



BMJ Open is committed to open peer review. As part of this commitment we make the peer review history of every article we publish publicly available.

When an article is published we post the peer reviewers' comments and the authors' responses online. We also post the versions of the paper that were used during peer review. These are the versions that the peer review comments apply to.

The versions of the paper that follow are the versions that were submitted during the peer review process. They are not the versions of record or the final published versions. They should not be cited or distributed as the published version of this manuscript.

BMJ Open is an open access journal and the full, final, typeset and author-corrected version of record of the manuscript is available on our site with no access controls, subscription charges or pay-per-view fees (<http://bmjopen.bmj.com>).

If you have any questions on BMJ Open's open peer review process please email [info.bmjopen@bmj.com](mailto:info.bmjopen@bmj.com)

# BMJ Open

## Study protocol for naturalistic observations and a Healthcare Failure Mode and Effect Analysis to identify vulnerabilities in the security and accounting of medications in Ontario hospitals

Journal:	<i>BMJ Open</i>
Manuscript ID	bmjopen-2018-027629
Article Type:	Protocol
Date Submitted by the Author:	31-Oct-2018
Complete List of Authors:	de Vries, Maaïke; North York General Hospital, HumanEra, Research and Innovation; University of Toronto, Institute of Health Policy, Management and Evaluation Fan, Mark; North York General Hospital, HumanEra, Research and Innovation Tscheng, Dorothy; Institute for Safe Medication Practices - Canada Hamilton, Michael; Institute for Safe Medication Practices - Canada Trbovich, Patricia; North York General Hospital, HumanEra, Research and Innovation; University of Toronto, Institute of Health Policy, Management and Evaluation
Keywords:	Hospital medication use process, Diversion, Healthcare safety and quality, Human factors

SCHOLARONE™  
Manuscripts

1

2

3       **Study protocol for naturalistic observations and a Healthcare Failure Mode and Effect**

4

5       **Analysis to identify vulnerabilities in the security and accounting of medications in Ontario**

6

7

8                       **hospitals**

9

10

11

12

13

14

15       **Author List:** Maaïke de Vries<sup>1,2</sup>, Mark Fan<sup>1</sup>, Dorothy Tscheng<sup>3</sup>, Michael Hamilton<sup>3</sup>, Patricia

16

17       Trbovich<sup>1,2</sup>

18

19

20

21

22       **Author Affiliations:**

23

- 24               1. HumanEra, Research and Innovation, North York General Hospital, Toronto, Ontario,
- 25               Canada
- 26
- 27
- 28               2. Institute of Health Policy, Management and Evaluation, University of Toronto, Toronto,
- 29               Ontario, Canada
- 30
- 31
- 32               3. Institute for Safe Medication Practices – Canada, Toronto, Ontario, Canada
- 33
- 34

35       **Corresponding Author:**

36

37       Maaïke deVries, MSc

38

39       Institute of Health Policy, Management and Evaluation

40

41       University of Toronto, Health Sciences Building

42

43       155 College Street, Suite 425

44

45       Toronto, ON Canada M5T 3M6

46

47       416-420-8678

48

49       [maaike.devries@mail.utoronto.ca](mailto:maaike.devries@mail.utoronto.ca)

50

51

52

53

54       **Word Count:** 3992

55

56

57

58

59

60

## ABSTRACT

**Introduction:** An increasing number of opioids and other controlled substances are being stolen from healthcare facilities, diverting medications from their intended medical use to be used or sold illicitly. Many incidents of medication loss from Canadian hospitals are reported as unexplained losses. Together, this suggests not only that vulnerabilities for diversion exist within current medication use processes (MUPs), but that hospitals lack robust mechanisms to accurately track and account for discrepancies and loss in inventory. There is a paucity of primary research investigating vulnerabilities in the security and accounting of medications across hospital processes. The purpose of this study is to map hospital MUPs, systematically identify risks for diversion or unintentional loss, and proactively assess opportunities for improvements to medication accounting and security.

**Methods and analysis:** We will conduct human factors-informed naturalistic observations, followed by a Healthcare Failure Mode and Effect Analysis (HFMEA). We will observe hospital personnel in the intensive care unit, emergency department, operating room and inpatient pharmacy in two hospitals in Ontario, Canada. Observations will capture how participants complete tasks, as well as gather contextual information about the environment, technologies, and processes. A multidisciplinary team will complete an HFMEA to map process flow diagrams for the MUPs in the observed clinical units, identify and prioritize potential methods of medication loss (failure modes), and describe mechanisms or actions to prevent, detect, and trace medication loss.

**Ethics and dissemination:** We received province-wide research ethics via Clinical Trials Ontario Streamlined Research Review System, and site-specific approvals from each participating hospital. The results from this study will be presented at conferences and meetings,

as well as published in peer-reviewed journals. The findings will be shared with hospitals, professional, regulatory and accreditation organizations, patient safety and healthcare quality organizations, and equipment and drug manufacturers.

**Keywords:** Hospital medication use process, Diversion, Healthcare safety and quality, Human factors

ARTICLE SUMMARY

Strengths and limitations

1. Applying human factors methodologies embraces system complexity and allows diversion to be studied from a systems, as opposed to an individual blame, perspective.
2. Basing the analysis on data collected through observations enables the study to identify vulnerabilities in processes according to how they are actually performed instead of how they are perceived to occur (work as done versus work as imagined).
3. Conducting the study in multiple units in two hospitals enables corroboration of results between sites, as well as the comparison of workflows and failure modes across hospitals and as a function of clinical area.
4. Probability and severity scoring of failure modes (and other components of the hazard analysis) is subjective; however, our study design mitigates this with a multidisciplinary team and independent scoring.
5. There are widespread system-level and individual-level practice variations within a hospital, and point-in-time observations likely do not capture all possibilities, even as attempts to increase the number and time of observations are employed.

## INTRODUCTION

The opioid crisis claims lives every day, with opioid misuse causing increasing rates of morbidity and mortality across Canada.[1–4] A worrisome parallel trend shows a growing number of opioids and other medications going missing or being stolen from Canadian healthcare facilities[5–10] and entering the illegal street market.[7,8] The theft of medications for personal substance use or trafficking is described as ‘diversion’, because drugs are transferred, or diverted, from legitimate medical to non-medical use.[11] Opioids are one of several classes of medications categorized as controlled substances, given their potential for misuse. Canadian hospitals have a responsibility for the safety and security of these medications. In contrast to the diversion prevention guidance in the United States that describes multiple safeguards that should be in place, including a broad multidisciplinary effort to assess diversion risks and implement mitigation strategies,[12–19] Canadian diversion prevention guidance for hospitals is outdated and does not comprehensively address elements covered in other jurisdictions.[20–25]

At present, Canadian hospitals lack robust processes and infrastructure to accurately track and resolve discrepancies in their controlled substance inventory. For example, Canadian hospitals detected and reported 1020 incidents of controlled substance loss and theft to Health Canada in 2016.[9] Over 80% of incidents were reported by hospitals as unexplained losses, meaning that at the time of reporting (i.e., within 10 days of discovery), the loss could not be attributed to any particular cause or action. Clearly, system-wide gaps in the traceability of medication transactions through technologies, processes, and environments can result in considerable losses of medications without recourse to audit or trace their whereabouts. As a result, many hospitals may not be aware of the deficiencies in their medication accounting and security processes. Further, the large proportion of unexplained losses suggest that current

estimates of medication thefts in Canadian hospitals, diversion or otherwise, underestimate the issue.

**Impact of hospital medication diversion**

The hospital setting is particularly vulnerable to diversion by healthcare workers because of the large quantity of stock, frequent use for treating patients, and the proximity with which many hospital personnel interact with medications. Ease of access and frequent interaction with controlled substances can be considered occupational hazards, increasing the risk of diversion and substance use disorder among healthcare workers.[26–28] The opportunity to divert medications can escalate drug seeking behaviour and lead to overdose and death.[19,29] The healthcare worker who diverts is at risk of infection from unsterile medications and needles.[30–32] There are also professional risks to the healthcare worker, including termination of employment, revocation of their license, civil malpractice claims, and criminal prosecution.[33–35]

Diversion has been shown to have negative effects beyond its impact on the person who is diverting medications, including on patients, healthcare facilities, and the larger community. Patients have been directly harmed by receiving inadequate analgesia or anesthesia when their medication is diverted,[36–38] been provided substandard care when their healthcare worker was impaired,[12,39] and even contracted viral or bacterial infections due to medications or syringes compromised in the diversion process.[30,31,40] Healthcare facilities and pharmacies bear the cost of diverted medications from their stock, as well as the cost of substandard care/services, follow-up activities to investigate the incident and address patient care, and reporting requirements to the authorities.[36,41,42] The larger community is impacted by the increase in

the supply of medications ending up on the street[7,8] and decreased public trust in healthcare professions, institutions, and workers.

### **Human factors approach to studying the medication use process and vulnerabilities for diversion**

There is a lack of primary research describing how controlled substances are lost or stolen from hospitals. Diversion literature largely consists of expert commentary and institutional experience,[43–46] case reports,[47–49] and audit reports.[50–53] These build awareness of the issue and provide insights into potential mechanisms for diversion; however, none provide a systematic empirical investigation of the vulnerabilities compromising the security and accounting of medications across the entire hospital medication use process (MUP; e.g., procuring, storing, ordering, dispensing, preparing, administering, and wasting of medications). Consequently, it is unclear what organizational, technological, or educational interventions are needed and which specific vulnerabilities they should be optimized to address. In addition, literature discussing hospital medication abuse, security, and management are often written in response to an incident, such as an overdose.[31,54] Although it is important to investigate the effects of these incidents and update best practices in response, it is equally, if not more important, to proactively identify potential risks to prevent new and unexpected patterns of diversion.

To address this gap not only with respect to diversion but controlled substance stewardship in general, we propose a naturalistic observation study designed to map hospital MUPs and systematically identify vulnerabilities in these processes that increase the risk for diversion. Recognizing the sensitivity of the topic, we emphasize that our study seeks to understand



diversion from a systems perspective, empirically and objectively identifying process failures in the security and accounting of medications rather than characterizing, blaming, or otherwise criminalizing healthcare workers who may be diverting.

Human factors is the discipline concerned with understanding the interactions among humans and other elements of a system, such as processes and technology. As a result, it is uniquely equipped to consider the interplay of workload pressures, technology design, organizational culture, policies and procedures, and legislation on the security and accounting of medications within the hospital setting. Naturalistic observations are observations of participants in their own environment going about their day-to-day activities. From the time medications enter a hospital to their eventual use and/or disposal, handoffs occur between hospital staff, departments, dispensing technologies, and record keeping systems. A human factors approach to naturalistic observations will allow us to study vulnerabilities that emerge from these handoffs (e.g., departmental siloes), permitting the most comprehensive analysis possible. Specifically, we will conduct human factors-informed observations in four units in two hospitals, followed by a Healthcare Failure Mode and Effect Analysis.

**Healthcare Failure Mode and Effect Analysis for identifying vulnerabilities for diversion**

Healthcare Failure Mode and Effect Analysis (HFMEA) involves mapping detailed process flow diagrams and then systematically identifying and prioritizing vulnerabilities via a structured decision-making algorithm.[55] HFMEA was developed by the Department of Veterans Affairs National Centre for Patient Safety (NCPS) in 2002.[56] It been successfully applied to several healthcare processes, including the ordering and administration of medications as well as the sterilization and use of surgical instruments.[57–61] HFMEA combines concepts and

components from the Failure Mode and Effect Analysis (FMEA), Hazard Analysis and Critical Control Point, and root cause analysis.[56] FMEA was originally used in aviation, manufacturing, and nuclear industries to evaluate risk of products, and has been used in healthcare to conduct proactive risk analyses on high-risk technologies and processes.[62,63]

The use of FMEA in healthcare has been criticized because of concerns with the manner in which a single risk priority number (RPN) is used to rank vulnerabilities.[64] The RPN in FMEA is calculated by multiplying scores from three ordinal scales: severity, probability and detectability. Multiplying these scores creates an RPN that is mathematically flawed, unstable (small changes in one score can lead to large changes in RPN), and masks important distinctions.[64–66]. For example, a failure mode with high detectability, high probability, but low severity could be prioritized the same as a failure mode with high detectability, low probability, but high severity. Given that failure modes with the highest RPN would be considered as hazards with the highest priority, efforts may be misdirected based on a misleading RPN score. HFMEA addresses these concerns by prioritizing vulnerabilities using a decision tree analysis that considers not only the severity and probability scores, but also whether there are control measures that prevent or detect these failures. The HFMEA decision tree analysis uses “yes” and “no” responses when assessing the criticality, presence of control measures, and detectability of the failure modes.[55] As a result, the prioritization in HFMEA is more robust than in FMEA.

The purpose of this study is to understand how medications are secured and accounted for throughout the MUP in two Ontario hospitals, generate data on where vulnerabilities exist for

diversion or unintentional losses, identify existing safeguards against these vulnerabilities, and proactively assess opportunities for improvements to medication accounting and security.

**METHODS AND ANALYSIS**

We will employ an observational study design comprised of two phases. In the first phase, we will conduct naturalistic observations to understand and contrast MUPs across units and hospitals. Although we are interested in identifying vulnerabilities in the MUP that could allow diversion to occur, we do not expect to observe incidents of diversion. Rather, the purpose of the observations is to map the MUPs. In the second phase, we will use HFMEA to proactively identify and evaluate failure modes in MUPs and identify opportunities for improvement to medication accounting and security. The study observations and analysis will take place from May 2018 to June 2019.

**Clinical Observations**

**Setting**

Naturalistic observations will be conducted in four units (intensive care unit, emergency department, operating room, and inpatient pharmacy) in two hospitals in Toronto, Ontario, Canada. We purposively selected the settings to meet three criteria: academic and community hospital sites, units with high use and access to controlled substances, and units with different types of automated dispensing cabinets.

