

# DRUG DIVERSION PROGRAMS

*A work in progress.*

Drug diversion is simply the illegal use or obtainment of prescription medications. It is estimated that approximately 10% of healthcare workers abuse drugs due to the open availability and access to medications in the healthcare setting<sup>1</sup>. Undetected diversion can have a negative impact on the diverter, patient, facility, and the community. Healthcare organizations are responsible for developing and implementing Drug Diversion Prevention programs which would help to protect all those involved from potential harm<sup>2</sup>. The program must comply with all federal and state regulations and incorporate policies and procedures that help to identify potential diversion scenarios and outline investigative and resolution processes. In order to have a robust program, one must identify the key stakeholders, build a multidisciplinary Diversion Response Team (DRT), develop policies and procedures not only for the DRT but also for basic medication management, educate ALL staff, from Environmental Services to Senior Leadership, and hold people accountable.

There are a variety of Drug Diversion Surveillance tools available today to assist in identifying the potential diverter. These tools are built with parameters based on an institution's medication management policies and procedures and will identify all anomalous behavior. Unfortunately in many instances, particularly at implementation, potential diversion cases are identified, only to discover that deviations from the expected guidelines are due to the lack of holding staff accountable for defined practices. Nurse leaders, as well as physician leaders, must take on a more active role in enforcing the medication management policies regarding time from dispensing to administering and wasting. Deviations can occur for a multitude of reasons, including but not limited to lack of knowledge and staff to assist in the medication process, poor practices, and true diversion. Leaders have a responsibility to establish processes that support staff while enabling rapid detection of diversion<sup>3</sup>. If these guidelines are not adhered to, then the surveillance tools become much more difficult to rely on and hours will be spent investigating cases.

In an effort to identify possible drug diversion, healthcare agencies are increasingly implementing programs to assist in detecting potential diversion. These programs should include six critical areas in need of constant optimization. They include creating policies, developing processes for what to monitor, identifying how and when to monitor, obtaining organization commitment at departmental and executive levels, integrating all needed data, and educating all employees. It is important to note that these programs need to be nurtured. The optimization process should be continuously reevaluated on a regular basis to ensure adherence to existing policies and processes. "It is imperative that organizations establish a program that discourages diversion and strengthens accountability, rapidly identifies suspected diversion and responds to known or suspected diversion incidents, and continually seeks to improve controls." <sup>4</sup>

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<sup>1</sup> The Joint Commission Division of Healthcare Improvement, (2019) Quick Safety: Drug Diversion and impaired health care workers. Issue 48.

<sup>2</sup> American Journal of Health System Pharmacists (2022) ASHP Guidelines on Preventing Diversion of Controlled Substances. Issue 79:2279.

<sup>3</sup> The Joint Commission Division of Healthcare Improvement, (2019) Quick Safety: Drug Diversion and impaired health care workers. Issue 48.

<sup>4</sup> American Journal of Health System Pharmacists (2022) ASHP Guidelines on Preventing Diversion of Controlled Substances. Issue 79:2281.

If your organization needs assistance in optimizing your Drug Diversion Prevention program, [contact Trexin](#) and we can help you mature your program.



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