



Health
Canada

Santé
Canada

*Your health and
safety... our priority.*

*Votre santé et votre
sécurité... notre priorité.*

Management Response and Action Plan
**Audit of Non-Insured Health Benefits,
Medical Supplies and Equipment, Vision Care and Mental Health**

March 2014

Management Response and Action Plan
Audit of Non-Insured Health Benefits, Medical Supplies and Equipment, Vision Care and Mental Health
March 2014

Recommendations	Management Response and Planned Management Actions	Deliverables	Expected Completion Date	Responsibility
<p>Recommendation 1</p> <p><i>It is recommended that the Assistant Deputy Ministers, First Nations and Inuit Health Branch (FNIHB):</i></p> <ul style="list-style-type: none"> • <i>update the benefit management guidelines for vision care and mental health especially as it relates to strengthening controls related to providers; and</i> • <i>fully implement the provider audit framework for vision care and mental health.</i> 	<p>Management agrees with the recommendation.</p> <p>Building on the NIHB Benefit policies and operational guidelines already in place, the Assistant Deputy Ministers, FNIHB will:</p> <ul style="list-style-type: none"> • develop a nationally consistent provider registration agreement (for vision care and mental health providers) which includes the right of the NIHB Program to audit provider billings; • incorporate provider registration requirements into the benefit Guides; • implement a provider registration process in these benefit areas; and • implement a national schedule of provider audits in these benefit areas. 	<p>1.1 <i>For the vision-care benefit area:</i></p> <p>1.1.a Create a standard, nationally consistent vision care provider agreement which mirrors that in place in the MS&E benefit, and includes the right of the NIHB Program to audit providers.</p> <p>1.1.b Implement a standard national provider registration process for vision care providers.</p> <p>1.1.c Complete agreements with vision care providers.</p> <p>1.2 <i>For the Short-Term Crisis Intervention Mental Health Counselling benefit area:</i></p> <p>1.2.a Create a standard, nationally consistent mental health provider agreement based on the existing dental benefit registration form, including proof of professional standing and the right of the NIHB Program to audit providers.</p> <p>1.2.b Implement a standard national provider registration process for mental health providers.</p> <p>1.2.c Complete agreements with mental health providers.</p> <p>1.3 <i>In accordance with the provider audit frameworks for vision care and mental health benefits:</i></p> <p>1.3.a Establish a contract for the conduct of audits in the vision and mental health benefit areas (2 audits per benefit, per year).</p>	<p>March 2014</p> <p>August 2014</p> <p>February 2015</p> <p>May 2014</p> <p>August 2014</p> <p>February 2015</p> <p>Completed</p>	<p>NIHB-PPPD, NIHB-OSSD; HC Legal Services & FNIHB Regions</p> <p>NIHB-PAD & FNIHB Regions</p> <p>FNIHB Regions</p> <p>NIHB-PPPD, NIHB-OSSD; HC Legal Services & FNIHB Regions</p> <p>NIHB-PAD & FNIHB-Regions</p> <p>FNIHB Regions</p> <p>NIHB-PAD</p> <p>NIHB-PAD&</p>

Management Response and Action Plan
Audit of Non-Insured Health Benefits, Medical Supplies and Equipment, Vision Care and Mental Health
March 2014

Recommendations	Management Response and Planned Management Actions	Deliverables	Expected Completion Date	Responsibility
		1.3.b Develop a rolling 2-year schedule of audits to be undertaken nationally in vision and mental health benefit areas (audits across all regions within a 3-year period).	March 2014	FNIHB-Regions
<p>Recommendation 2</p> <p><i>It is recommended that the Assistant Deputy Ministers of the First Nations and Inuit Health Branch (FNIHB) create personal information banks and update the privacy impact assessments for vision care and mental health benefit programs.</i></p>	<p>Management agrees with the recommendation.</p> <p>The Assistant Deputy Ministers of the FNIHB will ensure that the required Personal Information Banks (PIBs) and Privacy Impact Assessments (PIAs) for vision care and mental health benefits are completed.</p>	<p>2.1 Complete PIB for data gathered and used for processing NIHB vision care benefits and send to HC-ATIP.</p> <p>2.2 Complete PIB for data gathered and used for processing NIHB Short Term Crisis Intervention Mental Health Counselling Benefits and send to HC-ATIP.</p> <p>2.3.a Complete PIA for the NIHB Vision Care Benefit.</p> <p>2.3.b Develop action plan & timelines for mitigation measures to address risks identified in PIA.</p> <p>2.3.c send completed PIA and action plan to HC-ATIP.</p> <p>2.4.a Complete PIA for the NIHB Short Term Crisis Mental Health Counselling Benefit.</p> <p>2.4.b Develop action plan & timelines for mitigation measures to address risks identified in PIA.</p> <p>2.4.c send completed PIA and action plan to HC-ATIP.</p>	<p>March 2014</p> <p>March 2014</p> <p>September 2014</p> <p>October 2014</p> <p>January 2015</p> <p>December 2014</p> <p>January 2015</p> <p>March 2015</p>	<p>NIHB- PPPD & FNIHB Regions</p> <p>NIHB- PPPD & FNIHB Regions</p> <p>NIHB- PPPD & FNIHB Regions</p> <p>NIHB- PPPD and FNIHB Regions</p>

