

The Pursuit of Prevention - Confronting Drug Diversion



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This activity is supported by **Fresenius Kabi**.

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Learning Objectives

Following completion of this activity, participants will be able to:

1. Describe essential components of a diversion stewardship program.
2. Differentiate diversion risk points within the medication lifecycle.
3. Recognize common challenges seen by diversion programs and the opportunities available to mitigate diversion risks.



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Agenda

- Define Drug Diversion
- Diversion Detection Approach
- A day in the life...
- Lessons Learned/Challenges
- Harnessing Technology



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Drug Diversion

The illegal distribution or abuse of prescription drugs or their use for purposes not intended by the prescriber¹

- Controlled substances
- Non-controlled substances
- Recalled
- Expired
- Waste



¹U.S. Department of Health and Human Services

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Program Philosophy

Equal parts **art** and **science**

- Define the **purpose**
- **Scope** the work
- Determine the **approach**

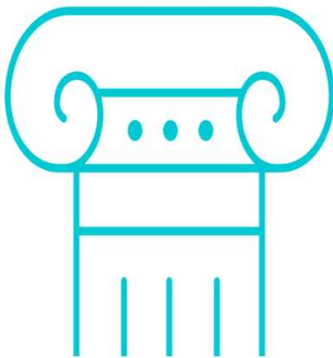


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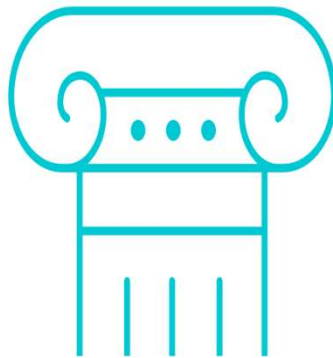
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Program Pillars

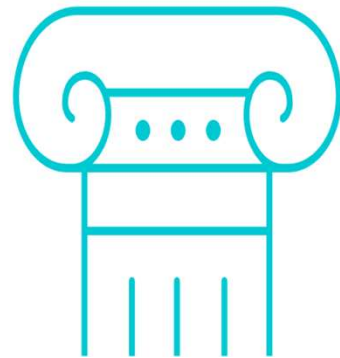
Prevention



Monitoring



Compliance



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Program Responsibilities

A day in the life of a drug diversion specialist



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Prevention



Security



Physical Barriers



Policies



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Monitoring



Audits



Surveillance



A.I. Solutions



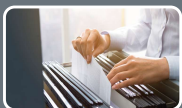
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Compliance



Registration



Record Keeping



Reporting

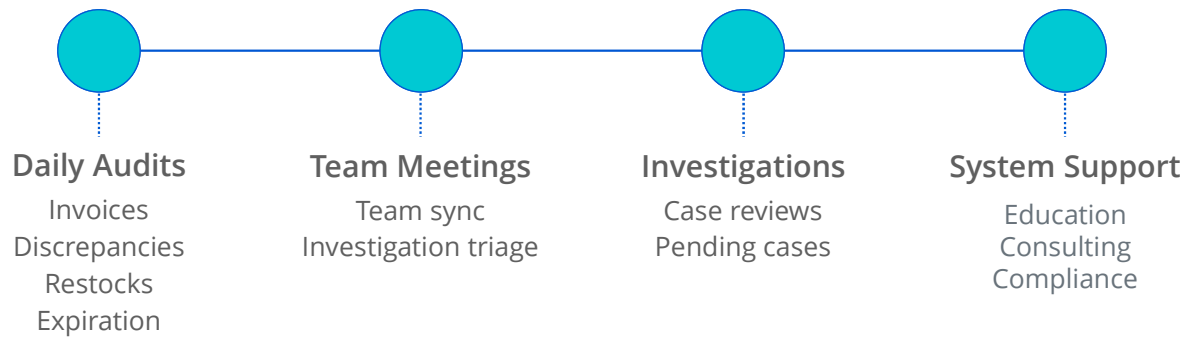


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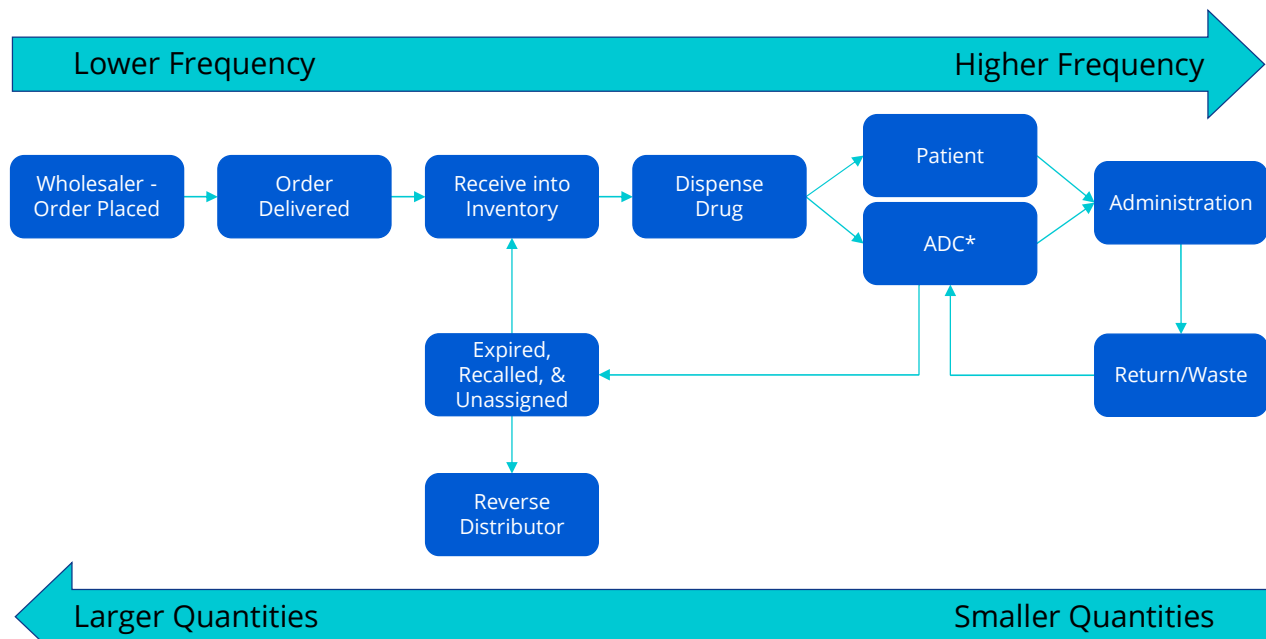
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A day in the life...



