

Pages 1 through 28 redacted for the following reasons:

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S13, S15 and S17

DM Approved  
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Hiring Request Form	
<p>Hires will only be approved in the areas of critical service and/or meet an urgent government priority.</p> <p>First consideration must be given to internal candidates; therefore, a request for an external hire must demonstrate why an internal candidate could not be identified.</p> <p>External hires will only be approved where a role is specialized (e.g. Corrections, social workers) and/or specialized in a hard to recruit location.</p>	
Ministry Name:	Health
Division/Branch:	Financial and Corporate Services/ Billing Audit and Investigations Branch (PharmaCare Audit)
Existing Requisition: (If applicable)	n/a
Type of Hire (Regular Permanent, Regular Part-time and %, Temporary Assignment, Auxiliary)	Regular Permanent
Number of Positions:	2
Position Number(s):	60065, 60064
Position Classification:	Investigator – FO 21
Start Date/Term of Position:	asap
Is the position(s) covered within the current STOB 50 forecast of the ministry:	Yes
Is the position covered in the ministry's current 2012/13 salary budget:	yes
Is the position cost-recovered external to the reporting entity (who pays and what proportion is cost-recovered):	no
Is this a newly created position:	no
Why is the position vacant:	Previous hiring actions did not fill all vacancies and allow for an eligibility list of qualified applicants. Further hiring actions are required.
<p><b>What is the nature of the role and why is the position critical to be filled:</b></p> <p>To maintain public confidence, the Ministry of Health must ensure the proper expenditure of public funds and provide assurance that PharmaCare claims are paid in accordance with legislation, policy and legal agreements.</p> <p>The <b>PharmaCare Auditor</b> positions are responsible for performing audits to ensure providers—and claims for drugs, medical supplies, and services paid by PharmaCare to a provider—are in compliance with the Pharmacuetical Services Act, College of Pharmacists of BC Acts and Bylaws, terms of the PharmaCare Enrolment Agreement or PharmaCare Participation Agreement and with PharmaCare policies and procedures.</p> <p>Expenditures through the PharaCare System total ober \$1 billion a year. The risk to both Government and the Ministry of Health is that the detection and investigation of fraud and irregular billing will go undetected and the recovery of provincial funds paid as a result will be affected. Increasing incidents of fraud and criminal activities have required the Ministry to enhance its audit and investigations capabilities and adequately staff to ensure that there is efficient and effective regulatory enforcement of all prescription payments.</p>	
S13, S17	In addition regular audits and

investigations, combined with regulatory enforcement actions, act as a significant deterrent to health care fraud.

*Why can the position not be offset with another resource that could be declared surplus?*

The unit is already under staffed and there are no positions that can be used to offset or declared surplus

*If auxiliary, can the position be posted as a regular position? If no, why not.*

n/a

Is this a request for external hire:

no

Has this position been posted and filled internally within the last 6 months?

no

*If external hire, why is the position not proposed for internal hiring?*

ADM Approval:

*Msida*

Date:

*October 9/12*

Email request to Tanya Mackay [Tanya.Mackay@gov.bc.ca](mailto:Tanya.Mackay@gov.bc.ca) with a cc to Richele Bridges [Richele.Bridges@gov.bc.ca](mailto:Richele.Bridges@gov.bc.ca)

DM Approval:

Date:

