

Responding to Controlled Drug Diversion

ISSUE

Diversion: Unlawful channeling of regulated drug products from legal prescribed sources for illicit use or redistribution.

Diversion of Controlled Medications can negatively impact both your facility's rating and your nursing license if found to be complicit in deficient preventative measures, upon a failure to identify diversion in a timely manner, OR upon a **failure to take appropriate action following suspected controlled drug diversion**.

To ensure appropriate response to suspected controlled drug diversion, consider these action steps:

IMMEDIATE ACTION

- Alert Director of Nursing or unit managers of potential diversion per facility policy*
- DON to conduct requisite interviews prior to staff leaving the premises, per applicable state law and facility policy
- DON to notify consultant pharmacist and pharmacy director immediately
- DON assumes responsibility for INVESTIGATION and should follow facility policy regarding drug diversion

INVESTIGATE AND RECORD

- WHEN suspected Diversion occurred (time frame)?
- WHO could be involved (all nursing staff that had access to medications)?
- WHAT was involved (list of medications, quantity, and strength)?
- WHICH resident(s) was/were involved?

CONTACT

- Notify local police department to report suspected Drug Diversion within 24 hours (record contact info and case #)
- Notify Pharmacy (they may coordinate with Board of Pharmacy and DEA as necessary)
- Notify state Board of Nursing and Health Department, per applicable state law

PLAN OF CORRECTION

- Corrective Plan should include education and increased frequency of intermittent audits
- Consultant Pharmacist can conduct **Preventing Diversion** in-service

STATE SPECIFIC STEPS

- Check with your Consultant Pharmacist or Pharmacy Director for any state specific guidance

** The facility should maintain policies and procedures that provide prompt identification of loss or potential diversion of controlled medications and reporting of suspected crimes*