

Medication Disposal Day **Guidelines**

Medication disposal days are implemented to ensure that unwanted medications are collected and destroyed using methods that are both legal and environmentally sound. Studies show that teens most often obtain prescription drugs from friends and/or family members. Holding medication disposal events can help prevent medication diversion and raise public awareness. Pairing events with educational efforts is strongly encouraged. And keep in mind that events can range in size, from “two cops and a bucket” to a large scale community event.

This document offers general guidance for pharmacists, community members and other health professionals covering logistical matters and other requirements involved in coordinating medication disposal events in your communities.

You should check the requirements in your area, including your State Board of Pharmacy, before embarking on a disposal day event. This document is not to be construed as legal advice.

These guidelines were created by the Ohio Department of Health, the Cardinal Health Foundation and other state agencies.

Step 1 - Contact local partners

Required partners

- Law enforcement (must be present to take custody of controlled medications)
 - Call or send a written request to your local law enforcement seeking their participation.
 - If controlled and non-controlled medications will not be segregated, then all must be treated as controlled substances. Law enforcement must have custody of controlled substances until destruction. If it is determined that controlled and non-controlled medications will be segregated during the event, a pharmacist must be present to identify and segregate the medications.
 - United States Drug Enforcement Agency (DEA) permission is required if a pharmacist will be handling the collected medications. It is not required that pharmacists participate. However, if pharmacists are not present to segregate controlled and non-controlled medications, all must be treated as controlled substances. In addition, the state agency regulating controlled substances should also be contacted to ensure that all applicable regulatory requirements are being met.
- Waste management company
 - If it is determined that controlled and non-controlled medications will be segregated during the event, a hazardous waste company licensed with the State Board of Pharmacy must be used to transport and destroy all non-controlled medication.
 - Identify an appropriate facility for proper destruction (organizers or law enforcement may need assistance in locating an appropriate facility to destroy the collected pharmaceuticals at the collection site and then transport them to another location for incineration).
 - Law enforcement and event coordinators and sponsors should understand that they may be required to assist with payment of destruction. It is important to determine cost with the waste management company prior to scheduling the event

Recommended partners

- Local organizations and agencies for support, sponsorship, and volunteers
- Hospitals, pharmacies, health departments, substance abuse treatment centers, county medical societies, etc.
- Other staff, site supervisor, greeters, data entry, pharmacy technicians, and interns

Step 2 - Obtain permits and approval

- A letter to local/regional DEA agent-in-charge seeking written approval is required. It should be sent by the local police department involved and should include the following:
 - Date, time, and location
 - Description of participating law enforcement
 - Detailed description of the event, including the disposal method
 - Whether controlled and non-controlled medications will be segregated by a pharmacist
- It is strongly advised to notify your state's EPA.

Step 3 - Preparation before event

- Identify the date, time, and location
- Determine whether controlled and non-controlled substances will be segregated
- Determine what materials will be collected
- Determine responsibilities for each partner
- Prepare and distribute publicity and educational materials
- Prepare and distribute a participant survey (optional, but recommended)
- Provide necessary supplies

Step 4 - Considerations

- Patient privacy
- Safety
- Avoiding medication diversion

Step 5 - The collection

- Strategy for medication collection
- Medication inventory
- Packing medications
- Destruction

Step 6 - After the event

- Analyze medication inventory and participant surveys (optional)
- Report the results to the community and event partners

Below are the suggested organizations and agencies to contact for financial and logistical support of the event. Ideally, all partners should assist with planning, publicity, and providing volunteers for the event. Prepare publicity materials and supply to partners for distribution.

- Local health departments
- Nursing associations
- County medical society
- County fire departments
- County sheriff's offices
- Solid Waste Management Districts (SWMDs)
- County/city departments on aging
- Centers for Medicare & Medicaid Services
- Drug-free community coalitions
- Hospitals
- Hospices
- Pharmacies
- Public and private universities (involve colleges of pharmacy if geographically available)
- Poison control centers
- Religious groups
- State Board of Pharmacy
- State agency regulating controlled substances (if different from the State Board of Pharmacy)
- State Dental Association
- Environmental Protection Agency
- Department of Health
- Local office of U.S. Drug Enforcement Agency (DEA)
- State TRIAD agencies
- Substance abuse treatment centers
- Alcohol and substance abuse boards
- Veterans administration hospitals
- Veterinary organizations/hospitals
- Wastewater treatment plants
- Soil and water conservation districts

