



FROM AWARENESS TO ACTION

Strategies for Drug Diversion Prevention and Detection

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- 550 BED LEVEL I TRAUMA CENTER
- BUFFALO NY
- NO DISCLOSURES





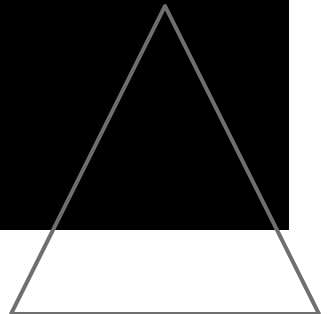
OBJECTIVES

- DEFINE DRUG DIVERSION
- DISCUSS THE IMPACT OF DRUG DIVERSION
- DISCUSS PREVENTION STRATEGIES
- DISCUSS THE ROLE OF TECHNOLOGY IN DETECTION
- SHARE CASE STUDIES



DRUG DIVERSION

- **ISMP** – A MEDICAL AND LEGAL CONCEPT INVOLVING THE ILLEGAL MOVEMENT, ADULTERATION, MARKETING OR TRANSFER OF ANY LEGAL MEDICATION ANYWHERE WITHIN THE SUPPLY CHAIN. ¹
- **NY BUREAU OF NARCOTICS ENFORCEMENT (BNE)** – MANUFACTURE, POSSESSIONS, DELIVERY OR USE OF A CONTROLLED SUBSTANCE BY A PERSON OR IN A MANNER NOT SPECIFICALLY AUTHORIZED BY LAW. ²
- **CMS** - THE ILLEGAL DISTRIBUTION OR ABUSE OF PRESCRIPTION DRUGS OR THEIR USE FOR UNINTENDED PURPOSES. ³



Diversion By the Numbers



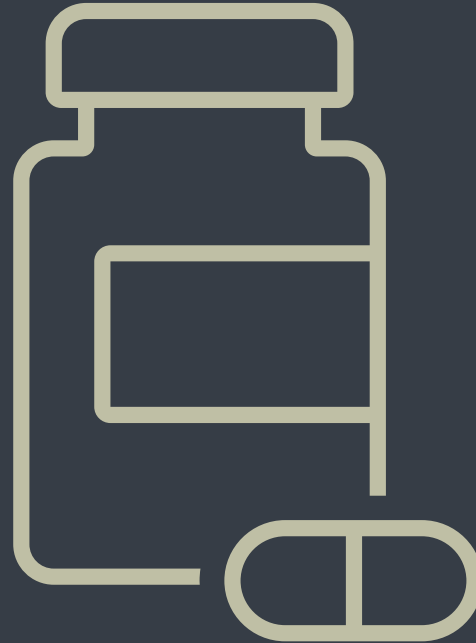
Opioids

The most commonly diverted drugs in a healthcare setting⁴



1 in 10

Healthcare workers misuse drugs or alcohol during their career¹



Injectables

Many healthcare workers who divert drugs start with injectables.¹



Machined Learning⁵

96.3% Accuracy

95.9% Specificity

96.6% Sensitivity

Diversion detected an average of **160** days faster

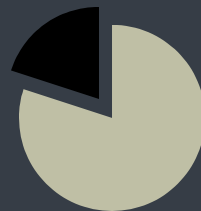


Anesthesia

Psychotropic drug use and addiction is now considered an occupational hazard⁴

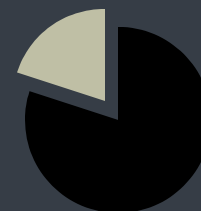
96%

Of healthcare executives agree that diversion is occurring in US hospitals¹.



17%

Of healthcare executives agree that diversion was occurring in their facility¹.



Personal Use

Drugs diverted from health care facilities are most commonly used to support an additional of either the HCW or an associate.

VICTIMS OF DIVERSION



Employee



Patient



Co-Workers



Health Care
Systems

Former Nurse Sentenced for Drug Diversion from Boston-Area Hospital

BOSTON – A former nurse was sentenced yesterday in federal court today in Boston for diverting opioids from a Boston-area hospital.

Andrea Falzano, 39, of Winchester, was sentenced by U.S. District Court Judge Nathaniel M. Gorton to three months in prison and one year of supervised release. In August 2023, Falzano pleaded guilty to three counts of unlawfully obtaining controlled substances by fraud, deception, and subterfuge.

