The Pursuit of Prevention - Confronting Drug Diversion

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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.
Drug Diversion

The illegal distribution or abuse of prescription drugs or their use for purposes not intended by the prescriber\(^1\)

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

\(^1\)U.S. Department of Health and Human Services
Program Philosophy

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

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

Program Pillars

- **Prevention**
- **Monitoring**
- **Compliance**
Program Responsibilities

A day in the life of a drug diversion specialist

Prevention

Security

Physical Barriers

Policies
Monitoring

- Audits
- Surveillance
- A.I. Solutions

Compliance

- Registration
- Record Keeping
- Reporting
A day in the life...

- Daily Audits
  - Invoices
  - Discrepancies
  - Restocks
  - Expiration
- Team Meetings
  - Team sync
  - Investigation triage
- Investigations
  - Case reviews
  - Pending cases
- System Support
  - Education
  - Consulting
  - Compliance

Lower Frequency
- Wholesaler - Order Placed
- Order Delivered
- Receive into Inventory
- Dispense Drug
- Patient
- ADC*
- Expired, Recalled, & Unassigned
- Reverse Distributor
- Return/Waste

Higher Frequency
- Larger Quantities
- Smaller Quantities

*Automated Dispensing Cabinet
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What to Monitor:
- CSOS orders
- 222 forms
- Physical invoices
- Confirmation of receipt

Other Considerations:
- Separation of duty
- Surveillance cameras

**McLaren Health System**
- $7.75M fine + 3-year memorandum
- Distributed C-IIs to unregistered facilities

**Mass General Hospital**
- $2.3M fine
- Incomplete or missing inventories
- RN also diverting from ADCs
What to Monitor:
- Dispenses
- Delivery receipt
- Re-dispenses

Other Considerations:
- Method of delivery

What to Monitor:
- Practice patterns
- Administrations
- Re-dispenses

Other Considerations:
- Difficult to confirm
- Drug tampering
**What to Monitor:**
- Dispensed quantity
- Restock quantity
- Discrepancies

**Other Considerations:**
- Separation of duties

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**Sovah Health**
- $4.36M fine + 4-year memorandum
- Inventory sent to 'ghost' cabinets

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**Cheshire Medical Center**
- 583 fentanyl drips (1000mcg/100mL) diverted
- Under investigation

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*U.S. Attorney's Office, Western District of Virginia*

*State of New Hampshire Board of Nursing*
What to Monitor:
- Practice patterns
- Waste assay audit
- Camera surveillance

Other Considerations:
- Falsification of records
- Drug swapping

UT Southwestern
- $4.5M fine + 3-yr memorandum
- 2 nurses fatally overdosed

Northeast Hospital Corporation
- $1.9M fine + corrective action plan
- “Expired” 17,000+ C-IIs
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What to Monitor:
- Expired inventory
- 222 forms

Other Considerations:
- Separation of duties
- Designated location

Leadership & Advocacy

Consult on operational changes
- Controlled substance compliance
- Drug diversion risks

Committee involvement
- Diversion Oversight Committee
- Opioid Stewardship
- Medication Safety
Lessons Learned

Overcoming Challenges

Program Communication

*How will information be shared and with whom?*

**Internal**
- Diversion Team
- Leadership Personnel
- Suspected Diverter

**External**
- DEA
- State Licensing Boards
- Law Enforcement
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
Harnessing Technology

Core Systems

- Electronic Medical Record
- Perpetual Inventory System
- Electronic Ordering / Reverse Distribution
Fundamentals

- A.I. Software
- Camera Surveillance
- Badge Readers

Next Gen

- Drug Waste Analysis
- Fully Integrated Smart Pumps
- Medication Tracking
Questions?

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

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References