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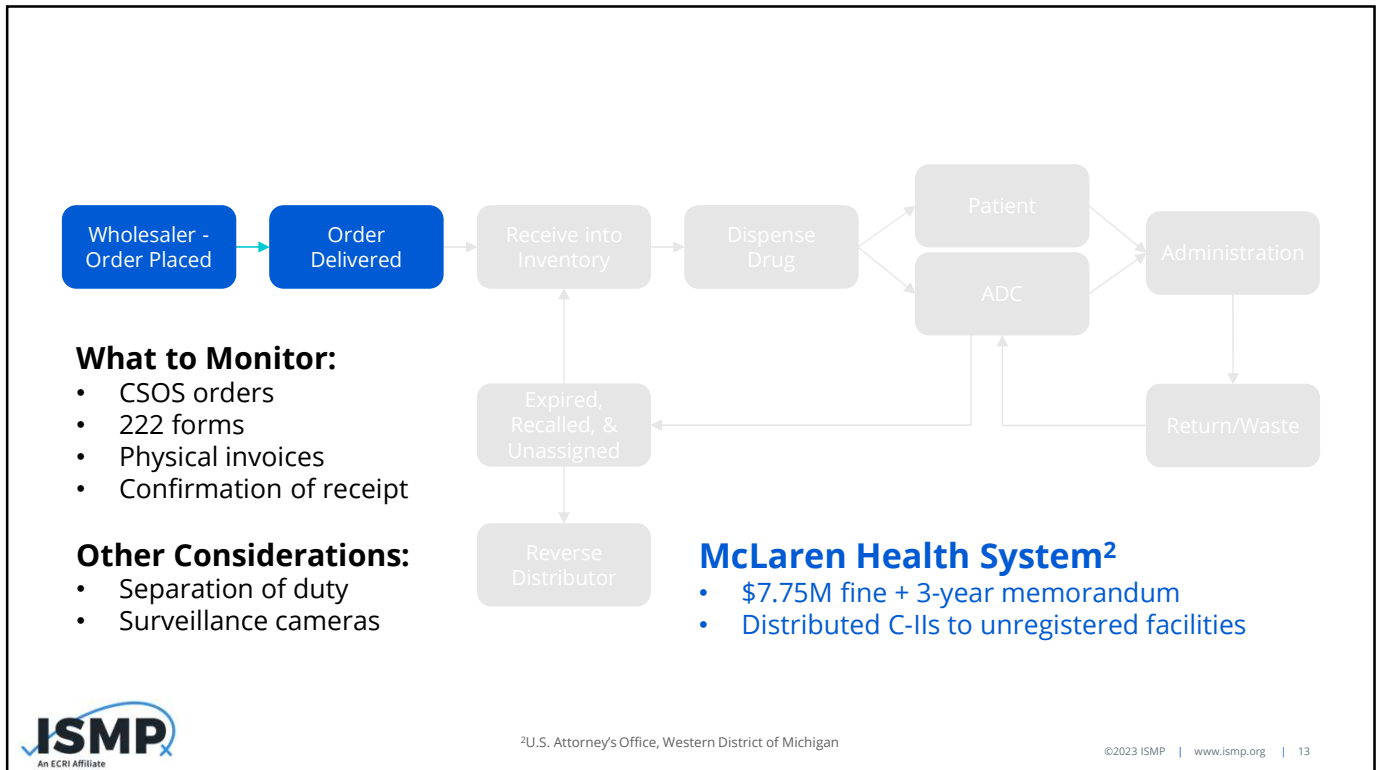