Responsibilities of key partners

Law enforcement

- Send a signed letter to the local DEA agent-in-charge requesting approval for the event
- Contact the State Board of Pharmacy and the state agency regulating controlled substances (if different from the state board) to determine whether additional requirements exist for medication disposal
- Take custody of controlled substances (by law, law enforcement are the only people who can be in possession of the collected medications)
- Determine what containers the controlled substances will be deposited as directed by the waste management company.
- Ensure that the waste management company or DEA licensed vendor transports the medication directly to the site of destruction or transport controlled substances to the DEA evidence locker and maintain secured locked possession
- Prevent medication diversion by carefully witnessing all stages of the collection process

Pharmacist (optional)

- Segregate controlled and non-controlled substances
- Identify unlabeled medications using reference materials as necessary
- Inventory the medications (optional)
- Instruct law enforcement to take possession of controlled substances
- Provide counting materials and reference materials for identifying medications

Responsibilities of key partners *(continued)*

Waste management company

- Transport and destroy all medications
- Provide disposal containers for all substances
- Seal the filled containers and transport all substances to point of destruction
- Properly destroy the collected medications
- Provide a certificate of destruction

Tips on choosing a waste management company:

- Check with your state's EPA on preferred licensed companies
- Seek recommendations of a company used in past events
- Verify that the company is properly permitted to accept and transport pharmaceuticals
- A contract, pricing, and the delivery of containers should be negotiated by the event organizer
- Know if the company has requirements for segregating medications, such as separating items under pressure, needle delivery medications, nitrogen based medications, and mercury containing medications

Other staff / volunteers

- Coordinate site set up
- Direct staff and volunteers
- Oversee the collection process to ensure proper procedure is followed
- Maintain copies of the medication inventory (inventory is optional)
- Verify that the medication has been properly disposed of by the waste management company
- Record inventory of medications (inventory is optional)
- Give direction to participants and answer questions
- Provide pens/markers to obscure personal information
- Distribute educational materials (optional, but GenerationRx materials are appropriate)
- Survey participants (optional)
- Pharmacy interns and technicians may assist the pharmacist(s) in identifying and counting medications (permission must be granted by the DEA for these individuals to handle medications)

Tips on date, time, and location

- For a large scale event with multiple locations, preparations should begin at least 90 days before the event. Smaller events or one location events may need less preparation time.
- The day and time should be convenient for participants. Hold the event on the weekend beginning in the morning and ending in late afternoon (e.g., 9 a.m.-3 p.m.)
- Choose a neutral, easily accessible location with free parking (Cardinal Health locations can not be used as a drop-off site)
- The logistics of the site should include barriers/protection around the drug handling area. If an outdoor site is chosen, consider shelter from inclement weather (such as tents or canopies).

Controlled and non-controlled substances segregation

There are two options for the collection and disposal of the medications:

1. No segregation of controlled and non-controlled medication

- If medications will not be segregated, then ALL medications must be treated as controlled substances and hazardous waste
- Pharmacists are not required for this method
- Law enforcement officers take possession of ALL medications and assume responsibility for their destruction

2. Segregation of controlled and non-controlled medication (must be approved by DEA)

- Pharmacists determine whether medication is controlled or non-controlled
- Controlled substances are taken into custody by law enforcement
- Non-controlled substances are deposited into the hazardous waste containers for removal by the waste management company
- Medications that cannot be identified are treated as controlled substances

Accepted items

It is important to determine what items will and will not be accepted at the event. The following items should be considered: over-the-counter (OTC) medications, veterinary medications, vitamins, supplements, thermometers, and sharps (needles).

A special note on sharps and thermometers:

- Ensure that the waste vendor is licensed to destroy these types of items
- Have sharps containers and thermometer containers available
- Even if it is determined that sharps and/or thermometers will not be collected, it is inevitable that participants will bring them. Be prepared to collect these items either way.
- Contact your local hospital or solid waste management district for assistance with disposal of sharps.
- Contact a local mercury recycling service or your local solid waste management district for disposal of thermometers. Contact your EPA for additional assistance.

