

# MaineHealth

December 4, 2013

Larry Carbonneau, Manager  
Health Care Oversight  
Division of Licensing and Regulatory Services  
Department of Health and Human Services  
41 Anthony Avenue  
State House Station # 11  
Augusta, Maine 04333-0011

Re: Waldo County General Hospital  
Retail Pharmacy Service  
Not Subject to Review Determination Request

Dear Mr. Carbonneau:

Waldo County General Hospital is requesting that the Department make a determination that Waldo County General Hospital's proposed operation of a retail pharmacy as a department of the Hospital is not subject to Certificate of Need review and approval.

Waldo County General Hospital (WCGH) is a 25-bed critical access hospital licensed by the State of Maine, Department of Health and Human Services, and certified for participation in the Medicare and Medicaid programs.

WCGH provides pharmacy services as an ancillary service. The proposed retail pharmacy would be an extension of this current service that would be available within WCGH's primary service area.

Operating the Retail Pharmacy as a department of WCGH provides both WCGH and its patients with certain advantages:

- Due to its participation in the 340B drug program, WCGH receives favorable pricing for pharmaceuticals, enabling WCGH to pass these savings along to its patients. WCGH investigated establishing the Retail Pharmacy as a subsidiary corporation; however, if this approach is taken, the favorable pricing would not be available to the operation.
- The Retail Pharmacy contribution margin will be used to support WCGH's provision of charity care, improving access to health care for residents of WCGH primary service area.
- The proposed location of the Retail Pharmacy is on the first floor of the hospital building, providing convenient access for patients leaving the Hospital and physician offices, supporting patients acquiring their medications and complying with their prescription regimens.

WCGH looks forward to the Department's determination that this activity does not constitute a "New Health Service" as defined the Maine Certificate of Need Act of 2002 and that the activity is not subject to Certificate of Need review and approval.

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WCGH would be happy to respond to any concern, issue or question of the Department as it considers this request.

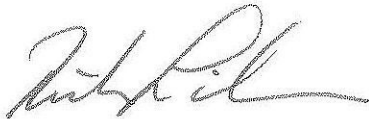
All communications regarding this matter may be directed to:

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Portland, Maine 04102  
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We look forward to hearing from you soon.

Sincerely,



Rich Linehan  
Director of Planning

c.c.: Rich S. Lawrence