

	Department: Corporate Compliance	Policy No.: 601
	TITLE: DRUG DIVERSION PREVENTION AND REPORTING	
Effective Date: 1/1/15	Revised: 1/1/15	

DRUG DIVERSION PREVENTION AND REPORTING

PURPOSE:

The purpose of this Policy is to ensure that Ascension At Home, LLC and subsidiaries, (the “Company”) has adopted the appropriate procedures to monitor, detect and prevent drug diversion and abuse.

POLICY:

The Company shall have controls in place that meet all DEA and State Board of Pharmacy requirements for prescription medications and controlled substances deemed to have the potential for diversion.

PROCEDURE:

General Principles

“Drug Diversion” is defined as the act of intentionally and without proper authorization, using or taking possession of a prescription medication (which includes but is not limited to Controlled Substances) and medical gas from the Company’s supply, from a Company patient, or through the use of the Company’s prescription dispensing systems.

Suspicion of drug diversion may arise from a variety of circumstances, including, but not limited to:

- witnessing an incident of probable drug theft;
- observing behaviors that may indicate that an employee, contractor or patient is otherwise impaired;
- identifying suspicious activity during routine monitoring and/or proactive surveillance; and
- notification of suspected drug diversion from an external source, such as a patient, a family member of a patient, or local law enforcement.

Adoption of Comprehensive Drug Diversion Surveillance and Prevention Program

The Company’s Home Infusion Operations shall adopt a comprehensive Drug Diversion Surveillance and Prevention Program (or similarly named program) that (among other things) reviews, tracks and trends drug ordering and dispensing data; monitors drug waste disposal procedures; validates patient drug use; and investigates any variances in data of drug utilization.

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Duty to Report

- It is every Company employee’s and contractor’s duty to report known or suspected incidents of drug diversion by employees, contractors and patients.
- An individual who suspects an employee or contractor of engaging in drug diversion should notify his or her supervisor, call the Ethics and Integrity Helpline at 877-835-5267 or call a member of the Legal Department. If, however, a patient is suspected of drug diversion, such report should be made to a member of either the Corporate Compliance Department or the Legal Department in order to protect the confidentiality of medical information.
- If the initial report of suspected drug diversion is not through either the Corporate Compliance or Legal Departments (i.e., it was reported to a supervisor), the individual receiving this report shall immediately notify a member of either the Compliance or Legal Department.
- Any individual who reports suspected drug diversion honestly and in good faith will be protected from retaliation.

Investigation

- Upon notification of suspected drug diversion, a member of the Corporate Compliance Department in conjunction with the appropriate personnel from Home Infusion Operations, the Legal Department and Human Resources, will perform an initial investigation.
- This initial investigation will determine whether any patient has been harmed or placed at risk of harm and whether the suspected drug diversion involves an impaired employee or contractor. Appropriate action will be taken to treat the patient or remove the risk of harm.
- All steps are to be taken to preserve any readily apparent evidence, such as medication vials or syringes. If evidence involves an infusion pump, the medication will be removed from the pump and placed in a sealed plastic bag. The pump should not be cleared and should be sequestered.
- After the initial investigation, if reasonable suspicion exists that drug diversion may have occurred, members of the Corporate Compliance, Legal, Human Resources and Home Infusion Operations will determine next steps, which may include notification to the applicable federal and state regulatory authorities.

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Reporting to Governmental Authorities

- If a controlled substance is determined to have been diverted by any individual, The Company will ensure that appropriate reports are made to the Drug Enforcement Agency (DEA) and the applicable State Board of Pharmacy.
- In the event of drug diversion by a Company employee or contractor, the Legal Department will notify the appropriate local or state police department.
- In the event of drug diversion by a patient, the Legal Department in collaboration with other members of Company leadership will determine whether the Company is required to report the diversion to the local or state police department. When reporting incidents of drug diversion by a patient, the report will be made in a manner consistent with the Company’s privacy practices and simply describe the facts of the diversion and not disclose additional information regarding the patient's medical history, condition, diagnoses, or treatment.
- The Legal Department will evaluate all incidents of drug diversion to determine whether additional external reports should be made, such as reports to the Department of Health or Food and Drug Administration.

Future Employment and Contracting with the Company

If an employee or contractor is determined to have been engaged in drug diversion, the employee will be subject to corrective action, which, in accordance with the Company’s Disciplinary Action Policy, Policy No. 111, can include suspension and/or termination of employment. Such action may be taken regardless of whether the diversion occurred within the scope of employment or training, or while the employee was off-duty.