



# *How-to Guide for* **DRUG TAKE-BACK:**

Managing a **Pharmacy-Based COLLECTION PROGRAM**  
for Leftover Household Pharmaceuticals



*Product Stewardship Institute Inc. is an equal opportunity employer and provider.*





# How-to Guide for **DRUG TAKE-BACK:** Managing a Pharmacy-Based Collection Program for Leftover Household Pharmaceuticals

## WHAT'S INSIDE?

- Best practices for running a drug take-back program
- Regulatory instructions for handling controlled substances
- Collection systems and vendor options
- Cost information and funding options
- Strategies for promoting your program

## WHO WAS THIS GUIDE DESIGNED TO HELP?

- Pharmacists and pharmacy managers
- Anyone else interested in safe drug disposal including:
  - ✓ Local leaders
  - ✓ Government officials
  - ✓ Healthcare providers
  - ✓ Drug abuse prevention and recovery networks
  - ✓ Waste managers
  - ✓ Environmental advocates
  - ✓ Rural communities

*Prepared by the Product Stewardship Institute, Inc. in collaboration with the New York Product Stewardship Council with funding from the Rural Utilities Services United States Department of Agriculture.*

## **PRODUCT STEWARDSHIP INSTITUTE**

The Product Stewardship Institute (PSI) is a national, membership-based nonprofit committed to reducing the health, safety, and environmental impacts of consumer products across their lifecycle with a strong focus on sustainable end-of-life management. Headquartered in Boston, Massachusetts, we take a unique product stewardship approach to solving waste management problems by mediating stakeholder dialogues and encouraging producer responsibility. With a membership base comprised of 47 state governments and hundreds of local government agencies, as well as partnerships with more than 110 companies, organizations, academic institutions, and non-U.S. governments, we work to design, implement, evaluate, strengthen, and promote both legislative and voluntary product stewardship initiatives across North America.

## **NEW YORK PRODUCT STEWARDSHIP COUNCIL**

The New York Product Stewardship Council (NYPSC) works to implement the principles of product stewardship in New York State and nationally by providing leadership, guidance, and resources (including policies, evaluations, and educational tools) to individuals, organizations, institutions, local governments, the state legislature, elected officials, and manufacturers. NYPSC educates these stakeholders about the benefits of product stewardship and provides a forum for the exchange of information regarding existing policies and programs.

*This material is based on work supported under a grant by the Rural Utilities Service, United States Department of Agriculture. Any opinions, findings, and conclusions or recommendations expressed in this material are solely the responsibility of the authors and do not necessarily represent the official views of the Rural Utilities Service.*

## **ACKNOWLEDGMENTS**

This How-to Guide was developed by the Product Stewardship Institute, Inc. and the New York Product Stewardship Council (the Project Team) for the United States Department of Agriculture Rural Development Office. The Project Team would like to thank the many individuals in New York State who contributed their time and provided valuable insights towards this project, including those from the Development Authority of the North Country, Oneida-Herkimer Solid Waste Authority, Mountain View Prevention Services, Upstate New York Poison Center, Center for Family Life and Recovery, Sims Municipal Recycling, the Vernon Police Department, Lewis County Public Health Agency, Oneida County Health Department, Citizens Campaign for the Environment, and the New York Department of Environmental Conservation Region 6 Office. Many of these organizations provided on-the-ground assistance and were instrumental in identifying potential pharmaceutical collection locations in the county. The Project Team is also grateful to the five pharmacies that volunteered to be collection locations for this project. Finally, the Project Team would like to acknowledge Cornell University's Survey Research Institute for conducting the public awareness survey for this project.

## **PROJECT CONTACT**

For more information, please contact Vivian Fuhrman, associate for policy and programs at the Product Stewardship Institute, at (617) 236-4771 or [vivian@productstewardship.us](mailto:vivian@productstewardship.us).

People with disabilities who require these materials in a different format or other special accommodations should contact Amanda Nicholson at [amanda@productstewardship.us](mailto:amanda@productstewardship.us) or at (617) 236-4833.

# CONTENTS

## TABLE of CONTENTS

<b>INTRODUCTION</b> .....	<b>6</b>
Why Was This Guide Created? .....	6
What's the Problem? .....	7
What's the Solution? .....	7
What are the Benefits of Pharmacy Collection? .....	8
<b>SO YOU WANT TO START A DRUG TAKE-BACK PROGRAM: PHARMACY IMPLEMENTATION GUIDE</b> .....	<b>9</b>
<b>1. Comply with Federal Regulations</b> .....	<b>10</b>
Modifying your DEA Registration: a Step-by-Step Process .....	10
DOT Special Permit: How to Comply .....	12
How to Apply for Party Status to a DOT Special Permit .....	13
<b>2. Choose the Right Collection System</b> .....	<b>14</b>
Choosing a Reverse Distributor.....	14
Choosing a Receptacle .....	15
Mail-Back Envelopes .....	15
<b>3. Determine a Funding Source</b> .....	<b>16</b>
Legislated Programs .....	16
Voluntary Programs .....	16
<b>4. Set up the Program</b> .....	<b>17</b>
Receptacle Installation .....	17
Log, Liner, Signs, and Mail-back.....	17
<b>5. Operate the Program</b> .....	<b>18</b>
Educate and Train Your Employees.....	18
Monitor Your Receptacle .....	19
Replace Full Liners .....	19
Order New Liners.....	19
<b>6. Spread the Word</b> .....	<b>20</b>
In-Pharmacy Advertising .....	20
Outreach in the Community .....	21
<b>CASE STUDY: DRUG TAKE-BACK IN RURAL NY</b> .....	<b>26</b>
Choosing our Reverse Distributor .....	26
Selecting our Products and Services.....	27
Yearly Costs Associated with our Pilot Program.....	28
Collection Success .....	29
The Power of Community Outreach .....	30
<b>APPENDICES</b> .....	<b>32</b>
Appendix A. Sample: Submission for Party Status to DOT Special Permit .....	32
Appendix B. Matrix for Choosing a Vendor .....	33
Appendix C. FAQ Document for Running a Pharmacy Drug Take-Back Program .....	35
Appendix D. Sample Press Release .....	36
<b>ENDNOTES</b> .....	<b>38</b>



# INTRODUCTION

## WHY WAS THIS GUIDE CREATED?

### Project Background

Although the number of drug take-back programs continues to increase across the country, only a small fraction of the U.S. population has access to these programs, and many existing collection locations do not accept [controlled substances](#). As a result, residents who want to remove unwanted pharmaceuticals from their homes often flush medicines down the drain or throw them out with the household trash—both of which can lead to water contamination and adverse [environmental impacts](#). The absence of safe and convenient drug disposal options also contributes to prolonged storage of unwanted medicines in the home where they can lead to [accidental poisonings and prescription drug abuse](#), especially among teens.

In 2014, the U.S. Drug Enforcement Administration (DEA) issued a new policy allowing pharmacies to collect controlled substances, such as prescription painkillers, for disposal. This guide offers step-by-step guidance to help pharmacies provide this critical service to their communities. It also provides valuable information for government officials, community groups, and others interested in promoting pharmacy-based drug take-back.

From October 2015 through September 2016, the Product Stewardship Institute and the New York Product Stewardship Council promoted the collection of pharmaceuticals through a pilot project in Oneida and Lewis Counties, New York. Thanks to funding from the United States Department of Agriculture, the two organizations helped five pharmacies set up safe and convenient collection programs for leftover—unwanted and expired—household medications in rural areas. The

information presented throughout this guide was gathered through experience with this and other take-back projects. This guide can help you set up a drug take-back program in any pharmacy, regardless of location.





# ION

## WHAT'S THE PROBLEM?

### Prescription Drug Abuse Epidemic:

One U.S. citizen dies every 14 minutes from a drug overdose,<sup>i</sup> leading to 100 deaths per day across the country.<sup>ii</sup> Today, unintentional prescription opioid overdose kills more

Americans than cocaine and heroin combined,<sup>iii</sup> and drug abuse has surpassed motor vehicle accidents as the leading cause of injury death.<sup>iv</sup>

Federal and state governments have declared this public health threat an epidemic.<sup>v</sup>

Storing unwanted and expired medications in the home increases the risk of misuse, and places children, seniors, and pets at risk for accidental poisoning.



### Environmental Contamination:

When drugs are disposed of in the garbage, poured down the drain, or flushed, they end up in the environment, potentially harming aquatic ecosystems.<sup>vi</sup> Even if they enter the sewage system first, pharmaceutical compounds reach wastewater treatment plants that are not designed to remove them before being released into the environment. Concern about their presence in the drinking water supply<sup>vii</sup> continues to grow. A 2002 study conducted by the U.S. Geological Survey found that 80 percent of streams tested across the country were contaminated with at least one pharmaceutical, personal care product, or other organic wastewater contaminant.<sup>viii</sup>

Each year, over \$1 billion worth of leftover drugs are thrown in the trash, flushed, or relegated to medicine cabinets. These disposal strategies leave the door open for accidental poisonings, drug abuse, and contamination of our waterways.

## WHAT'S THE SOLUTION?

### Take-Back Programs for Safe Drug Disposal

Many Americans wonder how to [properly rid their home](#) of unwanted and expired drugs.