*Automated Dispensing Cabinet

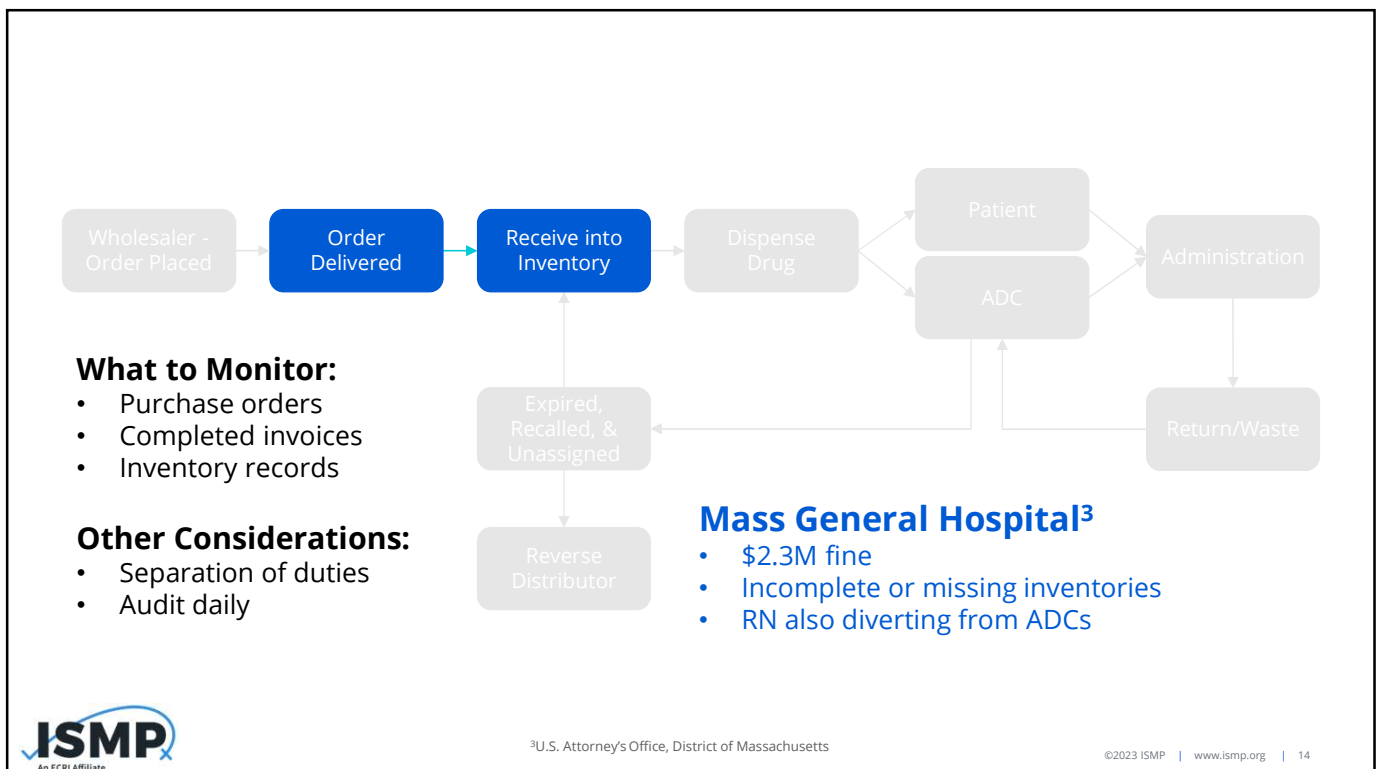
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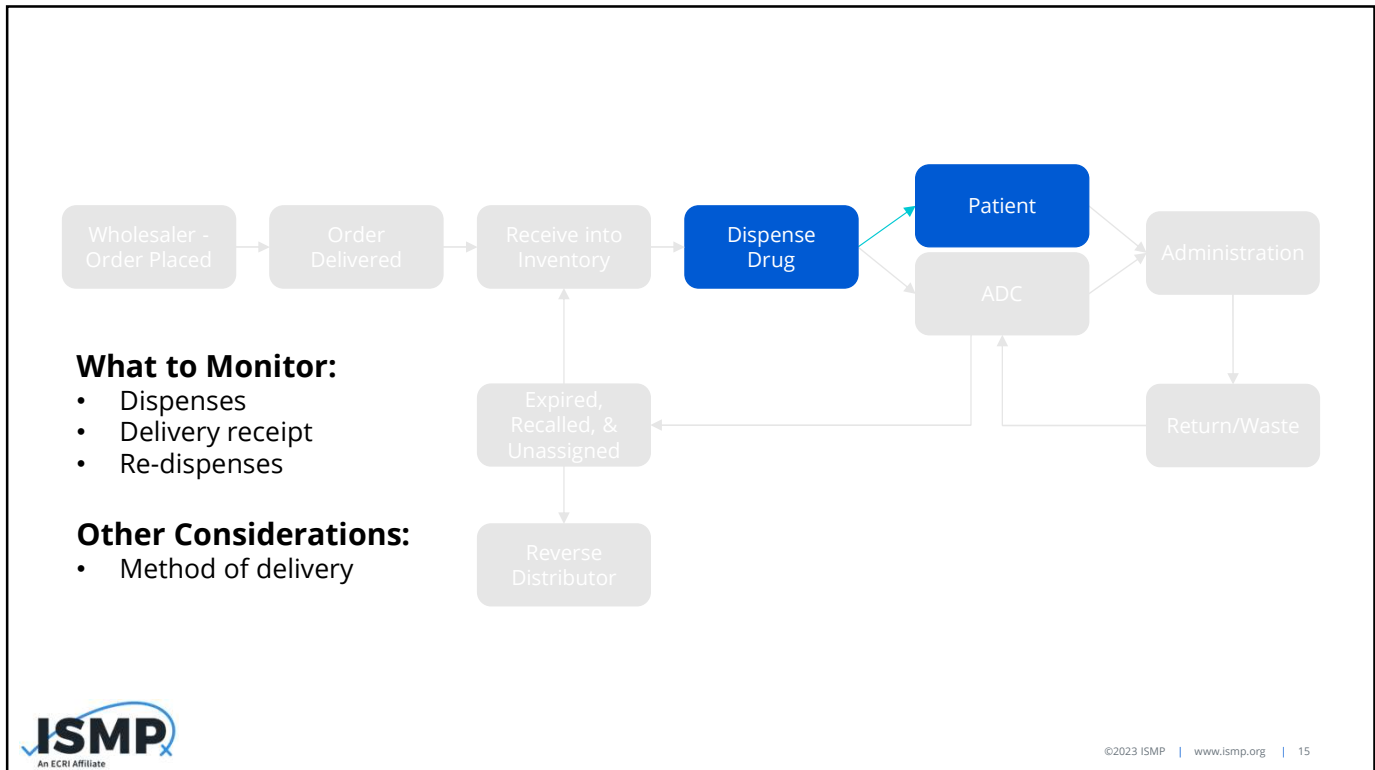