**Participants**

We will use purposive sampling to recruit participants for the clinical observations. We will include front-line healthcare workers who have a role in or interaction with at least one

component of the MUP and who consent to being observed. This includes healthcare workers who directly interact with medications (e.g., dispensing and administering medications), as well as hospital personnel who are involved indirectly (e.g., encountering partial vials of medication while cleaning patient rooms). We estimate that a sample size of 20 participants is the minimum number of observations required to reach theoretical saturation, whereby additional sessions would not likely yield further insights. Therefore, the estimated number of participants is 160 (20 individuals per unit x 2 hospitals x 4 units). However, the number of healthcare workers recruited for observations is expected to differ somewhat between units because of differences in staffing complement, shift schedules, and number of tasks related to the MUP. For example, in the intensive care units, we expect to observe a minimum of 14 nurses, 2 pharmacists, 2 physicians, 1 respiratory therapist, and 1 environmental services staff, whereas in the inpatient pharmacies, we expect to observe 18 pharmacy technicians and 2 pharmacists.

Participants will be asked to sign consent forms before being observed. Participants will be given as much time as they require to review the consent form and have their questions answered by the research team prior to deciding if they wish to participate. The study team will highlight that participation is voluntary and can be stopped at any time for any reason and that clinical performance is not being assessed or evaluated.

## Data Collection

One human factors specialist and one clinician will jointly observe within each hospital unit for approximately five times a week for four weeks. Observations will take place on all days of the week and include all hours of the day. Each observation session will last for two to eight hours, depending on the participants' availability, the shift duration, and the task(s) being

observed. Some tasks are frequent and repetitive so require less time to capture, whereas others occur infrequently or over the course of a longer time period so require longer observation periods. Observers will unobtrusively shadow participants as they carry out their daily activities. The purpose of the observations is to obtain a detailed understanding of participants' typical tasks and responsibilities, as well as the procedures and equipment related to the MUP. The observations will also characterize problematic issues that are observed (e.g., not logging out of the automated dispensing cabinet system) or that participants describe to the observer (e.g., unwillingness of peers to witness wasting). Observations will capture the MUP for all medications, but with a focus on controlled substances to identify safeguards and vulnerabilities specifically for these medications.

Observers will take free-form notes, collect artifacts of clinical practice (e.g., blank pre-printed forms), as well as take photographs of the environment, technology and supplies. The photographs will be used to recall or visualize process steps during the mapping process. Images will also be used to provide context when presenting and describing results. The free-form notes will capture step-by-step how participants complete tasks as well as contextual information, including the physical layout of the unit, the roles and shifts covered by staff, technologies used to document dispensing, and locations of medications on the unit. The observer will fully transcribe their free-form notes into Word© and upload them onto a secure SharePoint© site hosted at the research team's home organization.

Coding of observation data

Data collected during observations will be uploaded into MAXQDA© version 2018.1 data management and analysis software. One human factors specialist will code the observation

data using codes for hospital units (intensive care unit, emergency department, operating room, and inpatient pharmacy), tasks, and vulnerabilities or safeguards. A second research team member will review the codes, and any discrepancies will be resolved through discussion.

## Healthcare Failure Mode and Effect Analysis

The HFMEA process includes five main steps.[56] We will first map the process flow diagrams for the management and use of medications in the observed clinical units. Next, we will identify potential methods of medication loss and evaluate their severity, risk and detectability, as well as identify potential areas where mitigation strategies can be implemented.

### 1. Define the topic

The first step is to define the HFMEA topic, including boundaries to limit its scope. Our HFMEA will examine the hospital MUP, including the procuring, storing, ordering, dispensing, preparing, administering and wasting of medications. We will limit the topic to specific units within the hospital (i.e., operating room, intensive care unit, inpatient pharmacy, and emergency department). Any hospital personnel role, technology, or object that directly or indirectly interacts with medications will be included. Processes that are external to the hospital unit or roles that are not affiliated with the hospital will be out of scope (e.g., administration of medications by paramedics, delivery of medications from distribution centre).

### 2. Assemble the team

The second step is to assemble a multidisciplinary team. Our team will be comprised of three human factors specialists, two pharmacists, one physician, two nurses, and two pharmacy

1 technicians. The members of the team will ensure there is expertise in conducting observations  
2  
3 and proactive risk analysis, as well as knowledge and experience working in the different  
4  
5 hospital settings and performing tasks covering the breadth of the MUP. For particular steps of  
6  
7 the HFMEA, team members will vary as a function of the unit being analysed (e.g., pharmacists  
8  
9 will brainstorm failure modes in the pharmacy).  
10  
11  
12  
13  
14  
15  
16

17 3. Graphically describe the process  
18

19 The third step is to develop process flow diagrams and number each task and subtask.  
20  
21 Creating process flow diagrams is an important first step in identifying safety risks from different  
22  
23 aspects of a work system (e.g., individual, technology, administration).[67] We will use the data  
24  
25 collected during the naturalistic observations to graphically map the step-by-step MUPs from  
26  
27 each clinical unit. Using direct observation of processes, as opposed to mapping processes  
28  
29 according to how tasks are supposed to occur, will strengthen the validity of our results.[68] The  
30  
31 maps will be created by retrieving data coded for specific units and tasks and translating the  
32  
33 process steps into a visual flow diagram using draw.io©. The mapping process will be completed  
34  
35 iteratively during the clinical observation period, so that gaps or steps requiring clarification can  
36  
37 be gathered in the next observation session. If observers note differences in how participants  
38  
39 perform the same process, this variation will be discussed by the HFMEA team and flagged in  
40  
41 the flow diagrams, because variations may suggest vulnerabilities in process. The team will  
42  
43 review the detailed process flow diagrams and one human factors specialist will transcribe each  
44  
45 task (e.g., dispensing from automated dispensing cabinet) and subtask (e.g., logging into the  
46  
47 automated dispensing cabinet, selecting the patient, selecting the desired medications) into  
48  
49 Excel©.  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60

#### 4. Conduct a hazard analysis

The fourth step consists of four sub-steps: A) list and number all potential failure modes (ways a step within a subtask can fail to accomplish its intended purpose) and potential effects if a failure were to occur; B) score the severity and probability of potential failure modes; C) use a decision tree analysis to identify critical failure modes; D) list all causes of critical failure modes.

A) Two HFMEA team members will independently brainstorm failure modes and effects for each of the subtasks, and any discrepancies will be discussed. If a decision on whether or not to include a failure mode cannot be reached, a third member of the team will reconcile the discrepancy. Failure modes will be organized into a worksheet (Figure 1) to facilitate the recording of results from the next two sub-steps.

B) Two HFMEA team members will independently score failure modes based on their severity and probability, as described by the NCPS (Table 1).[55] A hazard score is calculated by multiplying the severity and probability scores. The intra-class correlation (ICC) will be calculated for a subset of hazard scores to assess inter-rater reliability. Definitions of scale scores will be discussed and refined until an accepted level of agreement is reached ( $ICC \geq 0.60$ ). The severity and probability of the remaining failure modes will then be scored.



Table 1. Probability and severity scoring

Score	1	2	3	4
<b>Scale</b>				
<b>Probability</b>	<u>Remote</u> Unlikely to occur; may happen sometime in 5 to 30 years	<u>Uncommon</u> Possible to occur; may happen sometime in 2 to 5 years	<u>Occasional</u> Probably will occur; may happen several times in 1 to 2 years	<u>Frequent</u> Likely to occur immediately or within a short period; may happen several times a year
<b>Severity</b>				
<i>Patient outcome</i>	<u>Minor Event</u> No injury nor increased length of stay nor increased level of care	<u>Moderate Event</u> Increased length of stay or increased level of care for 1 or 2 patients	<u>Major Event</u> Permanent lessening of bodily functioning, disfigurement, surgical intervention required, increased length of stay for 3 or more patients	<u>Catastrophic Event</u> Death or major permanent loss of function or suicide
<i>Staff outcome</i>	First aid treatment only with no lost time or restricted duty injuries or illness	Medical expenses, lost time or restricted duty injuries or illness for 1 or 2 staff	Hospitalization of 1 or 2 staff, or 3 or more staff experiencing lost time or restricted duty injuries or illnesses	One death or hospitalization of 3 or more staff
<i>Equipment or facility</i>	Damages less than \$10,000 without adverse patient outcome	Damages more than \$10,000 but less than \$100,000	Damages equal to or more than \$100,000 but less than \$250,000	Damages equal to or more than \$250,000

Adapted from “The Basics of Healthcare Failure Mode & Effect Analysis” by the Department of Veterans Affairs National Center for Patient Safety (2014). Available from:  
<https://www.patientsafety.va.gov/professionals/onthejob/hfmea.asp>

- C) The HFMEA team will use a decision tree to prioritize the failure modes (Figure 2).
- Failure modes with sufficient hazard scores or that are single point weaknesses (i.e., failure in this step will invariably result in an adverse event) are considered in the next step of the decision tree. If an effective control measure exists (e.g., storing medications in a locked drawer to prevent an individual from opening the drawer and removing medications from it) or the failure mode is so obvious and apparent that a control measure is not warranted, then the failure mode does not proceed through the next steps of the HFMEA. All remaining failure modes are labelled as critical and considered in sub-step D.

1  
2  
3 D) The HFMEA team will brainstorm the potential causes of the critical failure modes and  
4  
5 record these in the worksheet. Completing the hazard analysis will produce a list of  
6  
7 critical failure modes and their causes.  
8  
9

## 10 11 12 5. Develop action and outcome measures 13

14  
15 The fifth step is to determine which failure mode causes can be eliminated or controlled and  
16  
17 describe what actions could be used to accomplish this. This step also includes developing  
18  
19 measures that can be used to test and analyse the success of a redesigned process. We will use  
20  
21 the list of critical failure modes from the hazard analysis to describe each step in the MUP that  
22  
23 increases the hospital's potential risk for medication loss, including those related to both the  
24  
25 security and accounting of medications. We will consider the causes listed for the failure modes  
26  
27 and describe mechanisms or actions that can be implemented to prevent, detect, and trace  
28  
29 incidents of medication loss. Finally, we will suggest measures that could be used to assess  
30  
31 successful implementation of these mechanisms and process improvements.  
32  
33  
34  
35  
36  
37

38 It is expected that the HFMEA will lead to an understanding of the current workflows and  
39  
40 failure modes affecting the MUP in one community and one academic hospital. Results of this  
41  
42 analysis will allow for a comparison of workflows and failure modes between hospitals and as a  
43  
44 function of clinical area (e.g., emergency department versus operating room). Using a human  
45  
46 factors approach, which considers interactions between all system elements (e.g., front-line  
47  
48 healthcare workers, administrators, policies and regulations, technology), we anticipate that we  
49  
50 will identify practices related to standards/guidelines, technologies and training.  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60

**Patient and public involvement**

Hospital personnel have supported this work by facilitating opportunities for observations and analysis of different aspects of the MUP in units that have high controlled substance use and access. Healthcare providers and hospital staff will also be engaged during the HFMEA and will inform the dissemination strategy. Patients and public were not involved in the design of this study.

**ETHICS AND DISSEMINATION**

**Ethics**

This study has received province-wide Research Ethics Board (REB) approval via Clinical Trials Ontario Streamlined Research Review System, as well as site-specific approvals from each participating hospital under this framework.

Consent for observations is obtained for the healthcare worker who is being observed. When photographs are taken, no patients or healthcare workers will be photographed, and all person identifiers will be eliminated (e.g., patient name/ID will be covered). Hospitals that choose to participate will remain anonymous and will be described using general terms (e.g., a community hospital) in publications and presentations.

All signed consent forms, observation free-form notes, artifacts and photographs, and database records will be kept secure and confidential. Observational data will be associated with a participant number to reduce the risk of participant identification. All data reported outside of the study team will be in aggregate form, without reference to any specific participant.

The observers are only responsible for collecting data as part of the study and will not perform clinical duties (e.g., helping with tasks). However, in the unlikely event that observers

1  
2  
3 suspect an error is about to be made that could compromise patient safety, observers will  
4  
5 intervene by asking the participant for clarification, as indicated in the REB.  
6  
7

## 8 9 **Dissemination**

10  
11 The audience for our research includes front-line hospital staff and administrators, as well  
12  
13 as professional, regulatory and accreditation organizations, patient safety and healthcare quality  
14  
15 organizations, and equipment and drug manufacturers. The findings from our study will be used  
16  
17 by organizations to inform recommendations, guidance and standards.  
18  
19

20  
21 The results will be shared with hospitals in Ontario and across Canada through  
22  
23 collaboration with the Institute for Safe Medication Practices Canada. Findings from this study  
24  
25 will be presented at conferences and meetings, as well as in manuscripts submitted for  
26  
27 publication. This study will be among the first to proactively capture empirical evidence of how  
28  
29 current controls for MUPs in Ontario hospitals may be improved to protect against medication  
30  
31 losses.  
32  
33

## 34 35 36 **LIMITATIONS**

37  
38 It is challenging for observations to capture how participants actually conduct tasks,  
39  
40 because participants may alter their behaviour due to the presence of the research team on the  
41  
42 unit (i.e., the Hawthorne Effect[69]). We will mitigate this effect by reassuring participants that  
43  
44 results will not be used to evaluate individual performance but will only be used to describe an  
45  
46 overall process. To minimize disruption and further normalize our presence, we will be as  
47  
48 unobtrusive as possible and conduct several hours of observations at multiple sites with multiple  
49  
50 participants.  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60

The validity of the results is strengthened by accurate note-taking by the observers. However, it is possible that some subtasks or contextual features of the environment will be missed. To limit the extent of missing information, observers will receive an orientation to each unit before beginning observations, will ask clarifying questions while observing, and will fully transcribe field notes. Two observers will capture MUPs in each unit, enabling corroboration and identification of tasks requiring further observation. Consistent team members will observe, transcribe and analyze the data.