Boulder DailyCamera.com Colorado, News, Business, Sports, Homes, Jobs, Cars and Information Story

Former Boulder Community Hospital nurse sentenced to 4 1/2 years for stealing meds

By Vanessa Miller, Camera staff writer

NEWS

Hospital tech who spread hep C via drug thefts gets 30 years

Ex-hospital worker gets 39 years for causing hepatitis C outbreak

MICHIGAN

McLaren Health and feds reach record \$7.75M settlement of drug allegations

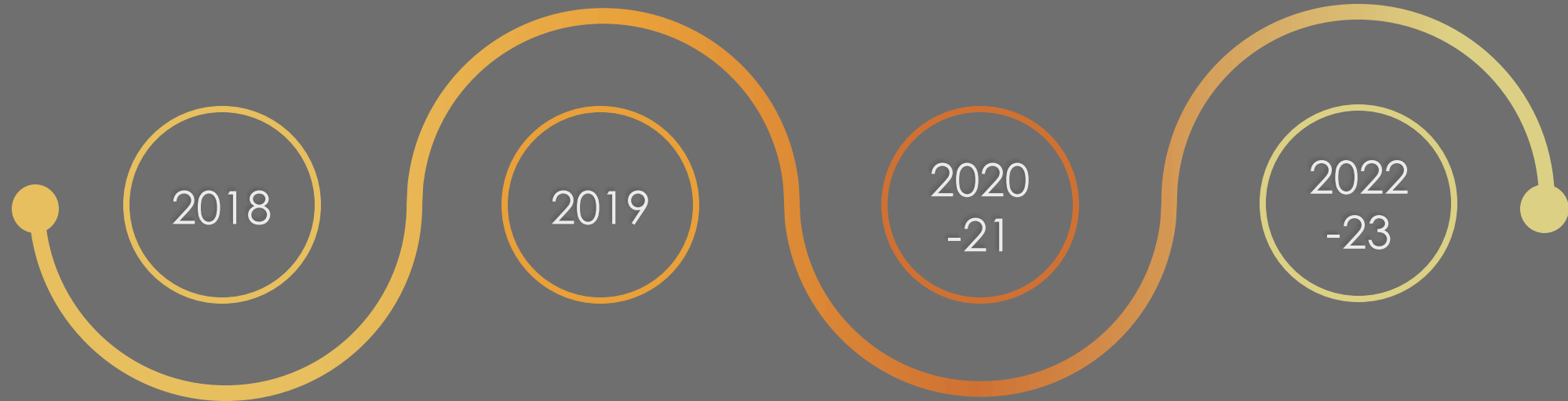
In 2010, Mayo Clinic discovered a radiology technician in its Jacksonville, FL location had infected 5 patients with hepatitis C. One patient died

NEWS

First individual lawsuit filed over hep-C-infected needles at Rose Medical Center



OUR JOURNEY



LIMITED

- FACILITY NOT ON BLIND COUNT BACK
- NO FORMAL REVIEW OF DISCREPANCIES
- DRUG DIVERSION COORDINATOR RESPONSIBLE FOR ALL INVESTIGATION WORK