Management Response and Action Plan
Audit of Non-Insured Health Benefits, Medical Supplies and Equipment, Vision Care and Mental Health
March 2014

Recommendations	Management Response and Planned Management Actions	Deliverables	Expected Completion Date	Responsibility
<p>Recommendation 3</p> <p><i>It is recommended that the Assistant Deputy Ministers, First Nations and Inuit Health Branch (FNIHB) address the information and system security matters identified and develop an integrated plan towards a single IT platform for vision care and for mental health.</i></p>	<p>Management agrees with the recommendation.</p> <p>The Assistant Deputy Ministers of the FNIHB agree to work towards a single IT platform for the vision care and (short term crisis intervention) mental health counselling benefits by including these benefit areas as part of the re-procurement of the national HICPS system.</p> <p>The Assistant Deputy Ministers of the FNIHB will ensure that existing regional IT systems include appropriate controls, and that NIHB regional offices are appropriately secured.</p> <p>The NIHB Program is committed to protecting client personal information. All NIHB employees (headquarters and regions) must familiarize themselves with the NIHB Privacy Code, and complete privacy training specific to the NIHB Program.</p> <p>NIHB also has an annual process in which all employees are reminded of their responsibilities with respect to client personal information.</p>	<p>3.1.a Issue annual reminder of NIHB Privacy requirements (including both HC & NIHB Privacy Training) and privacy “best practices” issued to all employees regarding safeguarding, storage and handling of personal information.</p> <p>3.1.b Confirm that all regional staff dealing with personal information received mandatory privacy (and information security) training or re-training.</p> <p>3.2 FNIHB Regional Executives will work with HC Corporate Services Branch to:</p> <p>3.2.a Ensure access to Alberta Region NIHB (physical) office space is appropriately secured, and any associated privacy risks are mitigated.</p> <p>3.2.b Work with CSB-IMSD to:</p> <p>3.2.b.i review the current approach to password security practices for each region-specific system and agree on a course of action for any necessary improvements.</p> <p>3.2.b.ii ensure that the mandatory IMSD change management process is followed for these systems.</p>	<p>February 2014 (completed)</p> <p>August 2014</p> <p>September 2014</p> <p>December 2014</p>	<p>NIHB-DG; FNIHB-Regions (with support from NIHB-PPPD)</p> <p>FNIHB Regional Executive</p> <p>FNIHB Regional Executive, Alberta Region</p> <p>FNIHB Regional Executive & CSB-IMSD</p>

Management Response and Action Plan
Audit of Non-Insured Health Benefits, Medical Supplies and Equipment, Vision Care and Mental Health
March 2014

Recommendations	Management Response and Planned Management Actions	Deliverables	Expected Completion Date	Responsibility
<p>Recommendation 4</p> <p><i>It is recommended that the that the Assistant Deputy Ministers, First Nations and Inuit Health Branch (FNIHB) re-communicate the Change Request Policy so deviations from the standard clauses are documented and approved.</i></p>	<p>The 2008 Directive on Transfer Payments was integrated into the 2010-11 contribution agreement templates in 2009.</p> <p>Not all clauses identified in the Directive on Transfer Payments are relevant for FNIHB's contribution agreements. Discretion is provided in the Directive with the inclusion wording such as "at the Minister's discretion," "where appropriate," "are addressed where they are relevant," and "when the Minister deems appropriate" which are referenced in Appendix E: Terms and Conditions for Contributions and Appendix G: Funding Agreement Provisions for Contributions.</p> <p>FNIHB contribution agreement templates are standardised for all FNIHB programs. The Assistant Deputy Ministers of the FNIHB will issue a reminder to FNIHB staff that deviations from the standard clauses are subject to FNIHB's <i>Change Request Policy for First Nations and Inuit Health Branch Contribution Agreements</i>.</p>	<p>Regional Support and Coordination, Health Funding Arrangements will issue a reminder to staff to comply with the Change Request Policy for the FNIHB Contribution Agreements.</p>	<p>April 2014</p>	<p>FNIHB, Regional Operations Support and Coordination, Health Funding Arrangements (in consultation with other partners).</p>