The subjective nature of identifying potential failure modes and scoring the probability and severity of their effects may compromise the reliability of the results. But, by using data collected through observations to conduct the HFMEA, the subjectivity of the hazard analysis is lessened by basing the work on observed behaviours as opposed to perceived actions based on accepted practices. To further limit threats to reliability, brainstorming failure modes, scoring probability and severity, and completing the decision tree will be conducted independently by two consistent members on the HFMEA team, with a third member reconciling differences when required. There is no defined hazard score threshold to indicate when a failure mode should be considered for further analysis. Instead, the decision will be made by the HFMEA team based on several factors, including the number of failure modes and distribution of hazard scores. However, regardless of the hazard score threshold, all failure modes will be assessed for single point weaknesses and progress through the decision tree (Figure 2).

## REQUIRED STATEMENTS

**Author Contributions:** PT, MF, MD, DT, and MH were involved in the conceptualization of the study. MD was responsible for drafting the protocol manuscript. PT, MF, DT, and MH reviewed and revised the manuscript for intellectual content. All authors reviewed and approved the final version of the manuscript.

**Acknowledgements:** The authors would like to thank Devika Jain for supporting the development of the study protocol and the submission for research ethics board approval.

**Funding Statement:** This work was supported by Becton Dickinson (BD) Canada Inc. [grant number ROR2017-04260JH-NYGH]. BD Canada Inc. was not involved in study design or writing of this article, and will not be involved in the collection, analysis or interpretation of data; in the writing of the report; or in the decision to submit the article for publication.

**Competing Interests Statement:** MF and PT have received honoraria from BD Canada Inc. for presenting at BD sponsored events.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60

**LEGEND OF TABLES AND FIGURES**

**Table 1.** Probability and severity scoring

**Figure 1.** Healthcare Failure Mode and Effect worksheet. CS, Controlled substances; ED, Emergency department; OR, Operating room; ICU, Intensive care unit; Pharm, Inpatient pharmacy

**Figure 2.** Decision tree analysis. Adapted from “The Basics of Healthcare Failure Mode & Effect Analysis” by the Department of Veterans Affairs National Center for Patient Safety (2014). Available from: <https://www.patientsafety.va.gov/professionals/onthejob/hfmea.asp>

## REFERENCES

- 1 Canadian Institute for Health Information. Opioid-related harms in Canada. Ottawa, ON: Canadian Institute for Health Information 2017.  
<https://www.cihi.ca/sites/default/files/document/opioid-harms-chart-book-en.pdf> (accessed 18 Feb 2018).
- 2 Gomes T, Greaves S, Tadrous M, *et al.* Measuring the burden of opioid-related mortality in Ontario, Canada. *J Addict Med* 2018;**Publish Ahead of Print**:000–000.  
doi:10.1097/ADM.0000000000000412
- 3 Special Advisory Committee on the Epidemic of Opioid Overdoses. National report: Apparent opioid-related deaths in Canada (January 2016 to December 2017) Web-based Report. Ottawa, ON: Public Health Agency of Canada 2018.  
<https://www.canada.ca/en/public-health/services/publications/healthy-living/national-report-apparent-opioid-related-deaths-released-june-2018.html> (accessed 24 Aug 2018).
- 4 Opioid-related morbidity and mortality in Ontario. Public Health Ontario. 2018.<https://www.publichealthontario.ca/en/dataandanalytics/pages/opioid.aspx> (accessed 27 Jun 2018).
- 5 Carman T, Adhopia V. More than 9 million prescription drugs have gone missing from pharmacies since 2012. CBC News. 2018.<https://www.cbc.ca/news/canada/missing-drugs-pharmacies-part1-1.4708041> (accessed 28 Jun 2018).
- 6 Howorun C. ‘Unexplained losses’ of opioids on the rise in Canadian hospitals. Macleans. 2017.<http://www.macleans.ca/society/health/unexplained-losses-of-opioids-on-the-rise-in-canadian-hospitals/> (accessed 18 Feb 2018).
- 7 Kubinec V-L. Codeine tops list of pharmaceutical drugs reported missing in Manitoba. CBC News. 2018.<https://www.cbc.ca/news/canada/manitoba/manitoba-missing-pharmaceutical-drugs-codeine-1.4722423> (accessed 24 Aug 2018).
- 8 Southwick R. Drug thefts on the rise as pharmacies targeted throughout Alberta. CBC News. 2018.<https://www.cbc.ca/news/canada/calgary/drug-theft-rise-pharmacies-targeted-alberta-1.4723945> (accessed 24 Aug 2018).
- 9 Carman T. Analysis of Health Canada missing controlled substances and precursors data, Jan. 1, 2012 - Sept. 30, 2017. GitHub. 2018.[https://github.com/taracarman/drug\\_losses](https://github.com/taracarman/drug_losses) (accessed 8 Sep 2018).
- 10 Access to Information and Privacy Division - Health Canada. Reports of controlled drug (including narcotics) diversion/loss/misuse in Canada (including but not limited to those reported to the Office of Controlled Substances) from the period of Jan 1, 2016 to Dec 31, 2016. Information file: A-2017-000435. 2017.
- 11 Health Canada. Strengthening Canada’s Approach to Substance Use Issues. Government of Canada. 2018.<https://www.canada.ca/en/health-canada/services/substance-use/canadian->



drugs-substances-strategy/strengthening-canada-approach-substance-use-issue.html (accessed 11 Oct 2018).

12 New K. Preventing, detecting, and investigating drug diversion in health care facilities. *Journal of Nursing Regulation* 2015;**5**:18–25. doi:10.1016/S2155-8256(15)30095-8

13 Maryland Department of Health and Mental Hygiene. Public health vulnerability review: drug diversion, infection risk, and David Kwiatkowski’s employment as a healthcare worker in Maryland. Maryland Department of Health and Mental Hygiene 2013.

14 Division of Public Health Services. Hepatitis C outbreak investigation Exeter Hospital public report. Concord, New Hampshire: New Hampshire Department of Health and Human Services 2013. <https://www.dhhs.nh.gov/dphs/cdcs/hepatitisc/documents/hepc-outbreak-rpt.pdf> (accessed 7 Sep 2018).

15 Berge KH, Dillon KR, Sikkink KM, *et al*. Elements of best practice. In eAppendix of ‘diversion of drugs within health care facilities, a multiple-victim crime: patterns of diversion, scope, consequences, detection, and prevention’. *Mayo Clinic Proceedings* 2012;**87**.

16 Brummond PW, Chen DF, Churchill WW, *et al*. ASHP guidelines on preventing diversion of controlled substances. *American Journal of Health-System Pharmacy* 2017;**1**:1–54. doi:10.2146/ajhp160919

17 Discipline hearing report between College of Nurses of Ontario & Antonella Pace. Toronto, Ontario: 2012. <http://www.cno.org/globalassets/2-howweprotectthepublic/ih/decisions/fulltext/pdf/2013/antonella-pace-9615048-nov.8.2012.pdf> (accessed 7 Sep 2018).

18 Discipline hearing report between College of Nurses of Ontario & Jessy-Lee Landry. Toronto, Ontario: 2013. <http://www.cno.org/globalassets/2-howweprotectthepublic/ih/decisions/fulltext/pdf/landry.pdf> (accessed 7 Sep 2018).

19 Berge KH, Dillon KR, Sikkink KM, *et al*. Diversion of drugs within health care facilities, a multiple-victim crime: patterns of diversion, scope, consequences, detection, and prevention. *Mayo Clin Proc* 2012;**87**:674–82. doi:10.1016/j.mayocp.2012.03.013

20 Narcotic Control Regulations. 2018. [http://laws.justice.gc.ca/PDF/C.R.C.,\\_c.\\_1041.pdf](http://laws.justice.gc.ca/PDF/C.R.C.,_c._1041.pdf) (accessed 7 Sep 2018).

21 Benzodiazepines and Other Targeted Substances Regulations. <http://laws.justice.gc.ca/PDF/SOR-2000-217.pdf> (accessed 17 Sep 2018).

22 *Required organizational practices handbook 2017 - version 2*. Ottawa, ON: Accreditation Canada 2016. <https://store.accreditation.ca/products/required-organizational-practices-handbook-2017-version-2>

- 23 *Medication management standards*. 12th ed. Ottawa, ON: Accreditation Canada 2017. <https://store.accreditation.ca/products/medication-management-standards>
- 24 College of Nurses of Ontario. Practice Standard: Medication. College of Nurses of Ontario 2017. [http://www.cno.org/globalassets/docs/prac/41007\\_medication.pdf](http://www.cno.org/globalassets/docs/prac/41007_medication.pdf)
- 25 Bureau of Dangerous Drugs, Canadian Hospital Association, Canadian Nurses Association, *et al.* Guidelines for the secure distribution of narcotic and controlled drugs in hospitals (5.3.2). Ottawa: Minister of Supply and Services Canada 1990. [https://scp.in1touch.org/document/3631/REF\\_Narcotic\\_Secure\\_Dist\\_in\\_Hsptl\\_19900101.pdf](https://scp.in1touch.org/document/3631/REF_Narcotic_Secure_Dist_in_Hsptl_19900101.pdf) (accessed 7 Sep 2018).
- 26 Merlo LJ, Cummings SM, Cottler LB. Recovering substance-impaired pharmacists' views regarding occupational risks for addiction. *Journal of the American Pharmacists Association : JAPhA* 2012;**52**:480. doi:10.1331/JAPhA.2012.10214
- 27 Hughes P, Storr CL, Brandenburg N, *et al.* Physician substance use by medical specialty. *J Addict Dis* 1999;**18**:23–37. <https://www.ncbi.nlm.nih.gov/pubmed/10334373> (accessed 11 Oct 2018).
- 28 Trinkoff AM, Storr CL, Wall MP. Prescription-type drug misuse and workplace access among nurses. *J Addict Dis* 1999;**18**:9–17. doi:10.1300/J069v18n01\_02
- 29 Bryson EO, Silverstein JH. Addiction and substance abuse in anesthesiology. *Anesthesiology* 2008;**109**:905–17. doi:10.1097/ALN.0b013e3181895bc1
- 30 Berge KH, Lanier WL. Bloodstream infection outbreaks related to opioid-diverting health care workers: a cost-benefit analysis of prevention and detection programs. *Mayo Clin Proc* 2014;**89**:866–8. doi:10.1016/j.mayocp.2014.04.010
- 31 Schaefer MK, Perz JF. Outbreaks of infections associated with drug diversion by US health care personnel. *Mayo Clin Proc* 2014;**89**:878–87. doi:10.1016/j.mayocp.2014.04.007
- 32 Hellinger WC, Bacalis LP, Kay RS, *et al.* Health care-associated hepatitis C virus infections attributed to narcotic diversion. *Annals of Internal Medicine* 2012;**156**:477–82. doi:10.7326/0003-4819-156-7-201204030-00002
- 33 Yanagisawa S. Nurse admits to theft of drugs. The Kingston Whig. 2016. <http://www.thewhig.com/2016/04/03/nurse-admits-to-theft-of-drugs> (accessed 18 Feb 2018).
- 34 CBC news. No jail time for nurse who stole drugs. CBC news. 2012. <http://www.cbc.ca/news/canada/north/no-jail-time-for-nurse-who-stole-drugs-1.1178772> (accessed 18 Feb 2018).
- 35 Blackwell T. As one nurse who stole narcotics has firing overturned, others have very different fates. National Post. 2016. <http://nationalpost.com/news/toronto-nurse-who-stole-opioid-painkillers-and-other-drugs-has-firing-overturned> (accessed 18 Feb 2018).

36 El-Aneed A, Gladney N, Collins K, *et al.* Prescription drug abuse and methods of diversion: The potential role of a pharmacy network. *J Subst Use* 2009;**14**.<http://www.tandfonline.com/doi/abs/10.1080/14659890802446087> (accessed 18 Feb 2018).

37 Mc Donnell C. Opioid medication errors in pediatric practice: four years' experience of voluntary safety reporting. *Pain Res Manag* 2011;**16**:93–8.<https://www.ncbi.nlm.nih.gov/pubmed/21499584>

38 Madadi P, Hildebrandt D, Lauwers AE, *et al.* Characteristics of opioid-users whose death was related to opioid-toxicity: a population-based study in Ontario, Canada. *PLOS ONE* 2013;**8**:e60600. doi:10.1371/journal.pone.0060600

39 Baldisseri MR. Impaired healthcare professional. *Crit Care Med* 2007;**35**:S106-116. doi:10.1097/01.CCM.0000252918.87746.96

40 Schuppener LM, Pop-Vicas AE, Brooks EG, *et al.* *Serratia marcescens* bacteremia: nosocomial cluster following narcotic diversion. *Infect Control Hosp Epidemiol* 2017;**38**:1027–31. doi:10.1017/ice.2017.137

41 MGH to Pay \$2.3 Million to Resolve Drug Diversion Allegations. The United States Attorney's Office District of Massachusetts. 2015.<https://www.justice.gov/usao-ma/pr/mgh-pay-23-million-resolve-drug-diversion-allegations>

42 Horvath C. Implementation of a new method to track propofol in an endoscopy unit. *Int J Evid Based Healthc* 2017;**15**:102–10. doi:10.1097/XEB.0000000000000112

43 Martin ES, Dzierba SH, Jones DM. Preventing large-scale controlled substance diversion from within the pharmacy. *Hosp Pharm* 2013;**48**:406–12. doi:10.1310/hpj4805-406

44 Hyland S, Koczmar C, Salsman B, *et al.* Optimizing the use of automated dispensing cabinets. *The Canadian Journal of Hospital Pharmacy* 2007;**60**:332–4. doi:10.4212/cjhp.v60i5.205

45 McKinney M. Best Practices: Curbing healthcare drug theft. Modern Healthcare. <http://www.modernhealthcare.com/article/20150523/magazine/305239996> (accessed 1 Jul 2018).