AWARENESS

- JOINT COMMISSION RECOMMENDATION TO ADDRESS DIVERSION
- LOCAL NEWS ARTICLE
- ESTABLISHED DRUG DIVERSION COMMITTEE

ACTION

- MACHINED LEARNING SOFTWARE UTILIZATION
- ESTABLISHED POLICY AND PROCEDURES FOR ALL INVESTIGATIONS

BEST PRACTICE

- EFFECTIVE AND RAPID RESOLUTION OF DISCREPANCIES WITH INTERDISCIPLINARY TEAM
- ROUTINE EDUCATION
- ROUTINE REPORTING

PILLARS OF A DIVERSION PROGRAM



Prevent



Identify



Report



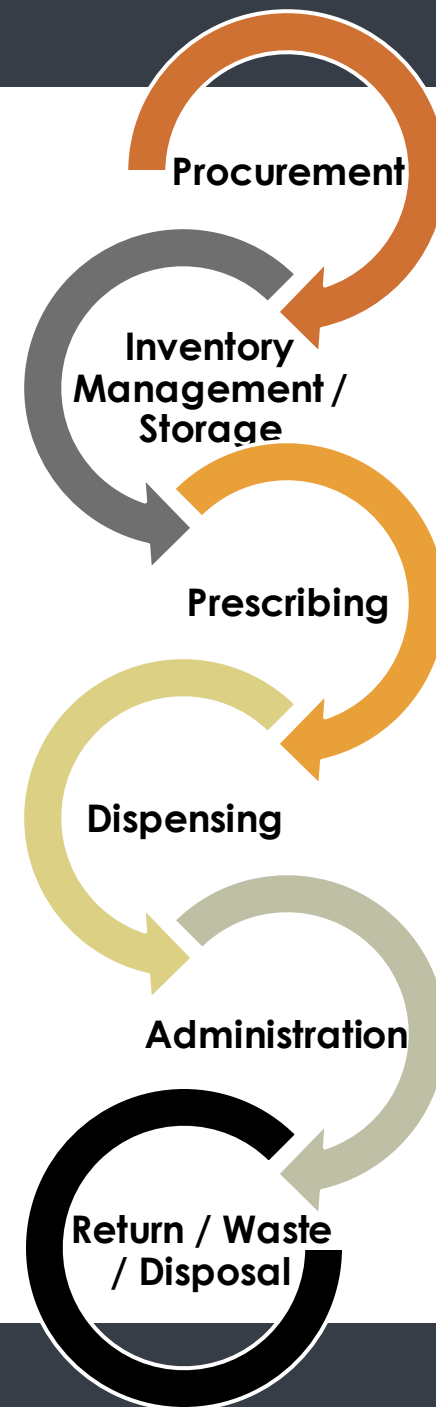
Respond



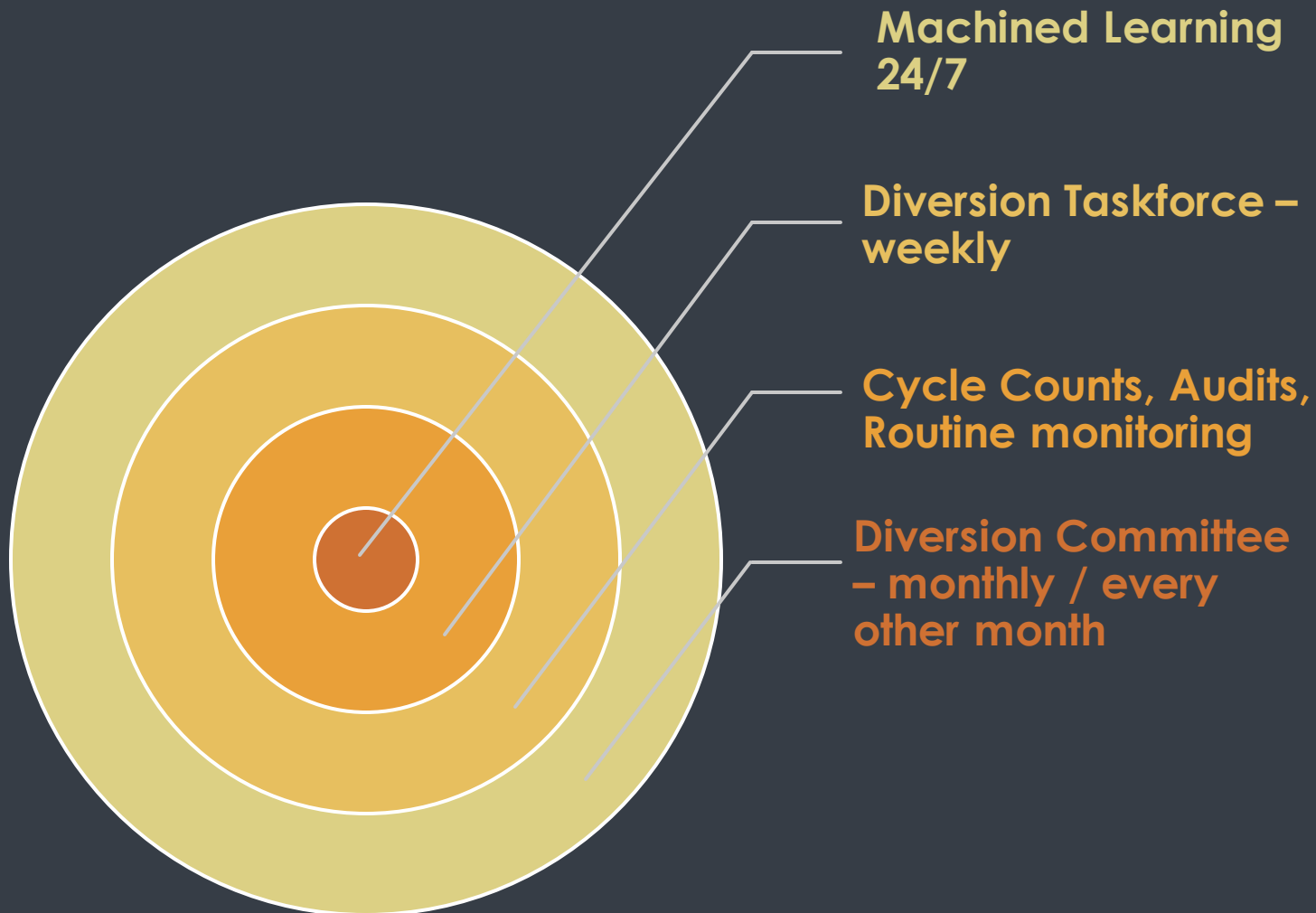
Measure

🚫 PREVENT

- Establish A Diversion Program
- Education
- Communication
 - No news is not good news!
- Prevention At Every Step Of The Drug Life Cycle
 - Segregated ordering and receiving
 - Perpetual Inventories and Blind Count Backs
 - Don't forget your refrigerated storage
 - Limited access and delivery to authorize pharmacy staff
 - Closed loop restocking and reconciliation



👁 IDENTIFY



- Cycle Counts
- Audits
 - MAR Data
 - Controlled substance access data
- Security
 - Badge swipe access to med rooms
 - Cameras
- Testing of Waste
- Utilization of machined learning analytics






REPORT

- Establish a confidential reporting platform
- Manage and report all discrepancies immediately upon discovery
 - BNE and DEA – reportable at the suspicion of diversion – not the confirmation
- Report to senior leadership

MM. 01.01.03 EP5

For hospitals that use joint commission accreditation for deemed status purposes: the hospital reports abuses and losses of controlled substances, in accordance with law and regulation, to the individual responsible for the pharmacy department or service and, as appropriate, to the chief executive.



Automated Dispensing Cabinet (ADC)

Electronic Medical Record (eMAR)

Time Keeping Software

Diversion Software Flags User Activity

Activity Alert Reviewed by Diversion Specialist

Activity determined to be acceptable practices by policy & procedures

Activity determined to not be acceptable practices by policy & procedures

Activity Reviewed by Facility Diversion Team

Activity reviewed and reasonable resolution found, no further information needed.

Activity reviewed and no reasonable resolution found, further information needed.

Activity Alert is CLOSED. Records and related information maintained in a retrievable location. Shared Drive or within Diversion Software

Activity sent to Nurse Manager for further review and follow up.



RESPOND AND MEASURE

