

Drug Diversion Investigation Checklist:

- ✔ Contact and report suspected diversion to appropriate managers.
- ✔ Interview employees working or who had access at the time of the discrepancy.
- ✔ Drug test employees working or who had access at the time of discrepancy.
- ✔ Interview any related patients if they are able.
- ✔ Review supporting medication records, logs, EMAR, to confirm missing amounts.
- ✔ Review surveillance footage and make a copy if something is observed.
- ✔ Prepare a chronological narrative of events leading to the diversion discovery and your follow up inquiry.
- ✔ Include any prior concerns, events, or red flags if a particular employee is suspected.
- ✔ Consider an audit of all controlled medications to confirm additional instances.
- ✔ If an employee is identified as the suspect, always get a statement from them (even if they deny the action).
- ✔ Save any emails or text communications with a suspected employee.
- ✔ Save any discarded/destroyed packaging, records, or altered packaging if located.
- ✔ File a complaint with DOPL (see 58-31b-702 for reporting requirements).
- ✔ Include copies of all of the above information in your complaint or send it to the investigator ASAP. (as a regulatory agency DOPL is HIPAA exempt)

Always follow your facilities policies and procedures.

Utilizing these tips will ensure the best outcome for a DOPL investigation.

