



STATE OF OREGON
POSITION DESCRIPTION

Position Revised Date:
4/30/2026

This position is:

- Classified
Unclassified
Executive Service
Mgmt. Svc – Supervisory
Mgmt. Svc – Managerial
Mgmt. Svc - Confidential

Agency: Department of Consumer & Business Services

Facility: Labor & Industries Building

New Revised

SECTION 1. POSITION INFORMATION

a. Classification Title: Compliance Specialist 3
b. Classification No: C5248
c. Working Title: Drug Price Reporting Specialist
d. PPDB No/WD ID: 0001.045
e. Section Title: Drug Price Transparency & Affordability (DFR)
f. Agency No: 44000
g. Employee Name: vacant
h. Budget Auth No: 1411751
i. Supervisor Name: Sarah Young
j. Repr. Code: OAS
k. Work Location (City – County): Salem – Marion

l. Position: Permanent Full-Time Seasonal Part-Time Limited Duration Intermittent Academic Year Job Share
m. FLSA: Exempt Non-Exempt If Exempt: Executive/Supervisory Administrative Professional Computer
n. Eligible for Overtime: Yes No

SECTION 2. PROGRAM AND POSITION INFORMATION

a. Describe the program in which this position exists. Include program purpose, who's affected, size, and scope. Include relationship to agency mission.

The Department of Consumer and Business Services (DCBS) is Oregon's largest business regulatory and consumer protection agency. The department administers state laws and rules to protect consumers and workers in the areas of workers' compensation, occupational safety and health, financial services, insurance, and building codes.

DCBS consists of the Workers' Compensation Division; Oregon Occupational Safety and Health Division; Division of Financial Regulation; Building Codes Division; Small Business Ombudsman; and Ombudsman for Oregon Workers. The department provides shared services to all divisions through the Director's Office and Central Services Division. The department also provides shared services to the Workers' Compensation Board. DCBS employs 950 employees and has a biennial operating budget of approximately \$685 million.

This position is with the Division of Financial Regulation (DFR). The division’s mission supports that of the department by protecting Oregonians’ access to fair products and services through education, regulation, and consumer assistance.

Part of the Drug Price Transparency and Affordability Section in DFR, the Oregon Prescription Drug Price Transparency (DPT) Program receives information about prescription drug prices and costs from drug manufacturers, health insurance companies, pharmacy benefit managers, and consumers. The program releases information to the public to provide accountability for prescription drug pricing. The DPT Program publishes annual reports and holds an annual public hearing on prescription drug pricing to inform policy makers and the public about trends in drug pricing and prescription drug policy.

b. Describe the primary purpose of this position, and how it functions within this program. Complete this statement. The primary purpose of this position is to:

Ensure that prescription drug manufacturers and other regulated entities report complete and compliant information about prescription drug prices and prices increases as required by Oregon law. This position leads compliance activities for the DPT Program, including ensuring that drug manufacturers are providing reports as required, communicating with regulated entities about complex and potentially sensitive compliance issues, reviewing and preparing evidence for investigations and enforcement actions, investigating and analyzing suspected non-compliance, referring cases for and supporting enforcement action, including testifying or providing evidence at administrative hearings. This position influences policy development as it relates to matters of manufacturer compliance and compliance standards and is responsible for reviewing trade secret claims, issuing determinations regarding trade secret claims, and maintaining documentation to support trade secret claim determinations and agreements. Due to the size of the program, this position is responsible for both initial reviews for compliance and more thorough inspection of submitted documentation and contextual information when reviewing trade secret claims and investigating suspected non-compliance situations. This position is responsible for legal review of trade secret claims, documenting the review as recommended by our attorneys, issuing determinations when we disagree with claims, processing appeals, and checking for court filings before finalizing reports that include information claimed as trade secret. This position also provides technical assistance to regulated entities and other stakeholders by responding to inquiries about program compliance, as well as preparing materials and providing training to educate regulated entities and other stakeholders about DPT reporting requirements.

