

Take Back the Narcs!

Implementing a Medication Disposal Kiosk

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The speakers have no conflicts of interest to disclose

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Learning Objectives — Pharmacists and Technicians

- Describe a public health concern that supports the need for increased pharmaceutical disposal options for patients
- Identify barriers to implementing a disposal box in a health-system setting
- Identify key players when implementing a disposal box in a health-system setting

Which of the following most strongly support the implementation a medication kiosk?

- A. Publicity from appearing on a take back site list
- B. The national opioid epidemic
- C. De-clutter patient bathroom cabinets
- D. Opportunities for tax cuts for hospitals

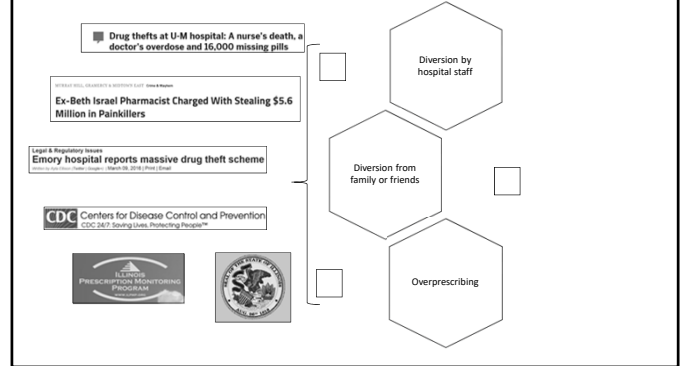
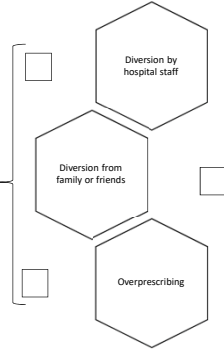
Which of the following is NOT a barrier when implementing a medication collection kiosk?

- A. Finding an appropriate physical location with adequate security and oversight
- B. Patient confusion after the DEA license is modified but before a kiosk is installed
- C. Finding invested representatives from key groups that must be part of the implementation team
- D. Finding liners that will meet DEA requirements

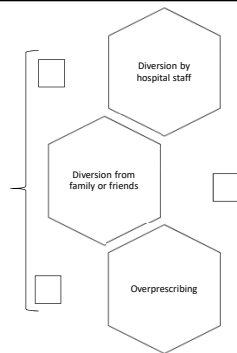
Who is NOT a “key player” when installing a medication collection kiosk?

- A. Office of General Council/Legal
- B. Security
- C. A patient representative
- D. Employees working in the area where the kiosk is located

Examples of factors contributing to increased availability of opioid medications and the opioid epidemic



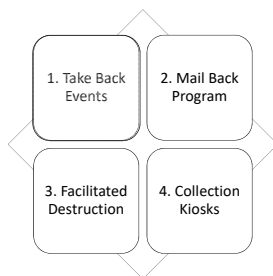
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Code of Federal Regulation – Part 1317



Summary of Retrieval Options



Summary of Retrieval Options



Summary of Retrieval Options



Summary of Retrieval Options



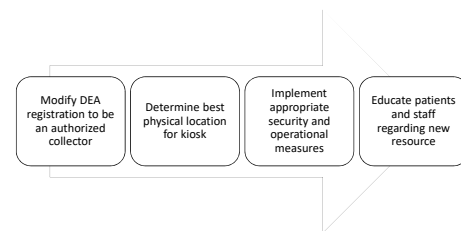
Steps to Implement a Medication Collection Kiosk

Based on Title 21 Code of Federal Regulations, Part 1317 - Disposal

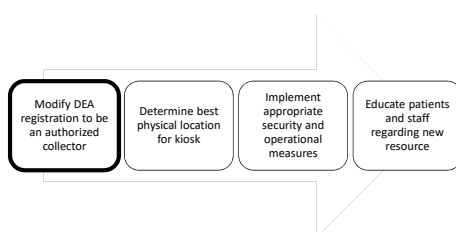


Disposal Regulations, DEA.
https://www.deadiversion.usdoj.gov/drug_disposal/part_1317/disposal_regulations.pdf

