

ADMINISTRATION

April 6, 2016

Dear Manufacturers,

75 Park Street  
PO Box 277  
Elizabethtown, NY 12932  
PHONE 518-873-3002  
FAX 518-873-2005

I am writing on behalf of Elizabethtown Community Hospital (ECH), 340B ID # CAH 331302-00 to inform manufacturers that ECH recently underwent an audit by the Health Resources and Services Administration (HRSA) of ECH's compliance with 340B Drug Pricing Program (340B Program) requirements.

John Remillard, Interim Chief  
Executive Officer

As background, ECH qualified for the 340B Program as a covered entity, Critical Access Hospital (CAH), located at 75 Park Street, Elizabethtown, New York 12932 and has participated in the 340B Program since September 30, 2010.

James P. Forcier, Board President  
Rob DeMuro, MD, Medical Director  
Kathy Gregoire, Executive  
Assistant

Through the audit process, ECH was found to have non-compliance within their 340B Program and responsible for repayment as a result of the following finding(s):

Matthew Nolan, Chief Operating  
Officer

**Finding 1:** ECH violated the Orphan Drug Exclusion, as prohibited by section 340B (e) of the PHSA. The transactions involved two Remicade and five Suboxone purchases during a period in early 2014.

Alan Chardavoyne, Chief Financial  
Officer

ECH has identified all affected manufacturers and has contacted each to notify them of these violations and has begun a dialogue on a method for repayment to affected manufacturers or has completed the repayment process. Additionally, as of October 15, 2015 in compliance with the Federal judgment awarded PHRMA, ECH as a CAH discontinued purchasing any orphan drugs under 340B arrangements. If manufacturers have not received notification from ECH and believe repayment may be owed for the violations described in this letter, or if you have any questions or comments regarding the violations described in this letter please contact Alan Chardavoyne CFO, Elizabethtown Community Hospital, 75 Park Street, Elizabethtown, New York, 12932, (518) 873-3136.

Julie Tromblee, Chief Nursing  
Officer

Darrin Goodrow, Chief Information  
Officer

Michelle Meachem, Director of  
Human Resources

Jane Hooper, Director of  
Community Relations

Heather Reynolds, Director of  
Quality

Sincerely,

Alan Chardavoyne, CFO