Drug take-back programs that accept both over-the-counter and prescription drugs — including controlled substances — provide a safe and convenient disposal option for leftover household medications. State and federal government agencies — as well as the Federal Drug Administration (FDA), Environmental Protection Agency (EPA), and other federal offices — promote take-back as the preferred strategy in preventing drug abuse and environmental contamination. To learn more, view PSI's October 2015 webinar, "[A Quest for Convenience: Drug Take-Back at Retail Pharmacies.](#)"

### Types of Drug Take-Back Programs:

**On-Site Receptacles:** Pharmacies, police stations, and a short list of other locations can voluntarily set up a drug collection kiosk for consumers to safely dispose of their controlled ([schedule II-V](#)) and non-controlled substances. On-site collection is the safest and most convenient method for consumers to dispose of unwanted medications.

**Mail-Back:** Mail-back programs are a common alternative or supplement to on-site collection receptacles. A pharmacy may offer prepaid mail-back envelopes to customers to purchase or for free.

**Collection Events:** Federal, state, tribal, or local law enforcement can host periodic take-back days when residents can drop off their leftover pharmaceuticals at a designated location during a specific window of time. Community organizations, municipalities, and other groups can partner with law enforcement to hold such a collection event.



# WHAT ARE THE BENEFITS OF PHARMACY COLLECTION?

Pharmacies are an ideal location for drug take-back kiosks. In many other countries, the pharmaceutical industry collaborates with government to offer drug disposal services at a wide array of participating pharmacies. These long-running programs provide safe drug disposal options to entire populations and play a pivotal role in protecting community health and the environment.

## How Does Becoming a Collection Site Benefit Your Pharmacy?

- **Community Leadership:** Highlight your pharmacy as a pillar of the community and show you are committed to the health and well-being of every resident.
- **Customer Interaction:** Demonstrate your expertise and value to the community when you answer questions about safe medication disposal.
- **Increased Foot Traffic:** Community members enter your store to return unwanted or expired medications, increasing sales opportunities.
- **Customer Loyalty:** Customers will appreciate your efforts to provide this helpful service. This encourages their loyalty and their future business.

## How Does Becoming a Collection Site Benefit Your Community?

- **Convenience:** Residents already visit your pharmacy to pick up their prescriptions; offering a drug collection kiosk makes it as easy for residents to drop off unwanted drugs as it is to pick them up.
- **Education:** Pharmacists are trusted health care professionals and are, therefore, the ideal candidates for conveying the environmental health and safety benefits of drug take-back programs.
- **Environmental Health:** These programs prevent pharmaceuticals from entering waterways, where they can harm the aquatic ecosystem and potentially contaminate drinking water.
- **Public Health and Safety:** Collecting leftover drugs for disposal provides a safe alternative to leaving them in the medicine cabinet where they are at risk of being abused or misused.



# START HERE

## So You Want to Start a DRUG TAKE-BACK PROGRAM: Pharmacy Implementation Guide\*

It's easy to start a drug take-back program that collects both controlled and non-controlled substances. Create a program at your pharmacy in 6 simple steps:



COMPLY WITH FEDERAL REGULATIONS

1

CHOOSE THE RIGHT COLLECTION SYSTEM

2

DETERMINE A FUNDING SOURCE

3

SET UP THE PROGRAM

4

OPERATE THE PROGRAM

5

SPREAD THE WORD

6



Ithaca, NY

\* New information on safe drug disposal is becoming available regularly. Visit the Product Stewardship Institute's [Pharmaceuticals webpage](#) and the [U.S. DEA National Take-Back Initiative webpage](#) for updates and additional resources. Be sure to check your state laws and contact your state's pharmacy board before launching a take-back program as pharmacy based programs are still prohibited in a limited number of states: AK, CT, HI, MN, MO, & MS (as of Sept. 2016).

# 1) COMPLY WITH FEDERAL REGULATIONS\*

## Modifying Your DEA Registration: a Step-by-Step Process

You must modify your DEA registration in order to collect controlled substances through an on-site take-back program. This is a free and simple online process that takes just minutes. Registering as a collection site does not commit you to collect pharmaceuticals; it simply allows your pharmacy the option.

Follow these easy steps:



VISIT  
[deadiversion.usdoj.gov](http://deadiversion.usdoj.gov)



Under  
"Registration Support"  
CLICK  
"Registration for  
Disposal of Controlled  
Substances."



ENTER  
your login  
information, all found  
on your existing  
DEA registration  
certificate.



\* This process and website may change over time. With questions, call (800) 882-9539 or email [DEA.Registration.Help@usdoj.gov](mailto:DEA.Registration.Help@usdoj.gov) and include the name on your Registration and your DEA Number.

D

SELECT your collection method: collection receptacle, mail-back program, or both. (For information on these options, see Section 2: "Choose the Right Collection System.")

E

SIGN and certify your collector status registration electronically.

F

SAVE and print a copy of your new registration certificate.



## DOT Special Permit: How to Comply\*

### Why was the U.S. Department of Transportation (DOT) special permit created?

Per the final DEA rule (see box on the right), pharmacies accepting controlled substances in their drug take-back receptacle are not allowed to inspect the collected material to determine whether it contained anything that would be considered hazardous materials. Because the hazardous nature of the content is unknown, the Pipeline and Hazardous Materials Safety Administration of the DOT would normally require specific protocol to be followed to ensure the safe transportation of these collected pharmaceuticals. The shipping container would have to adhere to DOT specifications for the hazardous materials that may be present in the container, and the container would have to be marked accordingly for transportation to the treatment facility. This is burdensome and was not the intention of the DEA.

In order to assure compliance with the DOT and DEA, the DOT approved a Special Permit, [SP 20255](#), for shipment of materials collected through take-back programs using receptacles. The permit exempts collectors

(e.g., reverse distributors) and shippers (e.g., pharmacies) from having to ship the collected contents of a take-back program receptacle as if it was hazardous material.

### How long does the process take?

If not using a [vendor with its own DOT Special Permit](#), pharmacies will need to apply for "party status" in order to be considered one of a group/class of business eligible for this exemption under an approved special permit 20255. This process takes just 5-10 minutes once you have all of the information you need. It can take anywhere from one day to three weeks for the DOT to process an application after you submit by email. Upon party status approval, DOT provides an authorization letter via email as proof of compliance under a special permit.

*\* The information and process described here was put into place to help those participating in take-back programs comply with federal regulations, but the process may change. Contact the DOT at (202) 366-4535 or [specialpermits@dot.gov](mailto:specialpermits@dot.gov) with any questions.*

## Drug Enforcement Administration's (DEA's) Final Rule on Collection of Controlled Substances

The DEA enforces regulations and laws concerning the manufacture and distribution of controlled substances. The DEA issued a [drug take-back policy](#) in 2014 permitting more types of business to collect controlled substances in an effort to increase collection locations and convenience, and encourage safe drug disposal. The rule allows manufacturers, distributors, reverse distributors, narcotics treatment programs, retail pharmacies, and hospitals/clinics with an on-site pharmacy to modify their registration with the DEA to maintain on-site drug collection receptacles and mail-back programs that accept controlled substances.

More information on this special permit, including a recorded webinar and presentation slides, a full copy of SP 20255, and the sample submission for party status can be found on the [PSI website](#).



## How to apply for party status to a DOT special permit:

**Note** that a reverse distributor may have received their own unique special permit from DOT which will not require the pharmacy to apply for the "party status" Special Permit 20255. If you are using such a vendor, you will NOT need to apply for party status to SP 20255. Check with your vendor before proceeding with SP 20255 below.

- A. Using a sample party status application (see Appendix A), fill out your company information where indicated in red.

**Recommended:** Run through the DOT Party Status Checklist:  
[www.phmsa.dot.gov/staticfiles/phmsa/downloadablefiles/hazmat/special%20permits/pte%20checklist.pdf](http://www.phmsa.dot.gov/staticfiles/phmsa/downloadablefiles/hazmat/special%20permits/pte%20checklist.pdf)

- B. Place application on your company's letterhead.

**Recommended:** Save application as a PDF file.

- C. Submit the PDF application file as an attachment to [specialpermits@dot.gov](mailto:specialpermits@dot.gov).

**Recommended:** Include an informative email subject line (e.g., "Submission for party status to a special permit for <INSERT PHARMACY NAME>").

- D. You will receive an automatic email confirmation that submission was received.
- E. Once processed, you will receive an email indicating you have been approved with an attached Authorization letter for your records.



### HELPFUL HINT:

D-U-N-S stands for "Data Universal Numbering System." It is a nine-digit number (completely separate from your DEA registration number) issued by Dunn & Bradstreet. For more information, visit [www.dnb.com/duns-number.html](http://www.dnb.com/duns-number.html).





# GUIDE

## 2) CHOOSE THE RIGHT COLLECTION SYSTEM

Only authorized reverse distributors can transport — or use a common carrier to transport— collected materials for destruction. Some of these vendors also provide collection containers. Begin by selecting a reverse distributor, and if needed, select a separate receptacle provider.

### HELPFUL HINT

If your reverse distributor does not provide on-site collection receptacles, contact a separate receptacle vendor.

