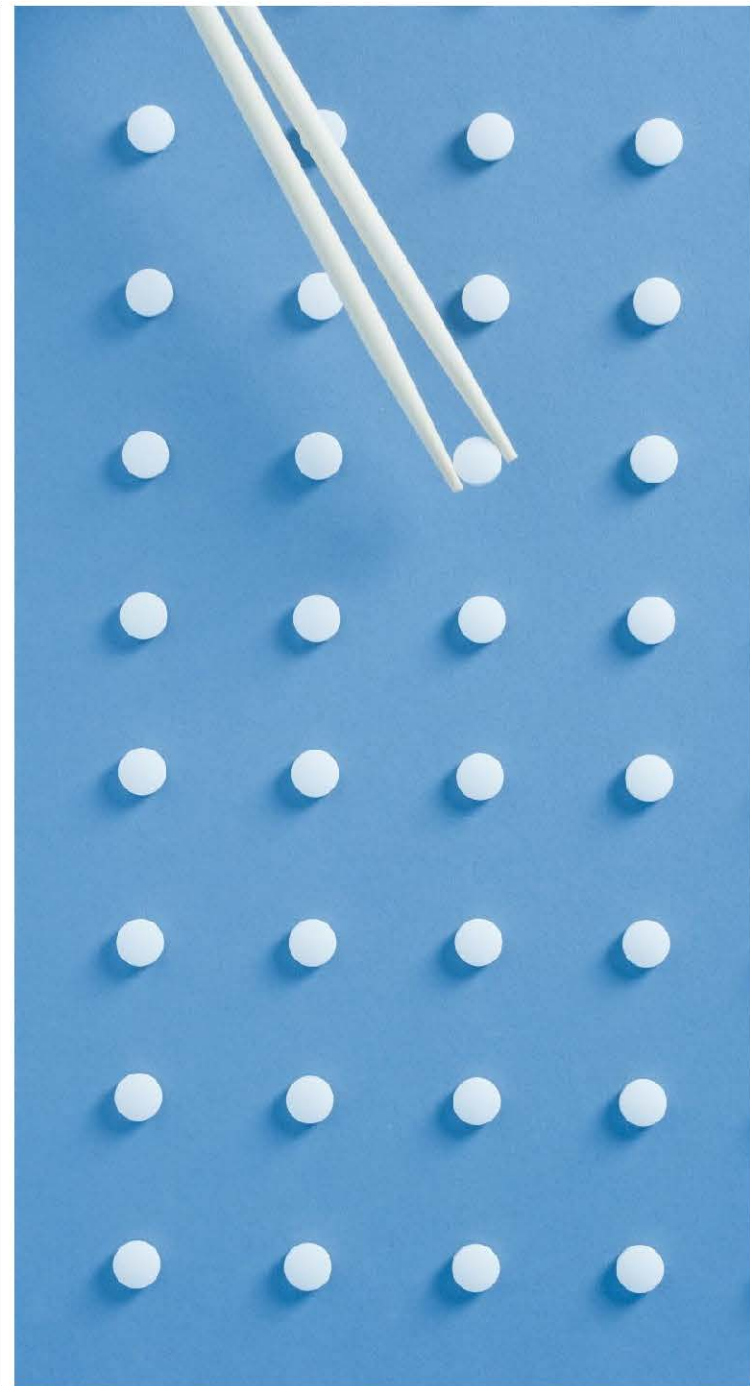

Drug diversion prevention and detection: Using a comprehensive risk and internal audit approach

