

Drug Diversion Program Essential Components – SAMPLE

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Drug Diversion Specialist

Function:

- Oversees and directs the drug diversion program's daily activities, including auditing and surveilling.
- Delegates surveilling and auditing functions as appropriate.
- Implements and monitors the drug diversion/impairment reporting process.
- Collects drug diversion-related data from across the institution, including medication-handling issues, medication security issues, healthcare practitioner behavior/performance concerns, and patient complaints.
- Presents drug diversion program reports to executive leaders and the governing body, as appropriate.
- Maintains a drug diversion database.
- Serves as a drug diversion resource to the staff and the healthcare organization.
- Provides ongoing drug diversion training to new and existing staff members.
- Regularly reviews controlled substance handling and security policies and revises policies as warranted.
- Convenes the drug diversion response team when a drug diversion incident is suspected.
- Leads drug diversion investigations and interviews suspected drug diverters.
- Ensures that internal and external regulatory reporting occurs as required following each drug diversion event.
- Stays abreast of relevant standards and regulations, including those from The Joint Commission (TJC), Drug Enforcement Agency (DEA), Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA), Environmental Protection Agency (EPA), and state board of pharmacy.
- Chairs the drug diversion operating committee.
- Serves as the institutional drug diversion contact for external agencies and the community.

Qualifications:

- Strong analytical skills.
- Experience performing audits and investigations.
- Experience with interview techniques.
- Familiarity with drug diversion-related standards and regulatory requirements, including TJC's medication management standards; DEA, EPA, CDC, and FDA regulations; and the Centers for Medicare and Medicaid Services' relevant conditions of participation.
- Excellent communication, teaching, and supervisory skills.

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- Ability and willingness to work at odd hours and on short notice.

Supervises:

- Drug diversion auditor(s).

Drug Diversion Response Team

Function:

- Determines whether there is reasonable suspicion to intervene or to monitor a suspected drug diversion situation.
- Convenes on very short notice and at odd hours, if necessary.
- Questions the suspected staff member, requires a drug screen, and suspends the individual, if necessary.
- Collaborates with the diversion specialist and the diversion interview team to make appropriate arrangements for interviewing the suspected diverter.

Composition:

- Composed of individuals who are familiar with clinical practice, the institution's drug surveillance methods, and the policies regarding drug handling and reasonable suspicion drug testing.
- Team composition may change depending on the nature of the suspected drug diversion and on member availability.

Structured according to the organization's culture and needs, the team often includes:

- A diversion specialist.
- A pharmacy representative.
- A human resources representative.
- The suspected diverter's supervisor.
- A risk management professional.

Drug Diversion Interview Team

Function:

- Meets with and questions the suspected diverter, reviews evidence, and gives the suspected diverter an opportunity to explain.
- Ensures that paperwork associated with the interview/drug test is complete and is explained to the suspected diverter.
- Provides the suspected diverter with professional assistance and employee assistance program information, as appropriate.
- Facilitates the drug test and receives the final results.
- Determines the outcome of the investigation, assisted by the diversion response team as warranted.

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Composition:

Composed of a small group who confronts the suspected diverter; this group includes a support person for the suspected diverter.

Includes:

- A diversion specialist.
- A human resources representative.
- The suspected diverter's supervisor.

Drug Diversion Operating Committee

Multidisciplinary working group that provides expertise and perspective from across the organization.

Function:

- Directs and documents the institution's drug diversion prevention, detection, and response activities.
- Ensures that the drug diversion program receives appropriate executive and departmental support.
- Communicates with relevant departments and practitioners regarding the drug diversion program.
- Communicates proposed changes to departments with identified risk areas and oversees and evaluates self-monitoring measures by those departments.
- Facilitates the development and approval of policies, forms, and standard operating procedures.
- Performs a comprehensive systemic analysis following each drug diversion event, directs warranted changes, and reevaluates improved processes.
- Tracks and analyzes data from drug diversion events.
- Implements ongoing educational programs for the institution.

Composition:

- Pharmacy.
- Nursing (including a representative from high-risk areas).
- Anesthesiology.
- Medical staff.
- Security.
- Risk management or general counsel.
- Compliance.
- Human resources.

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Updated: May 2022

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- Employee health.
- Environmental services (ad hoc as needed for sharps and waste management issues).

Leadership and Reporting:

Reports activities to executive leadership quarterly and the governing body annually.

- Chair – Drug diversion specialist.
- Co-chair – Pharmacy representative.

Meetings:

Meets at least quarterly; more frequently during initial development of the drug diversion program.

Drug Diversion Risk Rounds

On-site review of processes to identify drug diversion risk areas and hazardous medication-handling processes across the institution.

Function:

- Conducts drug diversion risk rounds across the institution wherever controlled substances are located.
 - Pays particular attention to high-risk areas, to include procedural areas, anesthesia workroom, drip preparation areas, and clinical units that have increased nursing autonomy and less supervision.
- Conducts unannounced rounds at least quarterly and as needed.
- Documents and communicates round findings, including opportunities for improvement, to the supervisor of the relevant department to decrease drug diversion risk and to the diversion operating committee.

Composition:

Limit team to a small number of individuals to minimize disruption of clinical activities. The team composition may vary depending on the unit under observation. A department representative may need to accompany the team.

Includes:

- Diversion specialist.
- Pharmacy representative.
- Nursing or anesthesiology representative (optional).

If the interview involves law enforcement, is in a facility where a security officer leads the interview, and/or the suspected diverter is a union member, the composition and function of the diversion interview team may differ.

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