### Choosing a Reverse Distributor

Consult the vendor matrix in Appendix B to help you select a reverse distributor that meets your pharmacy's specific needs. In doing so, consider the following about each vendor:

TRANSPORT OF COLLECTED MATERIALS	What is the system for transporting collected materials? Will this company pick up materials collected in inner liners, or is the pharmacy responsible for shipping pre-paid full liners through common carrier?
ADDITIONAL SERVICES	Does the reverse distribution company also offer collection receptacles? (See Choosing a Receptacle chart in the section below). Do they offer mail-back envelopes? What educational material and signage comes with this option?
DATA TRACKING	Is there an online system to track collection quantities? Find out whether the company provides tools for easily analyzing and reporting collection results. This is important to tracking the performance of a program and provides content to promote your pharmacy's contribution to the community's health and environment.
CUSTOMER SUPPORT	Can customer service be reached when it is most convenient for your business? Does their website answer your most important questions?
REGULATORY COMPLIANCE	Does the company prioritize regulatory compliance? Make sure they can answer questions about how they keep their system and services up to date with regulations. Numerous state Boards of Pharmacy have additional regulations to which the pharmacy must comply.
CONTRACT TERMS	Some companies require a pharmacy to sign a contract for a minimum number of years and assess a fee for early contract termination. Weigh the risks and benefits of signing a longer contract, and negotiate terms with the company if needed.
COLLECTION SCHEDULE	Does the company offer flexible collection options to meet your business needs and budget? For example, do they offer multiple collection schedules with a range of prices? Do they offer a fixed, pre-scheduled option? Your arrangement with a vendor will require less maintenance if services are pre-scheduled, but this may give you less flexibility to change services as needed, or may cost more to adjust.
COST	Does the company offer pricing options that provide the features you need? Make sure these fall within your budget.

## Choosing a Receptacle

Collection receptacles include a tamper-proof outer shell that can be locked, an inner liner composed of a box made of cardboard or other sturdy material, and layers of plastic that can be sealed for shipping. It should be able to be affixed to the wall or the floor.

Consider the following when selecting a receptacle:



Ithaca, NY

<b>SECURITY</b>	Does the receptacle meet DEA performance standards (e.g., tamper-proof, with a dual lock, with a lockable access slot, able to affix to wall/floor)?
<b>MATERIAL</b>	Is the receptacle sturdy? Metal containers are recommended as they meet the DEA's standard for strength. Make sure it comes with liners that can be shipped according to DOT packaging requirements specified in any relevant special permits.
<b>SIZE</b>	Are there different receptacle dimensions available? Consider where you will place the receptacle and how much space it requires on the floor or counter.
<b>VISIBILITY</b>	Can you easily tell when the receptacle liner is full? A receptacle with a translucent viewing pane allows you to see how full the liner is without unlocking (it does not reveal the contents) but may compromise the receptacle security. Check with the vendor for testing specifications.
<b>OUTREACH</b>	Does the company provide promotional material? Make sure signage is large enough to be read and includes what content is permissible and what is prohibited (by the <a href="#">DEA</a> as well as any applicable local, state, and federal laws).
<b>RENTAL OR PURCHASE</b>	Does the company provide receptacles for rent, for purchase, or both? Consider whether your collection program is intended to be short-term or permanent. Some companies charge a removal fee for rented receptacles.
<b>COST</b>	How much does the receptacle cost? Decide which receptacle characteristics are most important to you and choose a vendor that offers these at the lowest cost. (See "Choosing a Vendor" matrix in Appendix B.)

## Mail-Back Envelopes

Some vendors also sell certified mail-back envelopes, which a pharmacy can sell to customers, or provide "prepaid" as a free community service. This option allows residents to dispose of their leftover drugs by placing them in the envelope and shipping them directly to a destruction facility.

- Make sure the mail-back envelopes are prepaid and preaddressed to the onsite destruction facility of the reverse distributor (a DEA-registered collector) as is required by the DEA rule.
- Mail-back envelopes can be used as a supplement to an on-site receptacle. They help serve populations that do not or cannot regularly visit the pharmacy.
- Order mail-back envelopes on a regular schedule or as needed.



### HELPFUL HINT:

Bulk envelope purchases tend to come at a discounted price. Purchase a small number of mail-back envelopes to assess community interest first, and invest in a bulk order if demand is high.



# GUIDE

## 3) DETERMINE A FUNDING SOURCE

### Legislated Programs

**Extended producer responsibility (EPR) laws** require pharmaceutical companies to finance — and often to manage — drug take-back programs. They may also require a specific level of convenience, public education, and participation by certain collection sites like pharmacies, usually required to be paid for by pharmaceutical companies. Countries including Belgium, France, Hungary, Portugal, Spain, Mexico, Brazil, Columbia, and many Canadian provinces have thriving EPR programs that leverage the private sector's expertise and efficiency.

In the U.S., after years of costly pharmaceutical collection programs paid for by taxpayers, an increasing number of local and state governments are supporting EPR legislation to provide a more sustainable funding source. As of September 2016, there are over a dozen such [laws in effect in the U.S.](#), including two at the state level (Massachusetts and Vermont) and 11 at the local level (9 in California and two in Washington state). Similar legislation is under consideration across the country at the local, state, and federal levels.

### Voluntary Programs

**Government:** Many police departments and sheriff's offices host pharmaceutical collection boxes and/or support one-day community collection events. The DEA sponsors periodic nationwide take-back events, although the long-term fate of this funding is tenuous. Ultimately, the cost of any government effort is borne by taxpayers.

**Retailers:** Sometimes pharmacies — especially large chains — fund their own take-back programs. For example, in 2016 Walgreens began installing medication disposal kiosks in more than 500 of its drugstores (mostly just the 24 hour locations) in 39 states and Washington D.C. The same year, Benzer Pharmacy launched its RxTakeBack program (in conjunction with PharmaLink) at select Florida locations. Yellow Jug Old Drugs, a non-profit organization, provides low-cost take-back services in many retail pharmacies, which are paid for by each pharmacy. (See "Choosing a Vendor" matrix in Appendix B for more information on these and other reverse distributors and collection services.)

**Community Sponsorship:** Community organizations may choose to sponsor or promote drug take-back programs, but they need to pay for collection and transportation unless they hold an event on a DEA "[National Prescription Drug Take-Back Day](#)." In some areas, Covanta Energy, an energy-from-waste company, reduces costs by accepting collected pharmaceuticals for free destruction through their [Rx4Safety program](#).

[Contact PSI](#) if you'd like to explore funding options for starting a take-back program in your community. Becoming a PSI [Member](#) or [Partner](#) provides the greatest access to our resources and expertise.





# GUIDE

## 4) SET UP THE PROGRAM

### Receptacle Installation

1. Determine an accessible place for the receptacle within sight of the pharmacy counter where it will not interfere with customers or fire exits;
2. Read receptacle installation and use instructions;
3. Secure the collection receptacle to wall, floor, or countertop;



Receptacle affixed to floor

### Log, Liner, Signs, and Mail-back

4. If a record-keeping log comes with the receptacle, find a secure place to store it;
5. Follow instructions to position a liner within the receptacle to double lock it;
6. Lock the access slot until you are ready to begin collections;
7. Display any signs or instructional materials that come with the receptacle so customers know what materials are permitted and what is not accepted; and
8. If applicable, place mail-back envelopes in a prominent location so customers are aware of this option.

Garro Drugs: participated in PSI's drug take-back pilot program.



# GUIDE

## 5) OPERATE THE PROGRAM

### Steps to Running Your Drug Take-Back Program

#### Educate and Train Your Employees

- Provide pharmacy employees with a fact sheet on running a drug take-back program (see Appendix C for a pharmacy FAQ document).
- Train pharmacy employees to answer questions and educate customers about the collection process.
- Train pharmacy employees to keep an eye on the receptacle to ensure its proper use by customers.
- Educate pharmacy employees on items NOT accepted in the collection receptacle, and instruct customers to contact local household hazardous waste officials with questions about disposal of:
  - ✓ Aerosols
  - ✓ Medical sharps (e.g., needles, syringes)
  - ✓ Mercury thermometers
  - ✓ Batteries
  - ✓ Medical equipment, supplies, or devices
  - ✓ Hazardous chemicals

#### HELPFUL HINT:

Instruct pharmacy employees to treat receptacle contents as if they contain dangerous medical sharps. Although sharps are prohibited in a drug take-back receptacle, they are sometimes deposited nonetheless.

Ithaca, NY



#### RULES:

- ✓ Employees cannot review contents of the receptacle.
- ✓ Employees cannot handle the drugs being disposed.
- ✓ This kind of take-back program is for pharmaceutical waste generated in a household only; commercial pharmaceutical waste (generated by pharmacy, doctor, hospital, etc.) such as outdated sample drugs may not be disposed of in the receptacle.



## Monitor Your Receptacle

- Check your receptacle regularly to ensure that it is used correctly and is not overflowing.
- Monitor to ensure drugs are placed inside the receptacle (not on top or beside it), that no drug diversion occurs, and that any customer questions can be readily answered.
- Optional: Install video surveillance in hospital locations if receptacle is not within line-of-site of the pharmacy counter.

