

DRUG DIVERSION COMPLIANCE, PREVENTION, MONITORING, AND DETECTION

What does it all mean?

There is a common misinterpretation of the key terms associated with drug diversion. Words like compliance, prevention, monitoring, and detection are synonymously used when they really have completely different meanings. Compliance, prevention, and monitoring should be thought of as separate components of a successful drug diversion program, with detection as the primary result. Drug diversion programs can only develop a successful strategy around each component once each term is differentiated and defined.

THE TERMS

COMPLIANCE: Conformity in fulfilling official requirements.¹

The key components of controlled substance compliance and why compliance is important for drug diversion programs is covered in depth in a previous Trexin Insight Paper ([Introduction to Controlled Substance Compliance](#)). Compliance creates the foundation in which all prevention and monitoring activities are built upon. Successful drug diversion programs cannot sustain without a robust compliance strategy.

PREVENTION: To keep from happening or existing.²

In drug diversion terms, prevention is stopping the act of diversion from ever occurring. The pillar of diversion prevention is therefore physical barriers to controlled substance medications. This includes medication safes, automated dispensing cabinets, locks, doors, etc. Any measure put in place that stops someone from accessing controlled substance can be thought of as prevention.

Aside from physical barriers, policies and procedures can also be thought of as a prevention strategy. For example, policy may further limit controlled substances access to certain employees, such as pharmacists and nurses. In this example, policy and physical barriers prevent certain employees like receptionists, housekeeping, and maintenance staff from ever gaining access to controlled substances. Although these measures will reduce the number of opportunities to divert drugs, prevention alone is not enough to stop drug diversion.

MONITORING: To watch, keep track of, or check usually for a special purpose.³

Successful drug diversion programs rely on both physical and analytical monitoring strategies. Physical presence can help identify diversion and deter people from diverting in the first place. If employees know they are being observed, they will be less inclined to divert drugs to avoid being caught. Simply put, physical presence creates accountability. Although it is unrealistic to have constant observation of all employees, it is important to observe or witness high-risk workflows. Processes like drug waste disposal, receiving inventory, and compounding, should all have witness observation to discourage diversion. A potential alternative for physical presence is surveillance systems in areas where medications are stored and accessed.

Those who seek to divert drugs can be creative and not all diversion will be identified by physical monitoring. It is important for drug diversion programs to also have analytical audits to detect anomalies, patterns, and behaviors that could be diversion related. Audits should focus on areas where diversion cannot be prevented. Furthermore, any process in which there are known opportunities for diversion, should be audited as frequent as possible. For example, the receiving of controlled substances from the wholesaler into the perpetual inventory. This workflow is a well-known target for diversion if gone unchecked. Analytical audits should be implemented wherever there are workflow gaps.

DETECTION: To discover or determine the existence, presence, or fact of.⁴

For drug diversion, this translates to identifying the theft of medications. Detection is the result of compliance, prevention, and monitoring harmoniously working together. These components collectively are much greater than the sum of its parts. All it takes is a single shortcoming in one of these areas for drug diversion to go unnoticed.

Compliance, prevention, and monitoring all have different meanings and all serve different purposes in the detection of diversion. Successful drug diversion programs view each area as equally important as the next, which allows the synchronicity of these components to detect as much diversion as possible. Programs with an unbalanced emphasis on compliance, prevention, or monitoring should reassess their efforts and adjust accordingly. [Contact a Trexin Advisor](#) to see how we can help evaluate and realign your drug diversion efforts.

References

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