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RE: Competition Bureau Market Study Notice: Digital Health Care

June 30, 2021

Dear Ms. Gillespie and Ms. McLean

GE Healthcare Canada (GE Healthcare) is a division within GE Canada, employing Ontarians across a diverse range of supply, services, and technology R&D activities. GE Healthcare provides transformational medical technologies and services that are shaping a new age of patient care. Our broad expertise in medical imaging and information technologies, medical diagnostics, patient monitoring systems, biopharmaceutical manufacturing technologies, and performance improvement solutions help our customers to deliver better care to more people around the world at a lower cost. In addition, we partner with healthcare leaders, striving to leverage the global policy change necessary to implement a successful shift to sustainable healthcare systems.

Overview of our response:

GE Healthcare appreciates the opportunity to provide comments and insights as part of the Competition Bureau's market study that will enable further adoption of innovation and the use of new and emerging medical technology, while also ensuring necessary protections and protocols are in place for the safe delivery of health care to patients.

Our response will focus on the following topics identified by the Competition Bureau and within the scope of this study, including:

1. Access, use, and sharing of data and information
2. Access, use and procurement of digital health products and services

1. Data and information:

Data and Artificial Intelligence (AI) has many possible uses in the health field, both clinically and administratively. Although the potential of AI has been well documented and demonstrated by researchers and developers, concerns about data access, bias and integration continue to hinder the adoption of AI in health care. Barriers include:

- Difficulties in accessing sufficient and quality data can hinder innovation in this space.
- Available data may be biased which can reduce the effectiveness and accuracy of the tools.
- In addition to data access, problems of scaling and integration in health care organizations can also hinder the use of digital health and AI. Differences between the institutions and the patient populations they serve can make it difficult to implement and implement them on a large scale and thus export these tools outside Canada's borders.

Recommandations:

➢ Develop or expand access mechanisms for high-quality data.
  o amounts of high-quality data are needed to train, adjust, evaluate and validate AI models. Increased access to high-quality data could help developers solve bias issues by ensuring that data is representative, transparent and fair.
  o E.G. When GE Healthcare developed the AI algorithm for pneumothorax detection, we initially worked primarily with data from North America. When it came time to deploy the algorithm in India, it didn't work - radiology practices were different. The problem was solved after forming the algorithm on images from India.
  o In addition to access to Canadian data, in order to develop solutions relevant to international markets and exportable outside Canada borders, it is critical to facilitate access to national and international data.

➢ Encourage stakeholders and relevant experts to set standards for the development, implementation and use of AI technologies. This could help deploy and scale AI tools by providing advice on data, interoperability, bias and formatting issues.

➢ Encourage interdisciplinary collaboration between developers and health care providers. This could lead to innovations and AI tools that are easier to implement and use in an existing workflow.

NOTE:

For example, in line with these recommendations, in France, the **Health Data Hub**[5] allows easy and unified access, transparent and secure, to health data to improve the quality of care and patient support. The Health Data Hub relies on academic, industrial, national and international partnerships. Articulated around 4 strategic issues, the Health Data Hub's service offerings aim to create a real reinforcement of capacity to innovate to make France a leader in health data analysis.

1. Highlighting the data heritage
2. Making it easier to use data
3. Protect citizens' data
4. Innovating with all stakeholders

2. Products and services:

Access and Use:

GE Healthcare believes that the considerable breadth of information, data and digital health in the health system will require a long-term and ongoing exchange of research, training and knowledge transfer between health care providers and industry.

It is imperative to create opportunities and incentives between industry and research hospitals to enable the deployment of evidence/tools resulting from research collaborations in health systems. These collaborations stimulate the growth and adoption of new technologies/clinical procedures that mutually benefit the health system and the life sciences sector.

Procurement:

A long-standing challenge in the health sector is the ability of new medical technologies to be adopted and integrated into Canada's health care system — a challenge for both multinationals and small and medium enterprises (SMEs) and start-ups who find themselves working together outside Canada to test their innovative solutions.

There is currently no way in the procurement process for the transfer of research results and the marketing opportunities for innovative products.

Even under a quality-price formula regime, the weighting of the quality factor is either too low or non-existent to have a real impact in order to promote quality, let alone innovation versus the lowest price.

There are innovative solutions that are not being used in Canada and have proven effective in other jurisdictions. Innovation often does not come at the lowest price. On the other hand, the adoption of innovation most often results in a positive return on investment when measuring the results of the health care system and/or patient care. Several case studies highlight the benefits of using criteria other than price when selecting medical technologies.

For example, the 2014/24 European Public Procurement Directive encourages this smarter and more holistic approach to public procurement, stimulates innovation and provides the most economically advantageous solutions. Value-based procurement approach can help break organizational silos within health facilities, reduce inefficiencies and spur innovation-driven investments.

The potential of procurement to support value-based health care remains largely untapped in Canada. Value-based sourcing is only possible when transactions go beyond short-term cost savings to involve quality factors such as technical merit, accessibility, environmental features and innovative features. By choosing the most valuable health care products, services and solutions, procurement has the power to shift the needle to smarter, more cost-effective spending.

Recommendations:

➢ The Canadian market must adopt a strategic global vision. Policies and programs (including financial incentives) must be both at a speed and scale that match the attractive offerings of competing jurisdictions, while identifying opportunities for international collaboration.

➢ Support the development of a value-based governance framework for innovation and procurement to move from innovation to commercialization and local adoption

As a member of MedTech Canada, GE Healthcare fully supports and provided input in our industry association's submission which has also been submitted as part of this market study. We would be pleased to participate in the Bureau's subsequent oral interviews to dive deeper into the topic, providing access to our experts on digital health and other advanced analytics technologies. During this session we could answer any additional questions and explore ways in which GE Healthcare may be able to help Canada advance opportunities in digital health care.

Sincerely,

Brigid Buckingham
Director, Government Affairs and Policy
GE Healthcare Canada