



STATE OF MICHIGAN
DEPARTMENT OF CORRECTIONS
LANSING

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GOVERNOR

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Prisoner Pharmaceuticals

Source: OAG 471-0325-17

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Audit recommendations MDOC complied with:	2,
Audit recommendations MDOC agrees & will comply:	1, 3, 4, 5
Audit recommendations MDOC disagrees with:	n/a

MDOC Corrective Action Plan
Approved by OIAS: November 2019

Finding 01 – Compliance with controlled substance medication controls could be improved

MDOC Will Comply

Estimated timeframe for completion: January 1, 2020

Status Update: The Bureau of Health Care Services (BHCS) has the established controls in place and they are being monitored. The BHCS is in the process of updating the form (CHJ-691 -Controlled Substance/Critical Tool Count) to add a supervisor/Health Unit Manager initial box for each day. This will offer a specific location for a sign off which will allow for standardization among all the sites.

Finding 02 – Compliance with medication box controls needs improvement

MDOC Has Complied

Complete: July 2019

Status Update: In our audit response, BHCS noted that while COMs will allow us to generate reports when fully implemented, it will not have the capability to generate reports specific to medication boxes as those medications come from stock. Health care leadership has reinforced the policy with the sites that were not in compliance. Medication boxes are currently inventoried monthly and there are audits to verify counts within the boxes.

Finding 03 – Enhanced control needed over restricted medications

MDOC Will Comply

Estimated timeframe for completion of Phase I of COMS: February 2020

Status Update: BHCS is actively working with MDOC COMs resource team in the implementation of the new health record in COMs. The Electronic Medication Administration Record (eMAR) is part of the ongoing COMs project. After Phase I of COMS is complete, the eMAR is scheduled to take place three or four months later.

Finding 04 – Pharmaceutical billing verification processes need improvement

MDOC Will Comply

Estimated timeframe for completion: September 30, 2019

Status Update: The MDOC contract monitoring unit (PMCD) meets monthly with the third-party reviewer, a standing agenda item is discussion of and monitoring of the required timelines. MDOC has updated the reporting requirements of the third-party reviewer to quarterly. MDOC will identify data analytic software for tracking by September 30, 2019. A timeline for implementation of software will be determined by DTMB in conjunction with MDOC ADSS.

Finding 05 – Approval process for nonformulary prescriptions needs improvement

MDOC Will Comply

Estimated timeframe for completion: September 1, 2019

Status Update: A documented standard process for nonformulary prescriptions existed at the time of the audit and remains valid. MDOC will provide a written notification reminding our contractor/providers of the process for non-formulary approvals and our intention to continue to enforce compliance.

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