

# **An Overview of Drug Diversion Issues**

Maureen Barker & Kelly Bennett

Florida Agency for Health Care Administration  
Division of Medicaid  
Fraud Prevention and Compliance Unit

# Objectives

- Provide Useful Resources (General Compliance Issues)
- Discuss Drug Diversion Issues
- Provide a Resource for Detailed Training



# Resources

- CMS



- State Medicaid programs



- State Medicaid Program Integrity units

- Education MIC



# Education/Training

Florida Medicaid Provider Training e-Library



## CMS Train-the-trainer Toolkits

- Managed Care Plan Compliance
- Medicaid Compliance for the Dental Professional
- Home and Community Based Services
- Beneficiary Card Sharing
- Drug Diversion



<http://ahca.myflorida.com/>

Better Health Care for All Floridians



Rick Scott  
Governor of Florida  
<http://www.flgov.com/>



Elizabeth Dudek  
Secretary



Medicaid



Health Quality Assurance



Florida Center for Health Information

Welcome to the Agency for Health Care Administration's Web site. Our mission is Better Health Care for All Floridians, and together we are responsible for the administration of the Medicaid program, for the licensure and regulation of health facilities and for providing information to Floridians about the quality of the health care they receive in Florida... [more information](#)

Every day we look for ways to improve health care in this state, and we appreciate your partnership in that effort. Thank you for the opportunity to serve you.

- Agency Alerts
- Agency News
- Public Meetings
- Boards and Councils

- The 2012-2013 Summary of Services is now available on the Agency's Medicaid website. To download or print the Summary of Services, please visit [http://ahca.myflorida.com/Medicaid/flmedicaid\\_shtm](http://ahca.myflorida.com/Medicaid/flmedicaid_shtm) and click on "Florida Medicaid Summary of Services, Fiscal Year 2012-2013."
- Sign up to receive notices about [FDA Recalls](#), [Market Withdrawals](#) and [Safety Alerts](#).
- [Provider Emergency Actions](#) – a listing of all regulated health facilities that have been placed under a moratorium on admissions, has had their license suspended, and/or have had any other restriction or limitation on their license.
- [Sign Up for Medicaid Health Care Alerts](#) –The Florida Medicaid program has an e-mail alert system to supplement the present method of receiving Provider Alerts information and to notify registered providers or interested parties of "late-breaking" health care information.

# Florida Medicaid

[About Us](#)[Programs](#)[Managed Care](#)[Providers](#)[Pharmacy Services](#)[Medicaid Quality](#)[Resources](#)[Area Offices](#)[How to Become a Provider?](#)[Already a Provider?](#)[EHR Incentive Program](#)[Provider Resources](#)[Cost Reimbursement](#)[Training/e-Library](#)

## How to become a provider?

- [Provider Enrollment](#)  
Provider Enrollment is responsible for enrolling qualified providers to receive Medicaid reimbursement for services rendered to Medicaid recipients.
- [Provider Enrollment Help Line Information](#)  
Florida Medicaid's Web Portal solution provides communication and self-service tools to the provider community.

## Quick Links

**ICD-10**   
**Transition Coming**  
**Are you prepared?**

- [Estimates Related to Federal Affordable Care Act: Title XIX \(Medicaid\) Program 12/17/12](#)
- [Estimates as requested by House staff](#)
- [Fiscal Agent](#)
- [Fraud and Abuse](#)
- [Statewide Medicaid Managed Care Program](#)
- [Florida Medicaid Reform Pilot](#)
- [Electronic Health Records](#)
- [Reports of Medicaid Eligibles](#)


## Reference Information

---

- [Medicaid Provider Handbooks](#)
  - [Medicaid Area Offices](#)
  - [Medicaid Provider Alerts](#)
  - [Florida Medicaid Summary of Services](#)
- 

### Center for Medicare and Medicaid Services Toolkits

By accessing this link you will find a series of excellent training toolkits developed by the Centers for Medicare and Medicaid Services (CMS) and the Medicaid Education Medicaid Integrity Contractor (MIC)/StrategicHealthSolutions.

 [Managed Care Plans: Critical Partners in the Fight Against Fraud, Waste and Abuse in Medicaid Toolkit](#) [28MB, ZIP]  
[For Download Only. Right click on the link and choose "Save Target As...." then save to a location on your computer.]

The toolkit offers clear and concise guidance to Managed Health Care Providers on detecting fraud, waste, and abuse; appropriate follow-up actions; sharing information; and making meaningful referrals.