Hiring Request	
<ul style="list-style-type: none"> <li>Hires will only be approved in the areas of critical service and/or to meet an urgent government priority.</li> <li>First consideration must be given to internal candidates, therefore, a request for an external hire must demonstrate why an internal candidate could not be identified.</li> <li>External hires will only be approved where a role is specialized (e.g. Corrections, social workers) and/or specialized in a hard to recruit location.</li> </ul>	
Service Request Number (BCPSA use only):	
Hiring Manager (Name/Phone/Email):	Rita King 250-952-1436 Rita.King@gov.bc.ca
Ministry Name:	Health
Division/Branch:	Finance & Corporate Services Audit & Investigations Branch PharmaCare Audit
Requisition Number (if applicable):	-
Position Number(s):	new
Number of Positions:	1
Position Title:	Research Analyst/Desk Auditor
Position Classification:	FO R18
Position Location:	Victoria
Type of Hire: Regular, Temporary Appointment (new/extension), Auxiliary (new/extension), Secondment Agreement (new/extension)	Regular
Start Date/Term (TA or Aux Appt Term):	As soon as possible
Employee Name (if applicable):	-
Will the request result in an increase to employee compensation (e.g., Temporary Appointment); indicate amount/%:	No
Is the position(s) covered within the current STOB 50 forecast of the ministry:	No
Is the position covered in the ministry's current 2012/13 salary budget:	Yes
Is the position cost-recovered external to the reporting entity (who pays and what proportion is cost-recovered):	No
Is this a newly created position:	Yes
Why is the position vacant:	New position
Will this hiring action be restricted to your ministry only?:	No
Is this request for external hire:	No
If external hire, why is the position not proposed for internal hiring?	N/A
Was the position posted within the last 6 months:	No
If yes, indicate the type of posting process used (internal to ministry, internal to government, external, etc.)	N/A

Was your competition successful:	N/A
Provide the posting REQ number (if applicable):	N/A
Have you considered all other resourcing options (e.g., redistribution of the work, realigning functions, etc.):	Yes. Position is needed to expand audit coverage of the PharmaCare Program (see below), in particular audits of high value drugs, narcotics and questionable billing practices.
<b>Why can the work not be reassigned; what have you done to reassign the work internally and/or laterally move resources from non-critical to critical positions?</b>	
The unit has been significantly understaffed in recent years, only recently have PharmaCare Auditors been approved for hiring. The Research Officer position undertakes research and complex data analysis to identify trends, emerging issues and conducts desk audits of high risk drugs, narcotics and questionable billing practices. Reallocating existing auditors to fulfill this function would result in fewer audits of pharmacies, loss of recoveries, and a reduced deterrent at a time when there are significant concerns over some pharmacy's practices. .	
<b>Why is this work critical:</b>	
Expenditures under the PharmaCare Program total over \$1.3 billion a year. PharmaCare Audit is responsible for performing audits to ensure claims for drugs, medical supplies, and services paid by PharmaCare to providers are in compliance with the Pharmaceutical Services Act, College of Pharmacists of BC Acts and Bylaws, terms of the PharmaCare Enrolment Agreement, PharmaCare Participation Agreement and with PharmaCare policies and procedures. The audit function supports the integrity and accountability of the program by ensuring the validity of claims submitted, and by providing evidence to support regulatory enforcement actions such as recovering overpayments, suspending payments, S13, S15, S17	
<b>What is the primary role and key accountabilities of the position:</b>	
The Research Analyst/Desk Auditor Position is responsible for: <ul style="list-style-type: none"> <li>• Conducting research, statistical and complex-data analysis to identify high risk areas and emerging issues for audit.</li> <li>• Conducting cross PharmaCare desk top audits of high risk drugs, narcotics, or billing practice concerns.</li> <li>• Following-up and investigating Patient and Physician concerns identified through the monthly confirmation letter process and following up on tips received from pharmacies and the public.</li> <li>• Providing input to strengthen PharmaCare policy and practices</li> </ul>	
<b>Why can the position not be offset with another resource that could be declared surplus:</b>	
The unit has been understaffed and a decision was made by ministry executive to expand the audit function. Declaring an auditor position surplus would result in fewer investigations, a loss of recoveries and reduced fraud deterrent.	
<b>What are the impact and/or level of risk to the ministry, government or citizens of BC if the position is not filled?</b>	
The risk to both Government and the Ministry is that the detection and investigation of invalid claims, irregular billings and fraud will go undetected and the recovery of provincial funds paid as a result will be lost. Increasing incidents of fraud and criminal activities involving pharmacies have required the Ministry to enhance its audit and investigations capabilities and adequately staff the function to ensure that there is efficient and effective regulatory enforcement of all prescription payments. S13, S17 S13, S17	
S13, S17	If this position is not filled, audit work may be not carried out in the areas of

highest risk and payback, cross PharmaCare audits of high risk drugs or billing practices may not take place, and opportunities for potential recoveries and other enforcement actions will be missed. The residents of BC may criticize government's commitment to enforcing the Pharmaceutical Services Act if public concerns over specific drugs or practices are not promptly investigated.

