

Mon Health

Controlled Substance
Diversion Prevention Program

Choose Mon Health. *Feel The Difference.*





Learning Objectives

- ✦ Define drug diversion in the healthcare setting.
- ✦ Describe how drug diversion can impact patient safety, the organization and your community.
- ✦ List the signs of drug diversion.
- ✦ Recognize your role and the organization's responsibility for preventing drug diversion and the impact on public safety.

August 2, 2022

2

The purpose of this educational module is to define what drug diversion is in healthcare, how it impacts patient safety, the organization, and the community, the signs of someone who may be diverting drugs, and to understand your role and the organization's responsibility for preventing drug diversion.



What Is Drug Diversion?

- * Diversion is the theft of drugs or any criminal act involving a prescription drug.
- * Diversion is not restricted to controlled substances.
 - Ex. opioids, sedatives, hallucinogens, etc.
- * U.S. Controlled Substance Act 1994
 - Transfer of prescription drugs from a lawful use to unlawful use

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3

So what is drug diversion?

Diversion is the theft of drugs or any criminal act involving a prescription drug. Diversion is not restricted to just controlled substances. Some noncontrolled medications, such as gabapentin, propofol, and cough syrups have been diverted.

The Controlled Substances Act places all drugs regulated by federal law into one of five schedules based on the substance's medical use, potential for abuse, and safety or dependence liability. It establishes that the transfer of prescription drugs for an unlawful use may be punishable by fines or prison time.



The Truth About Addiction

One person dies every



19 MINUTES

from drug overdose in the United States

and this increasing trend is driven by Rx painkillers.



Opioid pain relievers are responsible for more overdose deaths than cocaine and heroin combined.



Share this to help #EndMedicineAbuse.

Published by The Partnership at Drugfree.org. Visit MedicineAbuseProject.org for more details.

*** 12-16% of healthcare workers become addicted to prescription drugs during their career.**

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4

It is estimated that 12-16% of healthcare workers will become addicted to prescription drugs during their career.



Hospital Leadership



Under the law, entities (hospitals) have a responsibility to ensure that controlled substances are used for patient care and not diverted for non-medical uses.

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5

Hospitals have a responsibility to ensure that controlled substances are used for patient care and not diverted for non-medical uses.



Commonly Diverted Drugs

Opioids

- Morphine
- Hydromorphone
- Hydrocodone
- Oxycodone

Performance Enhancing Drugs

- Erythropoietin
- Anabolic steroids

Sedatives

- Ketamine

Others

- Antiretrovirals
- Gabapentin
- Loperamide (poor man's methadone)
- Promethazine
- Bupropion



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6

This slide contains a list of drugs that are commonly diverted. In addition to drugs normally thought of for diversion, such as opioids and sedatives, some less commonly considered medications are erythropoietin and other performance enhancing drugs, loperamide, promethazine, and bupropion.



Who Diverts Drugs and From Where?



Anyone From Anywhere!

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7

Any person from any area of the organization may have an opportunity to divert drugs.



Where Can Diversion Happen?

Procurement

- Purchase order and packing slips removed from records
- Unauthorized individual orders for medication(s) on stolen DEA Form 222
- Product container is compromised

Preparation and Dispensing

- Medications are replaced by product with a similar appearance when packaging
- Removing volume from mixed infusion
- Multidose vial overfill diverted
- Prepared syringe contents replaced with saline

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8

There are many areas in the healthcare setting for diversion to be possible. At the stage of purchasing drugs, invoices or packing slips can be removed from the facility records, making the diversion difficult to trace. Stolen order forms are another potential avenue for diversion. During medication preparation or dispensing, some or all of the drug may be diverted and potentially replaced with another medication.



Where Can Diversion Happen?

Prescribing

- Prescription pads diverted and forged
- Prescriber self-prescribing medication
- Verbal orders for medication entered but not verified by prescriber
- Written prescriptions altered by patient



Administration

- Medications are withdrawn from ADD on discharged or transferred patient
- Medication documented as given but not administered to patient
- Waste is not adequately witnessed and diverted
- Substitute drug is removed and administered while medication is diverted

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9

Diversion can occur when when prescription pads are stolen or forged. Additional ways that drugs could be diverted are if a prescriber is self-prescribing medications, a practitioner enters verbal orders that were not actually issued by the provider, or a patient alters a prescription.