## RULES:

- ✓ Two collector pharmacy employees must be present for replacing, securing, storing, documenting, and transferring the full liner to the reverse distributor for pickup or through a common carrier.
- ✓ If a full liner will not be immediately transferred to transporter or common carrier for destruction, it must be securely stored (e.g., in a locked room)."

## Replace Full Liners

1. Unlock the receptacle and remove the inner liner.
2. Record liner serial number, date, employee names, employee signatures, and other key information.
3. Tie, zip-tie, or tape the plastic inner liner closed.
4. Tape the outer liner (shipping container) closed. If a reusable container is used, transfer the plastic liner for storage or shipping.
5. Place an empty inner liner in the receptacle and double lock the door. If you do not have any new, empty liners, lock the access slot to prevent the receptacle from being used and indicate to customers when it reopens.

## Order New Liners

- Contact your vendor to order a new liner. Some vendors offer liner delivery on an automatic schedule.
- Plan ahead to avoid running out of empty liners!

## HELPFUL HINT:

When opting for automatic liner delivery, be sure to schedule a liner replacement frequency that will meet demand to avoid purchasing expensive unscheduled liner replacements. If a liner fills more quickly than anticipated and an off-schedule liner is needed, order it as soon as possible. Locking and suspending use of a full receptacle can result in customers discarding medications for disposal on/around the receptacle.



Sharps Compliance, Inc.



PharmaLink, Inc.



American Security Cabinets, Inc.

Not necessarily to scale. Receptacle models shown are not being endorsed. Some models not shown.

# GUIDE

## 6) SPREAD THE WORD

### How to Promote the Program within Your Community

Community awareness is key to making your take-back program a success. Start outreach early and employ the following techniques often to achieve maximum effectiveness.

#### In-Pharmacy Advertising

Promoting the program within your store is a low-cost, targeted, effective method for reaching interested residents. Ensure branding is consistent across your program's promotional materials (i.e., use the same colors, fonts, and pictures) to help customers recognize and remember your program.

- **POSTERS:** Bright, large, attractive posters catch customers' eyes and direct them to your collection kiosk.
- **FLYERS:** Stuff flyers into shopping bags. You can also hang flyers in town halls, libraries, schools, physicians' offices, hospices, healthcare organizations, and other frequently visited locations.
- **PILL BOTTLE STICKERS:** Small, bright stickers are effective on prescription bottles if space allows.
- **PHARMACY BAG ADVERTISEMENTS:** Easy for pharmacies to implement, these advertisements reach the right residents at the right time — when they are picking up prescriptions.
- **PHONES:** Train all pharmacy staff so they are prepared to answer customer questions about the program.

Place the pharmacy FAQ (see Appendix C) right behind a pharmacy counter or other prominent location to help employees relay important details quickly.



Return your leftover meds to our free, safe collection kiosk!

**RETURN YOUR LEFTOVER MEDS**  
to a nearby drug take-back location

PHARMACY NAME  
PHARMACY ADDRESS  
PHONE NUMBER

PHARMACY NAME  
PHARMACY ADDRESS  
PHONE NUMBER

PHARMACY NAME  
PHARMACY ADDRESS  
PHONE NUMBER

PHARMACY NAME  
PHARMACY ADDRESS  
PHONE NUMBER

Have a positive impact on public health & the environment.  
Safe - free of charge - no questions asked.

Questions? Contact PHARMACY/PHARMACIST NAME at PHONE NUMBER.

PRODUCT STEWARDSHIP INSTITUTE  
NYPSC  
New York Product Stewardship Council

This material is based upon work supported under a grant by the Rural Utilities Service, United States Department of Agriculture. Any opinions, findings, or conclusions or recommendations expressed in this material are solely the responsibility of the authors and do not necessarily represent the official views of the Rural Utilities Service. PSI is an equal opportunity provider and employer.

## HAVE LEFTOVER MEDICINE?

### USE THIS BAG

to bring back your unwanted or expired meds to either these drug take-back locations in INSERT TOWN/COUNTY through INSERT PROGRAM END DATE, if applicable.\*

**It's FREE, ANONYMOUS, and NO QUESTIONS ASKED**

PHARMACY NAME  
PHARMACY ADDRESS  
PHONE NUMBER

*\*Call each location for specific dates.*

### DON'T FLUSH!

EMPTY YOUR MEDICINE CABINET IN A SAFER, HEALTHIER, AND MORE ENVIRONMENTALLY RESPONSIBLE WAY.



This material is based upon work supported under a grant by the Rural Utilities Service, United States Department of Agriculture. Any opinions, findings, and conclusions or recommendations expressed in this material are solely the responsibility of the authors and do not necessarily represent the official views of the Rural Utilities Service. PSI is an equal opportunity provider and employer.



**OUTREACH METHODS IN THE COMMUNITY**  
are expanded upon below, and include:

- ✓ Newsletter
- ✓ Email
- ✓ Social media
- ✓ Press Release
- ✓ Media Outreach
- ✓ Radio Advertisement
- ✓ Television Advertisement
- ✓ Billboards

## **Outreach in the Community**

Wider community outreach is vital to increasing foot traffic, gaining new customers, and increasing collection quantities. Make a larger impact by recruiting local law enforcement agencies, the medical community, environmental organizations, drug abuse prevention/recovery organizations, government offices (public health, environment, solid waste, water, recycling, etc.), and other community groups to promote your program.

### **NEWSLETTER OR EMAIL**

Newsletters are a great way to reach your loyal customers. Customize the sample language below to fit your purposes, or send it to your community partners and ask them to send it out to their databases. Forwarding your newsletter to community or neighborhood listserves is a great way to cast a wider net.

#### **SAMPLE LANGUAGE FOR PHARMACY NEWSLETTERS**

*Do you have leftover medications hanging around in your medicine cabinet? Did you know that unwanted over-the-counter medications and prescription drugs [contaminate waterways and potentially local drinking water](#) when flushed, put down the drain, or placed in the trash? Drugs left in the home are equally dangerous, as they can find their way into the hands of children or potential addicts. Prescription drug abuse is the [fastest growing drug problem](#) in the U.S., and drug overdose has become the [leading cause of injury deaths](#). Let's be part of the solution!*

*Safely dispose of your unwanted and expired medications the right way by visiting our pharmacy today! We're collecting your leftover pharmaceuticals for free – no questions asked.*

*Visit us!*



## SAMPLE LANGUAGE FOR LOCAL/STATE GOVERNMENT AGENCIES, NON-PROFITS, LAW ENFORCEMENT, AND OTHER NEWSLETTERS

Do you have leftover medications hanging around in your medicine cabinet? Did you know that unwanted over-the-counter medications and prescription drugs [contaminate waterways and potentially local drinking water](#) when flushed, put down the drain, or placed in the trash? Drugs left in the home are equally dangerous, as they can find their way into the hands of children or potential addicts. Prescription drug abuse is the [fastest growing drug problem](#) in the U.S., and drug overdose has become the [leading cause of injury deaths](#). Let's be part of the solution!

Safely dispose of your unwanted and expired medications the right way by visiting one of the XX pharmacies in [ENTER TOWN/COUNTY NAME] offering safe, free drug take-back to residents. These pharmacies will collect your leftover pharmaceuticals for free – no questions asked.

Participating pharmacies include:

- ✓ [INSERT PHARMACY NAME, ADDRESS, PHONE NUMBER, HOURS]
- ✓ [INSERT PHARMACY NAME, ADDRESS, PHONE NUMBER, HOURS]
- ✓ [INSERT PHARMACY NAME, ADDRESS, PHONE NUMBER, HOURS]

Visit today!

## SOCIAL MEDIA

Facebook, Twitter, Instagram, and other social networks offer a free promotional platform for getting your message out to residents. In fact, social media is one of the most effective ways to reach the public; as of January 2016, nearly [2.3 billion people worldwide](#) were active social media users.

### TWITTER: CRAFTING THE PERFECT TWEET

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1084 x 512 pixels.

**Pro Tip!** Don't be afraid to tweet the same thing multiple times during one week. Twitter moves so quickly that tweets are often missed, and posting multiple times per week ensures that your post is seen.

Sample tweets:

- Safely get rid of your leftover meds at our pharmacy today.
- Leaving leftover drugs in the home can pose health and environmental dangers. Safely dispose of them today! [INSERT LINK to pharmacy website]



- Drop off your unwanted prescription and OTC meds at our pharmacy: [INSERT PHARMACY NAME/ADDRESS]
- Rid your home of dangerous, leftover meds today. [INSERT PHARMACY NAME/ADDRESS]
- Do the right thing: don't flush your meds. Return leftover drugs to a safe take-back location in [INSERT TOWN/COUNTY NAME]. [INSERT LINK TO PHARMACY WEBSITE]

**Pro Tip!** Visit [www.bit.ly](http://www.bit.ly) to convert your website hyperlink to a shorter version. This helps you fit more content in your 140-character tweets. Example: [bit.ly/pharmacy](http://bit.ly/pharmacy).

### FACEBOOK: APPEALING TO YOUR AUDIENCE

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn't always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 100 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.