46 Traynor K. DEA reschedules hydrocodone, makes changes to controlled substance disposal. *Am J Health Syst Pharm* 2014;**71**:1916–8. doi:10.2146/news140076

47 Mag HMT. Identifying and dealing with drug diversion. Health Management Technology. 2010.<https://www.healthmgttech.com/identifying-and-dealing-with-drug-diversion.php> (accessed 30 Jun 2018).

48 Cohen MR, Smetzer JL. Partially Filled Vials and Syringes in Sharps Containers Are a Key Source of Drugs for Diversion. *Hosp Pharm* 2016;**51**:514–9. doi:10.1310/hpj5107-514

- 49 Greenall J, Santora P, Koczmara C, *et al.* Enhancing Safe Medication Use for Pediatric Patients in the Emergency Department. *Can J Hosp Pharm* 2009;**62**:150–3. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2826921/> (accessed 30 Jun 2018).
- 50 Epstein RH, Gratch DM, Grunwald Z. Development of a scheduled drug diversion surveillance system based on an analysis of atypical drug transactions. *Anesth Analg* 2007;**105**:1053–60, table of contents. doi:10.1213/01.ane.0000281797.00935.08
- 51 Inciardi JA, Surratt HL, Kurtz SP, *et al.* The diversion of prescription drugs by health care workers in Cincinnati, Ohio. *Subst Use Misuse* 2006;**41**:255–64. doi:10.1080/10826080500391829
- 52 Burger G, Burger M. Drug Diversion: New Approaches to an Old Problem. *The American Journal of Pharmacy Benefits* 2016;**8**:30–3.
- 53 Ahmed I, Majeed A. The safe and responsible disposal of unused controlled drugs. *Br J Nurs* 2007;**16**:1318–22. doi:10.12968/bjon.2007.16.21.27717
- 54 Eisler P. Doctors, medical staff on drugs put patients at risk. USA TODAY. 2014. <https://www.usatoday.com/story/news/nation/2014/04/15/doctors-addicted-drugs-health-care-diversion/7588401/> (accessed 16 Nov 2017).
- 55 VA National Center for Patient Safety. The Basics of Healthcare Failure Mode and Effect Analysis. Ann Arbor, Michigan: United States Department of Veterans Affairs 2014. [https://www.patientsafety.va.gov/docs/joe/hfmea\\_intro\\_jm\\_may14.doc](https://www.patientsafety.va.gov/docs/joe/hfmea_intro_jm_may14.doc)
- 56 DeRosier J, Stalhandske E, Bagian JP, *et al.* Using health care Failure Mode and Effect Analysis™: the VA National Center for Patient Safety's prospective risk analysis system. *Jt Comm J Qual Improv* 2002;**28**:248–67, 209. doi:10.1016/S1070-3241(02)28025-6
- 57 van Tilburg CM, Leistikow IP, Rademaker CMA, *et al.* Health care failure mode and effect analysis: a useful proactive risk analysis in a pediatric oncology ward. *Qual Saf Health Care* 2006;**15**:58–63. doi:10.1136/qshc.2005.014902
- 58 Esmail R, Cummings C, Dersch D, *et al.* Using Healthcare Failure Mode and Effect Analysis tool to review the process of ordering and administering potassium chloride and potassium phosphate. *Healthc Q* 2005;**8 Spec No**:73–80.
- 59 Wetterneck TB, Skibinski KA, Roberts TL, *et al.* Using failure mode and effects analysis to plan implementation of smart i.v. pump technology. *Am J Health Syst Pharm* 2006;**63**:1528–38. doi:10.2146/ajhp050515
- 60 Nickerson T, Jenkins M, Greenall J. Using ISMP Canada's framework for failure mode and effects analysis: a tale of two FMEAs. *Healthc Q* 2008;**11**:40–6.
- 61 Pinkney S, Fan M, Chan K, *et al.* Multiple Intravenous Infusions Phase 2b: Laboratory Study. *Ont Health Technol Assess Ser* 2014;**14**:1–163.

62 Frewen H, Brown E, Jenkins M, *et al.* Failure mode and effects analysis in a paperless radiotherapy department. *J Med Imaging Radiat Oncol* 2018;**62**:707–15. doi:10.1111/1754-9485.12762

63 Rienzi L, Bariani F, Dalla Zorza M, *et al.* Failure mode and effects analysis of witnessing protocols for ensuring traceability during IVF. *Reproductive BioMedicine Online* 2015;**31**:516–22. doi:10.1016/j.rbmo.2015.06.018

64 Dean Franklin B, Shebl NA, Barber N. Failure mode and effects analysis: too little for too much? *BMJ Qual Saf* 2012;**21**:607–11. doi:10.1136/bmjqs-2011-000723

65 Bowles JB. An Assessment of RPN Prioritization in a Failure Modes Effects and Criticality Analysis. *JOURNAL- IEST* 2004;**47**:51–6.

66 Wheeler DJ. Problems With Risk Priority Numbers. *Quality Digest*. 2016.<http://www.qualitydigest.com/%5Bnode-path-raw%5D> (accessed 11 Oct 2018).

67 Simsekler MCE, Ward JR, Clarkson PJ. Evaluation of system mapping approaches in identifying patient safety risks. *Int J Qual Health Care* 2018;**30**:227–33. doi:10.1093/intqhc/mzx176

68 Daniellou F. The French-speaking ergonomists’ approach to work activity: cross-influences of field intervention and conceptual models. *Theoretical Issues in Ergonomics Science* 2005;**6**:409–27. doi:10.1080/14639220500078252

69 Parsons HM. What Happened at Hawthorne?: New evidence suggests the Hawthorne effect resulted from operant reinforcement contingencies. *Science* 1974;**183**:922–32. doi:10.1126/science.183.4128.922

HFMEA Step 3					BMJ Open HFMEA Step 4						HFMEA Step 5		
Medication Use Process					Failure Mode and Effect			Setting	Scoring		Decision Tree	Action	
#	Task	Sub-task	Related to CS only? (Y/N)	Role involved in the task	Potential Failure Mode	Potential Effect(s)	Potential Cause(s)	Occurs in ED, OR, ICU and/or Pharm	Probability (1-4)	Severity (1-4)	Proceed or Stop?	Eliminate, Control or Accept	Action
1													
2													
3													
4													
5	1.1												
6	1.2												
7	...												
8	...												
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													

E.g., Stocking the automated dispensing cabinet

E.g., Confirm number of units in current stock, verify count with witness

E.g., Pharmacy technician, nurse

E.g., Accept prepopulated count of stocked units without correctly counting the number of items

E.g., Discrepant count between documented number of stocked units and number

E.g., Confirmation bias, witness rushing technician to complete count

E.g., program automated dispensing cabinet to require blind count of current stock

For peer review only - <http://bmjopen.bmj.com/site/about/guidelines.xhtml>

BMJ Open

HFMEA Step 3

HFMEA Step 4

HFMEA Step 5

November 28, 2024 by guest. Protected by copyright.

Page 28 of 29

Does the hazard involve a sufficient likelihood of occurrence and severity to warrant that it be controlled?

YES

NO

BMJ Open

Is this a single point weakness in the process? (e.g., failure will result in system failure)

NO

YES

Does an effective control measure exist for the identified hazard?

YES

Stop

NO

Is the hazard so obvious and readily apparent that a control measure is not warranted?

YES

NO

Proceed to HFMEA next step



# BMJ Open

## Study protocol for clinical observations and a Healthcare Failure Mode and Effect Analysis to identify vulnerabilities in the security and accounting of medications in Ontario hospitals

Journal:	<i>BMJ Open</i>
Manuscript ID	bmjopen-2018-027629.R1
Article Type:	Protocol
Date Submitted by the Author:	10-Apr-2019
Complete List of Authors:	de Vries, Maaïke; North York General Hospital, HumanEra, Research and Innovation; University of Toronto, Institute of Health Policy, Management and Evaluation Fan, Mark; North York General Hospital, HumanEra, Research and Innovation Tscheng, Dorothy; Institute for Safe Medication Practices Canada Hamilton, Michael; Institute for Safe Medication Practices Canada Trbovich, Patricia; North York General Hospital, HumanEra, Research and Innovation; University of Toronto, Institute of Health Policy, Management and Evaluation
<b>Primary Subject Heading</b>:	Health services research
Secondary Subject Heading:	Qualitative research
Keywords:	Hospital medication use process, Diversion, Healthcare safety and quality, Human factors

SCHOLARONE™  
Manuscripts



1

2

3 **Study protocol for clinical observations and a Healthcare Failure Mode and Effect Analysis**

4

5 **to identify vulnerabilities in the security and accounting of medications in Ontario**

6

7

8 **hospitals**

9

10

11

12

13

14

15 **Author List:** Maaïke de Vries<sup>1,2</sup>, Mark Fan<sup>1</sup>, Dorothy Tscheng<sup>3</sup>, Michael Hamilton<sup>3</sup>, Patricia

16

17 Trbovich<sup>1,2</sup>

18

19

20

21

22 **Author Affiliations:**

23

- 24 1. HumanEra, Research and Innovation, North York General Hospital, Toronto, Ontario,
- 25
- 26 Canada
- 27
- 28 2. Institute of Health Policy, Management and Evaluation, University of Toronto, Toronto,
- 29
- 30 Ontario, Canada
- 31
- 32
- 33 3. Institute for Safe Medication Practices Canada, Toronto, Ontario, Canada
- 34

35 **Corresponding Author:**

36

37 Maaïke deVries, MSc

38

39 Institute of Health Policy, Management and Evaluation

40

41 University of Toronto, Health Sciences Building

42

43 155 College Street, Suite 425

44

45 Toronto, ON Canada M5T 3M6

46

47 416-420-8678

48

49 [maaike.devries@mail.utoronto.ca](mailto:maaike.devries@mail.utoronto.ca)

50

51

52

53

54 **Word Count:** 4248

55

56

57

58

59

60

## ABSTRACT

**Introduction:** An increasing number of opioids and other controlled substances are being stolen from healthcare facilities, diverting medications from their intended medical use to be used or sold illicitly. Many incidents of medication loss from Canadian hospitals are reported as unexplained losses. Together, this suggests not only that vulnerabilities for diversion exist within current medication use processes (MUPs), but that hospitals lack robust mechanisms to accurately track and account for discrepancies and loss in inventory. There is a paucity of primary research investigating vulnerabilities in the security and accounting of medications across hospital processes. The purpose of this study is to map hospital MUPs, systematically identify risks for diversion or unintentional loss, and proactively assess opportunities for improvements to medication accounting and security.

**Methods and analysis:** We will conduct human factors-informed clinical observations and a Healthcare Failure Mode and Effect Analysis (HFMEA). We will observe hospital personnel in the intensive care unit, emergency department, and inpatient pharmacy in two hospitals in Ontario, Canada. Observations will capture how participants complete tasks, as well as gather contextual information about the environment, technologies, and processes. A multidisciplinary team will complete an HFMEA to map process flow diagrams for the MUPs in the observed clinical units, identify and prioritize potential methods of medication loss (failure modes), and describe mechanisms or actions to prevent, detect, and trace medication loss.

**Ethics and dissemination:** We received province-wide research ethics via Clinical Trials Ontario Streamlined Research Review System, and site-specific approvals from each participating hospital. The results from this study will be presented at conferences and meetings, as well as published in peer-reviewed journals. The findings will be shared with hospitals,

professional, regulatory and accreditation organizations, patient safety and healthcare quality organizations, and equipment and drug manufacturers.

**Keywords:** Hospital medication use process, Diversion, Healthcare safety and quality, Human factors

**STRENGTHS AND LIMITATIONS OF THIS STUDY**

1. Applying human factors methodologies embraces system complexity and allows diversion to be studied from a systems, as opposed to an individual blame, perspective.
2. Basing the analysis on data collected through observations enables the study to identify vulnerabilities in processes according to how they are actually performed instead of how they are perceived to occur (work as done versus work as imagined).
3. Conducting the study in multiple units in two hospitals enables corroboration of results between sites, as well as the comparison of workflows and failure modes across hospitals and as a function of clinical area.
4. Probability and severity scoring of failure modes (and other components of the hazard analysis) is subjective; however, our study design mitigates this with a multidisciplinary team and independent scoring.
5. There are widespread system-level and individual-level practice variations within a hospital, and point-in-time observations likely do not capture all possibilities, even as attempts to increase the number and time of observations are employed.

## INTRODUCTION

The opioid crisis claims lives every day, with opioid misuse causing increasing rates of morbidity and mortality across Canada.[1–4] A worrisome parallel trend suggests a growing number of opioids and other controlled substances (CS) going missing or being stolen from Canadian healthcare facilities[5–11] and entering the illegal street market.[7,8] The theft of medications for personal substance use or trafficking is described as ‘diversion’, as drugs are transferred, or diverted, from legitimate medical to non-medical use.[12] Weaknesses in the security and accounting of CS in hospitals enables medications to be lost or diverted.[13] It is increasingly recognized that Canadian hospitals lack robust processes and infrastructure to accurately track and resolve discrepancies in their CS inventory. For example, of the 1020 incidents of CS losses and thefts detected and reported by Canadian hospitals to Health Canada in 2016,[9] over 80% were reported as unexplained losses, meaning that at the time of reporting (i.e., within 10 days of discovery), the loss could not be attributed to any particular cause or action. What has not been explored are the vulnerabilities within the hospital medication use process (MUP; e.g., procurement, storage, preparation, prescription, dispensing, administration, reconciliation, waste, return, removal) that increase the potential for diversion to occur. With Canadian hospitals experiencing increasingly formal expectations that they will verify and enhance diversion safeguards to protect patients and healthcare workers[14,15], they require systematic knowledge about where vulnerabilities exist and advice and guidance on how to mitigate these risks.

