

# Partners in Integrity: What Is a Prescriber's Role in Preventing the Diversion of Prescription Drugs?

## What Is Drug Diversion?

Drug diversion is the illegal distribution or abuse of prescription drugs or their use for purposes not intended by the prescriber.[1] The diversion of prescription drugs may occur at any point as prescription drugs are distributed from the manufacturer to wholesale distributors, to pharmacies, and ultimately to the patient.[2] Members of the medical profession may also be involved in diverting prescription drugs for recreational purposes, relief of addictions, monetary gain, self-medication for pain or sleep, or the alleviation of withdrawal symptoms.

## The Most Common Types of Drug Diversion

The most common types of drug diversion are:

- Selling prescription drugs;
- Doctor shopping;
- Illegal Internet pharmacies;
- Drug theft;
- Prescription pad theft and forgery; and
- Illicit prescribing.

## Drug Classes With a High Potential for Drug Diversion and Abuse

The National Institute on Drug Abuse (NIDA) and the U.S. Drug Enforcement Administration (DEA) have identified five classes of prescription drugs with a high potential for diversion and abuse. The classes include:

- Anabolic steroids;
- Central nervous system depressants;
- Hallucinogens;
- Opioids; and
- Stimulants.

## Clinical Practices That Can Minimize Drug Diversion

A provider should take precautions to avoid being taken advantage of by drug-seeking patients. Precautions include:

- Exercising caution with patients who use or request combination or “layered” drugs for enhanced effects (for example, anti-psychotics with opioids or benzodiazepines);
- Documenting thoroughly when prescribing narcotics or choosing not to prescribe;
- Keeping a DEA or license number confidential unless disclosure is required;
- Moving to electronic prescribing so that paper prescriptions are not required;
- Adhering to strict refill policies and educating office staff;

- Using State Prescription Drug Monitoring Programs (PDMPs), where available;
- Referring patients with extensive pain management or prescription controlled medication needs to specialized practices; and
- Collaborating with pharmacy benefit managers and managed care plans as they seek to determine the medical necessity of prescriptions for controlled substances.

## Prescribing Principles That Can Curb the Diversion of Drugs

Prescribers can curb drug diversion by adhering to prescribing principles for opioids and other controlled substances, such as:

- Completing a full evaluation and assessment to verify the need for pain medication;
- Requesting a report of a patient’s medication history from the State PDMP, where available, before prescribing opioids to patients;
- Screening for substance abuse;
- Prescribing opioids only if alternative therapies do not deliver adequate pain relief; and
- Using pain assessment tools to monitor the effectiveness of controlled substances.

## Reporting Suspected Drug Diversion

If a provider suspects that drug diversion has occurred, the activity should be documented and a report should be made. The agencies that should be notified for suspected drug diversion include:

- Local law enforcement and local fraud alert networks;
- DEA, for reporting theft or loss of controlled substances, at <https://www.deadiversion.usdoj.gov/webforms/dtlLogin.jsp> on the DEA Office of Diversion Control website; and
- U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG) by e-mail at [HHSTips@oig.hhs.gov](mailto:HHSTips@oig.hhs.gov) or by telephone at 1-800-HHS-TIPS (1-800-447-8477); TTY: 1-800-377-4950.

## Additional Resources

- For more information about prescription drug diversion, visit <http://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/Provider-Education-Toolkits/drug-diversion-toolkit.html> to review “Prescription Drug Diversion—Use of Legal Drugs for Illegal Purposes” modules 1 and 2 webinars and to download the “What Is a Prescriber’s Role in Preventing the Diversion of Prescription Drugs?” booklet.
- For information on fraud prevention and detection compliance guidance, visit <http://oig.hhs.gov/fraud/> on the HHS-OIG website.
- For more information on drug diversion, visit <http://www.deadiversion.usdoj.gov> on the DEA Office of Diversion Control website.
- For more information and statistics on the prescription drugs of abuse, visit <http://www.drugabuse.gov/drugs-abuse/prescription-drugs-cold-medicines> on the NIDA website.
- For more information on strategies to reduce drug diversion in the Medicaid program, visit <http://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/MedicaidIntegrityProgram/downloads/drugdiversion.pdf> on the Centers for Medicare & Medicaid Services (CMS) website.

## References

1 Centers for Medicare & Medicaid Services. Center for Program Integrity. (2012, January). Drug Diversion in the Medicaid Program: State Strategies for Reducing Prescription Drug Diversion in Medicaid. Retrieved July 18, 2014, from <http://www4a.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/MedicaidIntegrityProgram/downloads/drugdiversion.pdf>

2 National Institutes of Health. Author Manuscript. (2007, March). Mechanisms of Prescription Drug Diversion Among Drug-Involved Club- and Street-Based Populations. Retrieved July 18, 2014, from <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2879025/pdf/nihms177080.pdf>

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