**Pro Tip!** To achieve a larger, highly targeted audience, try putting a few dollars towards a sponsored Facebook post. Just \$15 can help you reach a higher percentage of interested town residents.

Find more information on [Facebook's Business Site](#).

#### Sample Facebook Posts:

- Bring your leftover prescription or OTC drugs to our pharmacy for free disposal. No questions asked!
- Leaving leftover drugs in the home can pose health and environmental dangers. Stop by our pharmacy and drop them off – for free! [INSERT PHARMACY ADDRESS/HOURS]
- Get leftover meds out of your home with our free collection kiosk. Questions? Call us: [INSERT PHARMACY PHONE NUMBER]
- Don't flush or toss your leftover meds. Bring them into our pharmacy for free disposal – no questions asked. <http://bit.ly/2bBkl8y>
- Protect our community's health and environment when you bring leftover meds back to a local pharmacy today. [INSERT LINK TO COLLECTING PHARMACY'S WEBSITE]





## PRESS RELEASE:

Press releases are a great way to reach out to local media outlets. It's important to have all the key facts in your press release so reporters can quickly grab pertinent information. See a sample press release in Appendix D. Your press release should include:

- Why safe and proper pharmaceutical disposal and collection is important
- Step-by-step instructions for residents detailing how to drop off their unwanted and leftover prescriptions, including:
  - Types of drugs accepted for collection
  - Are you offering access to a collection kiosk, mail-back envelopes, or both?
  - Is the collection program free to customers or is there a cost for them?
- Quote from the pharmacy owner, a head store pharmacist, and/or a well-known community leader or advocate
- Pharmacy name, address, phone number, and store hours

## MEDIA OUTREACH

Use the following steps to effectively reach out to local media and promote your program.

1. Ready your press release with the relevant information mentioned in the "press release" section to the left.
2. If you're unaware of all the newspapers, magazines, and web outlets in your area, search Google for your town/county outlets.
3. Once you have a list of relevant media outlets, go to each website's contact webpage and look for Editor in Chief, Local News Editor, or a Staff Writer who writes articles frequently.
4. Call relevant contacts via phone first. Provide a quick snapshot of the content from your press release.
5. Ask for their email. Email the editor your press release. Ensure the subject line of your email includes a few keywords that will catch an editor's attention.
6. Gain commitment from the editor via phone or email. If no commitment is gained, follow up via phone and email accordingly.
7. Monitor online and print newspapers and magazines for stories advertising your program.



### RADIO ADVERTISEMENT

If you're interested in buying paid advertisements, radio ads can give you the largest reach for the least amount of money. See the "Media Outreach" section on page 24 for steps to guide you in reaching out to radio hosts. Radio stations may respond more quickly by phone rather than by email.

### TELEVISION ADVERTISEMENT

Commercials on television are typically expensive, but worth pursuing if you have an expansive promotional budget. Smaller communities should target local cable news shows or town television stations to advertise their programs; many of these channels cover relevant community programs for free.

### BILLBOARDS

While expensive, billboard ads can be very effective in high-traffic areas. If you decide to pursue a billboard, include colors that stand out, eye-catching, relevant pictures, and only the most important details.



**Got Leftover Meds?  
DON'T FLUSH THEM!**

Bring them to any of these **INSERT TOWN/COUNTY NAME** locations:

LOCATION NAME ADDRESS	LOCATION NAME ADDRESS	LOCATION NAME ADDRESS	LOCATION NAME ADDRESS
--------------------------	--------------------------	--------------------------	--------------------------

**FREE. ANONYMOUS. NO QUESTIONS ASKED!**

A USDA Rural Utilities Service grant supports this program. Opinions, conclusions, or recommendations do not necessarily reflect the official views of the USDA. PSI is an equal opportunity provider and employer.



**Pro Tip!** Consistent, ongoing outreach and education is key to a successful program. Don't rely on a pre-program promotional push to do all the advertising for you.

# CASE STUDY:

## Drug Take-Back in Rural New York

In 2016, PSI and NYPSC piloted pharmacy-based drug take-back programs in rural New York. The project team achieved the following goals at four independent pharmacies and one hospital pharmacy in Oneida and Lewis Counties:

- ✓ Educated the public about the importance of drug take-back;
- ✓ Increased convenient collection opportunities in rural areas;
- ✓ Increased the volume of medicine collected in the target area; and
- ✓ Established best practices for outreach.

Falls Pharmacy participated in drug take-back pilot program.

### CHOOSING OUR REVERSE DISTRIBUTOR

We chose Sharps Compliance Inc. ("Sharps") because they are a reverse distributor that offers the following:

- A long history of experience;
- A national presence;
- Receptacles and mail-back envelopes that met federal regulations;
- Prices that fit the project budget;
- Responsive customer service; and
- An online tracking system to monitor collections at each site and generate progress reports.

#### HELPFUL HINT:

Hospitals and other high traffic locations will collect higher volumes, making larger capacity receptacles ideal.



## HELPFUL HINT:

50 envelopes per pharmacy would have been enough for six months at a rural location.

## SELECTING OUR PRODUCTS AND SERVICES

Our contract with Sharps included:

- One metal 18-gallon receptacle delivered to each pharmacy
  - This is the smaller of two units available from Sharps and has a smaller footprint.
  - This unit reduced the floor space needed in each pharmacy. We also expected collection rates for rural pharmacies to be lower than those in urban settings.
- Liners made of cardboard with a layer of plastic inside, pre-labeled for shipping
  - Replacement schedule for independent pharmacies: six per year (one every two months)
  - Replacement schedule for hospital pharmacy: 24 per year (two every month, increased from one per month to meet high demand)
- Bulk order of 250 mail-back envelopes to meet the needs of those who cannot regularly visit the pharmacy
- Log for recording specific information about each liner used, filled, and shipped
- Shipping costs through the United Parcel Service (UPS)
  - UPS pickups could be arranged through Sharps customer service if needed.

## HELPFUL HINT:

Discretion is critical to avoid diversion of drugs during transport. Because of this, contents for shipping will not be indicated on the outside of any inner liner box, regardless of whether the shipment is picked up for transport or shipped through a common carrier such as UPS. As the contents may contain hazardous materials, a DOT special permit, party status authorization, or other DOT-authorized special permit is needed. Check with your vendor for Special Permit status requirements.

## YEARLY COSTS ASSOCIATED WITH THE PILOT PROGRAM\*

The chart below displays costs associated with each of the five rural pharmacies that participated in the take-back pilot program. The total cost per pharmacy includes costs incurred through:

- 1) Promotion/outreach, which is predominantly handled by the pharmacy; and
- 2) Collection materials, which are provided by vendors (receptacle, mail-back envelopes, etc.).

These costs do not include time spent by pharmacy employees, but time investment was minimal in our pilot. The project team purchased mail-back envelopes through Sharps in bulk orders of 250 or 50, as indicated in the chart below.

### Costs in Rural Drug Take-Back Pilot Program

(6-month pilot with cost projection for full year)

	ONEIDA COUNTY		LEWIS COUNTY		
	Pharmacy #1	Pharmacy #2	Pharmacy #3	Pharmacy #4	Pharmacy #5 (hospital)
	Cost per year	Cost per year	Cost per year	Cost per year	Cost per year
<b>PROMOTION</b>					
Printed prescription bags	\$1,200	\$1,200	\$1,200	\$1,200	\$1,200
Pill bottle stickers	\$102	\$102	\$102	\$102	\$102
<b>MATERIALS</b>					
Receptacle rental	\$1,060	\$1,060	\$1,060	\$1,060	\$3,234
Single liner (off-schedule shipping)	\$151	\$151			
Mail-back envelopes (50/250)	\$1,050	\$1,050	\$1,050	\$1,050	\$498
Additional outbound shipping (approx.)	\$25	\$25	\$25	\$25	\$25
Removal fee	\$200	\$200	\$200	\$200	\$200
<b>TOTAL YEARLY COST</b>	<b>\$3,789</b>	<b>\$3,789</b>	<b>\$3,638</b>	<b>\$3,638</b>	<b>\$5,259</b>
<b>Average Yearly Cost</b>	<b>\$3,713</b> (independent)				<b>\$5,259</b> (hospital)

There was clear demand for a safe, convenient drug disposal option in the pilot communities. By hosting a take-back program, the pharmacies encouraged customer satisfaction and brought in new business. This can help offset the cost of hosting the program.

In running this pilot, we identified several areas where new take-back programs could reduce costs. For example, we could have ordered a smaller number of mail-back envelopes at the independent pharmacies, or could have eliminated them all together (although mail-back envelopes were very popular at the hospital pharmacy). Despite the great success of the printed prescription bags in advertising the program, we could have ordered lower quantities or focused on free advertising through social media.

“Not only did we collect a significant quantity of unwanted medications, our pharmacy also benefitted from increased foot traffic throughout the program period. Quite often, residents came through the store to drop off leftover drugs and end up buying a few things on their way out.”

— Brianna  
Manager at the Falls Pharmacy

\* Cost estimates are approximate and depend on many variables. Individual costs may vary.

