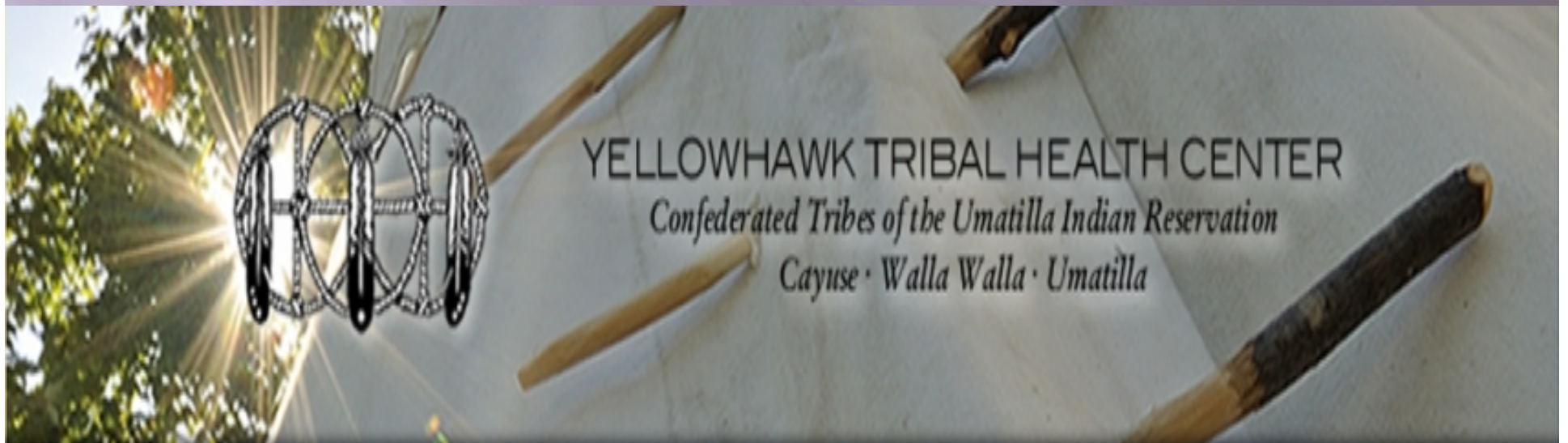


ENCOURAGING PHARMACIES TO IMPLEMENT TAKE BACK PROGRAMS

John Eaton R.Ph.



Why do we want to ?

- ▣ To provide an additional safe, convenient, and legal collection of house hold pharmaceuticals
- ▣ Currently- Take-Back Days twice a year, some Police stations, mail back programs.

Benefits of a Take Back Program

Reduce:

- ▣ Potential for misuse of medications
- ▣ Childhood poisonings
- ▣ Illegal use of medications
- ▣ Pharmaceuticals in landfills and wastewater treatment facilities
- ▣ Environmental impact of pharmaceuticals on surface and ground water supplies

What are the steps?

- ▣ Modify the DEA registration
- ▣ Purchase a collection unit and liners
- ▣ Have in place a means for destruction
- ▣ Choose a place to secure the unit
- ▣ Put in place policy and procedures

Modify the DEA registration

- ▣ http://www.deaiversion.usdoj.gov/drug_disposal

Purchase a collection unit and liners

- ▣ There are some options
- ▣ MedSafe
 - Has the required signage
 - Security
 - Liners
 - Shipping boxes
 - Documentation papers
 - Destruction service





Have in place a means for destruction

- ▣ For disposal of Medications
 - Reverse distributor
 - On site

Put in place policy and procedures

- ▣ Who checks
- ▣ When
- ▣ Storage location

medsafe

Inner Liner
Step Log
18-Gallon

Safe Collection Proper Destruction

1. INSTALLATION (Place Inner Liner into Receptacle)

Date Inner Liner Received: _____ Inner Liner NO: _____

Date Inner Liner Installed into Receptacle: _____

Address where Inner liner Installed: _____

Collector (Pharmacy) Registration NO: _____

1st Employee Name: _____

1st Employee Signature: _____

2nd Employee Name: _____

2nd Employee Signature: _____

2. REMOVAL (Remove and Seal Inner Liner)

Date Inner Liner Removed from Receptacle and Sealed: _____

1st Employee Name: _____

1st Employee Signature: _____

2nd Employee Name: _____

2nd Employee Signature: _____

3. STORAGE (Transfer to Storage)

Date Inner Liner Transferred to Storage: _____

1st Employee Name: _____

1st Employee Signature: _____

2nd Employee Name: _____

2nd Employee Signature: _____

4. DESTRUCTION (Ship for Destruction)

Date Inner Liner Transferred/Shipped for destruction: _____

1st Employee Name: _____

1st Employee Signature: _____

2nd Employee Name: _____

2nd Employee Signature: _____

Address (Reverse Distributor to which Inner Liner Transferred):

Sharps Environmental Services

1544 NE Loop, Carthage, TX 75633

Reverse Distributor Registration NO: RS0365800

100938 REV A

medsafe

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100938 REV A

What are the costs?