The Compliance Toolkit includes the following materials:

1. Presentation
2. Fact Sheet
3. Referral Guidelines
4. Resource Handout

# Today's Presenters are:

Maureen Barker

[Maureen.Barker@ahca.myflorida.com](mailto:Maureen.Barker@ahca.myflorida.com)

Kelly Bennett

[Kelly.Bennett@ahca.myflorida.com](mailto:Kelly.Bennett@ahca.myflorida.com)

## Additional resources

Florida Medicaid Provider  
Training e-Library



Yolanda Sacipa

[Yolanda.Sacipa@ahca.myflorida.com](mailto:Yolanda.Sacipa@ahca.myflorida.com)

**REPORT MEDICAID FRAUD**

**Online or 866-966-7226**

**REPORTE FRAUDE DE MEDICAID**

Rick Zenuch

[Richard.Zenuch@ahca.myflorida.com](mailto:Richard.Zenuch@ahca.myflorida.com)



# Do You Know Where the Drugs Are Going?

Partners in Integrity



# Objectives

At the conclusion of this presentation, participants will be able to:

- Identify common types of drug diversion activities
- List at least four drug classes that are targets for drug diversion
- Describe common drug diversion behaviors to look for in pharmacy practices
- List three actions that can be taken to prevent drug diversion activities

# Common Types of Pharmacy Fraud and Abuse

- Inappropriate billing
- Card sharing by beneficiaries
- Doctor shopping
- Diversion of prescription drugs



# What Is Drug Diversion?

Deflection of prescription drugs from medical sources into the illegal market:

- Can occur at any point in the distribution process
- Can lead to significant health and legal consequences
- Has financial implications

# Why Are Drugs Diverted?

- Intentional abuse of drugs
  - Recreation
  - Addiction
- Self-medicating
- Alleviation of withdrawal symptoms
- Monetary gain



# What Prescription Drugs Are Being Diverted?



# Who Is Diverting Drugs?

- Patients
- Healthcare professionals
- Suppliers
- Illegal Internet pharmacies





# How Are Patients Diverting Drugs?

- Medication sharing
- Prescription pad theft
- Card sharing
- Doctor shopping
- Forging or altering prescriptions
- Theft





# How Are Healthcare Professionals Diverting Drugs?

- Theft
- False claims
- Diluting medications
- False credentials
- Illicit prescribing



# How Are Suppliers Diverting Drugs?

- Counterfeit distribution
- Purchase of illegally-imported drugs
- Obtaining illegally



# Knowledge Check

Common types of drug diversion activities include which of the following?

- A. Theft
- B. Illicit prescribing
- C. Card sharing
- D. Counterfeit distribution
- E. All of the above



# Knowledge Check

Which of the following is not a drug class targeted for drug diversion?

- A. Stimulants
- B. Human growth hormone
- C. Narcotics/Opioids
- D. Antibiotics
- E. Central Nervous System (CNS) depressants



# Knowledge Check

K.T. has been a patient at your pharmacy for several years. She has always been very patient and courteous. You have noticed a change in her behavior over the past month or so. She has been very impatient and demanding with your staff. On the last two visits, she looks like she just crawled out of bed. Today, she brought in a prescription for Oxycontin that is missing the date. Your pharmacy technician informs her that you need to contact the doctor to find out when he wrote the prescription. She immediately replies that he wrote it today and you do not need to waste your time. What do you do?

# Knowledge Check

What would you do?

- A. Call the doctor to verify the date
- B. Take the patient's word for it and fill the prescription
- C. Notify the doctor of the patient's odd behavior
- D. Reprimand the technician because there is no need to verify the date
- E. Both A and C



# Knowledge Check

Which of the following is **not** a strategy to prevent drug diversion?

- A. Use the Prescription Drug Monitoring Program
- B. Develop a Comprehensive Training Program
- C. Refer patients to a Prescription Drug Disposal Program
- D. Dispense medications from prescriptions with missing provider information
- E. None of the above



# Summary of Drug Diversion Issues

- Common types of drug diversion
  - Forgoing treatment, Rx under false pretense, stolen Rx pad, false Rx, doctor shopping
- Commonly diverted drugs
  - Depressants, opioids, stimulants
- Common drug diversion behaviors
  - Cash payment, avoid pharmacist/prescriber, incomplete/inaccurate information
- Actions to prevent drug diversion
  - PDMP, training, drug disposal