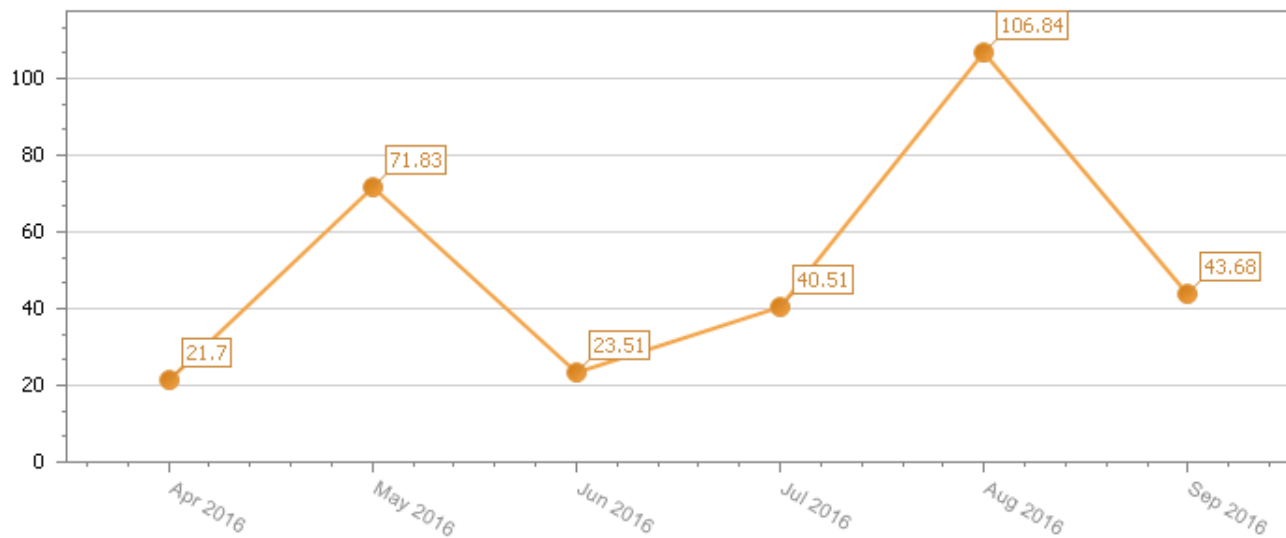


significant  
ions,  
from  
ut  
en,  
ore to  
ded  
r way  
a Flynn,  
Pharmacy

## COLLECTION SUCCESS\*

The pilot pharmacies collected an estimated 300 pounds of leftover drugs, an impressive amount given the sparsely populated rural communities in which the pilot took place. Collection quantities first peaked during the first month of the pilot, when residents initially became aware of the program and disposed of large stocks of old medications from their homes. Peaks also corresponded with promotional and outreach efforts. The addition of the hospital collection location greatly contributed to the peak in August.

**Pounds Collected Monthly in Rural Drug Take-Back Pilot Program**



Before the pilot program, Lewis and Oneida Counties had no ongoing take-back programs that collected both controlled and non-controlled substances. The pharmacies in this pilot program offered their communities and the surrounding area a vital pharmaceutical disposal option that was previously unavailable.

At the conclusion of this pilot program, the pharmacies had the option to continue their collection programs. Due to the overwhelmingly positive community reaction to the take-back programs, all five participating pharmacies indicated their interest in continuing and taking over the costs.

Ultimately, four out of five of the pharmacies elected to continue. Some opted for a lower liner frequency schedule offered by Sharps in order to reduce the monthly cost.

The pharmacy that decided not to continue only did so due to their close proximity to the hospital collection location. They felt that their customers' disposal needs would be met by the nearby site.

*"Every week, there are overdoses and accidental poisonings caused by leftover prescription drugs found in residents' homes. In addition, we often receive phone calls from family members who have lost loved ones and are looking for a way to dispose of medications that are no longer needed. We're proud to provide a much-needed solution for county residents to safely and easily remove leftover drugs from their medicine cabinets."*

— Diane Loftus,  
Director of Pharmacy at Lewis County General Hospital

\* Hospital pharmacy location added on August 1; Collection amounts do not reflect final month of program collections due to a 30-45 day delay in data availability.

# THE POWER OF COMMUNITY OUTREACH

## Lewis County General Hospital pharmacy

Throughout PSI and NYPSC's pilot project in Lewis and Oneida Counties, NY, Lewis County General Hospital pharmacy collected the largest quantity of leftover drugs in the shortest amount of time. Their high collection numbers can be attributed in part to their successful outreach.

### **Advertising in the Community**

First, Lewis County General Hospital, PSI, and NYPSC disseminated [a press release](#) to New York residents, associations, groups, and local government agencies to launch the collection program. Thanks to the hospital staff's knowledge of local media outlets, the team reached out to six local outlets via phone on the program launch date, including local daily papers, a radio show, and a local news website.

After gaining commitment via phone, the team sent the press release directly to the media outlet editors. This direct media outreach led to two articles published in frequently-read local county papers, and one video interview with the hospital's head pharmacist. Once articles were published online, Lewis County General Hospital further disseminated those articles via Facebook to reach a broader audience. The hospital also organized a table at their community health fair to educate residents on proper drug disposal.

Lewis County General Hospital staff next to a portion of their collections from a drug take-back event.



## In-Pharmacy Advertising

Lewis County General Hospital also put up flyers and posters throughout the hospital to catch visitors' attention. For the past six years, the dedicated staff has also participated in the annual, national DEA drug take-back day, hosting collection events in partnership with the local Sheriff's Department and Mountain View Prevention Services, a drug abuse prevention, education, and intervention organization. Residents therefore already saw this pharmacy as a leader in facilitating proper drug disposal.

*"We're grateful for the opportunity to provide county residents with an easy, safe solution for removing leftover drugs from their medicine cabinets. Not only did we collect a significant amount of unwanted medications, our pharmacy also benefitted from increased foot traffic and loyalty from our customers—they love the program! Due to this success, we've decided to continue the program indefinitely at our store."*

— Gary Athmakuri,  
Head Pharmacist at Garro Drugs

 **Lewis County General Hospital & Residential Health Care Facility** shared NYS Pollution Prevention Institute's post.  
August 2 at 4:18pm · 🌐

 **NYS Pollution Prevention Institute**  
August 2 at 2:30pm · 🌐

Today, Lewis County General Hospital & Residential Health Care Facility joined four pharmacies in New York's Oneida and Lewis counties in collecting leftover ho...

[See More](#)



**Lowville hospital joining pilot program to take in unwanted drugs**

LOWVILLE — Lewis County General Hospital is now accepting old prescription drugs for free through September as part of a drug take-back pilot program,...

[WATERTOWNDAILYTIMES.COM](http://WATERTOWNDAILYTIMES.COM)

 **Lewis County General Hospital & Residential Health Care Facility**  
August 12 at 9:01am · 🌐

This is a great way to dispose of controlled substances and leftover drugs.



**More Options Available For Disposing Of Old Drugs**

With the current drug epidemic, properly disposing of unused medications, especially narcotics, is more important than ever. There are some safe places to dispose of them now in Lewis County, including the hospital.

[WWNYTV.COM](http://WWNYTV.COM)

# APPENDICES

## APPENDIX A

### SAMPLE

#### SUBMISSION FOR PARTY STATUS TO DOT SPECIAL PERMIT

(COMPANY LETTERHEAD)  
(MONTH DAY, YEAR)

Associate Administrator for Hazardous Materials Safety  
Attention: General Approvals & Permits, PHH-31  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
East Building  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001  
[Specialpermits@dot.gov](mailto:Specialpermits@dot.gov)

- (COMPANY NAME) in accordance with the Department of Transportation Hazardous Materials Regulations in 49 CFR 107.107, hereby makes application for party status to DOT-SP 20255 (SPECIAL PERMIT NUMBER).
- Company Name and Address:  
(COMPANY NAME)  
(ADDRESS)  
(PERSON OF CONTACT)  
(TELEPHONE)  
(FAX)  
(EMAIL)
- Locations Where Permit Used:  
(COMPANY NAME)  
(ADDRESS)  
(PERSON OF CONTACT)  
(TELEPHONE)  
(Foreign applicants must provide a U.S. agent)
- Chief Executive Officer, President or ranking executive officer:  
(NAME)
- Dun and Bradstreet Data Universal Numbering System (D-U-N-S) Identifier:  
(D-U-N-S IDENTIFIER)
- Why party status is needed:  
(COMPANY NAME) needs party status to the above special permit because \_\_\_\_\_.
- Certification of understand of the provisions of the special permit:  
(COMPANY NAME) certifies that they fully understand the provisions of the special permit which party status is being requested.
- Previously granted party status:  
(PERSON OF CONTACT) certifies that (COMPANY NAME) has not been previously granted party status to this special permit.
- When a Class 1 material is forbidden for transportation by aircraft, except under an exemption or special permit (see Columns 9A and 9B in the table in 49 CFR 172.101), an application to renew an exemption or special permit to transport such Class 1 material on passenger-carrying or cargo-only aircraft with a maximum certificated takeoff weight of less than 12,500 pounds must certify that no person within the categories listed in 18 U.S.C. 842(i) will participate in the transportation of the Class 1 material: (AS APPLIES) or (N/A)
- Shipper/Carrier Status:  
(COMPANY NAME) will be acting as a SHIPPER (OFFEROR), CARRIER OR BOTH under the terms of the special permit.

