

Drug Diversion Detection & Prevention Plan Guide

The Board requires registrants to have a written Drug Diversion Detection & Prevention Plan. Each plan should be tailored to your individual needs and should be followed. The Board will hold the pharmacy, pharmacists, and other registrants accountable when safeguards against diversion were not in place.

The plan should not be limited to controlled substances. The Board requires wholesalers to report suspicious orders of ALL prescription drugs.

A drug diversion prevention plan should be inclusive, covering the time from the medication is ordered until the medication has left the facility or pharmacy. You will want to review and update your plan regularly.

If you write a sentence (or two) regarding each of the following bullet points that are applicable to your facility, it should be a good start.

This is not meant to be complete or to apply to all registrants, but rather assist you in creating a Drug Diversion Detection & Prevention Plan that is appropriate for your facility.

- Who has access to ordering medications? Is it password protected?
- Who checks in the medications? Signing off? Is this the same person as the one who places the order?
- Are invoices reviewed by a pharmacist (or manager) before placing medications on the shelf?
- Are invoices reviewed and signed by the pharmacist-in-charge (PIC)?
- Does the PIC review the monthly purchase summary from the wholesaler?
 - Look for large purchases
 - Look for name brands that facility isn't dispensing/selling
 - Look for small purchases of irregular items
- Who can make inventory adjustments in computer? Is it password protected/restricted? Are adjustments reviewed? By whom?
- Are surplus stock bottles and outdated medications secured prior to destruction/return to wholesalers?
- What is the procedure for disposal of spilled/adulterated medications?
- What is the procedure for return-to-stock medications?
- Share/Rotate Responsibilities – Do not let one person be in charge of multiple steps
- Employee conduct:
 - Drive through window process
 - Cell phone use
 - Dress code (coats and clothing with large pockets)
 - Purses and backpacks in pharmacy:
 - Provide lockers for employees
 - Purse/bag checks for employees at end of shift?
 - Large drink containers (good place to hide drugs)
 - Who can empty trash?
 - Are clear trash bags used?
 - Is the person who gathers the trash the one who carries it out?
- Employment of personnel:
 - Background check upon hire? Periodic after employment?
 - Require notification of arrest?
 - Do they need a waiver? If so, will you pursue a waiver?
 - Check Medicare Exclusion List?
 - Give them copy of policies & procedures and have employee sign receipt of P&P
- Don't treat all CDS medications the same:
 - Consider weekly or biweekly bottle counts of highly abused drugs.
 - Consider perpetual counts or regular audits of CII's.
- Drug screen policy:
 - Random drug screens or upon suspicious behavior.
 - When errors are committed, slurred speech, stumbling, sleeping, etc.
 - Make sure drugs screens are testing for proper drug (e.g. synthetic opiates vs. natural opiates)