SECTION 3. DESCRIPTION OF DUTIES

List the major duties of the position. State the percentage of time for each duty. Mark “N” for new duties, “R” for revised duties or “NC” for no change in duties. Indicate whether the duty is an “Essential” (E) or “Non-Essential” (NE) function.

| % of Time | N/R/NC | E/NE | DUTIES |
|-----------|--------|------|--|
| Ongoing | R | E | <p>Expectations of all DCBS employees</p> <ul style="list-style-type: none"> Perform position duties in a manner which promotes customer service and harmonious working relationships, including treating all persons courteously and respectfully. Engage in effective team participation through willingness to assist and support co-workers, supervisors, and other work-related associations. Develop good working relationships with division and agency staff and supervisors through active participation in accomplishing group projects and in identifying and resolving problems in a constructive manner. Demonstrate openness to constructive feedback and suggestions, in an effort to strengthen work performance. Contribute to a positive, respectful and productive work atmosphere. |

Note: If additional rows of the below table are needed, place cursor at end of a row (outside table) and hit “Enter”.

| | | | |
|-----|---|---|--|
| | | | <ul style="list-style-type: none"> • Foster and promote the importance and value of a diverse, discrimination and harassment free workplace. Respect diversity of opinions, ideas, and cultural differences. Support outreach and diversity related efforts in order to diversify the workforce. • Regular attendance is an essential function required to meet the demands of this job and to provide necessary services. |
| 60% | R | E | <p>Program compliance activities</p> <ul style="list-style-type: none"> • Review and process detailed information and documents submitted by drug manufacturers for proper documentation and compliance with laws, rules, and division policies. Analyze and investigate potentially noncompliant submissions, missing submissions, missing registrations, or other potential violations on the part of regulated entities. • Determine if trade secrecy status would be applicable to the information submitted based on guidelines as outlined in applicable trade secret laws. Evaluate claims of trade secrecy status submitted by regulated entities to determine if that status is appropriate for the information in question. Follow up with regulated entities to request any additional information that may be necessary in making trade secrecy determinations. Analyze and investigate potentially noncompliant claims of trade secrecy to determine whether information claimed as trade secret should be released to the public. Exercise independent judgement and resolve disputes regarding trade secrecy status through education, communication, and negotiation. • When submitted filings are out of compliance or not submitted when required, work with regulated entities to resolve any deficiencies or disputes and, if resolution is unsuccessful, recommend appropriate enforcement action, including potential civil penalties. Support enforcement action by division enforcement unit by reviewing and preparing evidence and legal interpretation for investigations, as well as testifying at or providing evidence for administrative hearings or other legal proceedings. |
| 25% | R | E | <p>Compliance consultation and technical assistance</p> <ul style="list-style-type: none"> • Act as a resource for regulated entities seeking to come into compliance by responding to external inquiries about program requirements, developing materials, and providing trainings to educate stakeholders on matters related to program compliance. • Correspond regularly with regulated entities regarding the program's reporting and compliance requirements, including outreach to outside entities that are required to report under law, but are not currently doing so. Provide expertise and assistance through written and verbal communication with regulated entities to explain laws, rules, and procedures. Assist regulated entities in resolving disputes related to trade secrecy status or completeness and accuracy of submitted documentation. |
| 10% | R | E | <p>Development of compliance standards and policies</p> <ul style="list-style-type: none"> • Using program knowledge, medical insurance expertise, pharmaceutical expertise, and interpretation of relevant laws/statutes, determine reporting requirements and guidelines based on the type(s) of drugs involved. As needed to make these determinations, review FDA regulatory information including approved labeling requirements for specific drugs, as well as SEC filings for drug manufacturers. • Provide input to management and other program staff regarding potential messaging, policy, or process changes that may improve overall compliance with program requirements. Provide input and |