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Your presenters



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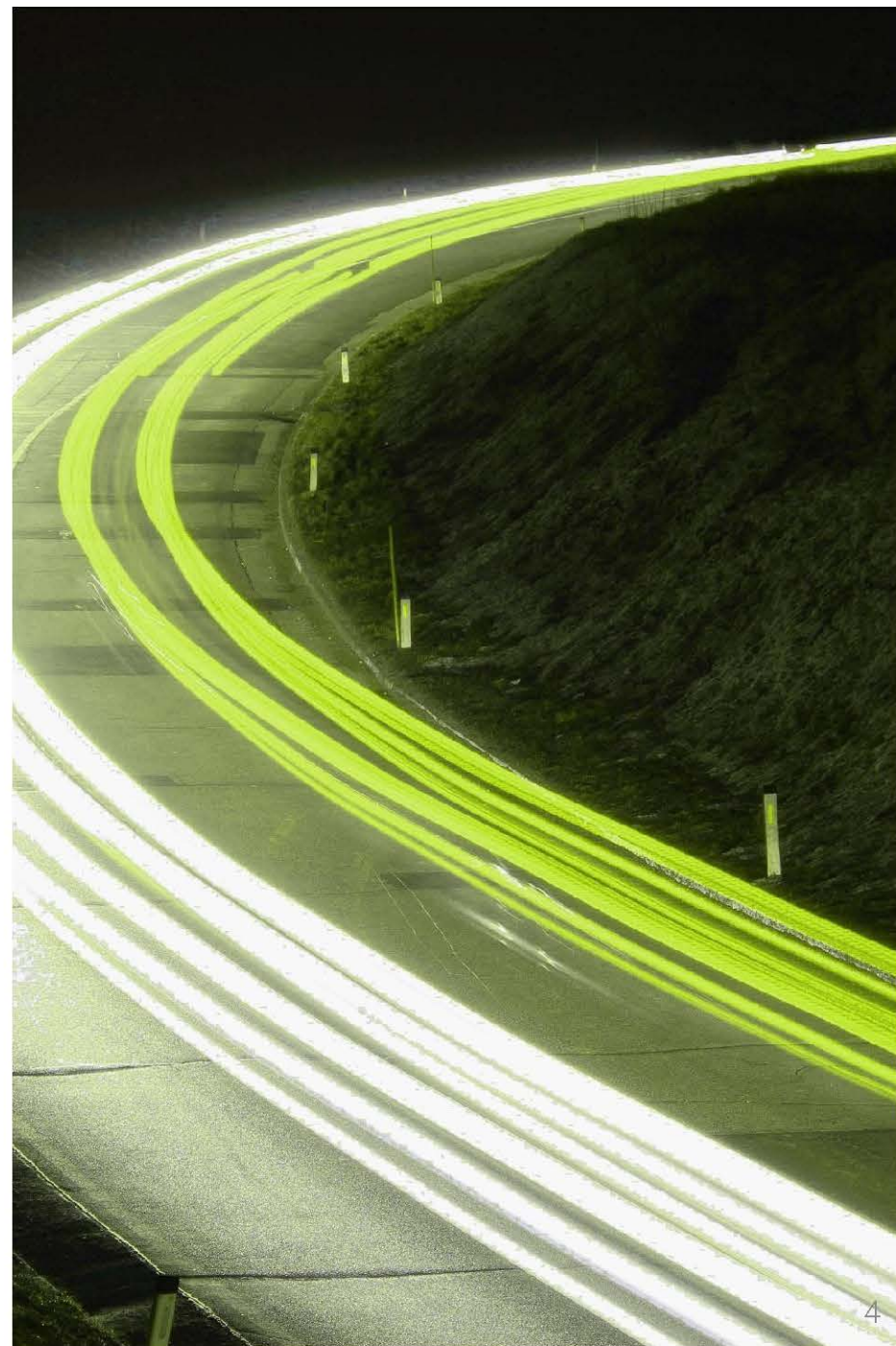


Learning objectives

1. Identify the impact of drug diversion on patients and healthcare organizations
2. Explain the common points of risk and methods of drug diversion in healthcare's controlled substance lifecycle
3. Describe the best practices of drug diversion prevention and detection
4. Understand best practices of an employer drug testing program

Agenda

- Understanding the escalation and impact of drug diversion
- Common points of risk and methods of drug diversion
- Leading practices for developing a drug testing program
- Building a comprehensive risk and internal audit-based approach to drug diversion prevention and detection



What is drug diversion?