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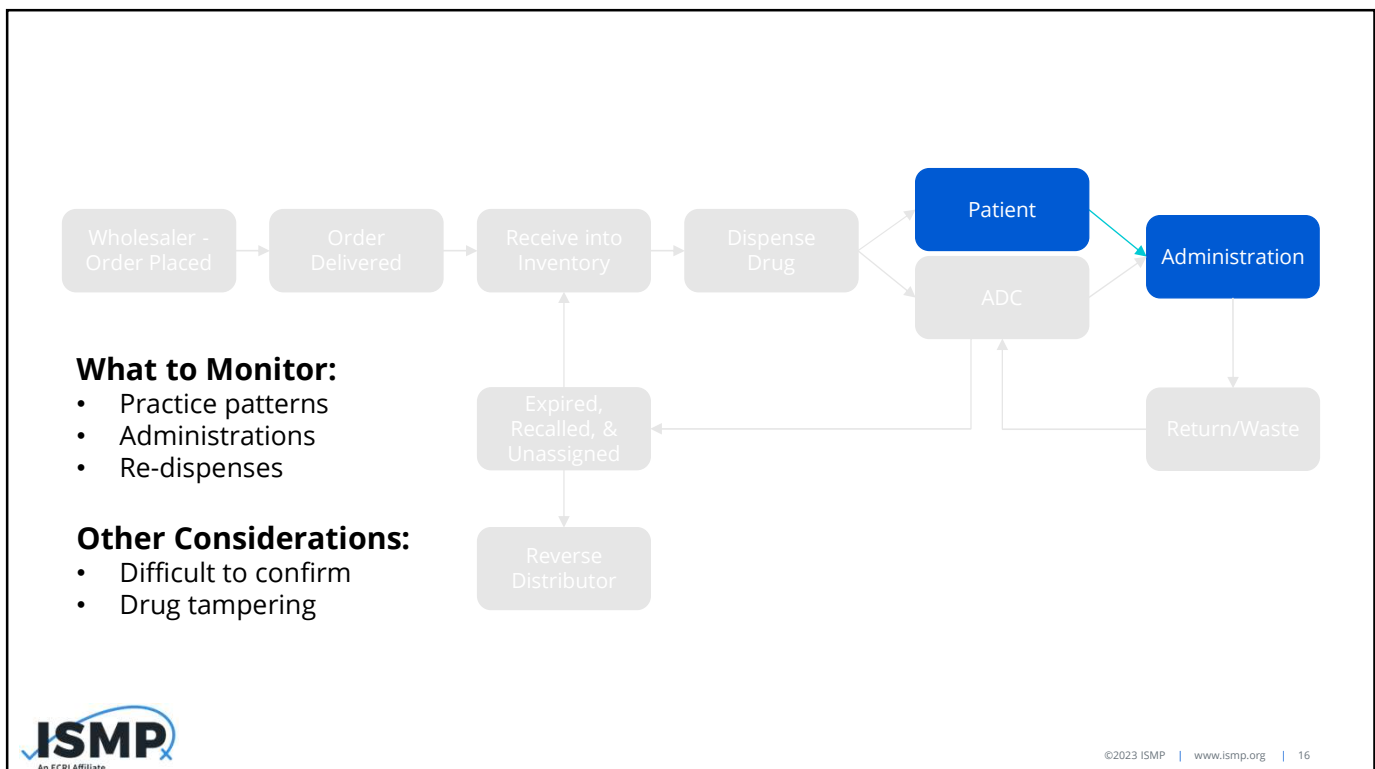


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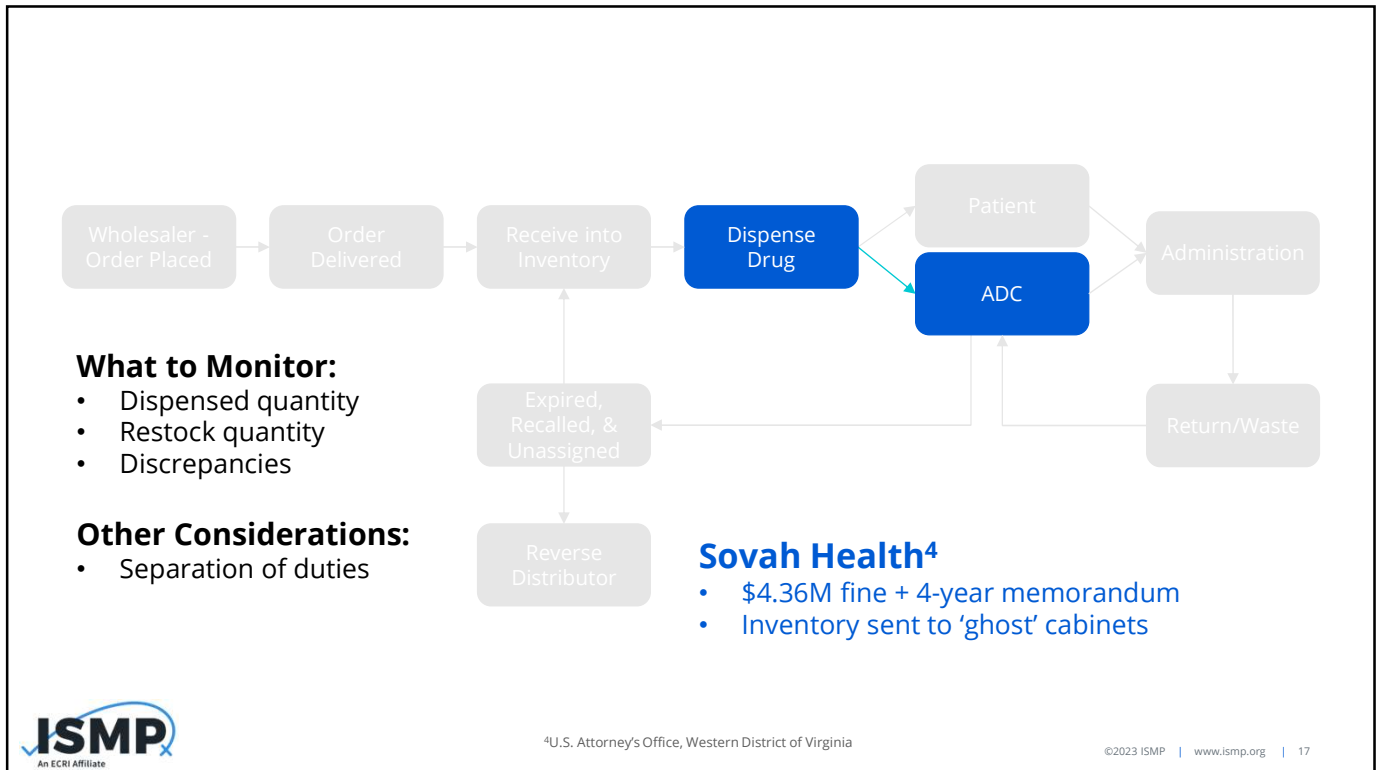