When administering drugs, a medication could be removed on a discharged patient, documented as given to the patient but not actually administered, diverted during the wasting process of a medication, or another drug is administered while the medication is diverted.



Where Can Diversion Happen

Waste and Removal

- Medication waste is removed from unsecured waste container
- Medication waste in syringes replaced with saline
- Expired medication(s) diverted from holding area

Diversion can happen anywhere that medications are located!

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10

Diversion can happen anywhere that medications are located.



Why Do People Divert?

**Opportunity is the only
aspect that we can control**

Pressure



Opportunity

Rationalization

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11

There are many reasons that individual can divert. The opportunity to divert is the only aspect that we can control.



Drug Diversion – A Case Story #1

- A discrepancy report was generated from the Pyxis machine. According to the report, 10 tablets of a controlled substance were missing from the Pyxis.
- The report was not addressed in a timely manner.
- The next day a diversion investigation was started.
- Pulling together the nursing and pharmacy staff, it was determined that the discrepancy report was a counting (human) error on the part of the staff.



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12



Drug Diversion – A Case Story #1

What could have happened?

- Had the drugs not been located, the staff who had accessed the Pyxis both before and after the discrepancy report was generated would have been investigated, potentially drug tested and potentially suspended for the duration of the investigation.

What should have happened?

- The discrepancy should have been reported immediately. The drugs should have been recounted by nursing and pharmacy staff at the time that the discrepancy report was generated.





Drug Diversion – A Case Story #2

- A drug was pulled from the Pyxis because it had reached its expiration timeframe.
- The vial was placed in the employee's pocket to be transported back to the pharmacy to be disposed of according to protocol.
- The reconciliation report was not appropriately addressed at the end of the shift.
- The vial left the building in the employee's pocket.
- When called, the employee was able to locate the vial and return it to the pharmacy.



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14



Drug Diversion – A Case Story #2

What could have happened?

- The employee could have been suspended and potentially terminated from employment had the vial not been located.



What should have happened?

- The employee should have followed the appropriate protocols to ensure that the expired medications were properly returned to the pharmacy for disposal.





Drug Diversion Impact

1. Impaired staff place patient safety in jeopardy
 - Lack of adequate pain control/clinical management
 - Potential exposure to infectious diseases
2. Impaired staff put the community at risk
 - Ex. Driving while impaired
3. Diverters can face professional licensure sanctions (potential loss of), fines, and potential jail time
4. Hospital and staff may face civil and regulatory liability
5. Negative publicity for the individual and organization





Be Alert for Signs of Potential Diversion

- Frequent disappearance
- Volunteer for overtime
- Helping medicate other patients
- Frequently wastes drug
- Frequently drops doses
- Holds waste for long periods
- Carries medication in pockets
- Secretive
- Routinely requests 1-time doses
- Poor documentation
- Variable performance
- Poor judgement
- Deteriorating relationships
- Blames others for errors
- Frequent personal crisis
- Blood on clothing (arms/legs)



Based on the statistics, if we are not identifying diversion, we are likely missing it!

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17

Be alert for signs of potential diversion. Potential signs include: (read list)

If we are not identifying diversion, we are likely missing it.



Signs of Impairment

Behavioral

- Increasing isolation from coworkers and social avoidance at work
- Frequent illness, accidents, emergencies, tardiness
- Complaints from others about poor work performance
- Moody, depressed, irritable, suicidal threats
- Frequent trips to the bathroom, locker room, unexplained absences, long lunches
- Illogical or sloppy charting

Physical

- Shakiness, tremors, slurred speech, sweating, unkept appearance
- Wearing long-sleeve clothing even in warm environments

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18

Signs of diversion impact include: (read list)



Medication Discrepancies

- Discrepancies should be reported to your Manager during the shift when the discrepancy occurs.
- Manager(s) or their designee are responsible for checking for discrepancies by the end of each shift.
- If discrepancies are unable to be resolved, the Manager should notify the Director of Pharmacy or their designee immediately and initiate an occurrence report.



What To Do If You Suspect Diversion

1. Notify your Manager
2. Report diversion or potential diversion to the Director of Pharmacy immediately
3. Call or log into the Compliance Line to make a report



Reporting your suspicions could save someone's life!



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20

If you suspect diversion, you should first notify your manager. Your manager should then report the diversion or potential diversion to the Director of Pharmacy. Lastly, you could call the Compliance Line to make a report.

Reporting your suspicions could save someone's life.