

# PREVENTING DRUG DIVERSION AS A PROVIDER

- Education
- Policies
- Implementation
- Reporting

The following information can be found at [Michigan.gov](http://Michigan.gov), "*Guard your Meds: Developing a Diversion Prevention Program*"

# EDUCATION

Education serves three purposes:

1. It warns those considering diverting,
  2. Cautions those who may be vulnerable to addiction and diversion,
  3. And enables staff to recognize and report signs that may indicate a colleague is impaired or diverting.
- Clinical staff should receive an additional training session devoted exclusively to the topic drug diversion. They should be educated on recognizing and reporting signs of diversion and impairment.

# POLICIES

- Must Adhere to the Requirements of:
  - Agencies:
    - Joint Commission
    - CMS Conditions of Participation
  - Federal:
    - The Controlled Substance Act
    - DEA regulations
  - State:
    - Medical Boards Rules
    - Pharmacy Board Rules

- Polices should cover:
  - Drug security and handling
  - Responsibility for surveillance
  - Reasonable suspicion testing
  - And the actions taken when diversion is suspected or confirmed.

# IMPLEMENTATION

- Facilities may choose to have their diversion program implemented by:
  - A diversion specialist who works independently and collaborates with others as appropriate
  - A multidisciplinary diversion team led by a diversion specialist
- The diversion specialist or team should:
  - Monitor trends within the facility
  - Ensure that policies and procedures are being followed
  - Conduct diversion risk rounds quarterly
  - Report to facility administration at least annually.

# REPORTING

- Reporting of drug diversion activity to federal, state and local law enforcement and professional licensing boards is mandatory.
- Develop a collaborative working relationship with local law enforcement so that diversion cases can be handled appropriately.