Definition

The transfer of a prescription drug from a lawful to an unlawful channel of distribution or use

Costs

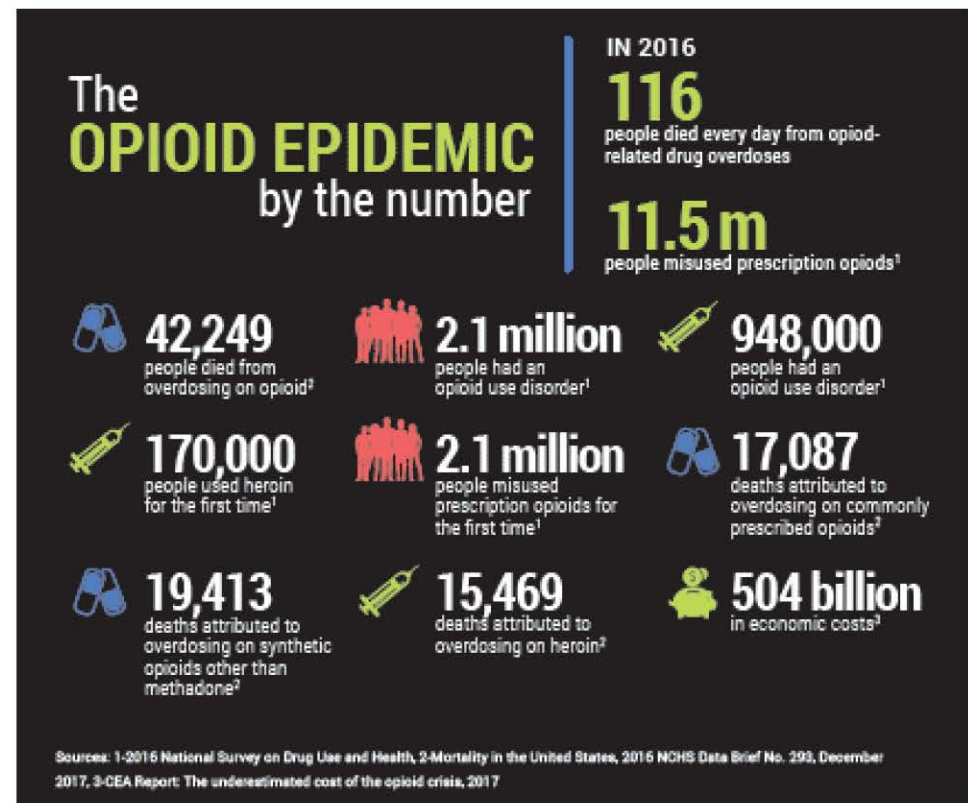
The estimated cost of controlled prescription drug diversion and abuse to both public and private medical insurers was approximately **\$72.5 billion per year in 2016 and has risen to \$78.5 billion in 2019**

Healthcare providers challenged with alcohol and/or drug dependency:

