



CASE STUDY

From newsworthy diversion to proactive protection:

**MOUNT SINAI HEALTH SYSTEM'S STORY OF DRUG
DIVERSION MONITORING**

ORGANIZATION SNAPSHOT

Mount Sinai Health System

LOCATION

New York, NY

EMPLOYEES

25,000 +

INDUSTRY

Healthcare

CHALLENGE

In 2014, the health system received an anonymous tip from inside the organization about a suspected diversion of drugs. One of their Pharmacy Directors had diverted over 200,000 doses of Oxycodone over a five-year period. No patients were harmed due to the diversion, but the case still could have had a serious negative impact on the hospital's reputation. Instead, it prompted the launch of a world-class drug diversion prevention, detection and response program and created the foundation for a long-standing collaboration with the Manhattan Special Narcotics Prosecutor to help fight the opioid epidemic.

SOLUTION

- Drug Diversion Intelligence

RESULTS

- Proactive patient monitoring, alert reduction, and advanced analysis of audit log data
- An automated solution that monitors drug diversion in near real-time, allowing the organization to work across departments to conduct investigations if necessary
- Increased staff compliance and education on drug diversion
- Increased visibility, allowing the compliance team the ability to go from monitoring one hospital to monitoring six



For more than 160 years, Mount Sinai Health System has been New York City's most extensive integrated health system encompassing eight hospital campuses, a leading medical school, and a vast network of ambulatory practices throughout the greater New York region. Mount Sinai's vision is to produce the safest care, the highest quality and satisfaction, and the best value of any health system in the nation. With over 25,000 employees and 3,814 patient beds, this system includes approximately 7,200 primary and specialty care physicians and 13 free-standing joint-venture centers. Additionally, they have more than 400 ambulatory practice locations throughout the five boroughs of New York City, Westchester, and Long Island and 31 affiliated community health centers.

Top New York City Health System bounces back from a 2014 incident to create a world-class drug diversion prevention, detection and response program.

The Challenge

In 2014, the health system received an anonymous tip from inside the organization about a suspected diversion of drugs. What they uncovered was more extensive than they ever could have imagined. One of their Pharmacy Directors had diverted over 200,000 doses of Oxycodone over a five-year period. No patients were harmed due to the diversion, but the case still could have had a serious negative impact on the hospital's reputation. Instead, it prompted the launch of a world-class drug diversion prevention, detection and response program and created the foundation for a long-standing collaboration with the Manhattan Special Narcotics Prosecutor to help fight the opioid epidemic.

MOUNT SINAI BY THE NUMBERS



7,200 primary and specialty care physicians



Over **25,000** employees



3,814 patient beds



400 ambulatory practice locations

Mount Sinai took action immediately upon receiving the tip and worked proactively with a Special Narcotics Prosecutor to investigate and remediate the case. “The good news for us is that we discovered it,” said Bruce Sackman, former Senior Investigator at Mount Sinai Health System. “We investigated and we brought the entire matter to the government for prosecution.” The trust and respect earned on this case led to early discussions about other potential instances of diversion so they could be stopped early and minimize harm.

“ Before Imprivata FairWarning, auditing tasks were performed manually with pharmacy taking the lead then handing off to other departments with little accountability. Now, with Imprivata FairWarning, the process is seamless, more efficient and multidisciplinary. It’s just a better program. ”

Lucy Cannizzaro, Associate Director of Administration & Director of Pharmacy, Director of Regulatory Affairs at Mount Sinai Brooklyn

The Solution

After the 2014 drug diversion discovery and investigation, the Mount Sinai Health System executed two very important actions:

- Assembling a drug diversion task force
- Optimizing their use of Imprivata FairWarning Patient Privacy Intelligence to help with compliance.

With a patient privacy monitoring program in place, the team realized they needed a solution for drug diversion monitoring as well. “We were looking to improve our compliance program and automate our system,” said Raymond Shelton, Mount Sinai’s HIPAA Security Officer. “[We] were frustrated with the other audit programs out there as they were cumbersome or the user needed a clinical background to use them, which I didn’t have.” The organization was able to obtain immediate buy-in from leadership and staff to begin the search process. “Everyone agrees that leadership engagement is the key because you want to ensure that the culture of the organization changes and that staff are empowered to come forward,” explained Lucy Cannizzaro, Associate Director of Administration & Director of Pharmacy, Director of Regulatory Affairs at Mount Sinai Brooklyn. She continued, “At Mount Sinai Health System, we have been very fortunate to have executive support for many years that allowed us to establish a diversion prevention program. In collaboration, pharmacy and corporate compliance formed a comprehensive diversion rounding program to perform educational rounds and observe and interact with front-line staff.”

When Imprivata FairWarning expanded to monitoring for drug diversion, the Mount Sinai Health System signed on as one of the first pilot customers and has since adopted Imprivata FairWarning Drug Diversion Intelligence to ensure a proactive approach to drug diversion monitoring. “We already had a drug diversion task force, but were in need of a better diversion system, one that could give a more comprehensive approach and a better interface with our operating systems,” explained Cannizzaro.

