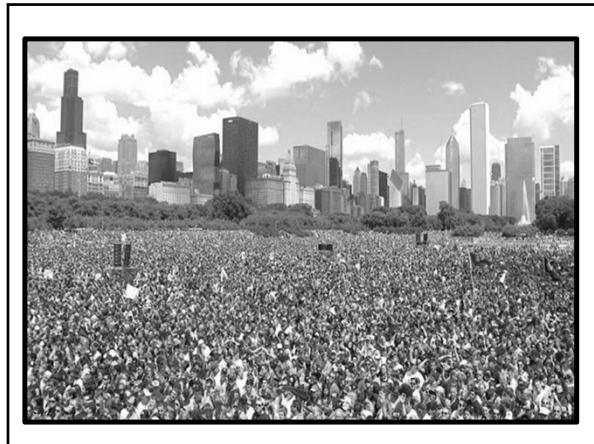◆◆ HealthPartners®

Implementing Drug Diversion Risk Rounds
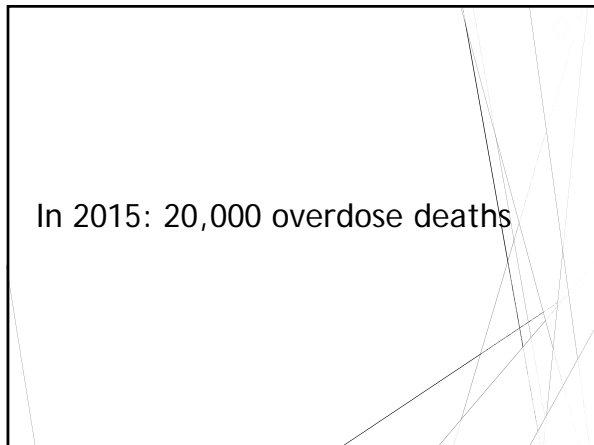
Sara Schroeckenthaler, JD
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Who We Are

▶ 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 health care 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

MASSACHUSETTS GENERAL HOSPITAL

ENTRANCE   ENTRANCE

$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

Foundation for Risk Rounds

▶ Senior leadership support

▶ Urgent issues addressed

Stakeholders

▶ Pharmacy

▶ Nursing

▶ Senior Leadership Team

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.

Measure #1	Yes	No
Medications are stored securely (either locked or in site of an employee at all times)		

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 there 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 flushes).
Comments: _____

Additional Comments: _____

Continue on next page

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Diversion Risk Round Assessment Tool

Measure #2	Yes	No
There is limited access to medications		

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	Yes	No
Medications stay secure throughout the entire medication process		

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: _____

☐ 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.

Measure #4 (only applicable to controlled substance)	Yes	No
Controlled substances processes		

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 Pyxis 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:

☐ Measure #1 score _____
☐ Measure #2 score _____
☐ Measure #3 score _____
☐ Measure #4 score _____

TOTAL SCORE: _____

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/control 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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