Key Considerations for the Compliance Professional

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Program Essentials

**Diversion Specialist**

- Daily operations-surveillance/education
- Database
- Institutional resource
- Diversion risk rounds
- Community, LE and regulatory liaison
Program Essentials

Response Team

- Objective
- Consistent
- Cumulative

Oversight Committee

Diversion Committee

- Anesthesia
- Nursing
- Pharmacy
- Security
- Risk Management
- Accreditation
- Chief Medical Officer
- Compliance
- Infection prevention
- Human Resources
- Employee Health
- Finance
- Laboratory
- Research
- Quality & Safety
- Ad hoc
Key Aspects of Program

• Education for all staff
• Policies to prevent, detect and respond to diversion
• Stakeholder collaboration
• Method of auditing
• Prompt attention to suspicious data
• Collaborative relationship with external agencies
• **Diversion risk rounds**

Diversion Risk Rounds

• Barometer of staff awareness and buy in
• Trouble shooting
• Process improvement and risk reduction
• Reinforcement of institutional commitment