**Impact of hospital medication diversion**

The hospital setting is vulnerable to diversion by healthcare workers because of the large quantity of stock and proximity with which many hospital personnel interact with medications. Ease of access and frequent interaction with CS can be considered occupational hazards, increasing the risk of diversion and substance use disorder among healthcare workers.[16–18] The opportunity to divert medications can escalate drug seeking behaviour and lead to overdose and death[13,19] or infection from unsterile medications and needles.[20–22] There are also professional risks, including suspension or termination of employment, revocation of license to practice, civil malpractice claims, and criminal prosecution.[23–25]

Diversion has been shown to have negative effects beyond its impact on the person who is diverting medications, including on patients, healthcare facilities, and the larger community. Patients have been directly harmed by receiving inadequate analgesia or anesthesia when their medication is diverted,[26–28] been provided substandard care when their healthcare worker was impaired,[29,30] and even contracted viral or bacterial infections due to medications or syringes compromised in the diversion process.[20,21,31] Hospitals bear the cost of diverted medications from their stock, follow-up patient care and investigations stemming from diversion, and reporting to authorities.[26,32,33] The larger community is impacted by the increase in the supply of medications ending up on the street[7,8] and decreased public trust in healthcare professions, institutions, and workers.

**Gap in understanding vulnerabilities for diversion in hospital MUPs**

System-wide gaps in the security and traceability of medication transactions through technologies, processes, and environments can result in considerable losses of medications

without recourse to audit or trace their whereabouts. As a result, many hospitals may not be aware of the deficiencies in their medication accounting and security processes. Further, the large proportion of unexplained losses suggest that current estimates of medication thefts in Canadian hospitals, diversion or otherwise, underestimate the issue. There is a lack of primary research describing how medications are lost or stolen from hospitals. Diversion literature largely consists of expert commentary and institutional experience,[34–37] case reports,[38–40] commentary on past incidents,[21,41] and audit reports.[42–45] These methods are retrospective and limited in their ability to identify or adequately characterize the system vulnerabilities that enable diversion. Although it is important to investigate the effects of these incidents and update best practices in response, it is equally, if not more important, to proactively identify potential risks to prevent new and unexpected patterns of diversion. To address this gap, we propose a study designed to map two hospitals' MUPs and systematically identify vulnerabilities in these processes that increase the risk for diversion. To our knowledge, this is the first study to prospectively and systematically investigate the vulnerabilities compromising the security and accounting of medications across the scope of hospital MUPs, as opposed to confined to a specific task or process, and to suggest mitigation strategies.

## Objectives

The objectives of this study are to understand the security and accounting of medications throughout the MUPs in two Ontario hospitals, to identify vulnerabilities and existing safeguards, and to proactively identify opportunities for improvement.

Recognizing the sensitivity of the topic, we emphasize that our study seeks to understand diversion from a systems perspective, empirically and objectively identifying process failures in

the security and accounting of medications rather than characterizing, blaming, or otherwise criminalizing healthcare workers who may be diverting.

## METHODS AND ANALYSIS

### Overview

The study team is comprised of five health services researchers with backgrounds in medication safety, three (MD, MF and PT) with expertise in human factors, one with clinical experience as a hospital pharmacist (DT) and one as a practising physician (MH).

Our study is comprised of two integrated parts, as one (clinical observations) informs the other (risk analysis). Figure 1 describes the study design, showing the order of the steps from each part. We will conduct clinical observations to understand and contrast MUPs across units and hospitals. Although we are interested in identifying vulnerabilities in the MUP that could allow diversion to occur, we do not expect to observe incidents of diversion. Rather, the purpose of the observations is to map the MUPs. We will use Healthcare Failure Mode and Effect Analysis (HFMEA) to proactively identify and evaluate failure modes in MUPs and identify opportunities for improvement to medication accounting and security. The study observations and analysis will take place from May 2018 to October 2019.

### Clinical observations

#### Setting

Clinical observations will be conducted in three units (intensive care unit, emergency department, and inpatient pharmacy) in two large (over 400 acute care beds) full-service hospitals in Toronto, Ontario, Canada. We purposively selected the settings to meet three criteria: one academic and one community hospital site, units with high use and access to CS,

and sites using different automated dispensing cabinet (ADC) platforms. Table 1 describes the units and lists the processes and personnel that we expect to observe at each. Several process tasks are expected to follow similar procedures/protocols given that both hospitals have central inpatient pharmacies that distribute unit-dosed medications to the floors, have ADCs on the clinical units, and operate within the same provincial health system. However, some process tasks are expected to differ between hospitals and clinical units because of differences in technologies (e.g., use of different ADCs) and protocols (e.g., requirement of a witness for wasting). For example, emergency departments often use paper documentation of medication orders and administration, whereas electronic systems are used to record these events in the intensive care units.

**Table 1.** Description of clinical observation sites and medication use processes

	<b>Intensive Care Unit</b>	<b>Emergency Department</b>	<b>Inpatient Pharmacy</b>
<b>Setting</b>	<ul style="list-style-type: none"> <li>- Combined medical surgical and coronary care intensive care unit</li> <li>- Site 1: 20-25 beds</li> <li>- Site 2: 20-25 beds</li> </ul>	<ul style="list-style-type: none"> <li>- Acute, subacute, and ambulatory care</li> <li>- Site 1: over 100,000 emergency visits annually</li> <li>- Site 2: over 50,000 emergency visits annually</li> </ul>	<ul style="list-style-type: none"> <li>- Preparation, manufacturing, and dispensing of oral and intravenous medications</li> <li>- Site 1: Omnicell ADC and vault</li> <li>- Site 2: Pyxis ADC and vault</li> </ul>
<b>Processes</b>	<ul style="list-style-type: none"> <li>- Ordering/prescribing</li> <li>- Dispensing</li> <li>- Preparing</li> <li>- Administering</li> <li>- Wasting</li> <li>- Returning</li> <li>- Reconciling</li> </ul>	<ul style="list-style-type: none"> <li>- Ordering/prescribing</li> <li>- Dispensing</li> <li>- Preparing</li> <li>- Administering</li> <li>- Wasting</li> <li>- Returning</li> <li>- Reconciling</li> </ul>	<ul style="list-style-type: none"> <li>- Procuring</li> <li>- Delivering</li> <li>- Storing</li> <li>- Preparing</li> <li>- Distributing</li> <li>- Returning</li> <li>- Reconciling</li> <li>- Wasting</li> <li>- Disposing/removing</li> </ul>
<b>Personnel</b>	<ul style="list-style-type: none"> <li>- Physicians</li> <li>- Registered nurses</li> <li>- Nurse practitioners</li> <li>- Pharmacists</li> <li>- Respiratory therapists*</li> <li>- Environmental services staff</li> <li>- Porters/transportation staff</li> </ul>	<ul style="list-style-type: none"> <li>- Physicians</li> <li>- Registered nurses</li> <li>- Nurse practitioners</li> <li>- Pharmacists</li> <li>- Physician assistants</li> <li>- Environmental services staff</li> <li>- Porters/transportation staff</li> <li>- Security guards</li> </ul>	<ul style="list-style-type: none"> <li>- Pharmacy technicians</li> <li>- Pharmacists</li> <li>- Environmental services staff</li> </ul>

\*Respiratory therapy is a regulated profession in Canada requiring licensing from the Canadian Society for Respiratory Therapy or one of the provincial regulatory bodies.



Participants

We will use purposive sampling to recruit participants for the clinical observations. We will include front-line healthcare workers who have a role in or interaction with at least one component of the MUP and who consent to being observed. This includes healthcare workers who directly interact with medications (e.g., dispensing and administering medications), as well as hospital personnel who are involved indirectly (e.g., encountering partial vials of medication while cleaning patient rooms). We estimate that a sample size of 20 participants is the minimum number of observations required to reach theoretical saturation, whereby additional sessions would not likely yield further insights. Therefore, the estimated number of participants is 160 (20 individuals per unit x 2 hospitals x 4 units). However, the number of healthcare workers recruited for observations is expected to differ somewhat between units because of differences in staffing complement, shift schedules, and number of tasks related to the MUP. For example, in the intensive care units, we expect to observe a minimum of 14 nurses, 2 pharmacists, 2 physicians, 1 respiratory therapist, and 1 environmental services staff, whereas in the inpatient pharmacies, we expect to observe 18 pharmacy technicians and 2 pharmacists (see Table 1 for a description of MUPs and personnel that will be observed in each clinical unit at each site).

Participants will be asked by the study team to sign consent forms before being observed. Participants will be given as much time as they require to review the consent form and have their questions answered by the study team prior to deciding if they wish to participate. The study team will highlight that participation is voluntary and can be stopped at any time for any reason and that clinical performance is not being assessed or evaluated.

## Data collection

Two members of the study team (one human factors specialist and one clinician) will jointly observe within each hospital unit for approximately five times a week for four weeks. Observations will take place on all days of the week and include all hours of the day. Each observation session will last for two to eight hours, depending on the participants' availability, the shift duration, and the task(s) being observed. Some tasks are frequent and repetitive so require less time to capture, whereas others occur infrequently or over the course of a longer time period so require longer observation periods. Observers will unobtrusively shadow participants as they carry out their daily activities. The purpose of the observations is to obtain a detailed understanding of participants' typical tasks and responsibilities, as well as the procedures and equipment related to the MUP. The observations will also characterize problematic issues that are observed (e.g., not logging out of the automated dispensing cabinet system) or that participants describe to the observer (e.g., unwillingness of peers to witness wasting). Observations will capture the MUP for all medications, but with a focus on CS to identify safeguards and vulnerabilities specifically for these medications.

Observers will take free-form notes, collect artifacts of clinical practice (e.g., blank pre-printed forms), as well as take photographs of the environment, technology and supplies. The photographs will be used to recall or visualize process steps during the mapping process. Images will also be used to provide context when presenting and describing results. The free-form notes will capture step-by-step how participants complete tasks as well as contextual information, including the physical layout of the unit, the roles and shifts covered by staff, technologies used to document dispensing, and locations of medications on the unit. The observer will fully

transcribe their free-form notes into Word© and upload them onto a secure SharePoint© site hosted at the study team’s home organization. Emerging findings will be confirmed with healthcare workers in the units.

Coding of observation data

Data collected during observations will be uploaded into MAXQDA© version 2018.1 data management and analysis software. One human factors specialist will code the observation data using codes for hospital units (intensive care unit, emergency department, and inpatient pharmacy), tasks, and vulnerabilities or safeguards. A second study team member will review the codes, and any discrepancies will be resolved through discussion. Coding of the observational data in MAXQDA© will create a dataset that is structured so that the study team can search and filter data related to specific MUP tasks, roles, technologies, or environments. These are important inputs for conducting the HFMEA, providing not only information on how tasks were performed and by whom but also contextual information for conducting the hazard analysis described below.

**Healthcare Failure Mode and Effect Analysis (HFMEA)**

Overview of HFMEA

Healthcare Failure Mode and Effect Analysis (HFMEA) is a prospective risk analysis that involves mapping detailed process flow diagrams and then systematically identifying and prioritizing vulnerabilities via a structured decision-making algorithm.[46] HFMEA was developed by the Department of Veterans Affairs National Centre for Patient Safety (NCPS) in 2002.[47] It been successfully applied to several healthcare processes, including the ordering and

administration of medications as well as the sterilization and use of surgical instruments.[48–52] HFMEA combines concepts and components from the Failure Mode and Effect Analysis (FMEA), Hazard Analysis and Critical Control Point, and root cause analysis.[47] FMEA was originally used in aviation, manufacturing, and nuclear industries to evaluate risk of products, and has been used in healthcare to conduct proactive risk analyses on high-risk technologies and processes.[53,54]

The HFMEA approach was developed to address criticisms of using FMEA in healthcare, particularly with respect to the use of a single risk priority number (RPN) to rank vulnerabilities.[55] The RPN in FMEA is calculated by multiplying scores from three ordinal scales: severity, probability and detectability. Multiplying these scores creates an RPN that is mathematically flawed, unstable (small changes in one score can lead to large changes in RPN), and masks important distinctions.[55–57]. For example, a failure mode with high detectability, high probability, but low severity would be prioritized the same as a failure mode with high detectability, low probability, but high severity despite having different risk implications.[55] Given that failure modes with the highest RPN would be considered as hazards with the highest priority, efforts may be misdirected based on a misleading RPN score. HFMEA addresses these concerns by prioritizing vulnerabilities using a decision tree analysis. The decision tree analysis considers not only severity and probability scores, but also assesses the criticality of the failures (i.e., single point weaknesses) and whether there are controls in place to prevent or detect these failures. The use of “yes” and “no” responses in the HFMEA decision tree to assess the criticality, presence of control measures, and detectability of the failure modes[46] is less subjective and more easily agreed upon than assigning scores.[58]

The HFMEA process includes five main steps.[47] After the study team defines the topic that will be analyzed and assembles a multidisciplinary team, information from the clinical observations will be used to map process flow diagrams for the management and use of medications in the clinical units. Next, we will identify potential methods of medication loss and evaluate their severity, risk and detectability, as well as identify potential areas where mitigation strategies can be implemented. Unique to our study is that the HFMEA will be conducted for the same processes at two sites, enabling us to find similarities and differences in processes, failure modes, and controls.

