Implementing Drug Diversion Risk Rounds

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Who We Are

- HealthPartners is a Minnesota-based integrated health care organization founded in 1957

- Provides health care services and health plan administration

- Employs more than 23,000
In 2015: 2 million people had a substance abuse disorder involving pain relievers
In 2015: 20,000 overdose deaths
Between 10-15% of healthcare workers are addicted to opioids.

In an organization with 23,000 employees, potentially 2300 healthcare workers could have an opioid substance abuse problem.
Emory University Hospital

Xanax and pain medications like hydrocodone diverted from pharmacy by pharmacy technicians

Georgia Board of Pharmacy Order: pharmacy license on probation for 3 years and hospital fined $200,000

$2.3 Million
Highlights from the DEA Corrective Action Plan

1. Drug Diversion Compliance Officer
2. Drug Diversion team
3. Review ADM settings
4. Pandora surveillance
5. Enhanced reporting
6. Quarterly trend analysis by drug diversion team
7. Targeted staff training
8. Standardized diversion investigation process
9. Enhanced monitoring and auditing

What’s the Role of Compliance?

▶ Bridge the gap
▶ Manage risk
▶ Structure - 7 Elements
▶ Convene the right players
<table>
<thead>
<tr>
<th>Foundation for Risk Rounds</th>
</tr>
</thead>
<tbody>
<tr>
<td>▶ Senior leadership support</td>
</tr>
<tr>
<td>▶ Urgent issues addressed</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stakeholders</th>
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</thead>
<tbody>
<tr>
<td>▶ Pharmacy</td>
</tr>
<tr>
<td>▶ Nursing</td>
</tr>
<tr>
<td>▶ Senior Leadership Team</td>
</tr>
</tbody>
</table>
Objectives

- Assess the current state of medication security
- Identify opportunities

Diversion Risk Round Assessment Tool

Assessed Location: __________________________ Surveyors: __________________________ Date: __________

Location Participants: _________________________________________________________________

**This location provides sample medications: ☐ yes ☐ no

Instructions: Assess the compliance of each measure by using the questions and observations provided below.

<table>
<thead>
<tr>
<th>Measure #1</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medications are stored securely (either locked or in site of an employee at all times)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Look & Ask:

☐ Are medications locked in med cupboards, drawers or med rooms? (Check cupboards to see if locked)
Comments: _______________________________________________________

☐ If meds are stored in site of employees: What happens when everyone needs to step away to take care of other tasks?
Comments: _______________________________________________________

☐ Are these keys stored in the lock, or in an obvious location?
Comments: _______________________________________________________

☐ Are there any medications sitting out, unsecured? Look in procedure rooms, on top of Pyxis, on carts, etc. (ex. Lidocaine, saline flushed)
Comments: _______________________________________________________

Additional Comments: ____________________________________________

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## Diversion Risk Round Assessment Tool

### Measure #2

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is limited access to medications</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Look & Ask:

- **Who is allowed access to medications?**
  
  Comments:  

- **How do you ensure that only these people access medication storage (card access, codes/keys, just assume)?**
  
  Comments:  

- **Are there other items stored with medications that make it necessary for other people to access those areas (office supplies, housekeeping items, etc.)?**
  
  Comments:  

- **Tell me how you would respond if you saw someone inappropriate accessing medication storage.**
  
  Comments:  

*Additional Comments:*

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## Diversion Risk Round Assessment Tool

### Measure #3

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medications stay secure throughout the entire medication process</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Look & Ask:

- **Are medications pre-drawn for procedures? If so, where and how are syringes stored prior to the procedure?**
  
  Comments:  

- **If possible, observe the wasting process. Does it occur as it was described?**
  
  Comments:  

- **Tell me about the process for managing expired medications in your department. Is the process the same for controlled substances?**
  
  Comments:  

- **Tell me about your process for inventorying and storing medications brought in by the patient from home, if applicable. Comments:**
  
  Comments:  

- **What is your process for discharge medications?**
  
  Comments:  

*Additional Comments:*

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**Diversion Risk Round Assessment Tool**

This section for locations with controlled substances only. Not applicable to locations without controlled substances.

<table>
<thead>
<tr>
<th>Measure #4 (only applicable to controlled substance)</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Controlled substances processes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Look & Ask:**

- □ Show me how you keep controlled substances secured? Where are they stored?
  - Comments: ____________________________
- □ How are CSs tracked? That is, how do you know what has been received, dispensed, how much and by whom? **Review the CS log.**
  - Comments: ____________________________
- □ Tell me about your process for handling discrepancies.
  - Comments: ____________________________
- □ Tell me about how you would handle a suspected diversion?
  - Comments: ____________________________
- □ Tell me how the “override function” on Pysis is used in your department (if applicable).
  - Comments: ____________________________

**Scoring:** Using observations and discussion from Measures 1-4, score each measure using the scoring system below:

<table>
<thead>
<tr>
<th>Measure #1 score</th>
<th>Measure #2 score</th>
<th>Measure #3 score</th>
<th>Measure #4 score</th>
<th>TOTAL SCORE: ____________</th>
</tr>
</thead>
</table>

0: No controls, no policy or staff unaware of policy and/or controls
1: Policies and/or controls in place, but not always followed
2: Policies/controls in place and followed

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**Implementation**

- Identify site leaders
- Surveyor training
- Communication plan
- Announced surveys
- Action plans
Survey Team

- Pharmacy
- Compliance
- Quality
- Nursing
- Safety and Security
- Employee Health
- Patient Safety

What did we learn?

- Enhanced surveyor training
- Site prioritization
- Unannounced vs. Announced
- Monthly touch points with pharmacy and nursing
Questions?

Contact information

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