



QuintilesIMS™

Diversion in Health Care Setting

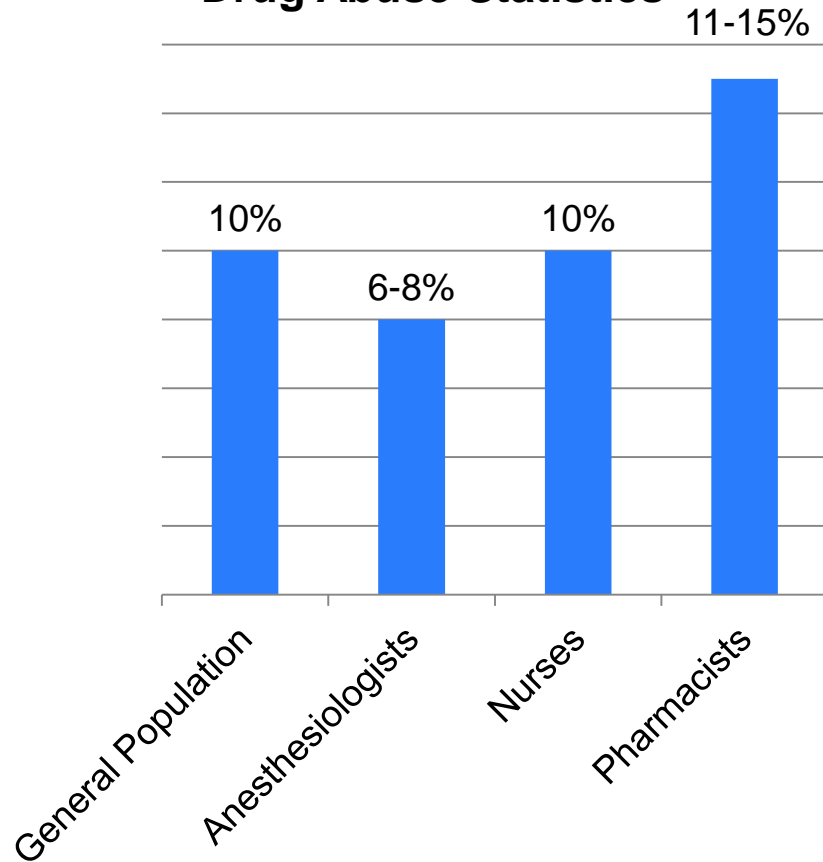
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BuzzeoPDMA

Drug Abuse Among Healthcare Professionals

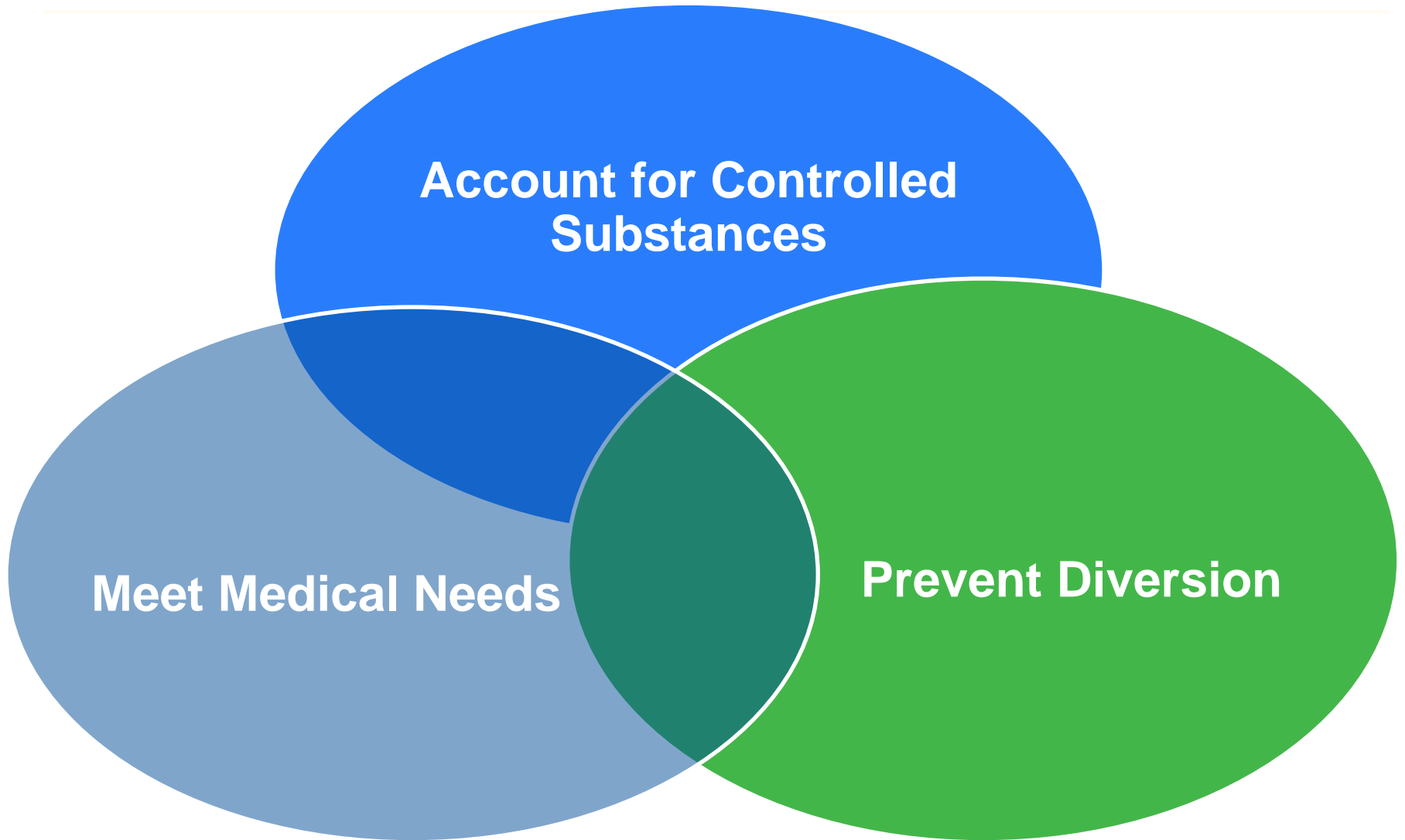


Drug Abuse Statistics

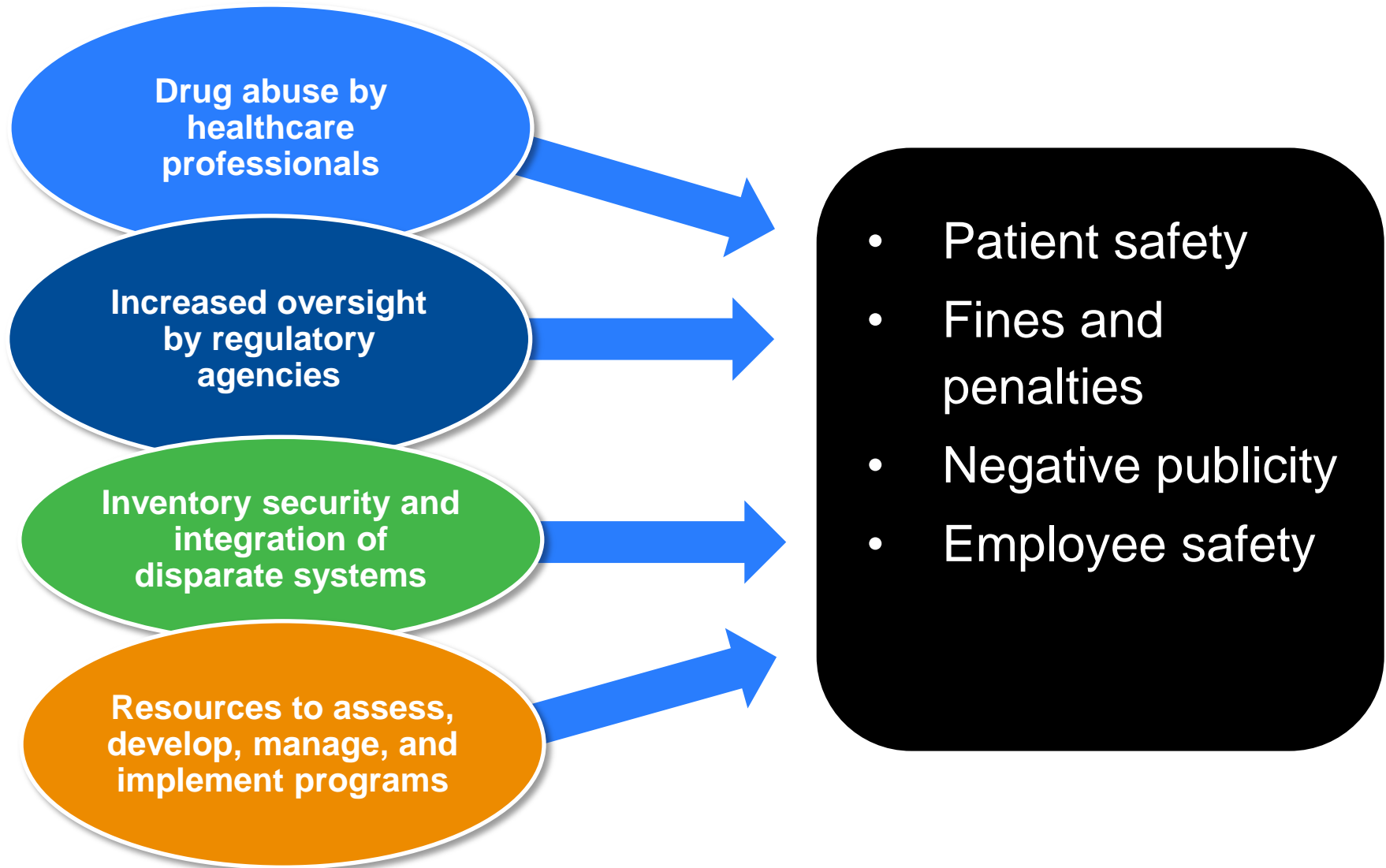


- Employee prescription drug abuse is often hard to see
 - > Diversion methods are often not