Identification and Prevention Strategies for Medication Diversion

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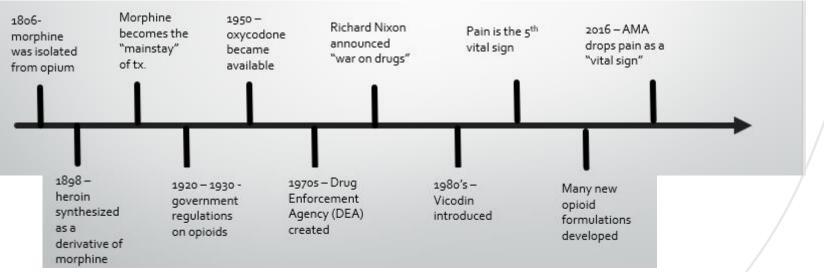


Objectives

- Define drug diversion and understand some of the costs associated with it
 - Determine who may be at risk for diverting medications
- Identify patient care and behavioral indicators that may be seen when a person is diverting medications
- Understand strategies available to help prevent drug diversion in the healthcare setting



History of Opioids





Opioid Pendulum

Pendulum of opinion

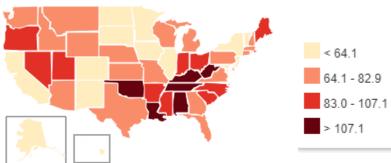
Depioids are evil Sedatives

Opioids are evil Sedatives are great Sedatives are evil Opioids are great



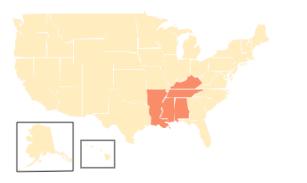
Opioid Dispensing Rates

2006



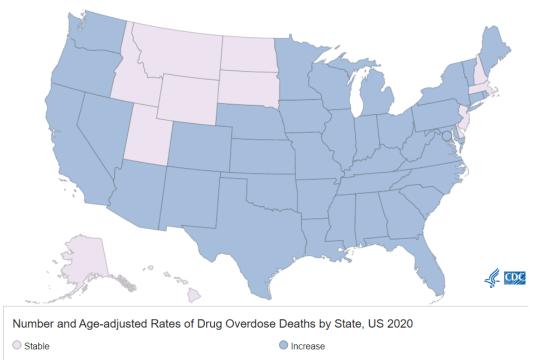








Drug Overdose Deaths

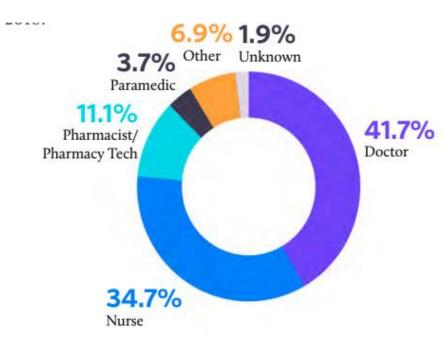




What is Drug Diversion

- Diversion: the unlawful use or distribution of medications in a way that was not intended by the prescriber of those medications
 - Considered theft regardless of intended use
 - Most commonly, it involves a controlled substance medication
- Diversion is relatively common among healthcare workers
 - Not routinely/openly discussed
- May go undetected for a significant amount of time

Medication Diversion by Role

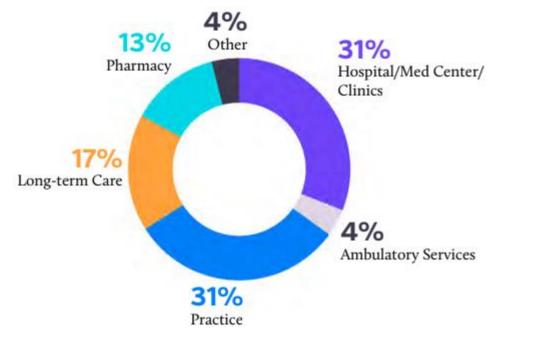


Some researchers say as many as 10% of all medical professionals will divert drugs from their workplace at some point in their career.



Protenus Diversion Digest – 2020 PSQH – Full transparency is key to stopping drug diversion

Medication Diversion by Setting





Common Medications being Diverted

| Drug Class | Examples of Drugs Within a Drug Class |
|---------------------------------------|--|
| Anabolic Steroids | methyltestosterone, testosterone |
| Central Nervous System Depressants | Barbiturates: pentobarbital Benzodiazepines: alprazolam, diazepam |
| Hallucinogens | ketamine |
| Opioids | diphenoxylate, fentanyl, hydrocodone, hydromorphone, meperidine, methadone, morphine, oxycodone, oxymorphone |
| Stimulants | amphetamine, dextroamphetamine, methamphetamine, methylphenidate |



Needle in a Haystack???





