

**CI-KH**  
**MEDICATION DIVERSION DETECTION, REPORTING AND**  
**RESPONSE**  
**Page 1 of 4**

**PURPOSE:**

The purpose of this policy is to outline Kettering Health’s system-wide approach to the detection, reporting and response to a suspected drug diversion. It is our utmost priority to provide a safe and healthy environment for employees, volunteers, patients, visitors and the communities we serve while also meeting all applicable legal and regulatory requirements.

**DEFINITIONS:**

**Controlled Substances:** Drugs and other substances that are classified by Schedule (Schedule I through Schedule V) under Title 21 of the Code of Federal Regulations and/or Chapter 4729 of the Ohio Revised Code. Kettering Health will only access and utilize Schedule II (e.g. Fentanyl) thru Schedule V Controlled Substances. Substances are placed in their respective schedules based on whether they have a currently accepted medical use in treatment in the United States, their relative abuse potential, and the likelihood of causing dependence when abused.

**Dangerous Drug:** A medication approved by the U.S. Food and Drug Administration (FDA) that, according to federal law and/or state law, can only be administered and/or dispensed to the public with a prescription from a Licensed/Registered Healthcare Provider. This is also referred to as prescription medication.

**Discrepancy:** Any event in which theft or loss of Dangerous Drug cannot be resolved and the circumstances are under review to determine where an error may have occurred (i.e. miscount of a controlled substance that after further review can be resolved – human error during count).

**Drug Diversion:** The illegal act of using, taking possession of, and/or distributing Prescription Medication. Drug Diversion could be demonstrated in several ways including, but not limited to:

1. Theft
2. Using or taking without a legal order/prescription
3. Forgery or modification of an order/prescription.
4. Manipulating records in an effort to divert Dangerous Drug (e.g. waste, return, administration)

**Drug Diversion Oversight/Steering Committee:** The Drug Diversion Oversight Committee will serve as the advisory group for the implementation of a Drug Diversion Response Team, which provides a systematic, coordinated, and continuous approach to the prevention, recognition, and reporting of Drug Diversion. The Committee will develop strategies and coordinate resources to support Drug Diversion

---

**Kettering Health Network (KHN) Organization-Wide Policy**

KHN adopts this policy for Kettering Medical Center, Sycamore Medical Center, Grandview Hospital and Medical Center/Southview Hospital, Greene Memorial Hospital, Soin Medical Center, Fort Hamilton Hospital, Troy Hospital, all hospital off-sites, and KHN Support Services.

**CI-KH**  
**MEDICATION DIVERSION DETECTION, REPORTING AND**  
**RESPONSE**  
**Page 2 of 4**

efforts and will serve as the organizational line of communication between the Diversion Program, executive leadership and the medical staff.

**Drug Diversion Response Team:** A consistent and active group comprised of Kettering Health employees from the following multi-disciplinary departments: Pharmacy Leadership, Human Resources, Corporate Compliance, Police/Security, and Legal Services. Other individuals including, but not limited to, Nursing leadership, the CMO for a particular hospital campus, and/or physicians will be asked to work with Drug Diversion Response Team based on the circumstances surrounding the suspected Drug Diversion

**Licensed/Registered Healthcare Provider:** An individual who provides care and services within the scope of their respective practice and as authorized by their respective regulatory agencies and Kettering Health policies.

**POLICY:**

1. Education and training.
  - a. All individuals covered by this policy, including Kettering Health leaders, who work in or have access to patient care areas shall receive education and training as part of their orientation, on an annual basis thereafter and, as needed, on the following topics:
    - i. Consequences of Drug Diversion: the impact on patient, staff, and visitor safety and the harm to life and career presented by Drug Diversion.
    - ii. Signs of Drug Diversion/Impairment: the personality and environmental factors that pose the greatest risk or may predispose individuals to engage in Drug Diversion, suspicious behaviors, and physical characteristics that may indicate Drug Diversion or impairment (e.g., frequent disappearances from the assigned work area, a pattern of removing Controlled Substances before the start of shift, immediately at the beginning or at the end of the shift, heavy or no wastage of Prescription Drugs, personality change, drowsiness and excessive fatigue, shakiness or tremors, slurred speech, etc.)
    - iii. Methods of Drug Diversion: the common methods used to engage in Drug Diversion, which may include, but are not limited to, removal of Prescription Medication when not needed by the patient, removal of Prescription Medication for patients already discharged, removal of duplicate doses of medication and failure to waste unused medications.
2. Responsibilities of those covered by this policy.
  - a. This policy applies to employees, contractors, volunteers, interns, members of the medical staff and students.

---

**Kettering Health Network (KHN) Organization-Wide Policy**

KHN adopts this policy for Kettering Medical Center, Sycamore Medical Center, Grandview Hospital and Medical Center/Southview Hospital, Greene Memorial Hospital, Soin Medical Center, Fort Hamilton Hospital, Troy Hospital, all hospital off-sites, and KHN Support Services.