- ▣ Collection Unit
- ▣ Liners
- ▣ Destruction



Get the word out

- ▣ In-house, web, flyers
- ▣ Work with providers, clinics, hospitals
- ▣ Community groups
- ▣ Law enforcement
- ▣ Start a campaign
- ▣ Work with public health

Prevention

- ▣ Set up working relationships with providers
- ▣ Monitor PDMP
- ▣ Restrictive/recommended pharmacy for those on Agreements?
- ▣ Become a resource for pain management.
- ▣ Be an advocate for the patient.



SUBPART A

§1317.05 Registrant disposal.

(2) Collection receptacles. Upon removal from the permanent outer container, the collector shall seal it and promptly:

- (i) Destroy the sealed inner liner and its contents;
- (ii) Securely store the sealed inner liner and its contents at the collector's registered location in a manner consistent with §1301.75(c) of this chapter (for practitioners), or in a manner consistent with §1301.72(a) of this chapter (for non-practitioners) until prompt destruction can occur; or
- (iii) Securely store the sealed inner liner and its contents at a long-term care facility in accordance with §1317.80(d).
- (iv) *Practitioner methods of destruction.* Collectors that are practitioners (i.e., retail pharmacies and hospitals/clinics) shall dispose of sealed inner liners and their contents by **utilizing any method in paragraph (a)(1), (a)(2), or (a)(4) of this section**, or by delivering sealed inner liners and their contents to a distributor's registered location by common or contract carrier pick-up or by distributor pick-up at the collector's authorized collection location.

paragraph (a)(1), (a)(2), or (a)(4)

(a) *Practitioner inventory.* Any registered practitioner in lawful possession of a controlled substance in its inventory that desires to dispose of that substance shall do so in one of the following ways:

(1) Promptly destroy that controlled substance in accordance with subpart C of this part using an on-site method of destruction;

(2) Promptly deliver that controlled substance to a reverse distributor's registered location by common or contract carrier pick-up or by reverse distributor pick-up at the registrant's registered location;

(3) For the purpose of return or recall, promptly deliver that controlled substance by common or contract carrier pick-up or pick-up by other registrants at the registrant's registered location to: The registered person from whom it was obtained, the registered manufacturer of the substance, or another registrant authorized by the manufacturer to accept returns or recalls on the manufacturer's behalf; or

(4) Request assistance from the Special Agent in Charge of the Administration in the area in which the practitioner is located.

(i) The request shall be made by submitting one copy of the DEA Form 41 to the Special Agent in Charge in the practitioner's area. The DEA Form 41 shall list the controlled substance or substances which the registrant desires to dispose.

(ii) The Special Agent in Charge shall instruct the registrant to dispose of the controlled substance in one of the following manners:

(A) By transfer to a registrant authorized to transport or destroy the substance;

(B) By delivery to an agent of the Administration or to the nearest office of the Administration; or

(C) By destruction in the presence of an agent of the Administration or other authorized person.

§1317.15 Reverse distributor registration requirements and authorized activities.

(a) Any person that reverse distributes a controlled substance shall be registered with the Administration as a reverse distributor, unless exempted by law or otherwise authorized pursuant to this chapter.

(b) A reverse distributor shall acquire controlled substances from a registrant pursuant to §§1317.05 and 1317.55(a) and (c) in the following manner:

- (1) Pick-up controlled substances from a registrant at the registrant's registered location or authorized collection site; or
- (2) Receive controlled substances delivered by common or contract carrier or delivered directly by a non-practitioner registrant.

SUBPART B

§1317.55 Reverse distributor and distributor acquisition of controlled substances from collectors or law enforcement.

(a) A reverse distributor is authorized to acquire controlled substances from law enforcement that collected the substances from ultimate users. **A reverse distributor is authorized to acquire controlled substances collected through a collection receptacle in accordance with §§1317.75 and 1317.80.**

§1317.60 Inner liner requirements.

(a) An inner liner shall meet the following requirements:

(1) The inner liner shall be waterproof, tamper-evident, and tear-resistant;

(2) The inner liner shall be removable and sealable immediately upon removal without emptying or touching the contents;

(3) The contents of the inner liner shall not be viewable from the outside when sealed;

(4) The size of the inner liner shall be clearly marked on the outside of the liner (e.g., 5-gallon, 10-gallon, etc.); and

(5) The inner liner shall bear a permanent, unique identification number that enables the inner liner to be tracked.

(b) Access to the inner liner shall be restricted to employees of the collector.

(c) The inner liner shall be sealed by two employees immediately upon removal from the permanent outer container and the sealed inner liner shall not be opened, x-rayed, analyzed, or otherwise penetrated.

PART C

§1317.90 Methods of destruction.

(a) All controlled substances to be destroyed by a registrant, or caused to be destroyed by a registrant pursuant to §1317.95(c), shall be destroyed in compliance with applicable Federal, State, tribal, and local laws and regulations and **shall be rendered non-retrievable.**

(b) Where multiple controlled substances are comingled, the method of destruction shall be sufficient to render all such controlled substances non-retrievable. When the actual substances collected for destruction are unknown but may reasonably include controlled substances, the method of destruction shall be sufficient to render non-retrievable any controlled substance likely to be present.

(c) **The method of destruction shall be consistent with the purpose of rendering all controlled substances to a non-retrievable state in order to prevent diversion of any such substance to illicit purposes and to protect the public health and safety.**