Risk Points of Drug Diversion

| Procurement | Purchase order and packing slip removed from records Unauthorized individual orders for CS on stolen DEA Form 222 Product container is compromised | | |
|-------------------------------|---|--|--|
| | | | |
| Preparation and Dispensing | CS are replaced by product of similar appearance when prepackaging Removing volume from pre-mixed infusion Multi-dose vial overfill diverted Prepared syringe contents are replaced with saline solution | | |
| | | | |
| Prescribing | Prescription pads are diverted and forged to obtain CS Prescriber self-prescribes CS Verbal orders for CS created but not verified by prescriber Written prescriptions altered by patients | | |
| | | | |
| Administration | CS are withdrawn from an ADD on discharged or transferred patient Medication documented as given, but not administered to patient Waste is not adequately witnessed and subsequently diverted Substitute drug is removed and administered while CS is diverted | | |
| | | | |
| Waste and Removal | CS waste is removed from unsecure waste container CS waste in syringe is replaced with saline Expired CS are diverted from holding area | | |



12

"a procedural sedation nurse was found to have a secret pocket sewn inside her uniform top in which she dropped syringes and substituted them with syringes filled with saline"

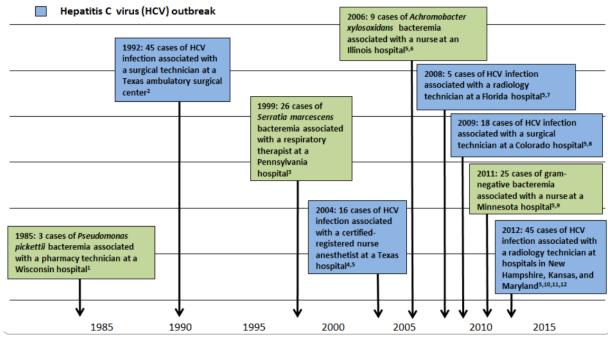
- "a radiology tech with hepatitis C diverted unused fentanyl syringes intended for administration to patients and 5 patients became infected with the virus"
- "an EVS team member rummaged through sharps container withdrawing miniscule amounts left over in the bottom of vials"
- "a nurse with an eating disorder pocketed furosemide and gave the patient doses of acetaminophen in its place"
- "a pharmacy technician stole 4 doses of Neulasta at a time (\$2600/dose). Over a 3 year period, there was a \$14 million loss to the cancer center"

Cost of Drug Diversion

- \$\$\$ medication lost/diverted
- Billing insurance for fraudulent prescriptions
- Ioss of reputation for institution
- Risk of Infection
- Impaired healthcare workers
- Fines from DEA
- Lack of pain control and/or treatment for patients

Risk of Infection

Bacterial outbreak





Indicators for Potential Diversion



Patient Care Indicators

- Inconsistent or incorrect charting
- Displays inconsistent work quality with times of high and low efficiency
- Offers to medicate other nurses' patients on a regular basis
- Obtains larger dose of narcotics when the ordered dose is available, the documents
- Requests to care for specific patients

- Illustrates specific narcotic use with patients under his/her care
- His/her patients reveal consistent pain scale patterns or complain that narcotics are not having the desired effect (especially when administered as needed) only on that shift
- Frequent or lengthy ADC activity by an individual outside of common medication administration times



Behavioral Indicators

- Isolates self from others, eats meals alone, avoids staff social events
- Frequent, unexplained disappearances during shift
- Often shows up on days off to finish work or retrieve forgotten items
- Frequently volunteers to work extra shifts

- Frequent spills or wastes of narcotics
- Chaotic home/personal life
- Refused to comply with narcotic diversion investigational procedure
- Medications in uniform pockets or taken home



Automated Dispensing Cabinet Indicators

- Frequent or unwarranted override withdrawal of meds
- Early withdrawal of doses (more often than ordered frequency)
- Simultaneous withdrawal of like medications (two different pain meds)
- Frequent "cancelled" transactions

- Frequent "inventory" transactions
- Unexpected increase in med utilization
- Suspicious verbal orders (following an override withdrawal, unusually high dose or frequency)



Strategies to Prevent Diversion



Components of Drug Diversion Detection Program

| | Core Administrative Elements | Legal and regulatory requirements Organization oversight and accountability |
|--|------------------------------------|--|
| | System-Level Controls | Human resources management Automation and technology Monitoring and surveillance Investigation and reporting |
| | Provider-Level Controls | Chain of custody Storage and security Internal pharmacy controls Prescribing and administration Returns, waste, and disposal |
| | | / |



