

Best Practices to Prevent Drug Diversion

Inventory Management: Maintain accurate records of all medication quantities, purchases, and dispensing or administration to quickly detect any discrepancies.

Employee Training: Educate staff about the risks of drug diversion, the importance of reporting suspicions, and procedures for handling medications.

Access to Controls: Limit access to controlled substance medications by storing them in a locked cabinet or safe, limiting access to authorized personnel, and supervising staff that handle those medications.

Monitoring: Regularly review medication usage patterns and discrepancies and promptly investigate drug losses, or any unusual or inconsistent behavior.

Auditing: Conduct periodic audits of records of accountability, administration, dispensing, and drug inventories to identify irregularities.

Reporting: Establish a clear process for reporting suspicions of drug diversion, ensuring that employees feel comfortable reporting concerns without fear of retribution.

Surveillance: Implement security measures like cameras and daily covert drug counts to quickly detect ongoing drug diversion.

Prescription Validation: Use the Ohio Automated Rx Reporting System (OARRS), ensure prescriptions are legitimate by verifying with prescribers, and confirming patient identification. Clearly notate on front of a controlled substance prescription the receipt to prevent unauthorized duplication.

Medication Disposal: Properly dispose of expired or unused medications to prevent them from being diverted.

Diversion Response Plan: Have a plan in place for responding to potential diversion incidents, including communication, investigation, and reporting to the State of Ohio Board of Pharmacy and local law enforcement.

Collaboration: Work with the State of Ohio Board of Pharmacy, other regulatory agencies, and local law enforcement and coordinate efforts to combat drug diversion.

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What To Do When You Suspect a Theft or Significant Loss

OAC 4729:5-3-02 and 4729:6-3-02 require a licensed Terminal Distributor of Dangerous Drugs or Drug Distributor to notify the Board of any theft or significant loss of dangerous drugs (controlled and non-controlled prescription drugs) and drug documents **immediately upon discovery** of the theft or significant loss.

This includes dangerous drugs in transit that were either shipped from or to a prescriber, terminal distributor, or drug distributor.

Please visit www.pharmacy.ohio.gov/theft for more guidance on these requirements including on submitting an initial notification to the Board.

IMPORTANT FOLLOW-UP REQUIRED

In addition to the initial notification requirements, a licensee is required to submit a detailed report of the theft or significant loss to the Board using the online portal within **30 days** following the discovery of such theft or significant loss. This detailed report is similar to the form required by DEA (Form 106) and must be submitted using the online portal accessible by visiting: www.pharmacy.ohio.gov/portal



Scan here to access the Board's online theft and loss reporting system.



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