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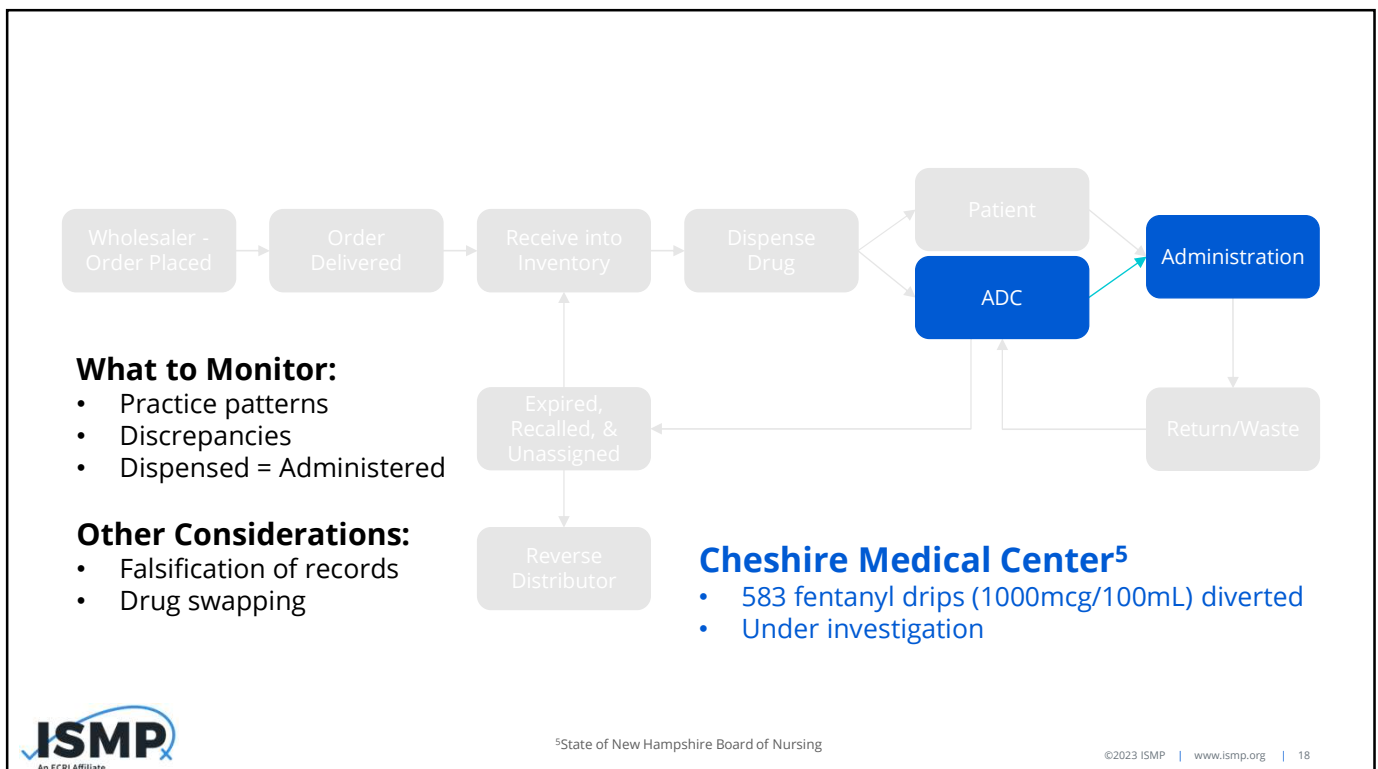