Diversion Assessment Added Activity from 07/23/2022 through 08/22/2022 NEW

Added by Protenus Aug 24, 2022 5:00 PM based on data available Aug 24, 2022

| Suspicion Score | Unreconciled Drugs | Incidents |
|-----------------|--------------------|-----------|
| 96 | No | 44 |

Statistics Ordered by Z-Score

Peer Group ADCs: BA-PACU1, BA-PACU2

| DESCRIPTION | MEAN | Z-SCORE | SUSPICION | |
|--|-------|---------|-----------------|-----|
| 34 dispenses or cancellations of drug pair 1000676 Dilaudid (HYDROmorphone Inj *PF*) and 1891949 Zofran (Ondansetron Inj 2 mg/mL) within 10 minutes of each other. | 2.02 | 14.52 | Very Suspicious | n |
| 74 wastes of controlled drugs in the user's peer group. | 13.16 | 3.37 | Very Suspicious | |
| 21 order overrides for controlled drugs in the user's peer group. | 2.84 | 3.28 | Very Suspicious | |
| 9 dispensations of 1871541 - Demerol (Meperidine Inj) in the user's peer group. | 3.33 | 2.45 | Suspicious | tor |
| 112 dispensations of controlled drugs in the user's peer group. | 27.32 | 2.43 | Suspicious | |
| 10 returns (10 to bin, 0 to stock, 0 to pharmacy) of controlled drugs in the user's peer group. | 1.89 | 2.34 | Suspicious | |
| This user performed an average of 8.0 dispensations of controlled drugs per shift. | 2.78 | 2.07 | Suspicious | |
| 20 total returns (10 to bin, 10 to stock, 0 to pharmacy). | 5.50 | 1.80 | Suspicious | |
| The average time that elapsed between the first and last dispensation for each of the user's shifts is 7.3 hours. | 6.55 | 0.25 | | |
| This user's longest shift utilizing the ADC machines lasted 10.5 hours. | 10.10 | 0.12 | | |

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Audits – things to look for

- Unreconciled medications
- Delayed administration/waste
- Batch wasting
- Waste partners
- Change in custody
- Waste full dose
- Pain scale patterns
- Dispense, administer, waste/return timing

Prevention Strategies

- Only remove current dose of medication for your patient
- Properly document medication administration and pain scores
- All wastes of medications must have a documented witness
- Do not be a "virtual witness" to medication wasting
- Do not loan your ID badge or pass codes to anyone
- Return unused medications according to procedure
- Report/resolve medication discrepancies promptly
- Report attempted inappropriate access to medications when identified
- Change ADC password every 6 months



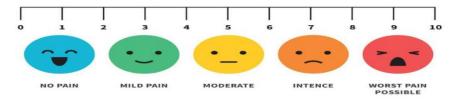
- Avoid removing multiple doses of the same medication at the same time
- Pulling multiple doses at once requires you to "hold onto" unused doses for longer than needed
 - Higher potential for misplacing med
 - Med could get mixed up with different patient meds
 - Med could be taken home inadvertently

One Moment One Task One Priority One FOCUS



Pain scores can provide accurate picture to patient care

- Why are we administering meds if pain score is 0?
- Why are we not giving meds if pain score is 10?
- Are pain scores consistent from shift to shift?
- Is pain re-assessment documentation missing?



PAIN MEASUREMENT SCALE



"I just wasted this... can you be my witness?"

"look, there is 50mcg waste in this syringe!"

Rhetorical question: How many of you have fallen victim to poor waste practices?







Team members who handle controlled substances are expected and empowered to "see something, say something."

Reporting Obligations

- The facility MUST report drug diversion incidents to all relevant federal and state agencies
- DEA must be notified immediately in the event of the theft or significant loss of a controlled substance
 - DEA 106 forms
- State laws vary, but reporting is mandatory in a majority of the states
 - Board of Pharmacy
 - Board of Nursing
 - Other state regulatory bodies

Ethical Obligations

• The ethical principles of benevolence (the duty to benefit another) and justice (the equal or comparative treatment of individuals) obligate health care professionals to provide humane care to all patients



Autonomy Respect a person's freedom to choose what's right for them







Summary

- Drug Diversion is very common
- If we don't look for it, we won't find it
- Each scenario of drug diversion is different
 - Tools can help identify potential issues
 - Objective data cannot tell the full picture
- We all have an obligation to report suspicious activity
 - We owe it to our patients
- Resources are available for those who need assistance

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