- 15 percent of pharmacists
- 10 percent of nurses
- 8 percent of physicians

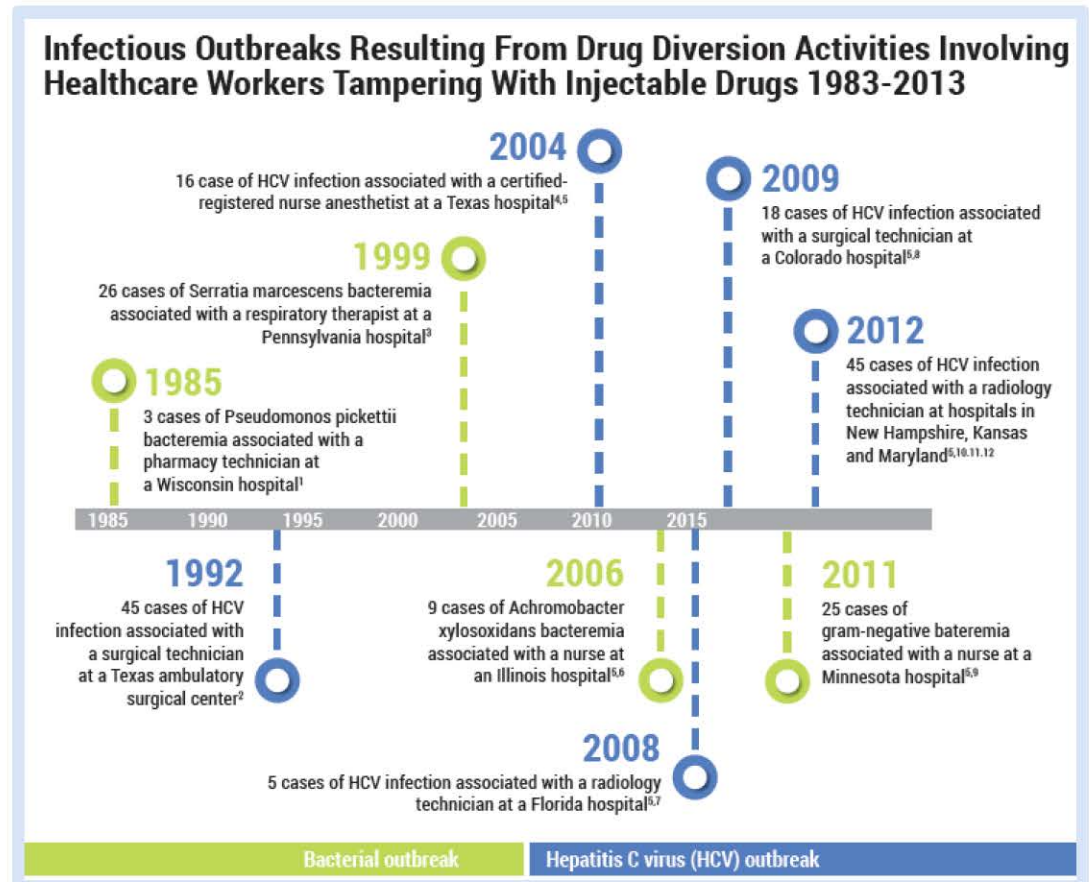
Why it matters

- **This is a national epidemic!**
- More than **42,000** deaths in the U.S. in 2016
- Overdoses killed more than **130 people per day** in 2018
- **21 to 29 percent** of patients prescribed opioids for chronic pain misuse them