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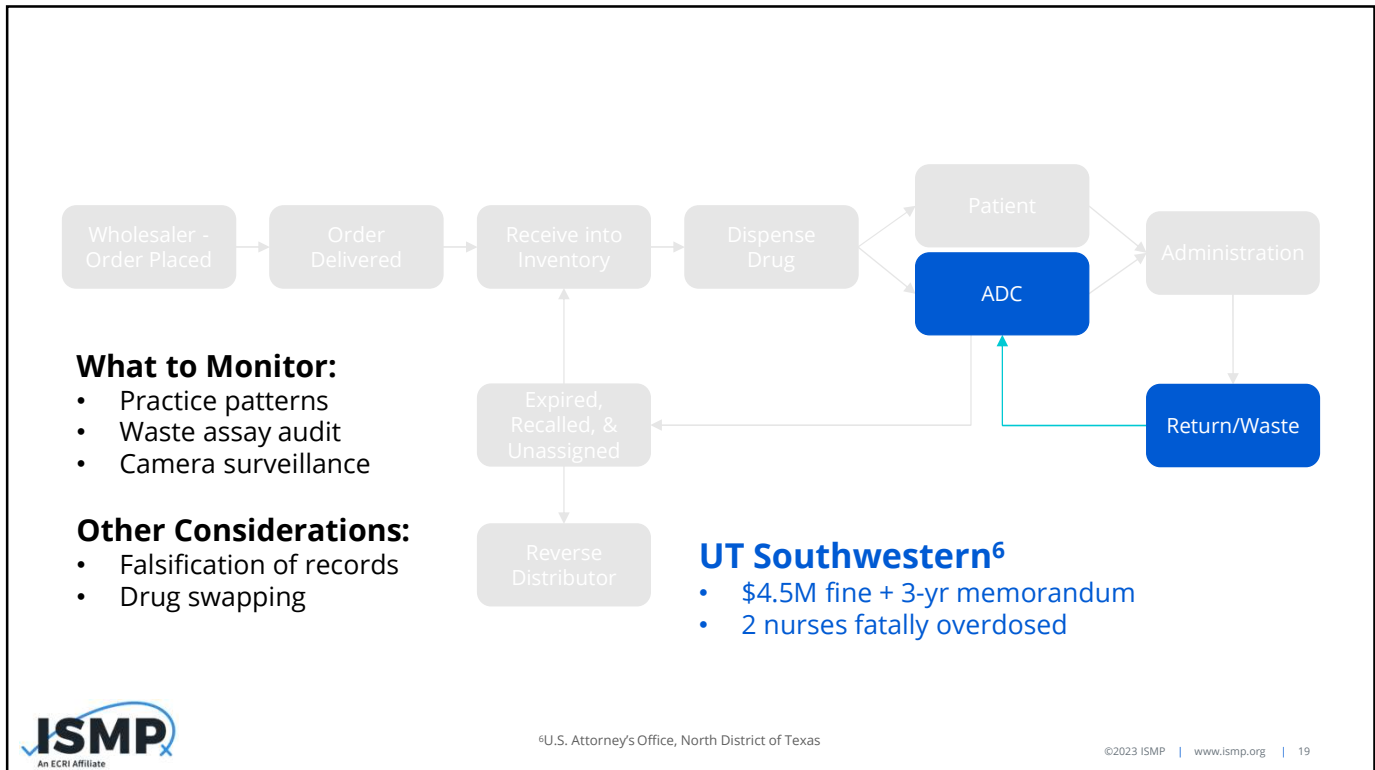


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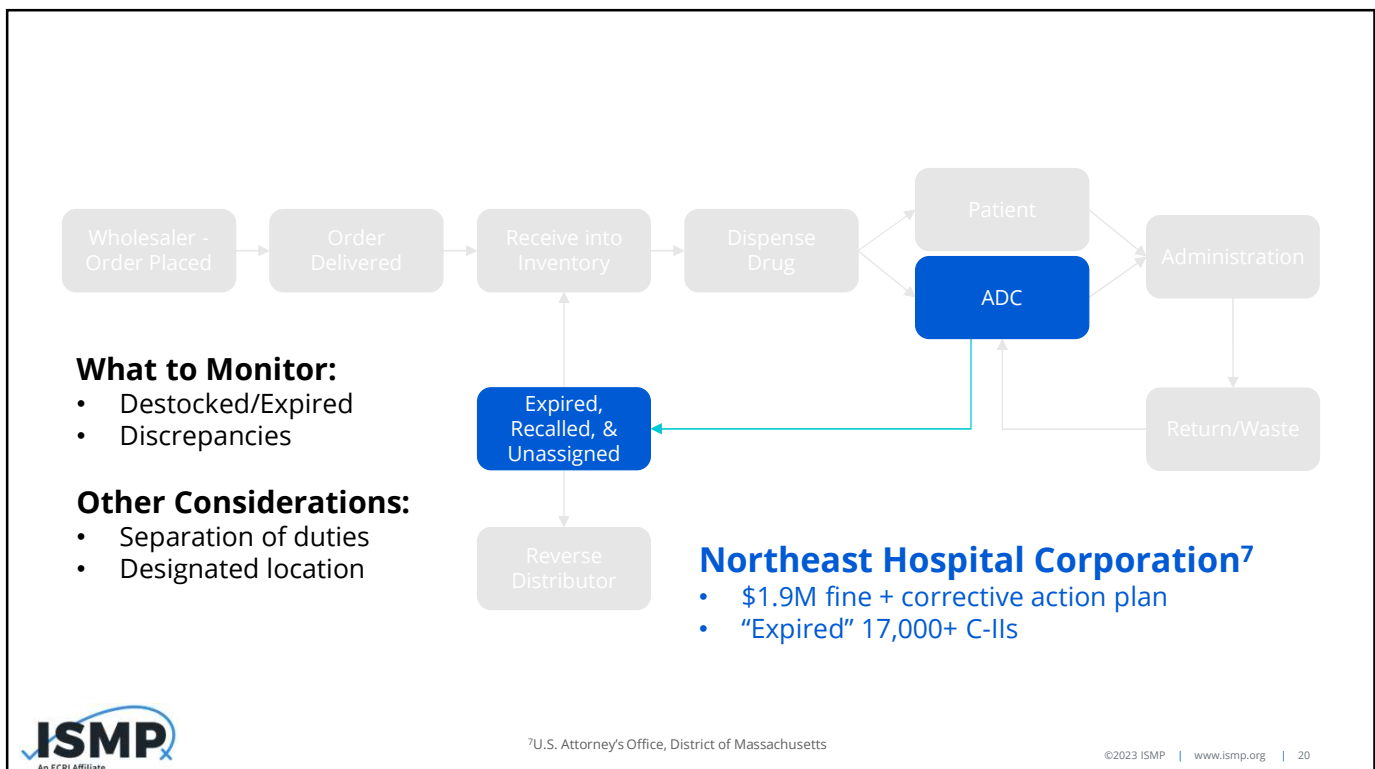