**What positions are you leaving unfilled to assist with the corporate pressures?**

The Billing Integrity Program will not be filling the SVG Auditor AO14 position

**If auxiliary, can the position be posted as a regular position? If no, why not.**

N/A

**If the request will result in an increase to an employee's compensation (e.g., Temporary Appointment request), explain why this is required and where the funds will be found to offset the increase.**

N/A

ADM Approval: \_\_\_\_\_

*M. Sidi*

Date: \_\_\_\_\_

*MAR 6/13*

**Email request to Tanya Mackay [Tanya.MacKay@gov.bc.ca](mailto:Tanya.MacKay@gov.bc.ca) with a cc to Richele Bridges [Richele.Bridges@gov.bc.ca](mailto:Richele.Bridges@gov.bc.ca) and Your ODE Manager**

**DM Approved**

☐ Yes ☐ No

Date: \_\_\_\_\_

- Once approved, submit the form in a **WORD** document (do not PDF) to the BCPSA online service request and tracking site located at <http://www.gov.bc.ca/myhr/contact> (click on the 'AskMyHR' service request link found half way down the page)
- Under the Service Category select: Jobs and Hiring > Hiring Restriction

Hiring Request	
<ul style="list-style-type: none"> <li>Hires will only be approved in the areas of critical service and/or to meet an urgent government priority.</li> <li>First consideration must be given to internal candidates, therefore, a request for an external hire must demonstrate why an internal candidate could not be identified.</li> <li>External hires will only be approved where a role is specialized (e.g. Corrections, social workers) and/or specialized in a hard to recruit location.</li> </ul>	
Service Request Number (BCPSA use only):	
Hiring Manager (Name/Phone/Email):	Rita King/250-952-1436/Rita.King@gov.bc.ca
Ministry Name:	Health
Division/Branch:	Finance & Corporate Services/Audit & Investigations Branch/PharmaCare Audit
Requisition Number (if applicable):	-
Position Number(s):	New
Number of Positions:	1
Position Title:	Pharmacist
Position Classification:	Pharmacist 4
Position Location:	Victoria
Type of Hire: Regular, Temporary Appointment (new/extension), Auxiliary (new/extension), Secondment Agreement (new/extension)	Regular
Start Date/Term (TA or Aux Appt Term):	ASAP
Employee Name (if applicable):	N/A
Will the request result in an increase to employee compensation (e.g., Temporary Appointment); indicate amount/%:	No
Is the position(s) covered within the current STOB 50 forecast of the ministry:	No
Is the position covered in the ministry's current 2012/13 salary budget:	No – AO24 covered within the salary budget, the balance in the professional services budget (funds for a contracted pharmacist)
Is the position cost-recovered external to the reporting entity (who pays and what proportion is cost-recovered):	No
Is this a newly created position:	Yes
Why is the position vacant:	New position
Will this hiring action be restricted to your ministry only?:	No
Is this request for external hire:	No
If external hire, why is the position not proposed for internal hiring?	N/A
Was the position posted within the last 6 months:	No
If yes, indicate the type of posting process used (internal to ministry, internal to government, external, etc.)	N/A
Was your competition successful:	N/A
Provide the posting REQ number (if applicable):	N/A

*Have you considered all other resourcing options (e.g., redistribution of the work, realigning functions, etc.):*

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***Why can the work not be reassigned; what have you done to reassign the work internally and/or laterally move resources from non-critical to critical positions?***

PharmaCare Audit has limited access (1 day a week) to a Pharmacist within Pharmaceutical Services Division (PSD) with community pharmacy experience. In addition, part time access to pharmacists in Vancouver for a specific project. However, this ad-hoc, part time, as available arrangements do not provide audit staff with adequate access to a full time, independent pharmacist with experience operating a community pharmacy. Due to the expanded size of the audit function and increasing levels of inappropriate/fraudulent billings, a full time pharmacist providing expert advice is required. Recent experience has shown the expertise of a Pharmacist adds significant value to the audit process.