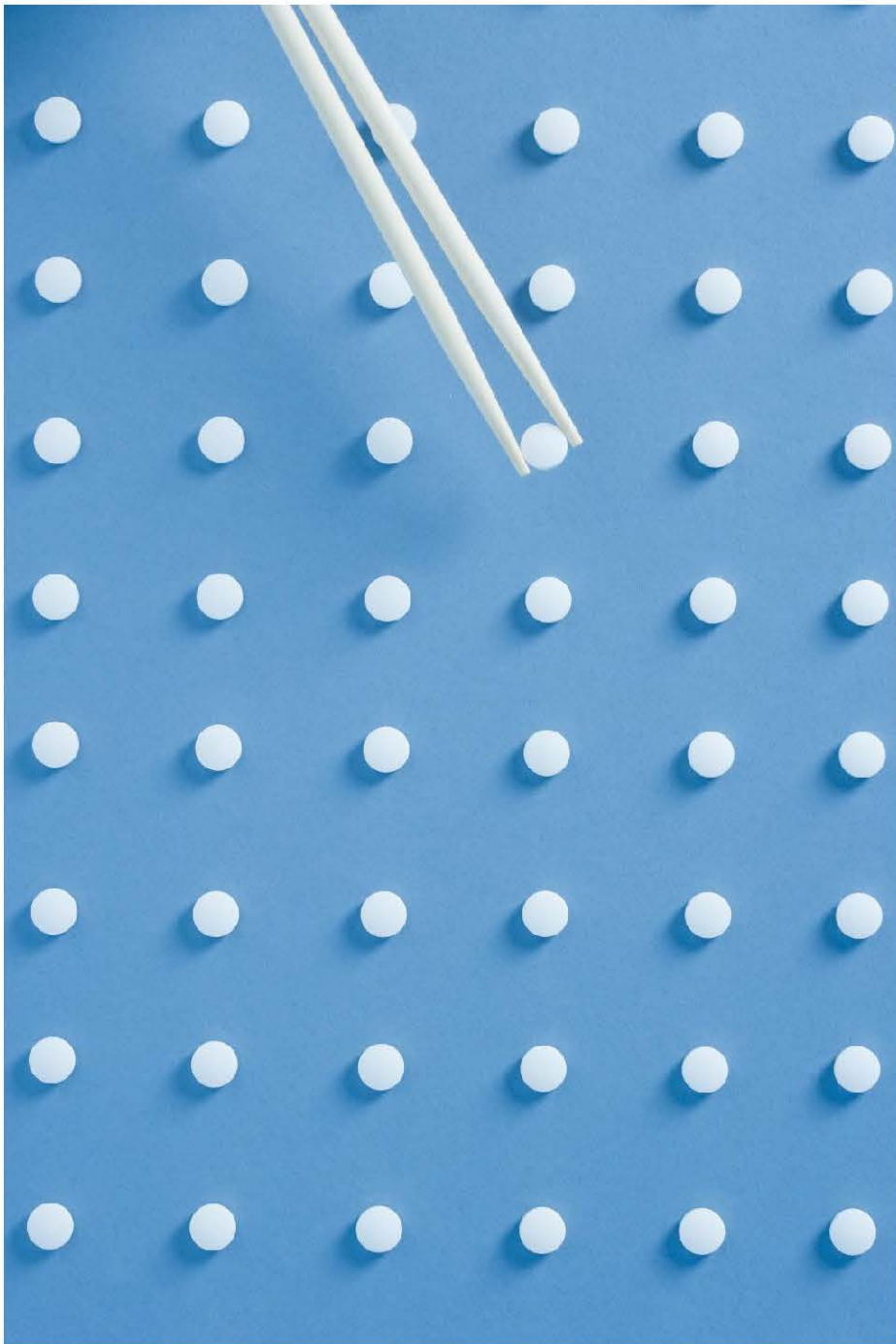
Patient impact

- Harm to patients who trust our healthcare system to care for them
- Increased incidence of neonatal abstinence syndrome (opioid withdrawal)
- Spread of HIV and Hepatitis C with injectable drug use
- Pain not effectively managed during or after procedures



Organizational impact

- Massachusetts General Hospital paid **\$2.3 million** to resolve allegations that lax controls enabled employees to divert controlled substances for personal use
- In March 2016, Emory University Hospital Midtown was fined **\$200,000** and its pharmacy license was placed on three years' probation by the Georgia Board of Pharmacy
- In January 2017 the Abington Hospital paid **\$510,000** lax controls enabled a staff pharmacist to take more than **35,000 pills**, including oxycodone, for illegal use
- 2018 DEA enforcements found numerous healthcare professionals charged and sentenced to prison for tampering with and diverting controlled substances