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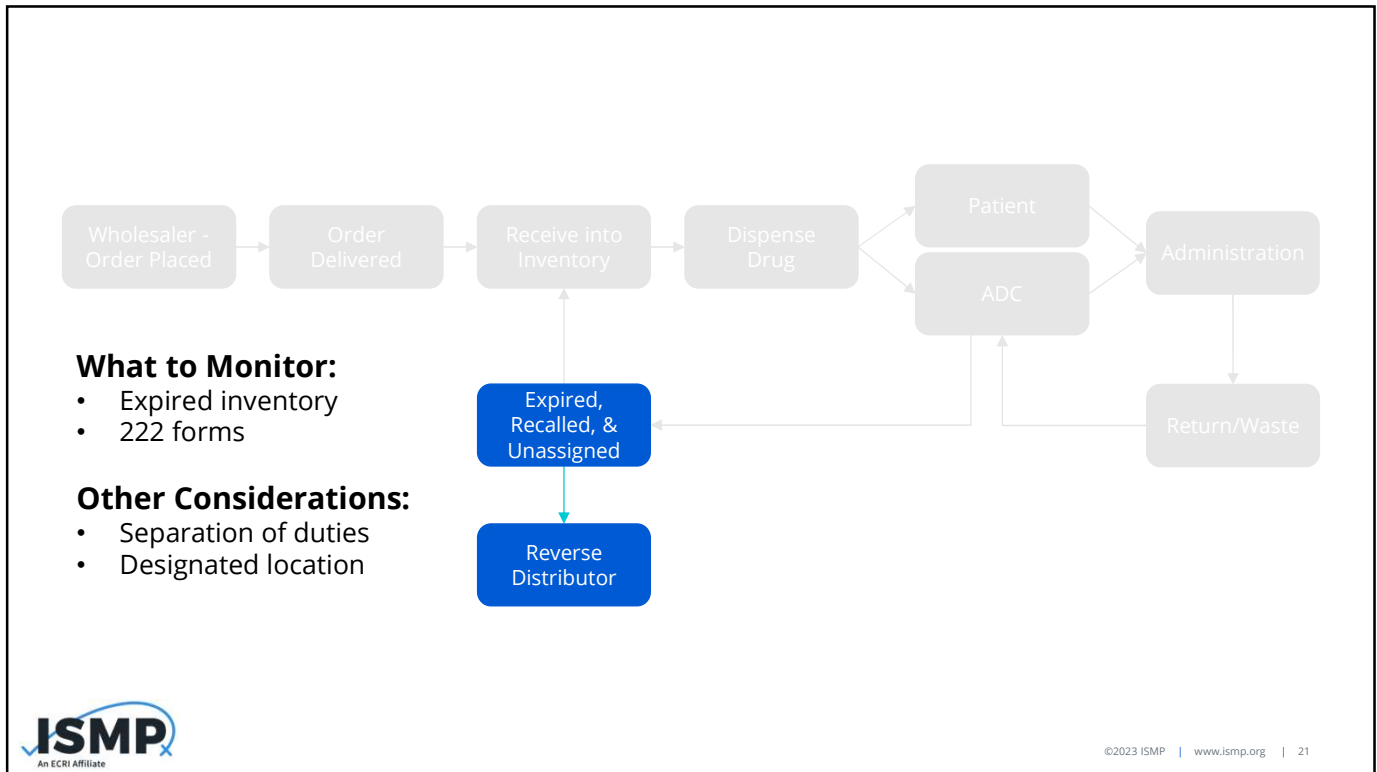


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Leadership & Advocacy

Consult on operational changes

- Controlled substance compliance
- Drug diversion risks

Committee involvement

- Diversion Oversight Committee
- Opioid Stewardship
- Medication Safety



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Lessons Learned

Overcoming Challenges



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Program Communication

How will information be shared and with whom?

Internal

- Diversion Team
- Leadership Personnel
- Suspected Diverter

External

- DEA
- State Licensing Boards
- Law Enforcement



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Program Standardization

Define *how* program activities are completed

Consistent across roles, practice settings, & level of concern

- Investigation process
- Monitoring & auditing
- Corrective action

Consistent day-to-day, regardless of auditor



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Monitoring & Auditing



Prioritize efforts



Know your limitations & restraints



Leverage technology for maximal coverage



Notified of system upgrades & workflow changes



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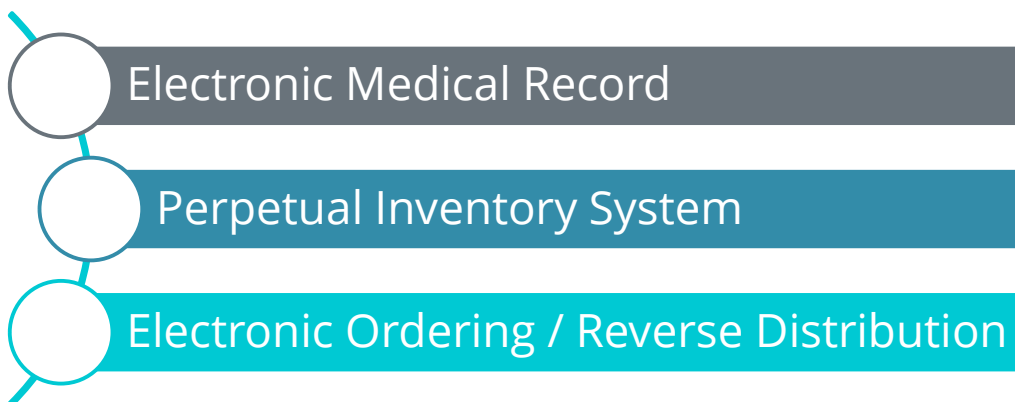
Harnessing Technology