“That’s one of the things that I like about Imprivata FairWarning is that if we do learn something that we missed, we can quickly have a solution built and monitored going forward. And that’s something that took a very long time in the past.”

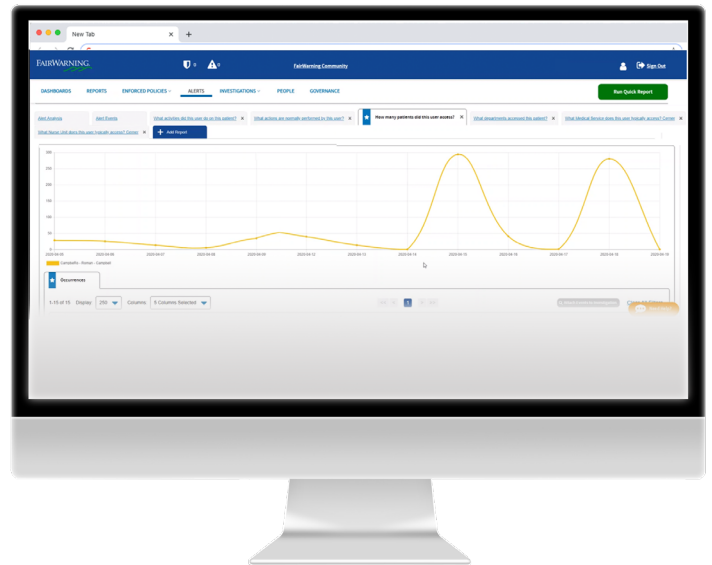
Lucy Cannizzaro, Associate Director of Administration & Director of Pharmacy, Director of Regulatory Affairs at Mount Sinai Brooklyn

The Results

The shift from a manual drug diversion monitoring program to an automated one has been impactful in ways the team had not completely appreciated before adoption. Cannizzaro explained, “Imprivata FairWarning’s solutions allow our team to monitor critical information near real-time, improving the identification and response and allowing immediate investigation. This efficiency also helps to improve policy compliance among staff as they now receive immediate feedback when an alert is triggered. With the assistance of our Imprivata FairWarning analyst, information is readily available when we do need to investigate.” This awareness encourages staff to follow the correct procedures and report signs of diversion.



Having reliable data collected systematically yielded other benefits, too. It can still be challenging for staff to believe that a colleague is a potential diverter. “We see that in drug diversion, we see that even in fraud cases and what happens is that the managers are shocked,” said Sackman “They can’t believe that their best employee is actually the one that wound up being the diverter.” Having a program which provides concrete data into substances that are diverted helps staff get past their own denial so they can address the situation effectively.



At the beginning of March 2020, Mount Sinai saw an explosion of COVID-19 patients entering its doors. Then, the need for maintaining regulatory compliance and drug diversion monitoring took on a whole new meaning. “Many of the things we monitor for are unusual behavior, and the circumstances in our environment since March 16th have all been unusual,” states Shelton. Imprivata FairWarning’s solutions offered everything the Compliance team at Mount Sinai needed during the crisis, including:

- Monitoring patient access proactively, reducing alerts, and advanced analysis of audit log data.
- Creating an automated solution that monitors drug diversion near real-time, allowing the organization to work as a team, across departments, to mobilize and conduct investigations if necessary.
- Increasing staff compliance and education on what drug diversion means, what to look for, and when they see something to say something.
- Increasing visibility, allowing the compliance team to go from monitoring one hospital to monitoring six.

“Never has anyone at Imprivata FairWarning said, ‘That’s not my job’ or ‘that can’t be done,’” shared Shelton. “When you do have something, an alert or a suspicion or something that pops up, you need something to be done instantaneously. And Imprivata FairWarning has always been very responsive,” Lucy Cannizzaro continued. “It’s a very big part of why it’s great to work with Imprivata FairWarning. ”

Imprivata FairWarning, already known as a leader in patient security and privacy according to Shelton, demonstrated its focus on customers by helping the Compliance team “shift focus when COVID-19 hit from forensics and auditing to surveillance mode.” These proactive monitoring solutions allowed hospital administration who were “up to their elbows in a surge of [COVID-19] patients for which he or she had no vaccine, no cure” to concentrate on their jobs in a crisis without worrying about data breaches or drug diversion. Imprivata FairWarning allows Mount Sinai to focus on what it does best – provide the highest quality of care, allowing COVID-19 patients to remain safe and secure, with their private information remaining private.

Looking ahead

Since the 2014 drug diversion incident, Mount Sinai has taken a proactive approach to drug diversion monitoring by adopting an advanced automated solution that monitors drug diversion near real time and with more accountability. And throughout the COVID-19 crisis, Mount Sinai has built a culture of trust and peace of mind in patient privacy and drug diversion monitoring, allowing the staff to focus on the vital task of treating an influx of patients. The organization is now equipped with an enhanced culture of compliance and education that focuses on proactive patient access monitoring, threat mitigation, and advanced analysis of audit log data.



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