Common points of risk and methods of drug diversion

- Procurement
- Preparation and dispensing
- Prescribing

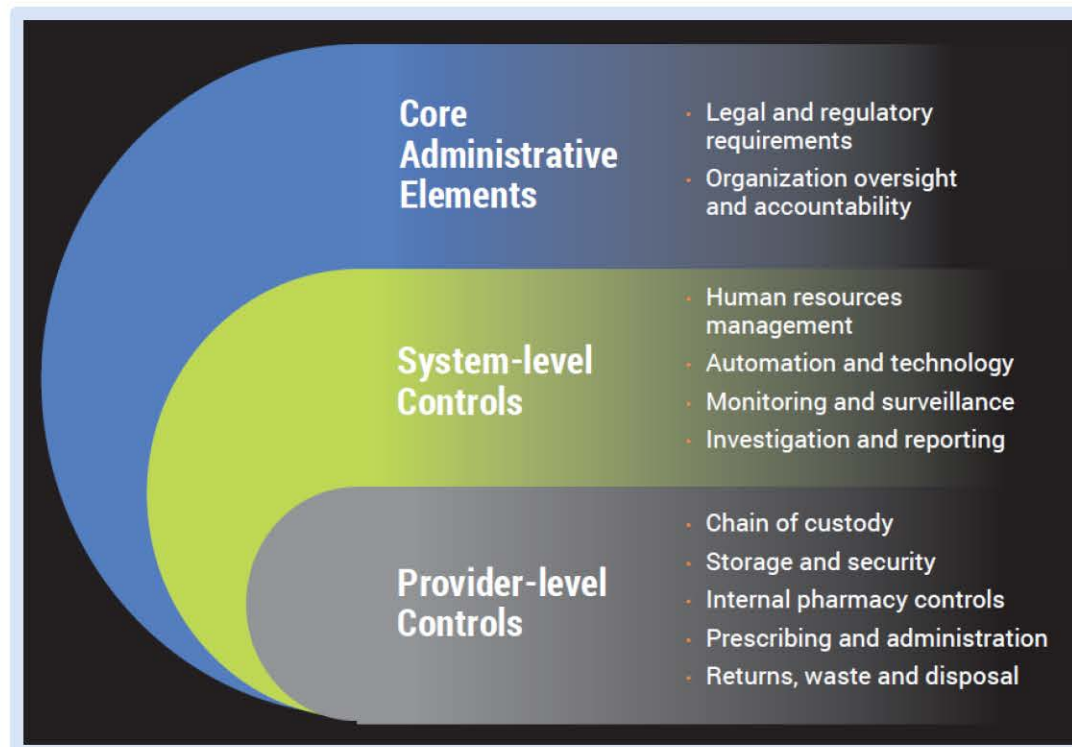
Common points of risk and methods of drug diversion

- Administration
- Waste and removal



Build a comprehensive risk and internal audit-based approach

- Identify where diversion occurs in the healthcare environment
- Identify workers at risk for drug diversion
- Define the drug diversion program approach and parameters
- Engage leadership
- Tap into technology
- Incorporate approach into culture and training



Build a comprehensive risk and internal audit-based approach

- While monitoring and surveillance is management's primary role within a Controlled Substance Diversion Prevention Program (CSDPP), all relevant data regarding controlled substance lifecycle management should be evaluated for:
 - Trends
 - Variances
 - Improvement opportunities
- A comprehensive CSDPP leadership team can work together to design, monitor and provide continuous audit feedback



Identifying workers at risk

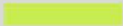
- Obtaining overlapping prescriptions from multiple providers and pharmacies
- Taking high doses of prescription pain relievers
- History of mental illness, alcohol or substance abuse
- Living in rural areas and having a low income





Behaviors that should raise concern

- Impulsiveness or compulsiveness
- Inability to deal with stress
- Low self-esteem or despondent
- Impatience or quick to anger
- Seeking to work alone
- Mood swings



Leading practices for developing a drug testing program

- Develop a written drug screening policy and process
- Conduct pre-employment and ongoing, periodic random drug tests
- Match the testing method to your needs
- Customize your drug testing by job functions
- Document the entire process and audit that process
- Contact insurance providers to check for potential discounts

Preparedness

- Preparation extends beyond simply informing employees about drug diversion prevention programs. Everyone has a role – the employer, Human Resources, supervisors, employees, etc.
- By acknowledging that drug diversion is a real risk, Human Resources leaders can implement policies to protect patients, help addicted staff and ensure the organization is in compliance with regulations
- Successful preparation can include, but is not limited to:



Written drug policy

According to the Substance Abuse and Mental Health Services Administration (SAMHSA), **a written policy should take into account legal requirements and regulations, the culture of the workplace and its employees, and the values and priorities of the organization.**