| | | | |
|--------------|----|---|---|
| | | | <p>recommendations for program-related policy changes, particularly related to matters of compliance.</p> <ul style="list-style-type: none"> • Research statutory legislative history, administrative rules relating to the program, trade secret determinations, and other compliance and enforcement issues for the division. Present findings to program coordinator and management, as appropriate, to inform program operations, overall compliance strategy, and policy changes. • Analyze issues, summarize cases, and draft documents or memoranda based on research. |
| 5% | NC | E | <p>Other duties as assigned</p> <ul style="list-style-type: none"> • May be called upon to assist other aspects of the program on an as-needed basis, including data collection and/or assisting in drafting the annual program report provided to the legislature. May also be called upon occasionally to assist other division units in compliance activities. |
| At all times | N | E | <p>Confidentiality expectation</p> <ul style="list-style-type: none"> • This position will be accessing or hearing confidential information during the course of performing position responsibilities. This information includes but is not limited to: financial accounts, SSN, criminal background history, financial information or status of an entity, examination results, and investigations. The information you access or hear while at work is confidential and may not be shared with anyone inside or outside the agency unless there is a business purpose for the information to be shared. |

SECTION 4. WORKING CONDITIONS

Describe any on-going working conditions. Include any physical, sensory, and environmental demands. State the frequency of exposure to these conditions.

Open office work environment with factors that include noise, overhead lighting, and temperature variations during weather transitions. Must be able to handle a variety of interruptions and have the ability to perform varied tasks throughout the workday. Occasional travel within Oregon and out of state.

This employee is eligible for remote work with supervisor’s approval and may occasionally be asked to work from the office or attend in-person meetings or events on an as-needed basis. This employee will be expected to meet in-person with their supervisor and team members at least once quarterly.

SECTION 5. GUIDELINES

a. List any established guidelines used in this position, such as state or federal laws or regulations, policies, manuals, or desk procedures.

- Oregon Revised Statutes
- Oregon Administrative Rules
- Prescription Drug Price Transparency Act (ORS 646A.680 through 646A.692)
- DPT Program Administrative Rules (OAR 836-200-0500 to 836-200-0560)
- Oregon Insurance Code
- Oregon Public Records Laws (including ORS 192.345 regarding trade secrets)
- Oregon Attorney General's Public Records and Public Meetings Manual
- DCBS Special Records Retention Schedules
- Drug Price Transparency Desk Manual

b. How are these guidelines used?

The Oregon Revised Statutes provide authority for program activities. The Administrative Rules establish reporting requirements and processes. The Oregon Insurance Code provides guidance and information on the overall regulation of insurance providers in the state of Oregon. Public records and trade secret laws guide determinations on the applicability of trade secret status to submitted information. The Oregon Attorney General's Public Records and Public Meetings Manual and DCBS Special Records Retention Schedules provides guidance in the retention and documentation of program-related records. The internal desk manual provides the method by which the functions are performed.

SECTION 6. WORK CONTACTS

With whom, outside of co-workers in this work unit, must the employee in this position regularly come in contact?

| Who Contacted | How | Purpose | How Often? |
|--|---|---|------------|
| <i>Note: If additional rows of the below table are needed, place cursor at end of a row (outside table) and hit "Enter".</i> | | | |
| Drug Manufacturers, Third-party Reporting Entities, other Regulated Entities | phone, in person, virtual meetings, writing | To discuss reporting and compliance requirements | Daily |
| State Attorney General's Office | phone, in person, virtual meetings, writing | Obtain advice, review findings | Regularly |
| Administrator/Deputy Administrators of DFR | phone, in person, virtual meetings, writing | Consult, inform, obtain guidance | As needed |
| Chief of Enforcement | phone, in person, virtual meetings, writing | Direction on enforcement cases | As needed |
| Insurance Product Regulation and Compliance Manager | phone, in person, virtual meetings, writing | Direction on compliance cases | As needed |
| Division staff | phone, in person, virtual meetings, writing | Collaboration on areas of mutual concern | As needed |
| IT staff | phone, in person, virtual meetings, writing | Collaboration on reporting system maintenance and improvement | As needed |

SECTION 7. POSITION RELATED DECISION MAKING

Describe the typical decisions of this position. Explain the direct effect of these decisions.