discovered until the abuser reaches very high doses
 - > They are often otherwise your best employees
 - > Typical timeframe for discovery 1 to 1.5 years

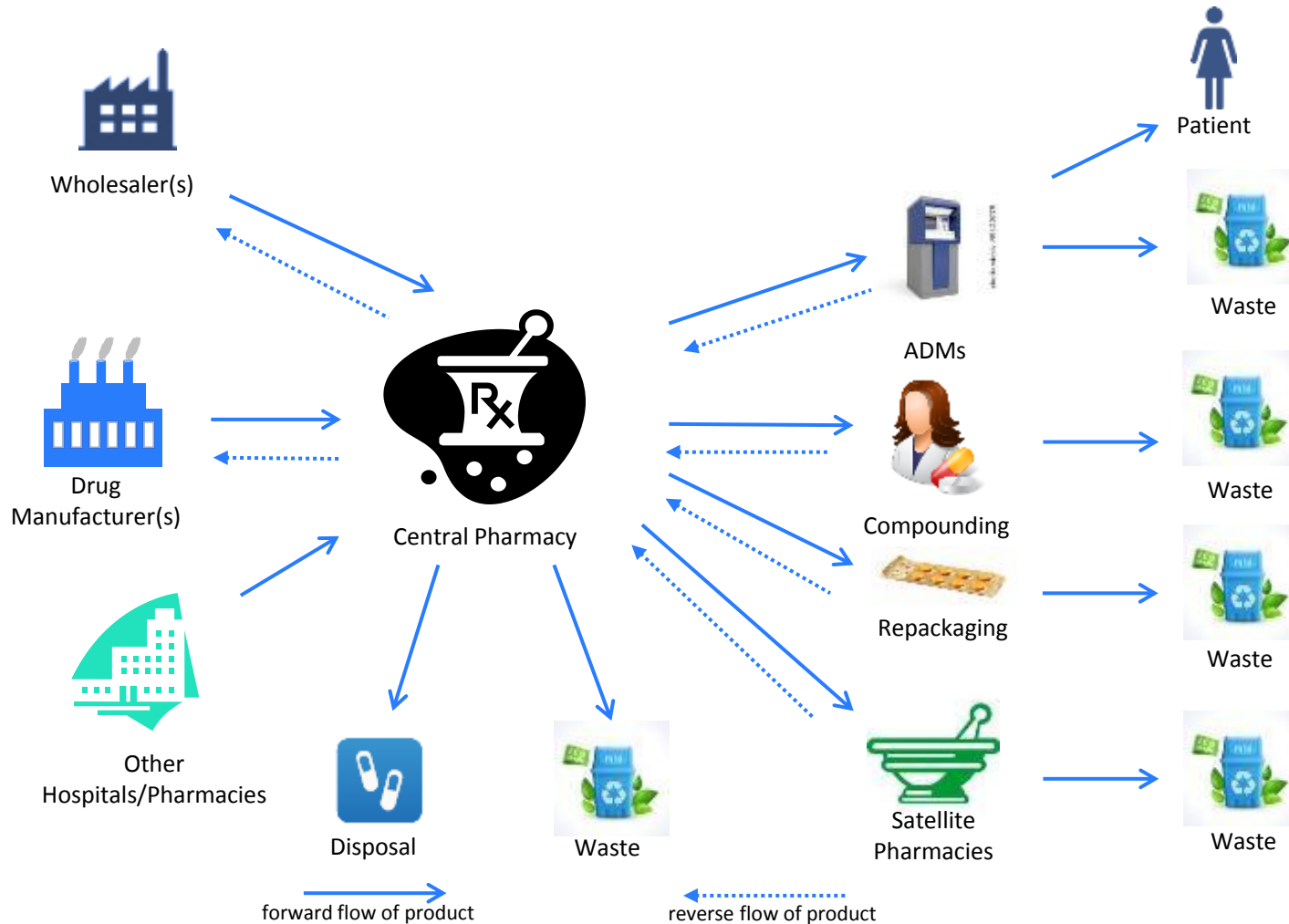
Diversion Detection: A Comprehensive Approach