- Establish a standard process
 - Verify data
 - Analyze situation
 - Conduct interviews when applicable
 - Peer comparisons
- Establish a culture of recovery
- Identify areas for improvement
- Accountability
- Report out progress and findings to leadership committees
- Improve quality and patient safety
- Foster a culture of support and trust



Radiology Technician

- Self injected from syringes intended for patients, leaving a partial dose
- Refilled syringe with saline solution to maintain correct volume

ICU RN

- RN pulled fentanyl from sedation bags into empty syringes
- RN documented infusion rates faster than pump was running
- Daughter of one patient with known history of drug use first suspected

Environmental Services

- Night employee cleaning the ORs emptied sharps containers to obtain residual fentanyl from vials
- Multiple exposures to contaminated sharps

Pharmacy Technician Student

- Under the supervision of a technician was filling ADCs
- Following the blind count back student was seen on med room camera dropping an Oxycodone tablet to the floor then returning to the room to retrieve it

RN

- Nurse removed injectable PRN pain control for patient; administered to patient
- Simultaneously removed PO pain control to divert for personal use.



REFERENCES

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 2. N.Y. Pub. Health Law. Chapter 45. Article 33 (2024)
 3. CMS. Drug Diversion Toolkit. (2024). Available at <https://www.cms.gov/files/document/drugdiversion022316pdf>
 4. Berge KH, Dillon KR, Sikkink K, Taylor T. Diversion of Drugs within Health Care Facilities, a Multiple-Victim Crime: patterns of Diversion, Scope, Consequences, Detection and Prevention. *Mayo Clinic Proceedings*. July 2012;87(7):674-682. Available at [https://www.mayoclinicproceedings.org/article/S0025-6196%2812%2900484-3/fulltext#:~:text=At%20the%20larger%20Mayo%20Clinic,diversion%20response%20teams%20\(DDiRT\).](https://www.mayoclinicproceedings.org/article/S0025-6196%2812%2900484-3/fulltext#:~:text=At%20the%20larger%20Mayo%20Clinic,diversion%20response%20teams%20(DDiRT).)
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 6. The Joint Commission, Division of Healthcare Improvement. Drug Diversion an Impaired Health care workers. *Quick Safety*. 2019; Issue 48. Available at https://www.jointcommission.org/-/media/tjc/newsletters/quick_safety_drug_diversion_final2pdf.pdf
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