***Why is this work critical:***

Expenditures under the PharmaCare Program total over \$1.3 billion a year. PharmaCare Audit is responsible for performing audits to ensure claims for drugs, medical supplies, and services paid by PharmaCare to providers are in compliance with the Pharmaceutical Services Act, College of Pharmacists of BC Acts and Bylaws, terms of the PharmaCare Enrolment Agreement, PharmaCare Participation Agreement and with PharmaCare policies and procedures. The audit function supports the integrity and accountability of the program by reviewing the validity of claims submitted, and by providing evidence to support regulatory enforcement actions such as recovering overpayments, suspending payments,

S13, S15, S17

S13, S15, S17

***What is the primary role and key accountabilities of the position:***

1. Provides clinical and professional advice to the Executive Director, Manager, Auditors and Special Provincial Constables on all matters relating to the PharmaCare Audit program including audit risk assessment, project planning, evaluation of claims and reporting.
2. Develops new audit methodology and audit approaches guided by the applicable Acts, PharmaCare policies and procedures and the BC College of Pharmacists Bylaws.
3. Provides clinical evaluation and exercise professional judgment in the analyzing of claims and review of PHN histories for areas of potential abuse based on PharmaCare policies. This includes working with the Billing Integrity Program Medical Consultant on the prescribing of pharmaceuticals.
4. From a professional pharmacist's perspective, identifies areas which pharmacies are not in compliance with PharmaCare policies and procedures and the Pharmaceutical Services Act, the PharmaCare Enrolment Agreement, and Federal and College Acts and bylaws and provides input to policy changes.
5. Ensures adequate support for findings and conclusions and potential audit recoveries in the final audit reports approved by the PharmaCare Audit Review Committee.
6. Compiles information on pharmacy practices throughout the province in order to assess if a pharmacy's billing practices warrant further investigation.
7. Oversees the Research Officer/Desktop Top Auditor and ensures audit work is in the areas of highest risk and payback, and meets professional quality standards.

***Why can the position not be offset with another resource that could be declared surplus:***

PharmaCare Audit has been understaffed and a decision was made by ministry executive to expand the audit function. The Pharmacist provides clinical expertise that Auditors do not have. Declaring an auditor position surplus would result in fewer investigations, a loss of recoveries and reduced fraud deterrence.

**What are the impact and/or level of risk to the ministry, government or citizens of BC if the position is not filled?**

The risk to both Government and the Ministry is that the detection and investigation of invalid claims, over billing and fraud will go undetected and the recovery of provincial funds paid as a result will be lost. Increasing incidents of fraud and criminal activities involving pharmacies have required the Ministry to enhance its audit and investigations capabilities and adequately staff the function to ensure that there is efficient and effective regulatory enforcement of all prescription payments.

S13, S17

S13, S17 The residents of BC may criticize government for not doing enough to enforce the Pharmaceutical Services Act and clamp down on disreputable pharmacies.

S13, S17

**What positions are you leaving unfilled to assist with the corporate pressures?**

The Billing Integrity Program will not be filling the SVG Auditor AO14 position

**If auxiliary, can the position be posted as a regular position? If no, why not.**

N/A

**If the request will result in an increase to an employee's compensation (e.g., Temporary Appointment request), explain why this is required and where the funds will be found to offset the increase.**

N/A

ADM Approval: \_\_\_\_\_ Date: \_\_\_\_\_

**Email request to Tanya Mackay [Tanya.MacKay@gov.bc.ca](mailto:Tanya.MacKay@gov.bc.ca) with a cc to Richele Bridges [Richele.Bridges@gov.bc.ca](mailto:Richele.Bridges@gov.bc.ca) and Your ODE Manager**

DM Approved

☐ Yes ☐ No Date: \_\_\_\_\_

- Once approved, submit the form in a **WORD** document (do not PDF) to the BCPSA online service request and tracking site located at <http://www.gov.bc.ca/myhr/contact> (click on the 'AskMyHR' service request link found half way down the page)
- Under the Service Category select: Jobs and Hiring.>Hiring Restriction