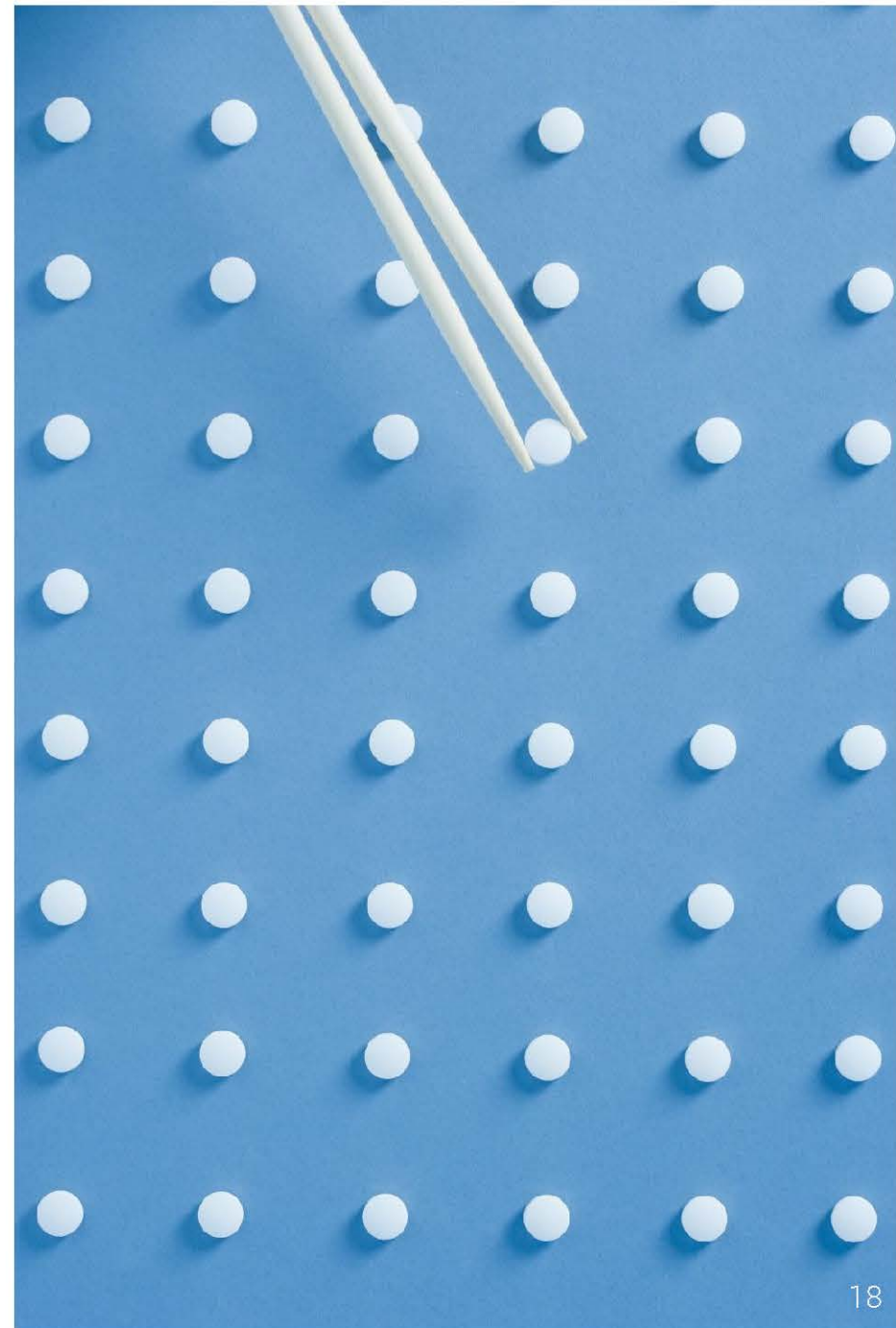


Basic elements of a successful policy should include:

- A statement of purpose
- Implementation approaches
- Goals
- Definitions, expectations and prohibitions
- Dissemination strategies
- Benefits and assurances
- Consequences and appeals

Drug testing

- Any workplace drug-testing program should comply with applicable local, state and federal laws
- Workplace drug-testing programs are designed to detect the presence of alcohol, illicit drugs, or certain prescription drugs. **Drug testing is a prevention and deterrent method** that is often part of a comprehensive drug-free workplace program



Drug testing (cont.)