Complexity of the Hospital Environment



Monitoring Drugs at Risk of Diversion



Diversion Detection Process



5 Things Learned From a Drug Addicted Nurse*



- **There's nothing to keep you from stealing drugs and needles**
- **Patients don't know if they are being short-changed on their meds**
- **It's easy to get away with it even if you get caught**
- **There's no incentive to seek help**
- **Hospitals can't fix the problem**

*Cracked.com; July 2014

DEA Diversion Case

Dignity Health -2014



- \$1.55 million settlement with corrective action plan
- Resolved claims it mishandled controlled substances
- The 37-hospital system paid \$1.25 million immediately, with the remainder to be submitted as deferred payment pending two-year compliance action plan
- Involved theft of between 20,000 – 30,000 hydrocodone tablets from its outpatient pharmacy in 2010 and 2011
- Numerous recordkeeping errors, such as missing signatures on delivery slips and inventory adjustments, as well as missing invoices

DEA Diversion Case

Mass General Hospital – September 2015



- Largest DEA settlement (\$2.3M) involving drug diversion allegation of a hospital registrant
- Investigation took place over about an 18 month period
- MGH self-reported thefts. Two nurses stole approx. 16,000 oxycodone
- Violations stem from:
 - Missing Drug Records
 - Incomplete Inventories
 - Failure to report thefts in a timely manner
 - Failure to provide effective controls against diversion
- Outcome for MGH
 - Cash Settlement
 - Corrective Action Plan
 - » Mandatory Training
 - » External Audit Program for 3 years
 - » Increased physical security controls (mandatory bio id for ADM access)

State Diversion Case

Emory Midtown Hospital - March 2016



- Conducted by the Georgia Bureau of Narcotics; DEA was not involved in this case
- Fined \$200,000 and 2 year probation
- Pharmacy Technicians stole pharmacist password for ordering, deleted the order once placed and then had access to paperwork that would be destroyed once product was received.

State and DEA Diversion Case

Seattle Cancer Center Alliance - July 2016



- Seattle, Washington - \$250,000 settlement and preventative action plan
- Falsification and altered prescriptions for 42 patients of the Center
- Pharmacy filled the prescriptions without due diligence to verify legitimacy of the prescription