This position will review reporting by regulated entities and determine compliance with statutory and administrative requirements. Employee exercises independent judgement to achieve program objectives.

This position will review reports submitted to the DPT Program and determine compliance with reporting requirements based on the type of prescription drug(s) and applicable statutory requirements. Determine if information submitted meets compliance requirements under the Drug Price Transparency Act and the Oregon Insurance Code. Investigate potential noncompliance with program requirements, work collaboratively to bring regulated entities into compliance, recommend appropriate sanctions, and provide support for enforcement action when needed, including providing evidence and testifying at administrative hearings or other legal proceedings. Decisions regarding non-compliance have significant financial consequences including possible civil penalties.

This position will review complex and technical claims of trade secrecy status to determine if information submitted would qualify as a trade secret and be conditionally exempt from disclosure. Decisions regarding trade secrecy status could impact regulated entities if privileged information is shared or these decisions could negatively impact program operations if data is incorrectly labeled as a trade secret and is not shared with the public as required. Decisions that have a negative impact on the DPT Program could impact public perception of the agency, state government, and services to organizations and citizens.

The position makes determinations on development of appropriate compliance standards within the framework of the Prescription Drug Price Transparency Act (ORS 646A.689) in order to enhance reporting information received, provide additional clarity and guidance to regulated entities, and improve overall program effectiveness. The position also makes decisions regarding policy changes, especially as they relate to the compliance aspect of the program.

SECTION 8. REVIEW OF WORK

Who reviews the work of the position?

| Classification Title | Position Number | How | How Often | Purpose of Review |
|-----------------------------------|-----------------|---|----------------------|---|
| Compliance & Regulatory Manager 2 | 0002.001 | phone, in person, virtual meetings, writing | As needed, Quarterly | General supervision, policy guidance. Quarterly performance reviews for achievement of overall objectives. |

Note: If additional rows of the below table are needed, place cursor at end of a row (outside table) and hit "Enter".

SECTION 9. OVERSIGHT FUNCTIONS

THIS SECTION IS FOR SUPERVISORY POSITIONS ONLY

- a. How many employees are directly supervised by this position? n/a
 How many employees are supervised through a subordinate supervisor? n/a
- b. Which of the following activities does this position do?
- | | |
|--|---|
| <input type="checkbox"/> Plan work | <input type="checkbox"/> Coordinates schedules |
| <input type="checkbox"/> Assigns work | <input type="checkbox"/> Hires and discharges |
| <input type="checkbox"/> Approves work | <input type="checkbox"/> Recommends hiring |
| <input type="checkbox"/> Responds to grievances | <input type="checkbox"/> Gives input for performance evaluations |
| <input type="checkbox"/> Disciplines and rewards | <input type="checkbox"/> Prepares & signs performance evaluations |

SECTION 10. ADDITIONAL POSITION-RELATED INFORMATION

ADDITIONAL REQUIREMENTS: List any knowledge and skills needed at time of hire that are not already required in the classification specification:

Special Requirements:

Position is subject to a criminal background check.

BUDGET AUTHORITY: If this position has authority to commit agency operating money, indicate the following:

| Operating Area | Biennial Amount (\$00000.00) | Fund Type |
|----------------|------------------------------|-----------|
| | N/A | |
| | | |

Note: If additional rows of the below table are needed, place cursor at end of a row (outside table) and hit "Enter".

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| | | |
| | | |

SECTION 11. ORGANIZATIONAL CHART

Attach a current organizational chart. Be sure the following information is shown on the chart for each position: classification title, classification number, salary range, employee name and position number.

SECTION 12. SIGNATURES

Employee Signature

Date

Supervisor Signature

Date

Appointing Authority Signature

Date