



Prescription Drug Diversion: Use of Legal Drugs for Illegal Purposes

Module 2



Objectives

At the conclusion of this presentation, you will be able to:

- Evaluate a prescription for tamper-resistant features
- Assess a Prescription Drug Monitoring Program (PDMP) and provide recommendations to improve the usefulness of it
- Formulate a drug diversion prevention plan for your practice

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Prevention

Implement Detection Strategies

- Involve entire team
- Recognize suspicious behavior
- Obtain a thorough history
- Look for consistency
- Conduct appropriate tests
- Prescribe non-pharmacological treatment
- Proceed cautiously



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Drug Diversion Prevention Strategies

All health care professionals

- Hang posters to deter drug seekers
- Be aware of lock-in programs for beneficiaries
- Pay attention to law enforcement alerts

Pharmacists

- Verify suspicious prescriptions with prescribers

Prescribers

- Consult PDMP data before prescribing controlled substances
- Store prescription pad in a secure location

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Drug Diversion Prevention Strategies

All Health Care Professionals

- Document in detail

Prescribers

- Implement detection strategies
- Recognize provider identity theft



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Prevention Prevent Provider Identity Theft

Safeguard your medical identity

<http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/SafeMed-ID-Products.pdf>



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Prevention of Prescription Drug Diversion and Abuse

- Tamper-resistant prescription pads
- National Drug Control Strategy
- Prescription Drug Abuse Prevention Plan
 - PDMP
 - Prescription drug disposal programs
- Lock Your Meds®
- Comprehensive training program



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Prevention Tamper-Resistant Prescription Pads

- Required for all Medicaid prescriptions
- Prevent fraudulent prescriptions using a variety of tools:
 - Watermarks
 - Thermo-chromic or coin-reactive ink
 - Erasure revealing background
 - Void protection upon duplication
 - A description of security features printed on each Rx form

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Prevention National Drug Control Strategy

- Produced by the Office of National Drug Control Policy (ONDCP)
- Outlines the efforts of the administration to reduce the drug problem



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**Prevention
National Drug Control Strategy**

Goals:

- Curtail illicit drug consumption in America
- Improve the public health and public safety of the American people by reducing the consequences of drug abuse

<http://www.whitehouse.gov/ondcp/2013-national-drug-control-strategy>

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**Prevention
Prescription Drug Abuse Prevention Plan**

- Education
- Tracking and monitoring
- Proper medication disposal
- Enforcement



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**Prevention
Prescription Drug Abuse Prevention Plan**

Education

- Public
 - Prescription drugs can be as dangerous as illegal drugs
- Health care professionals
 - Appropriate prescribing and dispensing of opioids
 - Recognition of substance abuse

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Prevention Prescription Drug Abuse Prevention Plan

Tracking and Monitoring

- PDMP
- Screening, Brief Intervention, and Referral to Treatment (SBIRT)
- Electronic prescribing of controlled substances

Option A



Option B



Prevention Prescription Drug Abuse Prevention Plan

Tracking and Monitoring—PDMP

- Statewide electronic database that collects information on controlled substance prescriptions
 - Track prescribing trends
 - Evaluate efforts to improve prescribing practices
 - Reduce drug diversion and abuse

Prescription Drug Abuse Prevention Plan—Tracking and Monitoring

PDMP—benefits

- Improve prescribing
- Reduce doctor shopping and substance abuse treatment admissions
- Result in fewer opiate exposures from abuse and misuse
- Save money



Prescription Drug Abuse Prevention Plan—Tracking and Monitoring

PDMP—resources

- National Alliance for Model State Drug Laws
<http://www.namsdl.org/>
- Alliance of States with Prescription Drug Monitoring Programs
<http://www.pmpalliance.org/>
- PDMP Center of Excellence
<http://www.pdmpexcellence.org/>

Prescription Drug Abuse Prevention Plan—Tracking and Monitoring

Status of State Prescription Drug Monitoring Programs (PDMPs)



¹ The operation of Nebraska's Prescription Monitoring Program is currently being facilitated through the state's Health Information Initiative. Participation by patients, physicians, and other health care providers is voluntary.
² The House of D.C. has approved the legislation but it is pending a 30-day review process by Congress.