**CI-KH**  
**MEDICATION DIVERSION DETECTION, REPORTING AND**  
**RESPONSE**  
**Page 3 of 4**

- b. All individuals covered by this policy are expected to fully comply with State and Federal laws and regulations and Kettering Health policies governing Dangerous Drugs, including Controlled Substances.
  - c. Should any individual suspect or become aware that Prescription Medication, including Controlled Substances, is being diverted, it is their responsibility to promptly report the matter openly or anonymously. Multiple reporting channels are available including leaders, Corporate Integrity via the Kettering Health Drug Diversion Hotline at 1-833-220-9959 or the website at [www.ketteringhealthdrugdiversion.ethicspoint.com](http://www.ketteringhealthdrugdiversion.ethicspoint.com), Human Resources, Campus Police, and/or Pharmacy site management.
3. Prevention of Drug Diversion.
- a. Kettering Health has established a Drug Diversion Oversight/Steering Committee and a Drug Diversion Response Team to help prevent potential instances of Drug Diversion
  - b. The Drug Diversion Oversight/Steering Committee will meet periodically to review this Policy and its effectiveness as well as Kettering Health's approach to preventing and identifying suspected or actual Drug Diversion.
4. Monitoring/Detection
- a. All reports/incidents of suspected Drug Diversion will be thoroughly investigated
  - b. Suspicion of potential Drug Diversion may originate from potential sources including, but not limited to, the following:
    - i. Witnesses to Drug Diversion or potential Drug Diversion
    - ii. Review of data related to the use, storage, and/or waste of Dangerous Drugs
      - i. Periodic review of analytics data regarding use/waste/null transactions and/or anomalous activity
      - ii. Periodic review of documentation appropriateness (i.e. closed loop reports).
      - iii. Chart Audit discovery
    - iii. Self-disclosure of Drug Diversion
    - iv. External reporting from individuals, law enforcement
    - v. Discovery of Dangerous Drugs outside of appropriate locations
5. Response to Suspected Drug Diversion
- a. Any instances of suspected Drug Diversion must be promptly reported via one of the multiple channels outlined in Section 2 above. If a Supervisor or HR or Kettering Health police are notified of a suspected Drug Diversion, they must promptly report the information to the Drug Diversion Response Committee via the Kettering Health Drug Diversion Hotline at 1-833-220-9959 or [www.ketteringhealthdrugdiversion.ethicspoint.com](http://www.ketteringhealthdrugdiversion.ethicspoint.com) so the suspected Drug Diversion can be promptly investigated.

---

**Kettering Health Network (KHN) Organization-Wide Policy**

KHN adopts this policy for Kettering Medical Center, Sycamore Medical Center, Grandview Hospital and Medical Center/Southview Hospital, Greene Memorial Hospital, Soin Medical Center, Fort Hamilton Hospital, Troy Hospital, all hospital off-sites, and KHN Support Services.

**CI-KH**  
**MEDICATION DIVERSION DETECTION, REPORTING AND**  
**RESPONSE**  
**Page 4 of 4**

- b. The leader will determine whether the suspected Drug Diversion involves an impaired individual performing active patient care.
  - i. In the event this is occurring, the leader should contact local HR and Police and consider removing the individual from patient care in addition to following the reporting step mentioned above in Section 5(a).
  - ii. An interview of the suspected individual will only be conducted by law enforcement. No one should attempt to conduct an investigation, interview the individual, conduct reasonable suspicion testing, etc. without guidance from the Drug Diversion Response Team as this could implicate a criminal investigation.
- c. If the individual does not appear impaired and/or is not providing active direct patient care, the following steps will be promptly initiated:
  - i. An assigned member of the Drug Diversion Response Team will investigate the report and available data to determine the probability of Drug Diversion.
  - ii. Notification to the Drug Diversion Response Team will be provided if this report is assessed as a possible Drug Diversion versus a Discrepancy.
  - iii. The Drug Diversion Response Team will thereafter be promptly activated and begin the discovery process to determine Drug Diversion risk along with the next steps.
  - iv. When the Drug Diversion Team's investigation concludes that Drug Diversion is suspected, a member of the Team will promptly notify the Ohio Board of Pharmacy and seek guidance regarding next steps, including the potential interview of the individual suspected of Drug Diversion. Other applicable licensing/registration boards will also be notified, as needed, based on direction and guidance from the Ohio Board of Pharmacy.
  - v. Anyone confirmed to have engaged in Drug Diversion will be subject to discipline up to and including termination and/or may be deemed disqualified to perform work or provide services for Kettering Health. Such action may be taken regardless whether the Drug Diversion occurred on Kettering Health property and/or during work hours.
  - vi. Kettering Health will also review any applicable patient records to determine whether any billing adjustments need to be made and/or reported to the appropriate entities.

SPONSORING DEPT: Corporate & Integrity  
DEPARTMENTS AFFECTED: All KH Departments  
DATE OF ORIGIN: 12/21/2022

---

**Kettering Health Network (KHN) Organization-Wide Policy**

KHN adopts this policy for Kettering Medical Center, Sycamore Medical Center, Grandview Hospital and Medical Center/Southview Hospital, Greene Memorial Hospital, Soin Medical Center, Fort Hamilton Hospital, Troy Hospital, all hospital off-sites, and KHN Support Services.