Steps for medication kiosk implementation



Steps for medication kiosk implementation

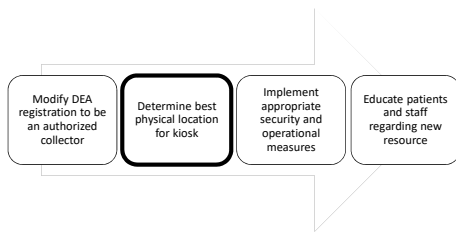


Steps for medication kiosk implementation

1. Modify the DEA registration to become an authorized collector
 - Must be eligible to handle schedule II controlled substances
 - Does not permit site to conduct a take-back event independently, this must still be done with law enforcement
 - Will populate site on list of "Controlled Substance Public Disposal Locations" even if no operation in place to take back medications
 - <https://apps.deadiversion.usdoj.gov/pubdispsearch/spring/main?execution=e1s1>

Disposal Regulations, DEA.
https://www.deadiversion.usdoj.gov/drug_disposal/part_1317/disposal_regulations.pdf

Steps for medication kiosk implementation



Steps for medication kiosk implementation

2. Determine location of medication kiosk

- For hospitals/clinics: shall be monitored regularly by employees
- Must be securely fastened to a permanent structure and securely locked
- Must have a permanent outer container and a removable inner liner
- Outer container must prominently display sign indicating Schedule II-IV only permitted
- Cannot be located in emergency or urgent care setting

Disposal Regulations: DEA
https://www.deadiversion.usdoj.gov/drug_disposal/perm_sheets/disposal_registration.pdf

Location, location, location

1. Specialty pharmacy
2. Onsite retail pharmacy
3. Physician based clinic
4. Hospital based clinic

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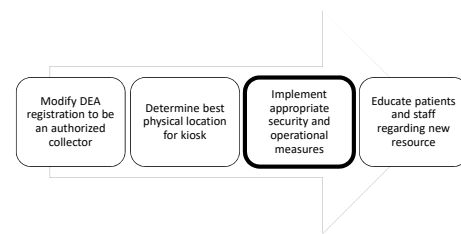
~~X~~ Specialty pharmacy

~~X~~ Onsite retail pharmacy

~~X~~ Physician based clinic

✓ 4. Hospital based clinic

Steps for medication kiosk implementation



Steps for medication kiosk implementation

3. Implement appropriate security and operations steps

- Incorporate individuals from important groups: Legal, Risk, Security, staff of kiosk location
- Determine how patients will access kiosk and where it will fit in workflow of staff
- Meet requirements of inner liner (21 CFR 1317.60) and select vendor
- Can collect controls and non-controls together, but cannot collect schedule 1 medications
- Can only collect from ultimate users (patients)
- "Once a substance has been deposited, it shall not be counted, sorted, inventoried, or otherwise individually handled"
- Installation and removal of liners shall be performed or supervised by two employees of the authorized collector

Disposal Regulations, DEA, https://www.deadiversion.usdoj.gov/21cfr/cfr_1317/cfr_1317.60_disposal/fact_sheet/disposal_registration.pdf

Steps for medication kiosk implementation



Steps for medication kiosk implementation

4. Educate patients and staff regarding new resource for disposal

- Incorporate disposal information into patient experience
- Educate staff regarding requirements and how to direct questions

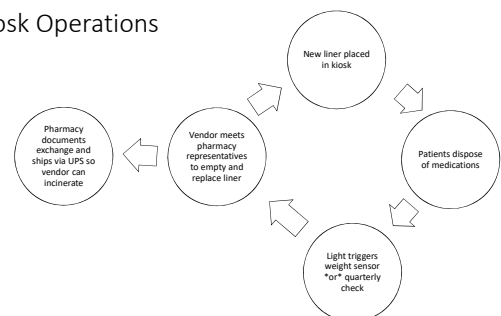
Disposal

We now offer a safe drug take-back site within the Digestive Health Center. Please bring your unused medication with you to your postoperative appointment. For the safety of others and the environment, patients are encouraged to take advantage of safe drug take-back programs and safe-drop sites.

