MSHP Annual Meeting 2016

Conducting Healthcare Provider Drug Diversion Investigations

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Setting the Tone and Focus...

- Focus not on theft from Pharmacy
- Brief description of a case study
  - RN with one year of experience
  - Excellent practice and documentation by all accounts
  - Routine review of ADM data by RN leader revealed sudden change in practice
  - Every effort made to dig into possible “normal” reasons of them
Collaboration is Key

• Identify your team ahead of time
• Build your relationships and communication before you need it
• Incorporate varied perspectives and contributions to collective objective
• Develop a plan or process to conduct your investigation
• Defer to subject matter expertise of partners
The Response

• How did the concern get identified?
• What is the background of the employee?
• What information do you need from digital systems?
• What are we looking at?- 
• What is associated urgency of the concern?
• Exchange information, concerns, thoughts with your team
• Make your plan and execute your response
Know Your Objectives

• A fair and objective evaluation
• Confirm or dispel concerns based on fact or evidence
• Avoid assumptions or conclusions without sufficient information
• Often your process can identify constructive change /improvement to policy, practice, education, or oversight
Taking Action

• Consider suspending employee access to ADMs or hospital areas
• In depth analysis of pharmacy data to understand full context of the issue
• Comprehensive background on the employee
• Coordinate an interview of the employee
• Discuss possible outcomes and related contingency steps
The Interview

• Know who “should” do them
• Know who “should NOT” do them
• Team should fully support with all available information
• Expertise and confidence in doing them is crucial
• Know the rules of engagement with employee interviews for your environment
Logistics

• No advance notice to employee
• Bring employee to interview location
• NO MORE THAN TWO INTERVIEWERS
• Know which interviewer is the LEAD
• Be prepared to take detailed notes
• Select a location with minimal interruption or distraction
• Be prepared for bathroom, tissue, water needs
Conducting the Interview

- Define the circumstances and objectives to the employee
- Limit to time necessary - no more than 2 hours generally - often it is less
- Expect excuses, denials, lies
- One interviewer controls the tone, tempo, strategy, and main questioning
- Second interviewer should observe, listen, take detailed notes, wait for primary interviewer to invite your questions
- No need for “good cop-bad cop”
- Always be professional and honest
What will you do?

• Do you know who will take the lead on suspected diversion?
• Do you know the rules on interviewing employees at your business?
• Do you know who will do the actual interview?
• Do you know how to document the investigation?
Short Video

• Please watch...
The Investigative Report

• Who will write it?
• Who do you give it to?
• Know the “big picture” for employment, legal, licensing, or other proceedings/challenges
• Should be comprehensive, truthful, and supported by fact and evidence
• Objective, professional, clear
The Investigative Report

• Background
  • How was the issue identified

• Supporting Staff
  • Who else was involved or provided information

• Documents/Information reviewed

• Investigative Summary
  • What was done to investigate the concern

• Conclusions

• Summary of each interview (as an appendix)

• Handout will be provided
While investigating a suspected narcotics diversion it is always a good idea to call the subject ahead and tell them about the concerns.

A True
B False
When interviewing the subject of a suspected diversion, it is advisable that interviewers consider all of the following, EXCEPT:

- A. use two interviewers only
- B. be compassionate—but firm
- C. tell subject lots of people have drug problems
- D. avoid allowing subject to control the interview
- E. Be truthful and honest with the subject
Case Study

• The rest of the story...
Key Takeaways

• Key Takeaway #1
  • Understanding that diversion investigations require a collaborative approach. Effective communication and preparation will directly impact your outcomes. Have a plan and process ahead of the need.

• Key Takeaway #2
  • When interviewing a suspected diverter it is critical to remain focused, disciplined, in control, and professional. Be prepared for deceit, denial, or deflection.

• Key Takeaway #3
  • Understand the human element involved without losing sight of the professional and ethical requirements to address the issues involved.