Nursing Operational Challenges



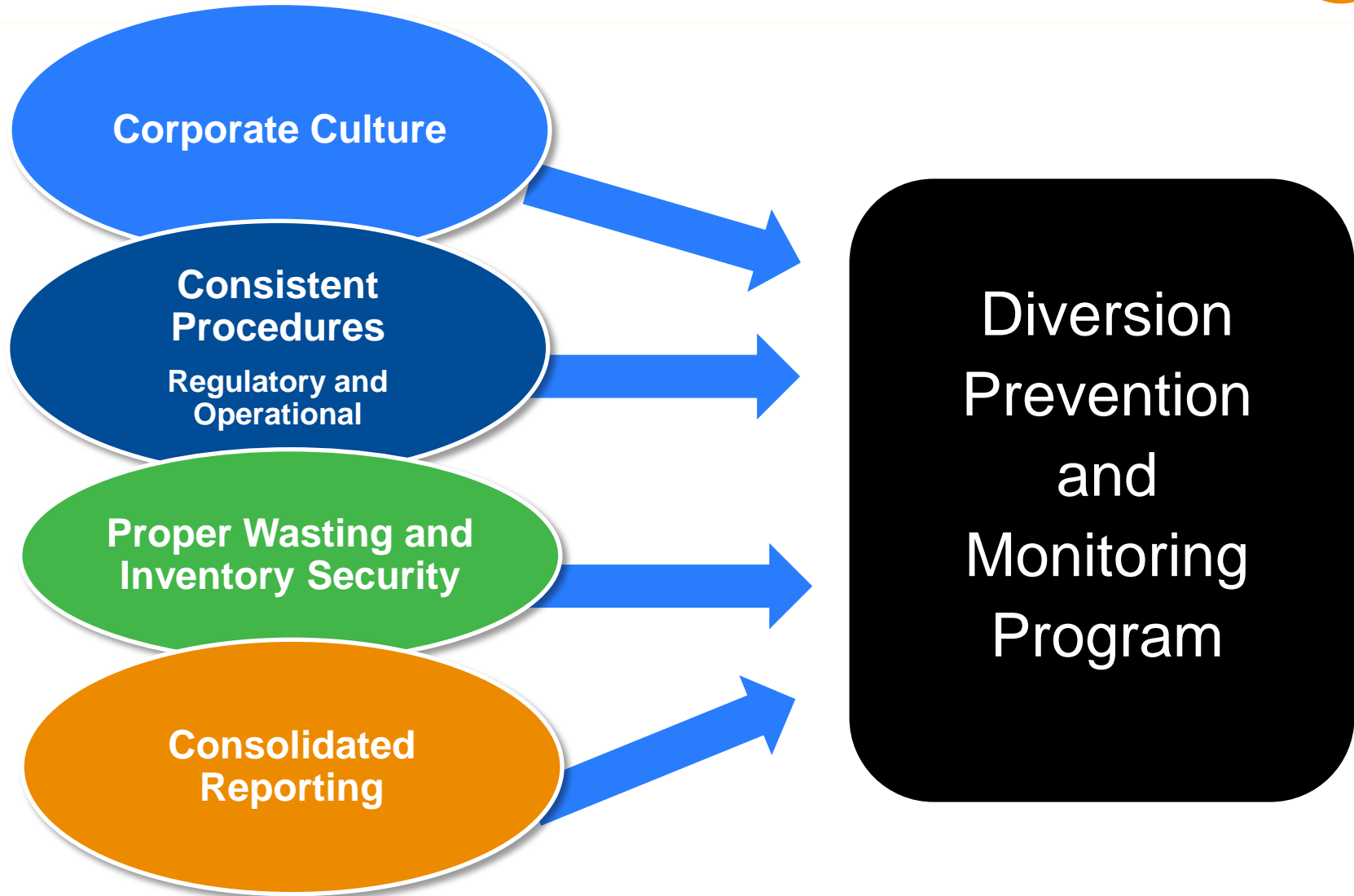
- Multi-dosing for pain management from single dose vials
- Chain of custody compliance
- Range orders
- Tracking of staff dispensing if not on the schedule
- Float or travel nurse monitoring across multiple work areas
- Proper tracking of patient-owned medications
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Anesthesia Practice Issues



- High Use of Opiates
- High Wastage of Controlled Substances
- Transactions on Cancelled Cases
- Late ADM Transaction Documentation
- Mismatched Location Transactions
- Mismatched Location Quantities

Success in Diversion Surveillance



State Focus on Hospital Diversion Programs



- New Hampshire – HB597
 - > Drug Free Workplace for Licensed Health Care Facilities
 - > Effective – August 2014
 - > Requires a policy establishing procedures for prevention, detection, and resolution of substance abuse, misuse or diversion in the workplace.
 - Training
 - Monitoring of inventory for diversion detection
 - Voluntary self-referral by addicted employees
 - Process for co-worker reporting
 - Drug Testing (for cause) What about Random??
 - Employee Assistance
 - Maintain confidential process
 - Processes for investigation, reporting, and resolution
 - Consequences for violations

State Focus on Hospital Diversion Programs



- California Proposed Regulation
 - > Focuses on physical inventory and inventory reconciliation requirements
 - > Loss and theft prevention
 - > Quarterly inventory counts and reconciliations
 - > Report thefts and losses to the Board

Thank you

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