to improve quality of care as well as better understand and treat this patient population.

Objective 4: To encourage continuity of care through the development of comprehensive policies and processes.

CMC has an active partnership with Columbus Consolidated Government for the Columbus Memory Project™, which aims for every senior in and around the Columbus, GA region receive a free memory screening, called the Memory Number®. CMC also participates in FDA approved clinical research trials aimed at modifying and ultimately eradicating Alzheimer's disease. CMC has also applied for and is expected to be welcomed into the Georgia Memory Net, a statewide effort to offer quality dementia care. All of these partnerships and trials require comprehensive policies and processes specifically designed for optimal care quality and outcomes. CMC and its patients benefit from this standardization of care.

Referring outside of CMC does not promote continuity of care, rather it results in fragmented patient care, which is particularly challenging for this patient population. The proposed mobile PET scanner will be a vital component of CMC's memory care center. The provision of diagnostic care will promote the continuum of care, significantly improving the continuity of care provided to patients. The mobile PET scanner will complement CMC's existing capabilities.

Objective 5: to improve financial access to high end diagnostic equipment by encouraging the provision of services to indigent and low income patients and by ensuring provider participation in Medicare, Medicaid, PeachCare, State Health Benefits Plan, and other public reimbursement programs as appropriate.

CMC makes services available to all clinically appropriate patients, without discrimination. CMC participates in Medicare, Medicaid, PeachCare, State Health Benefits Plan, and other programs and serves indigent/charity patients. Please refer to **Appendix J** for CMC's policy concerning this.

CMC has an established record of serving all clinically appropriate patients on a non-discriminatory basis (**Appendix J**). As a memory center, over half of the patient population is elderly Medicare recipients as well as patients from traditionally underserved populations such as indigent, minority and Medicaid patients. Approximately 22 percent of its research patient population is from underserved communities, a percentage that is among the top in the nation. In the most recent year (2022), CMC provided approximately \$4.8 million in free care, \$36,000 in charity care, and \$26,000 in bad debt write-off. Note that no bills are submitted to the patient, insurance, or the government for CMC's research work; this is called "free care" and is care paid for by CMC's research sponsors. Enhancing access to PET imaging will enable CMC to continue providing its unique services, programs, and research offerings, which promotes financial accessibility to all patient populations.

Objective 6: To analyze the availability of high end diagnostic services being provided through ongoing collection and analysis of information and statistical data.

CMC commits to providing the Department with all requested information and statistical data related to the operation of the mobile PET service. A statement of intent to comply with CON Rules is provided as part of **Appendix N**.

CMC is dedicated to ending Alzheimer's in this generation and strives to combat the disease. CMC has one mission: Battling Alzheimer's by Preserving Independence. This is done, in part, by the Columbus Memory Project™ which is a partnership between CMC and Columbus Consolidated Government to have every senior in and around the Columbus, GA region receive a free memory screening, called the Memory Number®.

CMC also participates in FDA approved clinical research trials aimed at modifying and ultimately eradicating Alzheimer's disease. The memory center was recognized as the third highest enrolling center in the world for the breakthrough drug, Leqembi, that was recently approved to slow the progression of early Alzheimer's disease by 27 percent.

In March of 2023, CMC is expected to be welcomed into the Georgia Memory Net, a statewide effort to offer quality dementia care, under Emory University's guidance, throughout Georgia. Made possible by a mandate from the Georgia State Legislature, Georgia Memory Net is dedicated to providing physicians with the resources needed to obtain quick, accurate diagnoses for their patients who exhibit signs of memory loss or cognitive impairment. Additionally, this resource provides planning and connection to community services to support physicians in the ongoing patient care process. Per the Georgia Memory Net website, the following data is collected:

Georgia Memory Net collects data pertaining to prevalence of Alzheimer's disease and related dementias, patient quality of health and life, care partner burden, and systemic or institutional burden. To enhance the ability of clinical and public health experts to better estimate the number of Georgians living with dementia, diagnosis information, including estimated stage of illness at time of diagnosis, is captured. This information is shared with the Alzheimer's Disease and Related Dementias State Registry.

Georgia Memory Net also surveys family or other care partners approximately every six months, using validated tools to measure levels of care partners' stress and burden. These data help us ensure the highest quality of service delivery and care, and informs our programs' ability to reduce caregiver burden via our linkage to care system. We monitor caregiver information over time to measure the longer-term effects of Georgia Memory Net on family members and other care partners.

The number of referrals to each Georgia Memory Net Memory Assessment Clinic is also monitored as a way to track Georgia's regional needs. Memory Assessment Clinics report performance indicators including wait times and patient wait lists so Georgia Memory Net can determine where an increased number of providers or resources may be needed.

Over the long term, Georgia Memory Net will track data provided by the Center for Medicare and Medicaid Services (CMS) relating to Emergency Room visits, repeated hospital admissions and skilled nursing placements. These data will help us determine the estimated diversion of unnecessary care transitions and the resulting cost savings to the state. Georgia Memory Net will also monitor Primary Care Physicians' rates of Annual Wellness Visits (AWVs) statewide to ensure that eligible older adults are receiving this routine, reimbursable care in order to increase rates of cognitive screening in a routine, less stigmatizing, fashion.

All of these efforts require ongoing collection and analysis of information and statistical data by CMC; CMC will continue to do this in the future.