Logistical supplies for a successful event

Site set-up

- Tables and chairs
- Tents/canopies (if outdoor site is chosen)
- Traffic cones
- Caution tape (to define restricted areas)
- Signage specifying the work stations
- Signage to direct participants
- Educational displays, display boards and easels

Collection supplies

- Recycling bins for excess medication packaging, pill containers, etc. Contact your local solid waste management district to learn more about recycling options.
- Plastic containers to secure medications for destruction (containers for non-controlled medications may be provided by the Waste management company).
- Sealable plastic bags
- Containers specified for sharps (obtain from a local nursing home, hospital, or fire department)
- Containers specified for thermometers
- Pill counters for the pharmacist (if conducting an inventory)
- Packing tape
- Scissors
- Permanent markers to blackout information on prescription bottles
- Inventory sheets (optional)
- Copies of participant survey (optional)
- Educational handouts (optional)
- Pencils and pens, clipboards, note pads/paper,

Supplies for staff / volunteers

- Name tags
- Safety vests for those directing traffic
- Protective gloves and masks for law enforcement and pharmacists
- Hand sanitizer
- Snacks and refreshments
- Computer with a spreadsheet template to record inventory (optional)
- Printer to print the inventory (optional)

How to publicize your event

- Create a press release to be distributed to local media and posted on internet websites
- Create flyers (electronic and printed) and send to organizations for display and/or distribution
- Send event information via email lists to hospitals, medical and nursing associations, nursing homes, local law enforcement agencies, prosecutors' offices, pharmacies, etc.
- Supply area pharmacies with fliers to distribute to customers; encourage pharmacies to display flyers, posters and/or handouts

Include the following important information in promotional materials

- Date, time, and location
- No cost to participate
- Person or website to contact for more information
- Total anonymity, no questions asked
- Inform the public providing medications for disposal to not remove medication labels; cross out personal information but keep medication information legible
- List of accepted and unaccepted items: OTC, pet medications, vitamins, supplements, thermometers, sharps, medical waste, aerosol cans, etc.
- Medications will not be returned and refunds will not be given
- Medications will be destroyed, not resold or reused

Types of educational materials to distribute

- GenerationRx adult or youth toolkit materials
- Information about proper disposal and safe usage of medication, including:
 - Flushing unwanted or left over medications down the drain/toilet can adversely affect the environment.
 - If a drug take back event is not available in your area, follow these steps to dispose of medications:
 1. Take the medications out of their original containers
 2. Mix the medication with an undesirable substance (coffee or cat litter)
 3. Put the mixture into a container, seal it, and put it in the trash
 4. Mark out or remove any personal information, including the Rx number, from the empty medication container and discard it

What to remember during the event

- Comply with all federal and state laws
- Privacy: Instruct participants to mark out all personal information on medications, but keep medication information (type, dosage) legible.
- Safety: Use universal precautions
 - Appropriate personal protective equipment (e.g. , gloves, etc.)
 - If it is decided that medications will be transferred out of their original containers, consider recycling the medication bottles where appropriate.
 - Avoid illegal diversion of medications by strategically setting up the site and placing law enforcement appropriately.
 - Law enforcement should have visual contact with the people dropping off the medications and the point of drop-off.
 - Protective barriers should be placed around the drug handling area. Individuals, including event volunteers, are not authorized to handle the medications.
 - The law enforcement agency involved should be given the full responsibility for the final say on the handling of the event. If questions or conflicting opinions arise during the planning stages or the actual event, it is better to lean toward more documentation and more safety.

Packing the medications

Non-controlled substances

- Non-controlled medications go into the hazardous waste containers
- If required by the waste management company, segregate medications into specified hazardous waste containers
- Place liquids and solids in separate containers, if directed by the waste management company
- Place sharps and thermometers in appropriate disposal containers

Controlled substances

- Place the medications in the containers reserved for controlled substances. The type of container used for controlled substances is up to the law enforcement or waste management company disposing of the materials (e.g., sealable plastic bags, covered plastic pails, paper bags).
- Medication that comes without its original container should be placed with controlled substances
- Place liquids and solids in separate containers

Report your results

- Inform event partners and the community about the success of the event (e.g., pounds collected, households, etc.)
- Send a letter to event partners and volunteers
- Develop a press release for local media

Other resources

www.deadiversion.usdoj.gov/drug_disposal
www.projectdrugdrop.org
www.disposemymeds.org

GenerationRx
Preventing the Misuse and Abuse
of Prescription Medications

Learn more about the Cardinal Health prescription drug abuse prevention program at www.cardinalhealth.com/GenerationRx.

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