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Prescription Drug Abuse Prevention Plan—Tracking and Monitoring

SBIRT

- Brief
 - National Institute on Drug Abuse (NIDA) Drug Screening Tool <http://www.drugabuse.gov/nmassist/>
- Universal
- Targeted
- Accessible
- Comprehensive
- Evidence-based

<http://www.samhsa.gov/prevention/sbirt/>

Knowledge Check

Review the characteristics below. Is the characteristic true or false?

1. PDMP reports can assure that patients in chronic pain properly manage opioid medications.
2. Review of PDMP data will help determine if patients obtain prescriptions from other health care professionals.

Prescription Drug Abuse Prevention Plan—Proper Medication Disposal

- Prevents drug diversion and abuse
- Promotes public safety
- Protects the environment



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Prescription Drug Abuse Prevention Plan—Proper Medication Disposal

Prescription Drug Disposal Programs

- DEA Take-Back Days
- SMARxT Disposal™
 - American Medicine Chest Challenge
- Dispose My Meds

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Prescription Drug Abuse Prevention Plan Lock Your Meds®

- Multi-media campaign
- “Be Aware. Don’t Share.”
- Free downloadable materials

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Prescription Drug Abuse Prevention Plan—Enforcement

- Minimize drug diversion and abuse
- Maintain access to prescription medications



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Prevention Compliance Program

Provide internal controls to:

- Prevent fraud and abuse
- Monitor adherence to Federal and State law and program requirements



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Prevention Compliance Program

Benefits of education and training

- Improved compliance
- Improved adherence to policies
- Increased collaboration
- Enhanced coordination
- Increased referral

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Prevention Drug Diversion Risk Management

Risk management: Proactive and reactive strategies that reduce the possibility of specific loss.

- Identify the risks
- Assess the probability

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Prevention Drug Diversion Risk Management

Estimate the impact

- Consider external factors
- Patient impact
- Legal and financial consequences

Control the risk

- Follow policies and procedures
- Conduct random audits

Verify use of PDMP

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Detection, Prevention, or Monitoring Strategies

For each of the strategies that appear on the next slide, identify each as either:

- 🔍 Detection
- ✖ Prevention
- 👁 Monitoring

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Detection, Prevention, or Monitoring Strategies

- Question anything that sends up a “red flag”
- Consult PDMP data before prescribing
- Add a drug diversion risk management program

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Reporting Drug Diversion

Notify law enforcement.

Report suspected drug diversion and other fraud or abuse to the State Medicaid agency (SMA)
<http://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/FraudAbuseforConsumers/Downloads/smafraudcontacts-february2014.pdf>

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Reporting Drug Diversion

Other agencies that may also be notified:

- Local law enforcement
- U.S. Drug Enforcement Administration (DEA)
- U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG) National Fraud Hotline
- State Medicaid Fraud Control Unit
- State licensing board if a health care professional is involved

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Available Resources

- CMS—Drug Diversion in the Medicaid Program
<https://www.cms.gov/MedicaidIntegrityProgram/Downloads/drugdiversion.pdf>
- National Health Care Anti-Fraud Association
<http://nhcaa.org>
- National Association of Medicaid Fraud Control Units
<http://www.namfcu.net>
- HHS-OIG
<https://oig.hhs.gov/>
- U.S. Department of Justice, DEA Office of Diversion Control
<http://www.deadiversion.usdoj.gov/>
- SMA
- Local law enforcement

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Questions



Please direct questions or requests to: MedicaidProviderEducation@cms.hhs.gov

To see the electronic version of this presentation and the other products included in the Prescription Drug Diversion Toolkit, visit the Medicaid Program Integrity Education page at <http://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/edmic-landing.html> on the CMS website.

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