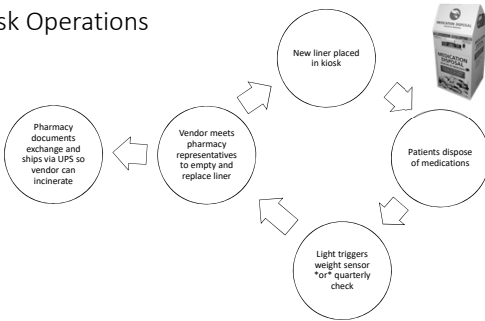
When these programs are not accessible, other secondary methods, including flushing the medication down the toilet, can be considered.

Check with your prescriber about safe disposal methods for your medication.

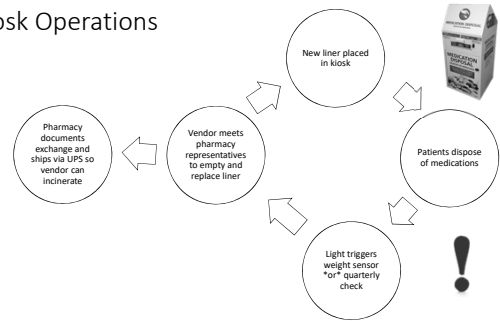
Kiosk Operations



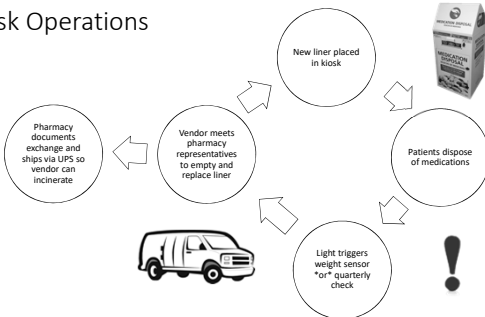
Kiosk Operations



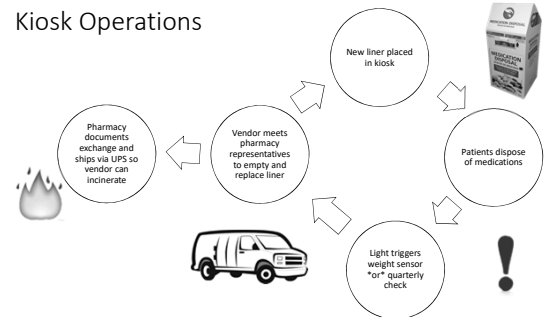
Kiosk Operations



Kiosk Operations



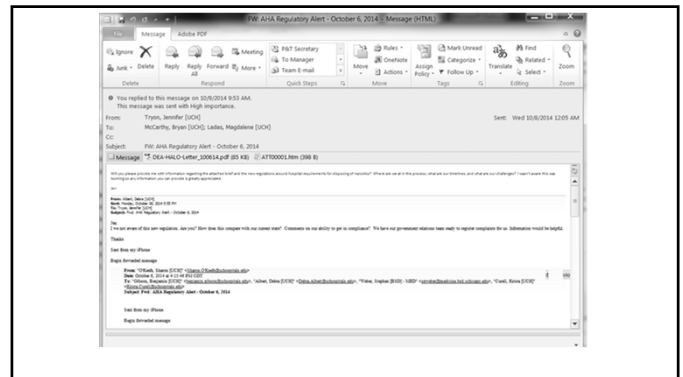
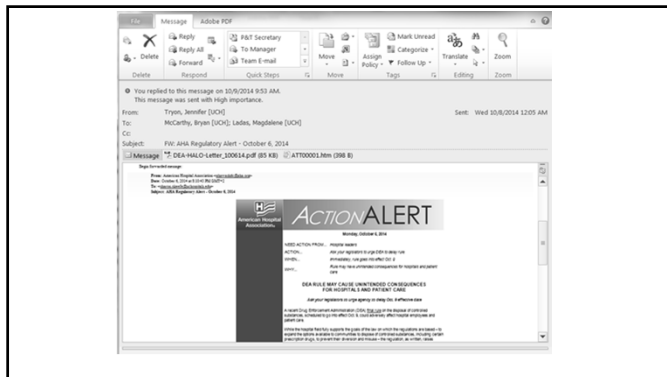
Kiosk Operations