Check requirements with your chosen vendor prior to applying for party status to a special permit.



# APPENDIX B\*

Matrix for Choosing a Vendor

See next page for longer list of vendors to consider.

	CONTACT		AVAILABILITY			REGS	TRANSPORT		UNIT		MAIL-BACK	DATA	COST STRUCTURE	
	Phone	Website	Entire U.S.	Majority of U.S. states	Select U.S. states	Registered reverse distributor	Collected materials shipped by common carrier	Direct pick-up of collected material	Receptacles available	Different sizes available	Prelabeled mail-back envelopes available	Online tracking with customer interface	Long-term/Rental	As-needed/Purchase
Assured Waste Solutions	(704) 865-7550	<a href="http://www.assuredwaste.com">www.assuredwaste.com</a>	X			X	X	X	X				X	X
Covanta Environmental Solutions	(800) 950-8749	<a href="http://www.covanta.com/Our-Solutions">www.covanta.com/Our-Solutions</a>	X			X		X	May be coming soon		May be coming soon		X	X
Far West Returns	(530) 872-1758	<a href="http://www.farwestreturns.com">www.farwestreturns.com</a>			X	X	X	X	Coming soon		Coming soon			
Heritage WTI, Inc.	(330) 3895-7336	<a href="http://store.heritage-enviro.com/">store.heritage-enviro.com/</a>	X			X	X	X	X	X	X (mail-back in boxes)			X (Mail-back only)
Pharma Logistics	(888) 729-7427	<a href="http://www.pharmalogistics.com">www.pharmalogistics.com</a>	X			X	X		X	X		X	X	X
PharmaLink Inc.	(727) 669-8187	<a href="http://pharmalinkinc.com/">pharmalinkinc.com/</a>		X		X	X		X			X		X
Reliable Pharmaceutical (RP) Returns	(615) 361-8856	<a href="http://www.rpreturns.com">www.rpreturns.com</a>	X			X		X	Coming soon		Coming soon	X		X
Rx Reverse Distributors	(772) 388-1212	<a href="http://rxreversedistributors.com">rxreversedistributors.com</a>	X			X			X	X		X		X
Sharps Compliance, Inc.	(903) 693-2525	<a href="http://www.sharpsinc.com/">www.sharpsinc.com/</a>	X			X	X		X	X	X	X	X	
Stericycle	(866) 783-9816	<a href="http://www.stericycle.com/compliance/pharmaceutical-">www.stericycle.com/compliance/pharmaceutical-</a>	X			X	X	X	X	X	X	X	X	X
United Rx Solutions	(631) 954-2073	<a href="http://www.unitedrxsolutions.com/">www.unitedrxsolutions.com/</a>	May provide services for consumer take-back programs in the future, but does not currently.											
Veolia	(617) 849-6600	<a href="http://www.veolianorthamerica.com/en">www.veolianorthamerica.com/en</a>	X			X	X (Not yet for pharmacies but coming soon)		Offered by partners		X	X	X	X
<b>RECEPTACLE PROVIDERS</b>														
American Security Cabinets	(866) 268-4955	<a href="http://rxdrugdrops.com/">rxdrugdrops.com/</a>	X						Offered by partners	X	X	Offered by partners		X
MedReturn LLC	(877) 218-0990	<a href="http://www.medreturn.com/">www.medreturn.com/</a>	X							X	X			X

\* This chart is not intended to be comprehensive nor exhaustive, and information about these vendors may change over time.

### Other vendors to consider:

- Achieva Group Returns
- Advanced Environmental Options
- ALMAC Clinical Services
- ARK RX Returns Solutions
- Chemtron Corporation
- Clean Harbors
- Daniels SharpSmart, Inc.
- Drug and Laboratory Disposal, Inc.
- Environmental Management Unlimited (EMU)
- Environmental Pharmaceuticals
- EXP Pharmaceutical Services Corporation
- EZ Pharmacy Returns
- GENCO Pharmaceutical Services (Capital Returns, Inc.)
- GRx Guaranteed Returns (Devos)
- Infectious Disease Control, Inc.
- Interbank-Equipment
- Maximum Rx Credit
- MedCycle Management
- Medicus-Health
- Med-Turn, Inc. (Inmar)
- National Pharmaceutical Returns (NPR)
- NovaPlus (Novation/Vizient)
- Omega 2000 Rx Returns
- Pharmaceutical Dimensions
- Pharmaceutical Returns
- Pharmaceutical Returns Services
- PharmaTech Services Inc. (Pharmacy Returns Logistics)
- PS Industries, Inc.
- Qualanex
- Quality Rx Returns
- A Red Bag Service
- ReturnCo (Pharma Mate, Inc.)
- Return Logistics International Corp.
- Return Solutions, Inc.
- Rx Drug Drop Box
- The Rx Exchange (Burke Horton, Inc.)
- Rx Return Box
- Salsbury Industries
- Save a Star Foundation
- Securr
- TD Pharmacy Returns
- Total Rx Services (Total Returns)
- Universal Rx Solutions
- US Industrial Technologies
- WDSrx (Pro-Med Returns)
- Yellow Jug Old Drugs

# APPENDIX C

## FAQ Document for Running a Pharmacy Drug Take-Back Program\*

### Frequently Asked Questions



#### What will your drug collection receptacle look like?

- Collection receptacles for household pharmaceutical waste are usually made of metal and look similar to a mailbox.
- Most receptacles are designed to be fitted with a “liner” such as a cardboard box layered with plastic.
- A lockable access slot allows unwanted/expired drugs to be deposited; it must be locked when pharmacy is closed.
- There will also be a larger locked door or panel through which the liner can be accessed by pharmacy employees with a key, but not by customers depositing drugs.
- The receptacle should not be open to the public until a liner is in place.

#### Where do I place my collection receptacle?

- The receptacle must be located in sight of the pharmacists, and should be where customers have easy access.
- Keep in mind you will need to affix the receptacle to the floor or wall. Some come with pre-drilled holes.

#### What materials can be placed in a collection receptacle?

- Pharmacies in the US are now permitted to modify their registration with the Drug Enforcement Administration (DEA) to collect controlled substances, schedule II-V, in addition to non-controlled substances.
- Items always prohibited for collection (i.e., schedule I illegal drugs) must be clearly indicated to the public on the receptacle’s signage.
- Additional prohibited items depend on local and state laws.

#### Can customers give their unwanted drugs to a pharmacy employee for placement in the receptacle?

- No, ultimate users (see box for definition) must place their own drugs directly into the receptacle.
- Pharmacy employees should be available to ensure the receptacle is used correctly and answer any questions.

**“Ultimate User”**= Person prescribed the medication or a member of their household.

**Exceptions:** If someone dies while in lawful possession of pharmaceutical controlled substances, any person lawfully entitled to dispose of the decedent’s property may dispose of the pharmaceuticals. A long-term-care facility may dispose of a current or former resident’s pharmaceuticals.

#### What happens when my receptacle liner is full?

1. **Record in designated log** key information about liner change (date, time, employees’ names, employees’ signatures, etc). Note: you are not expected to know or record what drugs are collected.
2. **Unlock the receptacle and seal the liner closed** which must be done by two employees together.
3. **Prepare the liner for transportation to destruction site** by common carrier or authorized reverse distributor.
4. **Store the full liner** in a secure room until it is ready for transport.
5. **Place a new liner in the receptacle.** New liners can be pre-ordered on a schedule or as needed depending on the vendor and arrangement.

#### What happens if my receptacle liner is full before my next liner has been delivered?

- Lock the receptacle access slot to prevent overflow, and indicate clearly to customers that it is temporarily closed.
- Leave the full liner in the closed receptacle with the access slot locked; or remove the full liner and store it in a secure room (e.g. a locked storage room) until it is transferred to a reverse distributor via pickup or common carrier.
- Contact your receptacle provider to order a replacement liner.

#### What happens if a personal item unintentionally falls into the receptacle?

- Do not reach into the liner for any reason.
- Contact local law enforcement to assist in retrieving the item.

*A USDA Rural Utilities Service grant supports this program. Opinions, conclusions, or recommendations do not necessarily reflect the official views of the USDA. PSI is an equal opportunity provider and employer. Persons with disabilities who require alternatively formatted materials or other special accommodations to ensure effective communication and access to this project should contact Amanda Nicholson at [amanda@productstewardship.us](mailto:amanda@productstewardship.us). Please allow at least 10 business days to arrange for accommodations.*

\* FAQ answers do not apply to every program. Answers may vary by pharmacy program and by vendor.

