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Management Response and Action Plan
Audit of Non-Insured Health Benefits (NIHB) - Pharmacy
June 2011

Recommendations	Management Response and Planned Actions	Deliverables	Expected Completion Date	Responsibility
<p><i>1. It is recommended that the Assistant Deputy Minister, First Nations and Inuit Health Branch update the NIHB risk profile, business continuity plans and recovery strategies and integrate these with the Disaster Recovery Plan for the Health Information Claim Processing System.</i></p>	<p>Management agrees with the recommendation.</p> <p>The NIHB Program has processes and rules which support clients receiving pharmacy coverage when they are evacuated. These risks and mitigation strategies will be included in the NIHB Risk profile.</p>	<p>Updated NIHB risk profile.</p>	<p>January 2012</p>	<p>Director General-Non-Insured Health Benefits (DG -NIHB)</p>
	<p>The NIHB divisional business continuity plans will be updated to ensure completeness for assets, contact lists, and recovery strategies including a link to the Health Information and Claims Processing System disaster recovery plan.</p>	<p>Updated business continuity plans.</p>	<p>May 2011</p>	

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<p><i>2. It is recommended that the Assistant Deputy Minister, First Nations and Inuit Health Branch enhance NIHB data monitoring and analysis to include such items as stimulants and early refills.</i></p>	<p>Management agrees with the recommendation.</p> <p>The NIHB Program will add stimulants to the Prescription Monitoring Program risk score calculations. This enhanced analytical work will support the expansion of the Prescription Drug Monitoring Program and there will be increased controls around clients that have been identified as at risks. These enhancements will also be used to inform, when appropriate, NIHB's ongoing provider audit work.</p>	<p>Enhanced client profiling.</p>	<p>September 2011</p>	<p>DG-NIHB</p>
	<p>NIHB will conduct regular "early prescription refill" surveillance analyses of clients who frequently refill their prescriptions early.</p>	<p>Conduct twice yearly analysis.</p>	<p>August 2011</p>	

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	Health Canada is considering acquiring an enhanced anomaly detection program during 2011/12 to support monitoring and analysis for client safety, financial management and fraud detection.	Develop Request for Proposal.	March 2012	

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<p><i>3. It is recommended that the Assistant Deputy Minister, First Nations and Inuit Health Branch direct the NIHB Program to review the results of the program audit framework quarterly to ensure timely attention is given to issues noted.</i></p>	<p>Management agrees with the recommendation.</p> <p>It is recognized that lessons learned from audits inform policy changes, system control changes and audit scope and criteria. The NIHB Program will ensure that following the end of the service transition period, regular and formal audit lessons learned are provided through the Audit Review Committee, Risk Management Committee and Payment Requisition Committee.</p>	<p>Revise the Administrative Procedures Manual.</p> <p>Review the audit program as a standing item at the: Audit Review Committee; Risk Management Committee; and Payment Requisition Committee.</p>	<p>October 2011</p> <p>April 2011</p>	<p>DG-NIHB</p>

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<p><i>4. It is recommended that the Assistant Deputy Minister, First Nations and Inuit Health Branch work with the Assistant Deputy Minister, Chief Financial Officer Branch to set any debt transferred to Health Canada as receivables in the departmental financial system so that a recovery process can be followed.</i></p>	<p>Management agrees with the recommendation.</p> <p>At the time of the transition between the two claims processors the NIHB Program performed a detailed review of all outstanding debts from providers. Last year, the NIHB Program, with the support of its Claims Processor, resolved a large portion of the outstanding debts. The NIHB Program will continue to work with the Chief Financial Officer Branch to ensure that the debts transferred to Health Canada are set as receivables in the departmental financial system and that the recovery process is followed.</p>	<p>Refine the Payment Requisition Committee process.</p>	<p>August 2011</p>	<p>DG-NIHB</p>
		<p>Review the status of all debts transferred from the previous contractor in order to determine whether any of these debts will be assigned to Health Canada.</p>	<p>August 2011</p>	

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<p><i>5. It is recommended that the Assistant Deputy Minister, First Nations and Inuit Health Branch develop health indicators to demonstrate the contribution pharmacy benefits make to the long term organizational objectives.</i></p>	<p>Management agrees with the recommendation.</p> <p>The NIHB annual report contains information about client safety and provider audits. The Program has also developed benchmarks compared to other public drug plans to measure its relative performance.</p> <p>The NIHB Program will develop management targets in the context of First Nations and Inuit Health Branch's (FNIHB's) strategic planning exercise that aims to achieve the Branch's mandate on health outcomes and targets.</p>	<p>Establish management targets as part of FNIHB strategic planning process.</p>	<p>March 2012</p>	<p>DG-NIHB</p>

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	Regarding contribution to health outcomes, the Program is developing health indicators to further illustrate how Program coverage provided by the Program assists clients to access medications that are necessary to address specific health needs and conditions.	Develop health indicators that illustrate the positive impact of NIHB pharmacy coverage to address the health needs of its clients.	September 2011	