

Drug Diversion Prevention, Detection, and Response Policy – SAMPLE

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Policy #:						Page 1 of 3
Policy Title:	Drug Diversion Prevention, Detection, and Response Policy					
Policy Category:						
Distributed By:						
Effective Date:		Supersedes Policy:				
Date Reviewed:						
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Related Policies:						

Policy Statement

(Insert organization name) is committed to the delivery of safe, quality care. Drug diversion by healthcare professionals creates a significant patient safety risk. Prevention, detection, and reporting of drug diversion are the responsibility of all (insert name of organization) staff. All (insert organization name) staff are expected to comply with state and federal laws and regulations regarding medication handling and security, as well as all policies of (insert organization name).

Purpose/Objective

To implement a drug diversion prevention, detection, and response program (drug diversion program) that provides a systematic, coordinated, and continuous approach to the prevention, recognition, and reporting of drug diversion.

Definitions

- **Drug diversion:** Unauthorized taking or use of any medication, including medication waste.
- **Medication Dispensing Cabinet (MDC):** drug dispensing cabinet (locked or automated).

Procedure

- **Pre-employment Background Checks**
 - In accordance with Drug Enforcement Agency (DEA) guidelines, (insert organization name) obtains information about prior convictions of crimes and prior unauthorized use of controlled substances as a part of the background check performed on all potential employees.
 - (Insert organization name) also seeks information from candidates regarding prior medication handling issues and involvement with drug diversion. The information obtained is considered as a portion of the candidate's overall evaluation and qualifications process. (Insert organization name) protects the candidate's right to privacy by maintaining response confidentiality.
- **Drug Diversion Specialist**
 - (Insert organization name) employs a drug diversion specialist who directs the daily operations of the drug diversion program. The diversion specialist oversees all

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aspects of drug diversion education, prevention, surveillance, investigation, and reporting at (*Insert organization name*).

- **Education**

- All new staff members receive education about drug diversion in new hire orientation and participate in drug diversion training. Drug diversion training is tailored to the staff member's job responsibilities and includes healthcare facility drug diversion risks, drug diversion/impairment warning signs, and reporting requirements. All staff are educated regarding response when drug diversion/impairment is suspected.

- **Clinical Staff Members**

- As a part of orientation, all clinical staff members receive a separate training session devoted exclusively to drug diversion. Access to controlled substances and the MDC is not permitted until this training is completed.

- **Drug Handling**

- (*Insert organization name*) adopts drug handling policies that address physical security controls and operating procedures to guard against theft and controlled substance diversion. At a minimum, consider the following:
 - Ordering, receiving, stocking, and transporting controlled substances within the institution.
 - Maintaining current and accurate records to include receipt and disposition for all controlled substances.
 - Reconciling controlled substance discrepancies, including appropriate waste management and use of biohazard containers.
 - Storing procedures to prevent unmonitored access by unauthorized individuals.
 - Dispensing procedures that address the security of controlled substances from the time of removal to the time of administration.
 - Reporting abuse and loss of controlled substances, in accordance with applicable federal and state laws, to the pharmacy director, the chief executive officer (CEO), and (*insert name of organization*) governing body, as appropriate.
- If tampering or drug diversion occurs, or if medication security otherwise becomes a problem, (*insert organization name*) evaluates its current medication security and handling procedures and implements the necessary systems and processes to ensure that the problem is addressed and patient health and safety are maintained.

- **Auditing and Surveillance**

- (*Insert organization name*) will maintain a drug diversion auditing and surveillance program to enable the prompt identification of the loss or diversion of controlled substances and to quickly identify the individual(s) responsible. The diversion specialist will have primary responsibility for daily surveillance activities.
- The auditing and surveillance program addresses the following:
 - Methods of surveillance/auditing:
 - Concurrent review of MDC data and medical records.
 - Random auditing and reconciliation focusing on controlled substance removals with medical record documentation.
 - Statistical thresholds requiring focused review.
 - Regular drug diversion risk assessment rounds.
 - Random chemical analysis of waste (refractometry) from procedural areas.

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- Process for monitoring and addressing improper or risky medication handling practices via progressive corrective action.
- Surveillance cameras in high-risk areas and other areas as appropriate.
- Procedures to be undertaken when drug diversion is suspected or identified.
- **Drug Diversion Response**
 - (*Insert organization name*) formalizes a drug diversion response team that is led by the diversion specialist and is available to respond to all suspected or known drug diversion cases 24/7. When reasonable suspicion for drug diversion/impairment occurs, as defined by (*insert organization name*) policy, the response team will convene and review relevant data. The team will decide whether to monitor the situation or to intervene. To protect patient safety, the response team will be authorized to commence a thorough drug diversion investigation, including interviewing, drug testing, and suspending the suspected diverter.
- **Reporting**
 - In order to ensure patient safety and in accordance with DEA guidelines, any (*insert organization name*) staff member who has knowledge or suspicion pertaining to drug diversion activities or impairment has an obligation to report such information immediately to a supervisor (or via an anonymous reporting system). The diversion specialist evaluates each report and convene the diversion response team if appropriate.
 - When drug diversion is confirmed, the diversion specialist ensures that all required internal and external reporting occurs, including reporting to the pharmacy director, the CEO, and the governing body, as well as to local and federal authorities.
- **Diversion Operating Committee**
 - (*Insert organization name*) establishes a multidisciplinary diversion operating committee, chaired by the diversion specialist, which meets regularly to direct (*insert organization name*) drug diversion prevention, detection, and response processes. The committee monitors and supports the drug diversion program and maintains and analyzes data regarding drug diversion incidents at (*insert organization name*). The diversion operating committee communicates proposed changes to departments that have identified risk areas and oversees and evaluates their corrective action and self-monitoring measures. In compliance with the medication management standards of The Joint Commission and other regulatory requirements, the diversion operating committee undertakes a comprehensive systemic analysis of all drug diversion incidents at (*insert organization name*) and directs and monitors relevant process changes as appropriate.

Resources

- U.S. Department of Health and Human Services, Centers for Medicare and Medicaid Services. *State Operations Manual – Appendix A – Survey Protocol, Regulations and Interpretive Guidelines for Hospitals*. Rev. 200, 02/21/2020.
- Title 21 CFR §1301.91, et seq. [Employee Responsibility to Report Drug Diversion](#)
- The Joint Commission. *Accreditation Requirements – Hospital Program*. Medication Management Standards. Oakbrook Terrace, IL: The Joint Commission, Joint Commission Resources; Effective January 1, 2019.

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- The Joint Commission, [Quick Safety. Drug Diversion and Impaired Health Care Workers.](#)

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