



**DEPARTMENT OF HEALTH
PHARMACY QUALITY ASSURANCE COMMISSION
PROCEDURE**

Title:	Guidelines for Investigating Diversion Cases
Reference:	Chapter 18.64 RCW Pharmacist WAC 246-945-232 Pharmacy Licensing WAC 246-945-233 Hospital Pharmacy Associated Clinics WAC 246-945-245 Health Care Entities WAC 246-945-005 Commission inspections and investigations
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Approved:	Tim Lynch, PharmD, MS, FABC, FASHP, Pharmacy Quality Assurance Commission Chair

This procedure establishes appropriate guidelines for areas the panel will request the investigator to collect information when investigating diversion cases in which the licensee holds a supervisory role (i.e. responsible pharmacy manager).

BACKGROUND:

Each case presents unique facts and must be assessed based on the facts presented. However, in the course of investigating and assessing diversion cases, there are several common issues that have arisen. These guidelines touch on areas where commission members will likely want information when reviewing diversion cases. These guidelines are not intended to be an exclusive list of questions.

GUIDELINES:

1. Discovery

How was the diversion discovered? Specifically, was it a result of a policy/procedure that was in place? Or, alternatively, was it discovered by happenstance, i.e. a staff member practicing while impaired or a patient returning to the pharmacy after being shorted? The goal is determining whether the diversion would have continued but for a random intervening event.

2. Variance reports

If available in inventory software, how often are variance reports run? Does the responsible pharmacy manager have access to them? How are they utilized? Is there a threshold difference at which further investigation is undertaken? Is there a threshold frequency where further investigation is undertaken?

3. Suspicious Ordering

At what level are the institution's automatic alerts from their wholesalers set for suspicious ordering? How often are those levels reviewed or compared to other comparable institutions? Who has control over setting these levels with wholesalers?

4. Management Authority

Who has the authority to revise policies and procedures, and make meaningful changes to security measures such as purchase of software updates or facility changes?

5. Remedial measures

What remedial measures were adopted? How quickly? Has there been a review to determine whether the remedial measures have successfully addressed the situation?