*1. Define the topic*

The first step is to define the HFMEA topic, including boundaries to limit its scope. Our HFMEA will examine the hospital MUP, including the procuring, storing, ordering, dispensing, preparing, administering and wasting of medications. The study team will limit the topic to specific units within the hospital (i.e., intensive care unit, inpatient pharmacy, and emergency department). Any hospital personnel role, technology, or object that directly or indirectly interacts with medications will be included. Processes that are external to the hospital unit or roles that are not affiliated with the hospital will be out of scope (e.g., administration of medications by paramedics, delivery of medications from distribution centre).

*2. Assemble the team*

The second step is to assemble a multidisciplinary team. The HFMEA team will be comprised of three human factors specialists, two pharmacists, one physician, two nurses, and two pharmacy technicians. The membership of the team ensures there is expertise in collecting and

analysing observational data and proactive risk analysis, as well as knowledge and experience working in the different hospital settings and performing tasks covering the breadth of the MUP. For particular steps of the HFMEA, team members will vary as a function of the unit being analysed (e.g., pharmacists will brainstorm failure modes in the pharmacy). The team will communicate over email as well as during in-person meetings. A minimum of five in-person meetings for each clinical unit will take place to cover the graphical description of the MUPs; identification and description of failure modes; assignment of severity and probability scores; decision tree analysis and identification of critical failure modes, causes, and controls; and actions and outcome measures. These meetings are embedded within the remaining steps described below.

### *3. Graphically describe the process*

The third step is to develop process flow diagrams and number each task and subtask. Creating process flow diagrams is an important first step in identifying safety risks from different aspects of a work system (e.g., individual, technology, administration).[59] The HFMEA team will use the data collected during the clinical observations to graphically map the step-by-step MUPs from each clinical unit at each hospital site. Using direct observation of processes, as opposed to mapping processes according to how tasks are supposed to occur, will strengthen the validity of our results.[60] The maps will be created by retrieving data coded for specific units and tasks and translating the process steps into a visual process flow diagram using draw.io©. The mapping process will be completed collaboratively between observers and iteratively during the clinical observation period, so that gaps or steps requiring clarification can be gathered in the next observation session. If observers note differences in how participants perform the same

process, this variation will be discussed by the team and described in the process flow diagrams, because variations may suggest vulnerabilities in process. Figure 2 shows an example of the task and subtask figure that will be constructed from the process flow diagrams produced in this step of the HFMEA. The team will review the detailed process flow diagrams and one human factors specialist will transcribe each task (e.g., dispensing from automated dispensing cabinet) and subtask (e.g., logging into the automated dispensing cabinet, selecting the patient, selecting the desired medications) into Excel©.

4. *Conduct a hazard analysis*

The fourth step consists of four sub-steps: A) list and number all potential failure modes (ways a step within a subtask can fail to accomplish its intended purpose) and potential effects if a failure were to occur; B) score the severity and probability of potential failure modes; C) use a decision tree analysis to identify critical failure modes; D) list all causes of critical failure modes.

- A) Two HFMEA team members will independently brainstorm failure modes and effects for each of the subtasks, and any discrepancies will be discussed. If a decision on whether or not to include a failure mode cannot be reached, a third member of the team will reconcile the discrepancy. Failure modes will be organized into a worksheet (Figure 3) to facilitate the recording of results.
- B) Two HFMEA team members will independently score failure modes based on their severity and probability, as described by the NCPS (Table 2).[46] A hazard score is calculated by multiplying the severity and probability scores. The intra-class correlation (ICC) will be calculated for a subset of hazard scores to assess inter-rater reliability. Definitions of scale scores will be discussed and refined until an accepted



level of agreement is reached ( $ICC \geq 0.60$ ). The severity and probability of the remaining failure modes will then be scored.

**Table 2.** Probability and severity scoring

Score	1	2	3	4
Scale				
<b>Probability</b>	<u>Remote</u> Unlikely to occur; may happen sometime in 5 to 30 years	<u>Uncommon</u> Possible to occur; may happen sometime in 2 to 5 years	<u>Occasional</u> Probably will occur; may happen several times in 1 to 2 years	<u>Frequent</u> Likely to occur immediately or within a short period; may happen several times a year
<b>Severity</b>	<u>Minor Event</u>	<u>Moderate Event</u>	<u>Major Event</u>	<u>Catastrophic Event</u>
<i>Patient outcome</i>	No injury nor increased length of stay nor increased level of care	Increased length of stay or increased level of care for 1 or 2 patients	Permanent lessening of bodily functioning, disfigurement, surgical intervention required, increased length of stay for 3 or more patients	Death or major permanent loss of function or suicide
<i>Staff outcome</i>	First aid treatment only with no lost time or restricted duty injuries or illness	Medical expenses, lost time or restricted duty injuries or illness for 1 or 2 staff	Hospitalization of 1 or 2 staff, or 3 or more staff experiencing lost time or restricted duty injuries or illnesses	One death or hospitalization of 3 or more staff
<i>Equipment or facility</i>	Damages less than \$10,000 without adverse patient outcome	Damages more than \$10,000 but less than \$100,000	Damages equal to or more than \$100,000 but less than \$250,000	Damages equal to or more than \$250,000

Adapted from "The Basics of Healthcare Failure Mode & Effect Analysis" by the Department of Veterans Affairs National Center for Patient Safety (2014). Available from:  
<https://www.patientsafety.va.gov/professionals/onthejob/hfmea.asp>

C) The HFMEA team will use a decision tree to prioritize the failure modes (Figure 4).

Failure modes with sufficient hazard scores or that are single point weaknesses (i.e., failure in this step will invariably result in an adverse event) are considered in the next step of the decision tree. If an effective control measure exists (e.g., storing medications in a locked drawer to prevent an individual from opening the drawer and removing medications from it) or the failure mode is so obvious and apparent that a



control measure is not warranted, then the failure mode does not proceed through the next steps of the HFMEA. All remaining failure modes are labelled as critical and considered in sub-step D. Figures 2 and 5 together provide an example of the anticipated outputs of the hazard analysis. Figure 2 shows which subtasks are associated with critical failure modes at each site using FM1, FM2, etc. as markers. When one site has a control in place to mitigate a critical failure mode identified in the other site, this is flagged with C1, C2, etc. Figure 5 provides a description of the corresponding critical failure mode and controls.

D) The HFMEA team will brainstorm the potential causes of the critical failure modes and record these in the worksheet. Completing the hazard analysis will produce a list of critical failure modes and their causes.

*5. Develop action and outcome measures*

The fifth step is to determine which failure mode causes can be eliminated or controlled and describe what actions could be used to accomplish this. This step also includes developing measures that can be used to test and analyse the success of a redesigned process. The HFMEA team will use the list of critical failure modes from the hazard analysis to describe each step in the MUP that increases the hospital's potential risk for medication loss, including those related to both the security and accounting of medications. The team will consider the causes listed for the failure modes and describe mechanisms or actions that can be implemented to prevent, detect, and trace incidents of medication loss. Finally, the team will suggest measures that could be used to assess successful implementation of these mechanisms and process improvements.

## Patient and public involvement

Hospital personnel have supported this work by facilitating opportunities for observations and analysis of different aspects of the MUP in units that have high CS use and access.

Healthcare providers and hospital staff will also be engaged during the HFMEA and will inform the dissemination strategy. Patients and public were not involved in the design of this study.

## ETHICS AND DISSEMINATION

### Ethics

This study has received province-wide Research Ethics Board (REB) approval via Clinical Trials Ontario Streamlined Research Review System, as well as site-specific approvals from each participating hospital under this framework.

Consent for observations is obtained for the healthcare worker who is being observed. When photographs are taken, no patients or healthcare workers will be photographed, and all person identifiers will be eliminated (e.g., patient name/ID will be covered). Hospitals that choose to participate will remain anonymous and will be described using general terms (e.g., a community hospital) in publications and presentations.

All signed consent forms, observation free-form notes, artifacts and photographs, and database records will be kept secure and confidential. Observational data will be associated with a participant number to reduce the risk of participant identification. All data reported outside of the study team will be in aggregate form, without reference to any specific participant.

The observers are only responsible for collecting data as part of the study and will not perform clinical duties (e.g., helping with tasks). However, in the unlikely event that observers

suspect an error is about to be made that could compromise patient safety, observers will intervene by asking the participant for clarification, as indicated in the REB.

**Dissemination**

The audience for our research includes front-line hospital staff and administrators, as well as professional, regulatory and accreditation organizations, patient safety and healthcare quality organizations, and equipment and drug manufacturers. The findings from our study will be used by organizations to inform recommendations, guidance and standards.

The results will be shared with hospitals in Ontario and across Canada through collaboration with the Institute for Safe Medication Practices Canada. Findings from this study will be presented at conferences and meetings, as well as in manuscripts submitted for publication. This study will be among the first to proactively capture empirical evidence of how current controls for MUPs in Ontario hospitals may be improved to protect against medication losses.

**LIMITATIONS**

It is challenging for observations to capture how participants actually conduct tasks, because participants may alter their behaviour due to the presence of the study team on the unit (i.e., the Hawthorne Effect[61]). We will mitigate this effect by reassuring participants that results will not be used to evaluate individual performance but will only be used to describe an overall process. To minimize disruption and further normalize our presence, we will be as unobtrusive as possible and conduct several hours of observations at multiple sites with multiple participants.

The validity of the results is strengthened by accurate note-taking by the observers. However, it is possible that some subtasks or contextual features of the environment will be missed. To limit the extent of missing information, observers will receive an orientation to each unit before beginning observations, will ask clarifying questions while observing, and will fully transcribe field notes. Two observers will capture MUPs in each unit, enabling corroboration and identification of tasks requiring further observation. Consistent study team members will observe, transcribe and analyze the data.

The subjective nature of identifying potential failure modes and scoring the probability and severity of their effects may compromise the reliability of the results.[62] But, by using data collected through observations to conduct the HFMEA, the subjectivity of the hazard analysis is lessened by basing the work on observed behaviours as opposed to perceived actions based on accepted practices.[58,63,64] To further limit threats to reliability, brainstorming failure modes, scoring probability and severity, and completing the decision tree will be conducted independently by two consistent members on the HFMEA team, with a third member reconciling differences when required.

## CONCLUSION

It is expected that the clinical observations and HFMEA will lead to an understanding of the current workflows and failure modes affecting the MUPs in one community and one academic hospital. Results of this analysis will allow for a comparison of workflows, failure modes, and controls between hospitals and as a function of clinical area (e.g., emergency department versus intensive care unit). Identification of critical failure modes and controls will demonstrate where vulnerabilities exist for diversion or unintentional loss and how they can be

mitigated, including those related to the physical security as well as the documentation and accounting of CS.

**REQUIRED STATEMENTS**

**Author Contributions:**

PT, MF, MD, DT, and MH were involved in the conceptualization of the study. MD was responsible for drafting the protocol manuscript. PT, MF, DT, and MH reviewed and revised the manuscript for intellectual content. All authors reviewed and approved the final version of the manuscript.

**Acknowledgements:**

The authors would like to thank Devika Jain for supporting the development of the study protocol and the submission for research ethics board approval.

**Funding Statement:**

This work was supported by Becton Dickinson (BD) Canada Inc. [grant number ROR2017-04260JH-NYGH]. BD Canada Inc. was not involved in study design or writing of this article, and will not be involved in the collection, analysis or interpretation of data; in the writing of the report; or in the decision to submit the article for publication.

**Competing Interests Statement:**

MD, MF, and PT have received honoraria from BD Canada Inc. for presenting at BD sponsored events.

## LEGEND OF TABLES AND FIGURES

**Table 1.** Description of clinical observation sites and medication use processes

**Table 2.** Probability and severity scoring

**Figure 1.** Study design. Integration of clinical observations and Healthcare Failure Mode and Effect Analysis (HFMEA).

