



Today's Agenda

- Governmental Affairs Update – Nick Goodwin, IHCA/INCAL
- Superior Health QIN-QIO – Teresa Hostettler
- Drug Diversion – Lori Davenport, IHCA/INCAL

July 10, 2025

Drug Diversion

Presented by:

Lori Davenport, Director of Regulatory Clinical Affairs



OUR DISCUSSION TODAY

OVERVIEW

- Drug Diversion –Definition and Implications
- Prevention
- Response
- AI
- QAPI
- Indiana – specifics



Definition & Reasons

- Drug diversion occurs when medication is redirected from its legal intended destination (personal use, sale, or distribution to others).
- Legal to illegal use
- Reasons for Diversion
- Consequences



Consequences

Residents

Legal repercussions

Providers

Facility

Organization

Loss of Trust

Co Workers

The Diverters Life



Why Diversion?

- Stress
- Access
- Money
- Feel better



Prevention

Takes the Village

Interconnected Interdependent

Policy Procedures

Review for handling

Review for documentation

Review for waste disposal

Properly dispose of expired or
unused medications to prevent
them from being diverted

The People must follow the policy and
procedure, or a gap occurs

Action Speaks louder than just words!



Interconnected Interdependent

Security

Keys

Access

infusions – locked cases and
portless tubing

Cameras

AI – analysis of data in EMR

Resident Feedback



Interconnected Interdependent

Staff Training

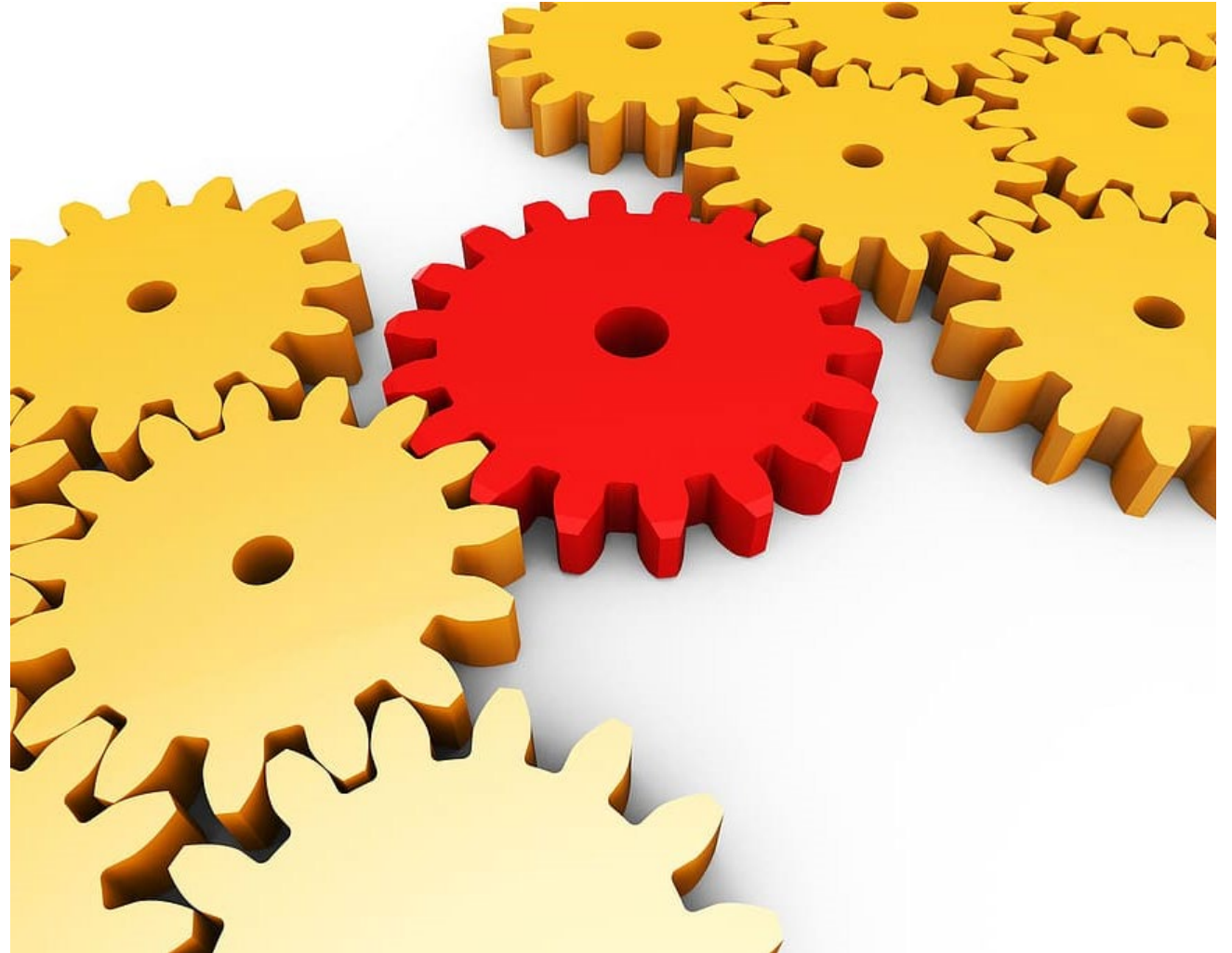
- Recognizing signs of diversion

- Reporting suspicions

- Expectations

- Procedures for wasting and witnessing – how long after pulling do you have to waste with a witness

- Know procurement Controls – ordering, receiving inventory, two-person count every shift and when receiving narcotics, electronic ordering systems



Interconnected Interdependent

Diversion Response Plan

Have a plan in place for responding to potential diversion incidents.

Communication, and investigation to include Indiana Board of Pharmacy, IDOH and local law enforcement



Interconnected Interdependent

Prescriptions

Ensure prescriptions are legitimate by verifying with prescribers and confirming resident identification.

Clearly notation front of a controlled substance prescription the receipt to prevent unauthorized duplication.

.



Criminal Charges

- A suspect accused of drug diversion can face serious legal and professional consequences.
- Criminal charges – Felony
- Range from Level 6 for less severe offenses to more serious like a level 3 or 4 felonies for diversion that leads to serious harm or death.
- Misdemeanor – low level possession or interference with medical services .
-

FELONY



This Photo by Unknown Author is licensed under [CC BY-SA](#)

Potential Penalties

- Fines
- Imprisonment
- Probation



Professional

- License sanctions –
- Revocation
- Suspension
- Censure
- reprimand
- probation



Pre-Trial Diversion

First time offenders – a pre-trial diversion might be an option

An agreement with the prosecutor to fulfill certain conditions

Successful completion can result in charges being dismissed and the case potentially being expunged.



Prevention

- Drug diversion in Indiana is a serious matter
- Can affect personal freedom
- Can affect professional career
- It's a violation of a resident right – misappropriation of property – Its abuse!



See something – say something
Mandatory Reporter



THANK YOU!