



# NATIONAL GRANGE

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*American Values. Hometown Roots.*

February 10, 2022

Dear Secretary Becerra:

The National Grange is America's oldest agricultural and rural life advocacy organization. Since its founding in 1867, the Grange has been the leading voice in advocating for sound public policy impacting rural and small-town citizens. Today, with nearly 1800 state and local chapters in 38 states, the Grange continues its mission to bring attention to issues of concern to rural America, to shed light on the health, economic, and resource disparities which impact approximately 22% of the US population that live there, and to work together with all interested parties to identify and implement viable solutions.

We appreciate the opportunity to comment on the proposed National Coverage Determination (NCD) regarding the use of monoclonal antibodies against for the treatment for Alzheimer's disease. We believe it is important for the Centers for Medicare and Medicaid Services (CMS) to reconsider this proposed policy. More than 6 million people in our country suffer from this unforgiving and relentless disease. This proposed policy will keep many of them and their families from access to the medicine and the hope it brings with it.

Research conducted by Dr. Ambar Kulshreshtha, MD, PhD from Emory and reported in 2021 has shown that the mortality rate for Alzheimer's and related dementias is higher in rural areas than it is in urban centers. One of the major contributors to this is thought to be the lack of access in much of rural America to health care professionals with experience in treating Alzheimer's and dementia. The Food and Drug Administration's approval of the breakthrough treatment, Aduhelm, brought hope to families dealing with Alzheimer's that a long-awaited therapy might be at hand.

CMS's proposed NCD was a crushing development for these patients and their loved ones. Restricting access to Aduhelm to patients involved in approved clinical trials is inequitable to rural citizens. Most clinical trials take place at health care institutions in major population centers. Americans who live hours away from a major city will be frozen out of these trials and, thus, denied access to a drug that could address their condition.

It also can't be denied that this proposed NCD will quite likely have a chilling effect on future research into Alzheimer's treatments. If CMS establishes a precedence that it can preclude the creation of a market for FDA-approved products, it will cast doubt over investment in continuing research and development.

In the interest of essential medical research and greater health equity for those living in rural regions and remote areas of the United States, we request that CMS reconsider this draft determination and provide access to innovative treatments that millions of current and future Alzheimer's patients and caregivers desperately need.

Sincerely,

Betsy Huber  
National Grange President