**Figure 2.** Example task and subtask figure for the distribution of medications from the inpatient pharmacy to the clinical unit. The first level of the figure is the pharmacy process, the second level is the flow diagram of tasks, and the third level is the numbered subtasks that occur within each task. Subtasks are described separately for the two hospital sites. FM1, FM2, etc. indicate the subtasks where critical failure modes were identified. C1, C2, etc. indicate the subtasks that act as controls at one site for critical failure modes identified at the other site. Numbering of critical failure modes and controls correspond to the descriptions in Figure 5. ADC, automated dispensing cabinet; CS, controlled substances

**Figure 3.** Example of Healthcare Failure Mode and Effect (HFMEA) worksheet. CS, Controlled substances; ED, Emergency department; ICU, Intensive care unit; Pharm, Inpatient pharmacy

**Figure 4.** Decision tree analysis. Used to conduct step 4C of the Healthcare Failure Mode and Effect Analysis. Adapted from “The Basics of Healthcare Failure Mode & Effect Analysis” by

the Department of Veterans Affairs National Center for Patient Safety (2014). Available from:  
<https://www.patientsafety.va.gov/professionals/onthethejob/hfmea.asp>

**Figure 5.** Example results table of critical failure modes and controls for the distribution of medications from the inpatient pharmacy to the clinical unit. The table describes the critical failure modes and controls identified in step 4 of the Healthcare Failure Mode and Effect Analysis. Numbering of critical failure modes and controls correspond to the markers in Figure 2. “X” indicates the hospital sites where the critical failure mode was identified. “C” indicates the site where a control was identified for a critical failure mode at the other site. Numbers in square brackets correspond to the numbered subtasks in Figure 2. CS, controlled substance

## REFERENCES

- 1 Canadian Institute for Health Information. Opioid-related harms in Canada. Ottawa, ON: : Canadian Institute for Health Information 2017.  
<https://www.cihi.ca/sites/default/files/document/opioid-harms-chart-book-en.pdf> (accessed 18 Feb 2018).
- 2 Gomes T, Greaves S, Tadrous M, *et al.* Measuring the burden of opioid-related mortality in Ontario, Canada. *J Addict Med* 2018;**Publish Ahead of Print**:000–000.  
doi:10.1097/ADM.0000000000000412
- 3 Special Advisory Committee on the Epidemic of Opioid Overdoses. National report: Apparent opioid-related deaths in Canada (January 2016 to December 2017) Web-based Report. Ottawa, ON: : Public Health Agency of Canada 2018.  
<https://www.canada.ca/en/public-health/services/publications/healthy-living/national-report-apparent-opioid-related-deaths-released-june-2018.html> (accessed 24 Aug 2018).
- 4 Public Health Ontario. Opioid-related morbidity and mortality in Ontario. 2018.<https://www.publichealthontario.ca/en/dataandanalytics/pages/opioid.aspx> (accessed 2 Feb 2019).
- 5 Carman T, Adhopia V. More than 9 million prescription drugs have gone missing from pharmacies since 2012. CBC News. 2018.<https://www.cbc.ca/news/canada/missing-drugs-pharmacies-part1-1.4708041> (accessed 28 Jun 2018).
- 6 Howorun C. ‘Unexplained losses’ of opioids on the rise in Canadian hospitals. Macleans. 2017.<http://www.macleans.ca/society/health/unexplained-losses-of-opioids-on-the-rise-in-canadian-hospitals/> (accessed 18 Feb 2018).
- 7 Kubinec V-L. Codeine tops list of pharmaceutical drugs reported missing in Manitoba. CBC News. 2018.<https://www.cbc.ca/news/canada/manitoba/manitoba-missing-pharmaceutical-drugs-codeine-1.4722423> (accessed 24 Aug 2018).
- 8 Southwick R. Drug thefts on the rise as pharmacies targeted throughout Alberta. CBC News. 2018.<https://www.cbc.ca/news/canada/calgary/drug-theft-rise-pharmacies-targeted-alberta-1.4723945> (accessed 24 Aug 2018).
- 9 Carman T. Analysis of Health Canada missing controlled substances and precursors data, Jan. 1, 2012 - Sept. 30, 2017. GitHub. 2018.[https://github.com/taracarman/drug\\_losses](https://github.com/taracarman/drug_losses) (accessed 8 Sep 2018).
- 10 Access to Information and Privacy Division - Health Canada. Reports of controlled drug (including narcotics) diversion/loss/misuse in Canada (including but not limited to those reported to the Office of Controlled Substances) from the period of Jan 1, 2016 to Dec 31, 2016. Information file: A-2017-000435. 2017.



11 Kula T. Sarnia nurse given health arrest for hospital fentanyl theft. The London Free Press. 2018.<https://lfpres.com/news/local-news/drug-stealing-former-nurse-given-house-arrest> (accessed 5 Oct 2018).

12 Health Canada. Strengthening Canada’s Approach to Substance Use Issues. Government of Canada. 2018.<https://www.canada.ca/en/health-canada/services/substance-use/canadian-drugs-substances-strategy/strengthening-canada-approach-substance-use-issue.html> (accessed 11 Oct 2018).

13 Berge KH, Dillon KR, Sikkink KM, *et al.* Diversion of drugs within health care facilities, a multiple-victim crime: patterns of diversion, scope, consequences, detection, and prevention. *Mayo Clin Proc* 2012;**87**:674–82. doi:10.1016/j.mayocp.2012.03.013

14 Canadian Society of Hospital Pharmacists. Controlled Drugs and Substances in Hospitals and Healthcare Facilities: Guidelines on Secure Management and Diversion Prevention. Ottawa, ON: 2019. <https://www.cshp.ca/cshps-controlled-drugs-and-substances-hospitals-and-healthcare-facilities-guidelines-secure> (accessed 21 Mar 2019).

15 Canadian Centre on Substance Use and Addiction, Health Canada. Joint Statement of Action to Address the Opioid Crisis: A Collective Response (Annual Report 2016–2017). Canadian Centre on Substance Use and Addiction 2017. <http://www.ccsa.ca/Resource%20Library/CCSA-Joint-Statement-of-Action-Opioid-Crisis-Annual-Report-2017-en.pdf> (accessed 27 Aug 2018).

16 Merlo LJ, Cummings SM, Cottler LB. Recovering substance-impaired pharmacists’ views regarding occupational risks for addiction. *Journal of the American Pharmacists Association : JAPhA* 2012;**52**:480. doi:10.1331/JAPhA.2012.10214

17 Hughes P, Storr CL, Brandenburg N, *et al.* Physician substance use by medical specialty. *J Addict Dis* 1999;**18**:23–37.<https://www.ncbi.nlm.nih.gov/pubmed/10334373> (accessed 11 Oct 2018).

18 Trinkoff AM, Storr CL, Wall MP. Prescription-type drug misuse and workplace access among nurses. *J Addict Dis* 1999;**18**:9–17. doi:10.1300/J069v18n01\_02

19 Bryson EO, Silverstein JH. Addiction and substance abuse in anesthesiology. *Anesthesiology* 2008;**109**:905–17. doi:10.1097/ALN.0b013e3181895bc1

20 Berge KH, Lanier WL. Bloodstream infection outbreaks related to opioid-diverting health care workers: a cost-benefit analysis of prevention and detection programs. *Mayo Clin Proc* 2014;**89**:866–8. doi:10.1016/j.mayocp.2014.04.010

21 Schaefer MK, Perz JF. Outbreaks of infections associated with drug diversion by US health care personnel. *Mayo Clin Proc* 2014;**89**:878–87. doi:10.1016/j.mayocp.2014.04.007

22 Hellinger WC, Bacalis LP, Kay RS, *et al.* Health care–associated hepatitis C virus infections attributed to narcotic diversion. *Annals of Internal Medicine* 2012;**156**:477–82. doi:10.7326/0003-4819-156-7-201204030-00002

- 23 Yanagisawa S. Nurse admits to theft of drugs. *The Kingston Whig*. 2016.<http://www.thewhig.com/2016/04/03/nurse-admits-to-theft-of-drugs> (accessed 18 Feb 2018).
- 24 CBC News. No jail time for nurse who stole drugs. *CBC News*. 2012.<http://www.cbc.ca/news/canada/north/no-jail-time-for-nurse-who-stole-drugs-1.1178772> (accessed 18 Feb 2018).
- 25 Blackwell T. As one nurse who stole narcotics has firing overturned, others have very different fates. *National Post*. 2016.<http://nationalpost.com/news/toronto-nurse-who-stole-opioid-painkillers-and-other-drugs-has-firing-overturned> (accessed 18 Feb 2018).
- 26 El-Aneed A, Gladney N, Collins K, *et al*. Prescription drug abuse and methods of diversion: The potential role of a pharmacy network. *J Subst Use* 2009;**14**.<http://www.tandfonline.com/doi/abs/10.1080/14659890802446087> (accessed 18 Feb 2018).
- 27 Mc Donnell C. Opioid medication errors in pediatric practice: four years' experience of voluntary safety reporting. *Pain Res Manag* 2011;**16**:93–8.<https://www.ncbi.nlm.nih.gov/pubmed/21499584>
- 28 Madadi P, Hildebrandt D, Lauwers AE, *et al*. Characteristics of opioid-users whose death was related to opioid-toxicity: a population-based study in Ontario, Canada. *PLOS ONE* 2013;**8**:e60600. doi:10.1371/journal.pone.0060600
- 29 Baldisseri MR. Impaired healthcare professional. *Crit Care Med* 2007;**35**:S106-116. doi:10.1097/01.CCM.0000252918.87746.96
- 30 New K. Preventing, detecting, and investigating drug diversion in health care facilities. *Journal of Nursing Regulation* 2015;**5**:18–25. doi:10.1016/S2155-8256(15)30095-8
- 31 Schuppener LM, Pop-Vicas AE, Brooks EG, *et al*. *Serratia marcescens* bacteremia: nosocomial cluster following narcotic diversion. *Infect Control Hosp Epidemiol* 2017;**38**:1027–31. doi:10.1017/ice.2017.137
- 32 MGH to Pay \$2.3 Million to Resolve Drug Diversion Allegations. The United States Attorney's Office District of Massachusetts. 2015.<https://www.justice.gov/usao-ma/pr/mgh-pay-23-million-resolve-drug-diversion-allegations>
- 33 Horvath C. Implementation of a new method to track propofol in an endoscopy unit. *Int J Evid Based Healthc* 2017;**15**:102–10. doi:10.1097/XEB.0000000000000112
- 34 Martin ES, Dzierba SH, Jones DM. Preventing large-scale controlled substance diversion from within the pharmacy. *Hosp Pharm* 2013;**48**:406–12. doi:10.1310/hpj4805-406
- 35 Hyland S, Koczmar C, Salsman B, *et al*. Optimizing the use of automated dispensing cabinets. *The Canadian Journal of Hospital Pharmacy* 2007;**60**:332–4. doi:10.4212/cjhp.v60i5.205

36 McKinney M. Best Practices: Curbing healthcare drug theft. Modern Healthcare. <http://www.modernhealthcare.com/article/20150523/magazine/305239996> (accessed 30 Jun 2018).

37 Traynor K. DEA reschedules hydrocodone, makes changes to controlled substance disposal. *Am J Health Syst Pharm* 2014;**71**:1916–8. doi:10.2146/news140076

38 Mag HMT. Identifying and dealing with drug diversion. Health Management Technology. 2010.<https://www.healthmgtech.com/identifying-and-dealing-with-drug-diversion.php> (accessed 30 Jun 2018).

39 Cohen MR, Smetzer JL. Partially Filled Vials and Syringes in Sharps Containers Are a Key Source of Drugs for Diversion. *Hosp Pharm* 2016;**51**:514–9. doi:10.1310/hpj5107-514

40 Greenall J, Santora P, Koczmara C, *et al.* Enhancing Safe Medication Use for Pediatric Patients in the Emergency Department. *Can J Hosp Pharm* 2009;**62**:150–3.<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2826921/> (accessed 29 Jun 2018).

41 Eisler P. Doctors, medical staff on drugs put patients at risk. USA Today News. 2014.<https://www.usatoday.com/story/news/nation/2014/04/15/doctors-addicted-drugs-health-care-diversion/7588401/> (accessed 16 Nov 2017).

42 Epstein RH, Gratch DM, Grunwald Z. Development of a scheduled drug diversion surveillance system based on an analysis of atypical drug transactions. *Anesth Analg* 2007;**105**:1053–60, table of contents. doi:10.1213/01.ane.0000281797.00935.08

43 Inciardi J, Surratt HL, Kurtz SP, *et al.* The diversion of prescription drugs by health care workers in Cincinnati, Ohio. *Subst Use Misuse* 2006;**41**:255–64. doi:10.1080/10826080500391829

44 Burger G, Burger M. Drug Diversion: New Approaches to an Old Problem. *The American Journal of Pharmacy Benefits* 2016;**8**:30–3.

45 Ahmed I, Majeed A. The safe and responsible disposal of unused controlled drugs. *Br J Nurs* 2007;**16**:1318–22. doi:10.12968/bjon.2007.16.21.27717

46 VA National Center for Patient Safety. The Basics of Healthcare Failure Mode and Effect Analysis. Ann Arbor, Michigan: : United States Department of Veterans Affairs 2014. [https://www.patientsafety.va.gov/docs/joe/hfmea\\_intro\\_jm\\_may14.doc](https://www.patientsafety.va.gov/docs/joe/hfmea_intro_jm_may14.doc)

47 DeRosier J, Stalhandske E, Bagian JP, *et al.* Using health care Failure Mode and Effect Analysis™: the VA National Center for Patient Safety’s prospective risk analysis system. *Jt Comm J Qual Improv* 2002;**28**:248–67, 209. doi:10.1016/S1070-3241(02)28025-6

48 van Tilburg CM, Leistikow IP, Rademaker CMA, *et al.* Health care failure mode and effect analysis: a useful proactive risk analysis in a pediatric oncology ward. *Qual Saf Health Care* 2006;**15**:58–63. doi:10.1136/qshc.2005.014902

- 49 Esmail R, Cummings C, Dersch D, *et al.* Using Healthcare Failure Mode and Effect Analysis tool to review the process of ordering and administrating potassium chloride and potassium phosphate. *Healthc Q* 2005;**8 Spec No**:73–80.
- 50 Wetterneck TB, Skibinski KA, Roberts TL, *et al.* Using failure mode and effects analysis to plan implementation of smart i.v. pump technology. *Am J Health Syst Pharm* 2006;**63**:1528–38. doi:10.2146/ajhp050515
- 51 Nickerson T, Jenkins M, Greenall J. Using ISMP Canada’s framework for failure mode and effects analysis: a tale of two FMEAs. *Healthc Q* 2008;**11**:40–6.
- 52 Pinkney S, Fan M, Chan K, *et al.* Multiple Intravenous Infusions Phase 2b: Laboratory Study. *Ont Health Technol Assess Ser* 2014;**14**:1–163.
- 53 Frewen H, Brown E, Jenkins M, *et al.* Failure mode and effects analysis in a paperless radiotherapy department. *J Med Imaging Radiat Oncol* 2018;**62**:707–15. doi:10.1111/1754-9485.12762
- 54 Rienzi L, Bariani F, Dalla Zorza M, *et al.* Failure mode and effects analysis of witnessing protocols for ensuring traceability during IVF. *Reproductive BioMedicine Online* 2015;**31**:516–22. doi:10.1016/j.rbmo.2015.06.018
- 55 Franklin BD, Shebl NA, Barber N. Failure mode and effects analysis: too little for too much? *BMJ Qual Saf* 2012;**21**:607–11. doi:10.1136/bmjqs-2011-000723
- 56 Bowles JB. An Assessment of RPN Prioritization in a Failure Modes Effects and Criticality Analysis. *JOURNAL- IEST* 2004;**47**:51–6.
- 57 Wheeler DJ. Problems With Risk Priority Numbers. Quality Digest. 2016.<http://www.qualitydigest.com/%5Bnode-path-raw%5D> (accessed 11 Oct 2018).
- 58 Chadwick L, Fallon EF. Evaluation and critique of Healthcare Failure Mode and Effect Analysis applied in a radiotherapy case study. *Human Factors and Ergonomics in Manufacturing & Service Industries* 2013;**23**:116–27. doi:10.1002/hfm.20302
- 59 Simsekler MCE, Ward JR, Clarkson PJ. Evaluation of system mapping approaches in identifying patient safety risks. *Int J Qual Health Care* 2018;**30**:227–33. doi:10.1093/intqhc/mzx176
- 60 Daniellou F. The French-speaking ergonomists’ approach to work activity: cross-influences of field intervention and conceptual models. *Theoretical Issues in Ergonomics Science* 2005;**6**:409–27. doi:10.1080/14639220500078252
- 61 Parsons HM. What Happened at Hawthorne?: New evidence suggests the Hawthorne effect resulted from operant reinforcement contingencies. *Science* 1974;**183**:922–32. doi:10.1126/science.183.4128.922

