

POLICY STATEMENT

The Role of the Consultant Pharmacist in Preventing and Detecting Diversion of Controlled Substances in Nursing Facilities

Preamble

Wherever controlled medications are stored, administered, or dispensed, there exists the potential for diversion or abuse of those controlled medications. The abuse of controlled medications is a serious public health and patient care issue. Laws have been established to ensure that controlled medications are used for their intended purpose. One of the important roles of consultant pharmacists is to help ensure that the accountability of controlled medications is maintained in the nursing facility.

Arguments and Research

In nursing facilities, consultant pharmacists have specific duties to help ensure that controlled medication accountability is maintained. Briefly stated, these duties are to establish a system of accountability of controlled medications, and to ensure that the system is followed and accurate records are maintained.¹

Consultant pharmacists need to accurately perform their duties that relate to accountability and destruction of controlled substances in nursing facilities and to assist facility staff in performing these duties.

Although a relatively small fraction of the nation's medication supply is administered in a health care facility such as a hospital, long term care facility, or outpatient surgery center, the nature of these settings provides ample opportunity for medication diversion. Frequent changes in medication orders and short term stays with rapid discharges often lead to significant quantities of controlled medications being stored while awaiting destruction. If not accounted for and stored properly, these controlled substances can present opportunities for diversion. This less appreciated form of medication diversion is associated with adverse consequences, staff abuse of controlled medications and/or diversion into the public sector. The scope and potential for harm associated with such medication diversion is incalculable. There are no available data to precisely define the extent of medication diversion from the health care facility workplace.²

Regulations from the Centers for Medicare and Medicaid Services state that consultant Pharmacists in nursing facilities have the following responsibilities related to controlled substances:³

- Establish a system of records of receipt and disposition of all controlled medications in sufficient detail to enable an accurate reconciliation; and

- Determine that medication records are in order and that an account of all controlled medications is maintained and periodically reconciled.

In addition, the facility in coordination with the consultant pharmacist has the responsibility to establish policies and procedures regarding the following:⁴

- A system of medication records that enables periodic accurate reconciliation and accounting for all controlled medications.
- The receipt of controlled medications in the nursing facility
- The storage of controlled medications in the nursing facility, which includes active patient medications, emergency drug kit medications, and expired or discontinued medications
- The administration of controlled medications in the nursing facility
- The disposition of unwanted controlled medications
- Accountability procedures for all controlled substances, including periodic counts by nursing staff and audits by the consultant pharmacist
- Prompt identification of loss or potential diversion of controlled medications and determination of the extent of loss or potential diversion.
- Reporting of controlled medication shortages to the appropriate authorities

The consultant pharmacist subsequently must ensure that policies and procedures relating to controlled medications are implemented by the facility, as well as:

- Conduct periodic audits of controlled medications to ensure that accountability is maintained; and
- Assist the facility in complying with all laws and regulations relating to controlled medications, including the reporting of shortages of controlled medications

Position

Within the long-term care setting, the large number of controlled medications that are dispensed and administered or go unused can pose a significant potential for diversion and become a threat to the environment and the community. Proper management of medication will help ensure that patients receive necessary prescribed medication, reduce medication costs, and prevent illegal diversion of controlled substances. Consultant pharmacists have specific duties in nursing homes to help ensure that controlled medication accountability is maintained through recognition of diversion and reporting as necessary. It is incumbent on them to take the lead in establishing methods of control, tracking, recognition of diversion and reporting as necessary and appropriate disposal of these products.

Approved by the American Society of Consultant Pharmacists Board of Directors, December 13, 2017.

References

1. State Operations Manual §483.45[b][2], July, 2017
2. Berge KH, Dillon KR, Sikkink KM, Taylor TK, Lanier WL. Diversion of medications within health care facilities, a multiple-victim crime: patterns of diversion, scope, consequences, detection, and prevention. *Mayo Clin Proc* 2012;87(7):674-82. Doi:10.1016/j.mayocp.2012.03/013. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3538481/pdf/main.pdf>
3. State Operations Manual §483.45[b][1], July, 2017
4. State Operations Manual, Appendix PP, pg.453 – 459, July, 2017