



## **Investigation of Potential Controlled Substance Diversion** ***Creating a Diversion Checklist: Elements to Consider***

Healthcare professionals are not immune to drug abuse and misuse, and professionals such as nurses, pharmacists, physicians, and critical care professionals are at particularly high risk for diversion of controlled substances due to the relatively common access to controlled substances in the workplace.

Early identification of diversion and abuse in the long-term care setting, as well as quick intervention, are vital for both patient care concerns and the health care professional's recovery. When potential diversions are suspected, having a standard Reporting Policy /Procedure and Investigation Protocol in place will permit quick and thorough investigation of incidents. Your pharmacy provider can also assist by providing reports, prescription data, and support through the investigation process.

### **Demographic Information:**

- Date/time of incident
- Facility/unit
- Name of person reporting incident
  - Job title
  - Phone #
- Brief description of event

### **Documentation Review:**

- Medication supply review / medication cart inspection/ medication room inspection
- Interim Supply Box contents inspection
- Review of staff accessing Interim Supply Box /verify supporting documentation and records
- Review of recently ordered new and refilled controlled substances- trends in frequency and quantity
- Review of resident pain management, pain control, and care notes
- Controlled Substance Declining Inventory Record compared to MAR for discrepancies
- Review shift-to-shift count documentation
- Camera documentation if available
- Badge access report to determine off-shift entry by staff
- Review personnel files of staff to determine history of involvement in similar circumstances

### **Notification:**

- Charge Nurse/Supervisor/Manager notified
- Manager contacted HR Department
- Compliance Officer notified
- Director of Pharmacy notified, if diversion is suspected
- DEA form 106 completed when applicable (<https://www.deadiversion.usdoj.gov/webforms/dtlLogin.jsp>)
- Reimbursement/medication replacement if resident medications are lost/stolen
- Other reporting requirements (local authorities, health agency, state board, disclose to resident, etc.)