- Develop a system to protect confidentiality – select someone who will be responsible for receiving employee drug test results and make sure that person is aware of confidentiality protocols
- Let employees know how drug-testing results can be used to inform their treatment, rehabilitation and re-integration into the workplace



Drug testing (cont.)

Building a program that meets your needs and is clearly identified in your policy is key.

Pre-employment: You can make passing a drug test a condition of employment. With this approach, all job candidates will receive drug testing prior to being hired

Annual physical: You can test employees as part of an annual physical examination. Be sure to inform employees that drug-testing will be part of the exam

For-cause and reasonable suspicion: You may test employees who show discernable signs of being unfit for duty (for-cause testing) or who have a documented pattern of unsafe work behavior (reasonable suspicion testing). These kinds of tests help to protect the safety and wellbeing of the employee and others

Post-accident: Testing employees who were involved in a workplace accident or unsafe practices can help determine whether drug use was a contributing factor

Post-treatment: Testing employees who return to work after completing a rehabilitation program can encourage them to remain drug-free

Medical marijuana has been legalized in many states, with some even allowing recreational use. This places employers in the delicate position of attempting to be compliant while maintaining order and safety in the workplace.

Although state laws vary, these laws don't require employers to permit drug use in the workplace or tolerate employees who report to work under the influence. Federal regulations still prohibit marijuana use.



Procedures

Healthcare facilities should have systems in place to deter controlled substance diversion that include methods to promptly identify and investigate possible diversion, intervene when it is occurring and follow up to deal with outcomes of confirmed diversion.

- Establish policies and procedures
- Implement medication procurement, inventory and security standards
- Develop protocols for prescribing, dispensing and administering medications
- Ensure thorough documentation
- Provide monitoring and surveillance of inventory
- Develop protocols for investigating
- Educate and train personnel
- Serve as a positive role model; sponsor or help with prevention services in your community and/or include healthy lifestyle articles in your newsletter
- Appoint a representative to serve on and support any local substance use prevention-oriented programs or community partnerships in your area
- Encourage employees and their family members to ask for help and recognize that treatment is more cost-effective than unsafe working conditions and lost productivity caused by drug-related problems
- Collect all the facts, find evidence, confront employees, document and report

Training

- Educate staff and supervisors about the effects of substance use on health, job performance and workplace safety
- Communicate the value of employees' personal health, families and communities. A successful program should clearly communicate the hazards of substance use and abuse and the benefits of avoiding it

Training (cont.)

- Training should include:
 - Materials on the risks associated with drugs
 - Inform employees how to avoid problems
 - Provide health promotion information, like stress management, healthy eating and fitness
- Supervisors should have additional responsibilities for implementing and maintaining a drug-free workplace



Support

- Providing employees with support for issues that affect their well-being will enhance the effectiveness of your drug-free workplace program. Support can be achieved through an employee assistance program (EAP) or other means, including:
 - **Hotlines** (SAMHSA's Drug-Free Workplace Helpline: 1-800-WORKPLACE (967-5752))
 - **Counseling services**
 - **Community programs**
 - **Professional association resources**
- Employee Assistance Programs (EAPs): EAPs can help employees with personal problems that affect their job performance and can identify and address a wide range of health, financial and social issues, including mental and/or substance use disorders
- In addition to an EAP, local drug-free workplace coalitions or other community-based groups may be able to provide assistance. Contact your state or county office for drug misuse services and ask if these resources are available in your area

Wrap-up

- Controlled Substance Diversion Prevention Program
- Interdisciplinary team with Pharmacy leadership
- Designated staff for monitoring, surveillance, trends analysis and internal audit
- Ongoing human resources management



Wrap-up (cont.)

- See something... say something!!!
 - Remember, 85% of your workforce will likely NOT abuse controlled substances in their careers and they become the organization's eyes and ears in detection and prevention
- Four-page Best Practice Guide in the Baker Tilly / AHIA Drug Diversion Prevention and Detection whitepaper



Connect with us



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Questions?



*Drug Diversion
Prevention and
Detection whitepaper*