# APPENDIX D

Sample Press Release



## FOR IMMEDIATE RELEASE

March 7, 2016

### CONTACT:

Scott Cassel, PSI – [scott@productstewardship.us](mailto:scott@productstewardship.us) - (617) 236-4822

Suzy Whalen, PSI – [suzy@productstewardship.us](mailto:suzy@productstewardship.us) - (617) 236-8293

Andrew Radin, NYPSC – [aradin@ocrra.org](mailto:aradin@ocrra.org) - (315) 453-2866

## Pharmacy-Based Drug Take-Back Program Launched in Oneida and Lewis Counties

*First collection program at pharmacies for controlled substances in the counties*

**New York**— Today, four pharmacies in New York's Oneida and Lewis counties will begin collecting leftover pharmaceuticals from residents free of charge. Designed and implemented by the Product Stewardship Institute (PSI) and the New York Product Stewardship Council (NYPSC), this drug take-back pilot program offers county residents convenient locations to dispose of their leftover and expired medications – just one part of a comprehensive strategy to reduce the public health and environmental impacts resulting from unwanted drugs.

Funded through a grant awarded to PSI and NYPSC by the United States Department of Agriculture, the pilot program will use pharmacy-based collection receptacles and pre-paid mail-back envelopes to facilitate the proper disposal of leftover pharmaceuticals. The locked receptacles and envelopes, acquired through [Sharps Compliance, Inc.](#), allow residents to dispose of unused medications— both over-the-counter (OTC) and prescription (Rx) drugs ([schedule II-V](#)) — for free, no questions asked. In contrast to the collections that take place at police stations and non-pharmacy locations, this program represents the first time that pharmacies are collecting controlled and non-controlled substances in the two counties on an ongoing basis. The pilot program is scheduled for six months.

"Every year more than 1,000 people in New York State die from a drug overdose – most commonly from prescription drugs," said Jan Oatman, regional recycling coordinator of the Development Authority of the North Country, NY. "Along with our Lewis County partner, we are honored to be working with an impressive coalition of pharmacies, local government agencies, non-profits, and waste managers to offer this collection service and negate the environmental and health effects leftover drugs pose to our communities."

Over [\\$1 billion](#) in leftover drugs are flushed down drains, tossed in the trash, or relegated to medicine cabinets each year. When flushed or trashed, over-the-counter medications and prescription drugs can potentially [contaminate open waterways and local drinking water](#). Equally dangerous, drugs left in the home can find their way into the hands of children or potential addicts. Prescription drug abuse is the [fastest growing drug problem](#) in the U.S. In New York, the number of drug-related poisoning deaths doubled from 2003 to 2012, and the number of deaths involving prescription opioids increased more than four-fold.

Pharmacy collection of controlled substances was made possible in New York last fall, when Governor Andrew Cuomo signed into law a bill ([A6062/S3687](#)) that directs the NY Department of Health to oversee a program for the safe disposal of unused controlled substances at convenient locations like pharmacies, long-term care facilities, and narcotic treatment programs.

"Pharmacies are the most convenient, accessible location for residents to safely dispose of their unwanted medications," said Scott Cassel, chief executive officer and founder of PSI. "This project provides hassle-free collection of unwanted medicine from citizens and will be a model for pharmacies across the state and nationwide."



Participating pharmacies include:

- [Bonaparte Pharmacy](#), 8210 Main St, Harrisville, NY - (315) 537-5032  
Hours: Mon-Fri 9:00am – 5:00pm
- [The Falls Pharmacy](#), 6805 McAlpine St, Lyon Falls, NY - (315) 348-8121  
Hours: Mon-Fri 9:00am – 6:00pm; Sat 9:00am – 12:00pm
- [U&I Pharmacy](#), 5236 West Seneca St, Vernon, NY - (315) 829-3605  
Hours: Mon-Fri 9:00am – 6:00pm
- [Garro Drugs](#), 704 Bleecker St, Utica, NY - (315) 732-6915  
Hours: Mon-Fri 9:00am – 6:00pm; Sat 10:00am – 1:00pm

“As a pharmacy owner, I recognize the need for convenient locations where county residents can safely dispose of their unwanted and expired medications,” said Kristine Richardson, owner of U&I Pharmacy in Vernon, Oneida County, NY. “Not only are we providing an important service to our community, but our business also benefits from increased customer loyalty and community awareness.”

At the end of this project, PSI and NYPSC will compile a How-To Guide detailing best practices for establishing and operating pharmacy-based medication collection programs in rural communities. This guide will serve as a resource to other rural communities across New York State and nationally to support safe and environmentally sound pharmaceuticals management as part of a sustainable rural economy.

Learn more about PSI’s work on pharmaceuticals on the [PSI website](#), or contact [Vivian Fuhrman](#) at (617) 236-4771.

---

## **About [Product Stewardship Institute](#)**

The **Product Stewardship Institute (PSI)** is a national, membership-based nonprofit committed to reducing the health, safety, and environmental impacts of consumer products across their lifecycle with a strong focus on sustainable end-of-life management. Headquartered in Boston, Mass., PSI takes a unique product stewardship approach to solving waste management problems by encouraging product design changes and mediating stakeholder dialogues. With 47 state environmental agency members, along with hundreds of local government members from coast-to-coast, and 110 corporate, business, academic, non-U.S. government, and organizational partners, we work to design, implement, evaluate, strengthen, and promote both legislative and voluntary product stewardship initiatives across North America. Like us on [Facebook](#) or follow us on [Twitter](#).

## **About [New York Product Stewardship Council \(NYPSC\)](#)**

NYPSC works to implement the principles of product stewardship in New York State and nationally by providing leadership, guidance, and resources (including policies, evaluations, and educational tools) to individuals, organizations, institutions, local governments, the state legislature, elected officials, and manufacturers. Product stewardship is the act of minimizing health, safety, environmental and social impacts of a product and its packaging throughout all lifecycle stages, and maximizing economic benefits. The producer of a product has the greatest ability to minimize adverse impacts, but other stakeholders such as suppliers, retailers, and consumers also play a role. The NYPSC educates these stakeholders about the benefits of product stewardship and provides a forum for the exchange of information regarding existing policies and programs.

## ENDNOTES

- i. U.S. Centers for Disease Control and Prevention (CDC) (2013). Opioids drive continued increase in drug overdose deaths [Press Release]. Retrieved 24 September 2013 from [http://www.cdc.gov/media/releases/2013/p0220\\_drug\\_overdose\\_deaths.html](http://www.cdc.gov/media/releases/2013/p0220_drug_overdose_deaths.html).
- ii. Centers for Disease Control and Prevention (2012). Wide-ranging OnLine Data for Epidemiologic Research (WONDER). Retrieved 7 July 2013 from <http://wonder.cdc.gov/mortsql.html>.
- iii. Department of Health and Human Services, Centers for Disease Control and Prevention (2011). Prescription painkiller overdoses at epidemic levels kill more Americans than heroin and cocaine combined [Press Release]. Retrieved 12 December 2011 from [http://www.cdc.gov/media/releases/2011/p1101\\_flu\\_pain\\_killer\\_overdose.html](http://www.cdc.gov/media/releases/2011/p1101_flu_pain_killer_overdose.html).
- iv. U.S. Food & Drug Administration (2014). FDA Commissioner Margaret A. Hamburg Statement on Prescription Opioid Abuse [Press Announcement]. Retrieved 9 September 2016 from <http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm391590.htm>.
- v. U.S. Centers for Disease Control and Prevention (2011). Policy Impact: Prescription Painkiller Overdoses. Retrieved 7 July 2013 from <http://www.cdc.gov/homeandrecreationalafety/rxbrief/>.
- vi. Ferrari, B., et al. (2003). Ecotoxicological impact of pharmaceuticals found in treated wastewaters: study of carbamazepine, clofibrac acid, and diclofenac. *Ecotoxicology and Environmental Safety* 55, 359- 370; Henschel, K.-P., et al. (1997). Environmental hazard assessment of pharmaceuticals. *Regulatory Toxicology and Pharmacology* 25, 220-225; Jones, O. A. H., et al. (2002). Aquatic environmental assessment of the top 25 English prescription pharmaceuticals. *Water Research* 36, 5013-5022; Hernando M.D., et al. (2006). Environmental risk assessment of pharmaceutical residues in wastewater effluents, surface waters and sediments. *Talanta* 69, 334-342.
- vii. World Health Organization, Water Sanitation Health (2016). Information sheet: Pharmaceuticals in drinking-water. Retrieved 9 September 2016 from [http://www.who.int/water\\_sanitation\\_health/emerging/info\\_sheet\\_pharmaceuticals/en/](http://www.who.int/water_sanitation_health/emerging/info_sheet_pharmaceuticals/en/); Associated Press (NA). An AP Investigation: Pharmaceuticals Found in Drinking Water, PHARMAWATER I: Pharmaceuticals found in drinking water, affecting wildlife and maybe humans. Retrieved on 9 September 2016 from [http://hosted.ap.org/specials/interactives/pharmawater\\_site/day1\\_01.html](http://hosted.ap.org/specials/interactives/pharmawater_site/day1_01.html); Harvard Medical School (2011). Harvard Health Letter: Drugs in the water. Retrieved on 9 September 2016 from [http://www.health.harvard.edu/newsletter\\_article/drugs-in-the-water](http://www.health.harvard.edu/newsletter_article/drugs-in-the-water).
- viii. Kolpin, D.W., et al. (2002). Pharmaceuticals, hormones, and other organic wastewater contaminants in U.S. streams. *Environmental Science & Technology*, 36(6), 1202-1211.