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Core Systems

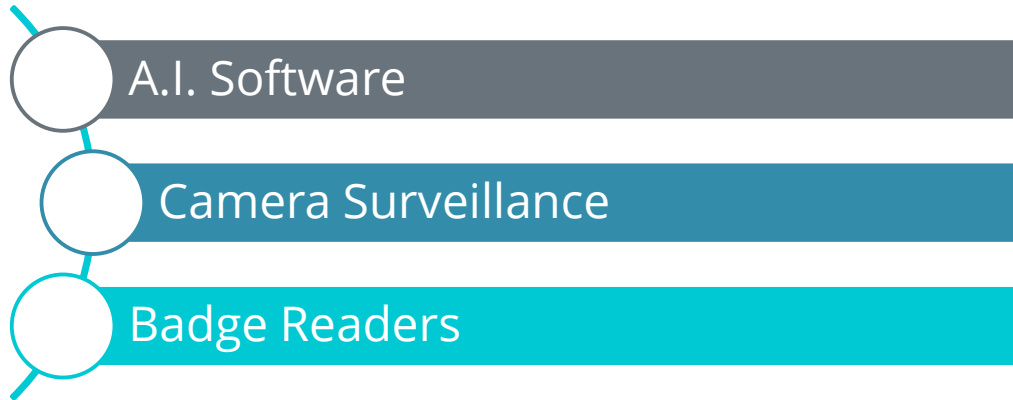


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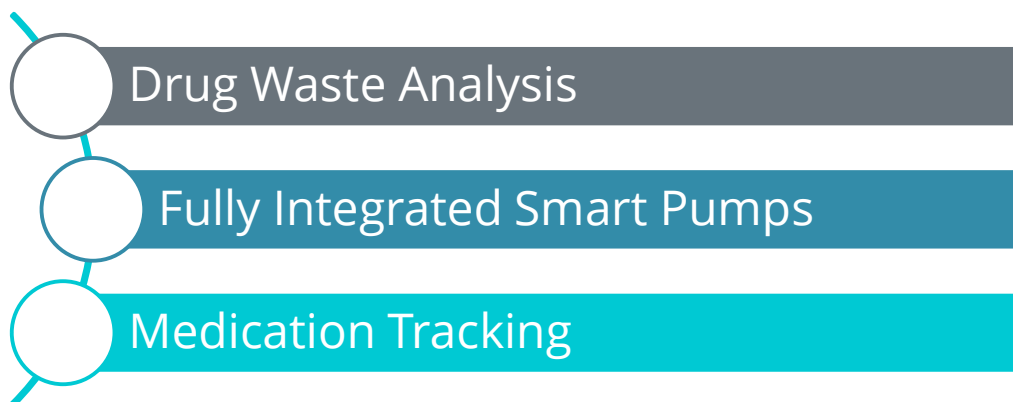
Fundamentals



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Next Gen



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Questions?

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Part II: Reducing the Risk and Infection Outbreaks from Drug Diversion

- Wednesday, March 15, 2023 – 1:00 to 2:00pm ET
- <https://www.ismp.org/events/part-ii-reducing-risk-and-infection-outbreaks-drug-diversion>



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References

1. U.S. Department of Health and Human Services. Centers for Medicare & Medicaid Services. Center for Program Integrity. (2012, January). Drug Diversion in the Medicaid Program: State Strategies for Reducing Prescription Drug Diversion in Medicaid. Retrieved January 30, 2023, from <https://www.cms.gov/Medicare-MedicaidCoordination/Fraud-Prevention/MedicaidIntegrityProgram/downloads/drugdiversion.pdf>
2. Department of Justice. U.S. Attorney's Office, Western District of Michigan. (2021, January). U.S. Attorneys Andrew Birge and Matthew Schneider Announce Record-Setting Drug Diversion Civil Penalty Settlement with McLaren Health Care Corporation. Retrieved January 30, 2023, from https://www.justice.gov/usao-wdmi/pr/2021_0119_MHCC
3. Department of Justice. U.S. Attorney's Office, District of Massachusetts. (2015, September). MGH to Pay \$2.3 Million to Resolve Drug Diversion Allegations. Retrieved January 30, 2023, from <https://www.justice.gov/usao-ma/pr/mgh-pay-23-million-resolve-drug-diversion-allegations>
4. Department of Justice. U.S. Attorney's Office, Western District of Virginia. (2022, June). Sovah Health to Pay United States \$4.36 Million to Settle Claims of Controlled Substance Act Violations. Retrieved January 30, 2023, from <https://www.justice.gov/usao-wdva/pr/sovah-health-pay-united-states-436-million-settle-claims-controlled-substance-act>
5. State of New Hampshire. Office of Professional Licensure and Certification, Board of Nursing. (2022, May). Retrieved January 30, 2023, from <https://www.oplc.nh.gov/sites/g/files/ehbemt441/files/inline-documents/sonh/nursing-matthews-emergency-suspension-20220526.pdf>
6. Department of Justice. U.S. Attorney's Office, Northern District of Texas. (2021, November). UT Southwestern to Pay \$4.5 Million to Resolve Alleged Controlled Substance Act Violations That Permitted Drug Diversion by Staff. Retrieved January 30, 2023, from <https://www.justice.gov/usao-ndtx/pr/ut-southwestern-pay-45-million-resolve-alleged-controlled-substance-act-violations>
7. Department of Justice. U.S. Attorney's Office, District of Massachusetts. (2022, December). Northeast Hospital Agrees to Pay \$1.9 Million to Resolve Allegations of Controlled Substance Recordkeeping Violations. Retrieved January 30, 2023, from <https://www.justice.gov/usao-ma/pr/northeast-hospital-agrees-pay-19-million-resolve-allegations-controlled-substance>