62 Faiella G, Parand A, Franklin BD, *et al.* Expanding healthcare failure mode and effect analysis: A composite proactive risk analysis approach. *Reliability Engineering & System Safety* 2018;**169**:117–26. doi:10.1016/j.ress.2017.08.003

63 Anderson O, Brodie A, Vincent CA, *et al.* A systematic proactive risk assessment of hazards in surgical wards: a quantitative study. *Ann Surg* 2012;**255**:1086–92. doi:10.1097/SLA.0b013e31824f5f36

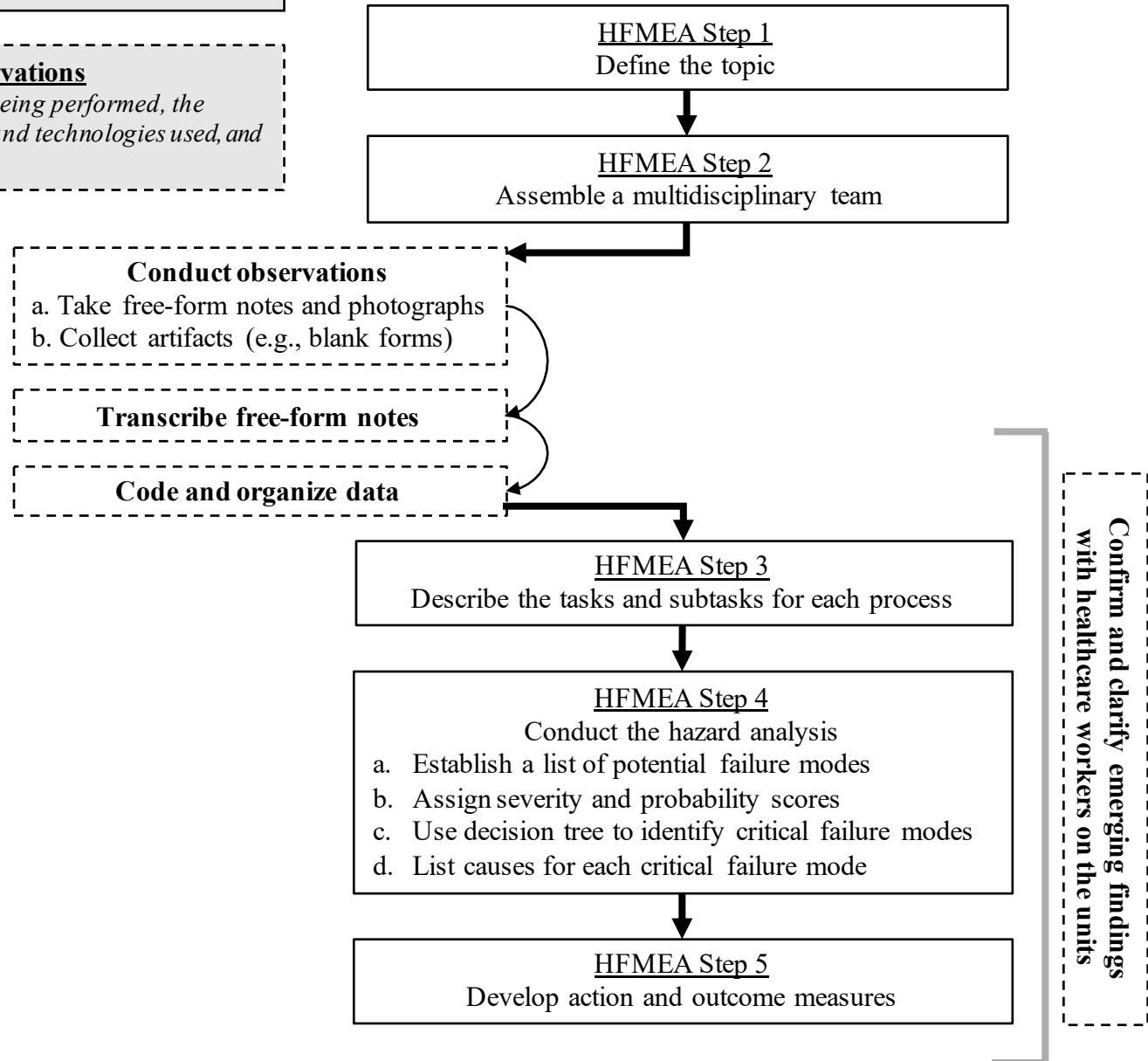
64 Johnston M, Arora S, Anderson O, *et al.* Escalation of care in surgery: a systematic risk assessment to prevent avoidable harm in hospitalized patients. *Ann Surg* 2015;**261**:831–8. doi:10.1097/SLA.0000000000000762

### **Steps for Healthcare Failure Mode and Effect Analysis**

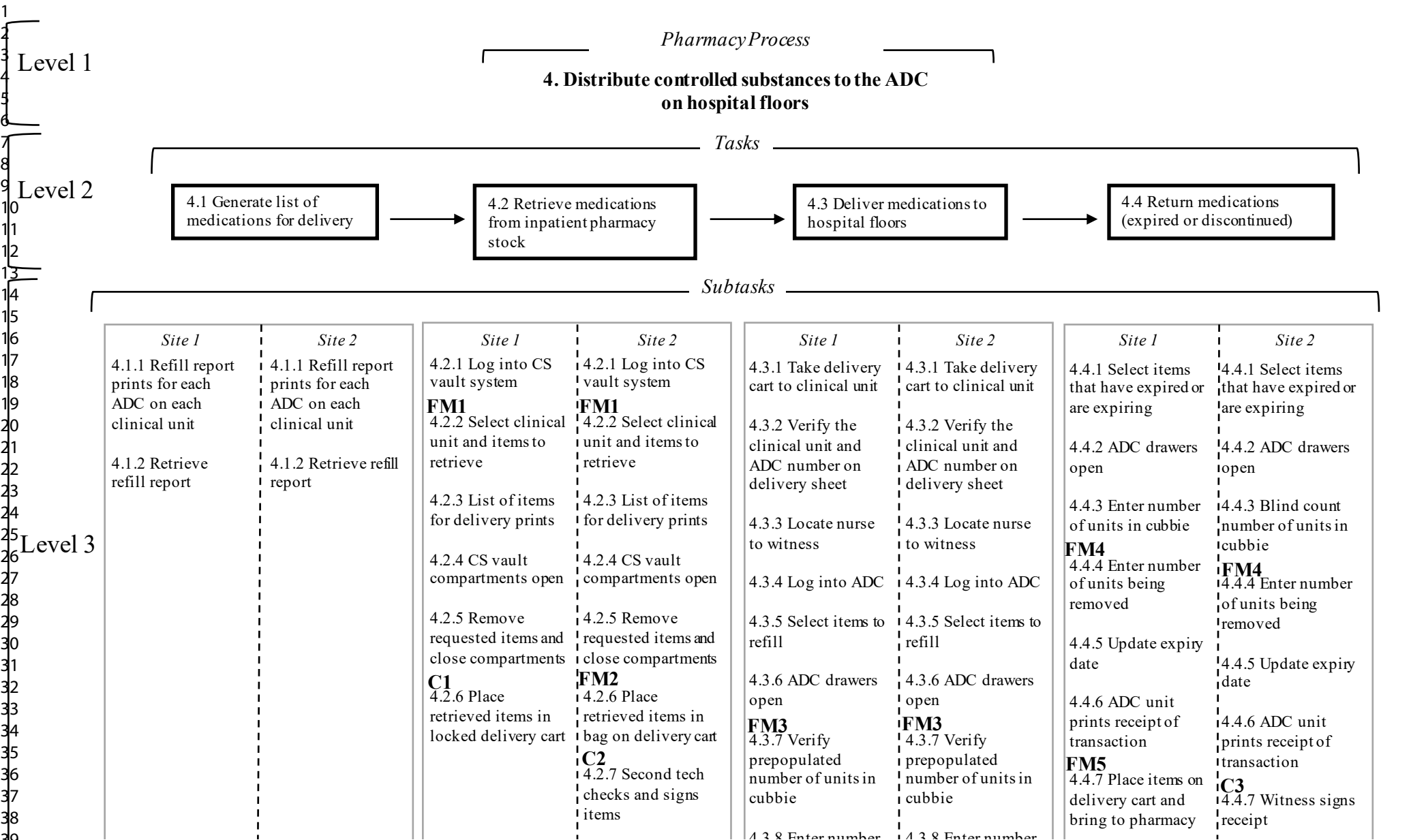
*Map process flow diagrams for the MUPs, identify vulnerabilities for diversion, and suggest areas where mitigation strategies can be implemented*

### **Steps for Clinical Observations**

*Develop detailed descriptions of the MUPs being performed, the people/team performing the tasks, the tools and technologies used, and the environment where the MUPs take place*







## HFMEA Step 3

BMJ Open

## HFMEA Step 4

## HFMEA Step 5

## Medication Use Process

## Failure Mode and Effect

## Setting

## Scoring

Decision  
Tree

## Action

#	Task	Sub-task	Related to CS only? (Y/N)	Role involved in the task	Potential Failure Mode	Potential Effect(s)	Potential Cause(s)	Occurs in ED, ICU and/or Pharm	Probability (1-4)	Severity (1-4)	Proceed or Stop?	Eliminate, Control or Accept	Action
1.1.1													
1.1.2													
....													
....													

E.g.,  
Stocking the  
automated  
dispensing  
cabinet

E.g., Confirm  
number of units in  
current stock,  
verify count with  
witness

E.g.,  
Pharmacy  
technician,  
nurse

E.g., Accept  
prepopulated count  
of stocked units  
without correctly  
counting the  
number of items

E.g., Discrepant  
count between  
documented  
number of  
stocked units  
and number

E.g., Confirmation  
bias, witness  
rushing technician  
to complete count

E.g., Program  
automated dispensing  
cabinet to require  
blind count of current  
stock



Does the hazard involve a sufficient likelihood of occurrence and severity to warrant that it be controlled?

YES

NO

BMJ Open

Is this a single point weakness in the process? (e.g., failure will result in system failure)

NO

YES

Does an effective control measure exist for the identified hazard?

YES

Stop

NO

Is the hazard so obvious and readily apparent that a control measure is not warranted?

YES

NO

Proceed to HFMEA next step

## Pharmacy Process: 4. Distribute controlled substances to the ADC on hospital floors

Site 1 Site 2  
Page 34 of 34  
[subtask]

**FM1.** Technician programs the CS vault to retrieve a greater number of unit doses than indicated based on minimum and maximum levels for each automated dispensing cabinet, creating an opportunity to gain access to a greater quantity of controlled substance

X X  
[4.2.2] [4.2.2]

**FM2.** Items placed on delivery cart are left unlocked and observed, creating an opportunity to for theft or tampering

C X  
[4.2.6] [4.2.6]

**C1.** Site 1 places the retrieved medications in a locked cart, which limits access to the medications once outside of the CS vault and acts as a control for this failure mode

**FM3.** Number of units in cubbie are counted/verified incorrectly, creating an opportunity to introduce discrepancy

X X  
[4.3.7] [4.3.7]

## Correction: *Clinical observations and a ealthcare ailure ode and ffect nalysis to identify vulnerabilities in the security and accounting of medications in Ontario hospitals: a study protocol*

---

de Vries M, Fan M, Tscheng D, *et al.* Clinical observations and a ealthcare ailure ode and ffect nalysis to identify vulnerabilities in the security and accounting of medications in Ontario hospitals: a study protocol. *BMJ Open* 2019;9:e027629. doi: 10.1136/bmjopen-2018-027629.

This article was previously published with an error in article title.

The correct title is **Clinical observations and a Healthcare Failure Mode and Effect Analysis to identify vulnerabilities in the security and accounting of medications in Ontario hospitals: a study protocol**

**Open access** This is an open access article distributed in accordance with the Creative Commons Attribution Non Commercial (CC BY-NC 4.0) license, which permits others to distribute, remix, adapt, build upon this work non-commercially, and license their derivative works on different terms, provided the original work is properly cited, appropriate credit is given, any changes made indicated, and the use is non-commercial. See: <http://creativecommons.org/licenses/by-nc/4.0/>

© Author(s) (or their employer(s)) 2019. Re-use permitted under CC BY-NC. No commercial re-use. See rights and permissions. Published by BMJ.

*BMJ Open* 2019;9:e027629corr1. doi:10.1136/bmjopen-2018-027629corr1