Lessons Learned

- Patience!
- Plan appropriately for the DEA license modification downstream effects
- Consider the ask of pharmacy staff when selecting vendor
- Plan ahead for operational process
- Work with frontline staff to educate on requirements of patient ONLY disposal
- Identify an invested pharmacy colleague
- Many site-specific considerations

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Controlled Substance Disposal History

- Controlled Substances Act
 - Patients with unused, unwanted, or expired pharmaceutical controlled substances had limited disposal options
- Secure and Responsible Drug Disposal Act of 2010
 - Patients may deliver controlled substances to another person for purposes of disposal, including drug take back programs and long term care facilities

Controlled Substance Disposal History

Public Health Concern

- Significant increases in deaths and admissions for controlled substances
- Increased violent crime and property crime associated with controlled substances in all US regions
- Prescription drug abuse on the rise, especially for teens



Controlled Substance Disposal

- Disposal of Controlled Substances, 21 C.F.R §§ 1301, 1304, 1305, 1307, 1317 (2014).
 - Encourage public and private entities to collect and destroy controlled substances in a secure, convenient, and responsible manner
 - Decrease the amount of controlled substances introduced into the environment
 - Reduce the home supply of unused controlled substances and reduce the risk of diversion or harm

Controlled Substance Disposal

- Disposal of Controlled Substances, 21 C.F.R §§ 1300, 1301, 1304, 1305, 1307, 1317 (2014).
 - Three voluntary options for controlled substance disposal
 - Take-back events
 - Mail-back programs
 - Collection receptacles

Collection Receptacle Regulations

1. Drug Enforcement Administration registration
2. Standard for destruction – “Non-retrievable”
3. Location that is regularly monitored by employees
4. Inner liner inventory record keeping

Registration



U.S. DEPARTMENT OF JUSTICE ★ DRUG ENFORCEMENT ADMINISTRATION
DIVERSION CONTROL DIVISION

Controlled Substance Public Disposal Locations - Search Utility

Business Name	Address 1	Address 2	City, State Zip	Distance	Map
UNIVERSITY OF CHICAGO DCAM OUTPATIENT PHARMACY	5758 S. MARYLAND AVENUE	MC30010	CHICAGO, IL 60637	0 miles	Map
WALGREEN CO.	8028 S COTTAGE GROVE AVE		CHICAGO, IL 60619	3 miles	Map
WALGREEN CO.	3405 S KING DR		CHICAGO, IL 60616	4 miles	Map
BOND DRUG COMPANY OF ILLINOIS, L.L.C.	1633 W 10TH STREET		CHICAGO, IL 60643	6 miles	Map
BOND DRUG COMPANY OF ILLINOIS, L.L.C.	1931 W CERMAK RD		CHICAGO, IL 60608	7 miles	Map

https://www.deadiversion.usdoj.gov/drug_disposal/

“Non-Retrievable”

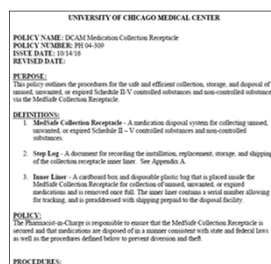


Location



Inner Liner Record Keeping

- Policy and Procedure Development



Policy and Procedure Development

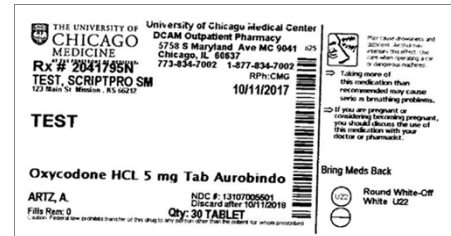
Multi-disciplinary subject matter expert coordination

- Pharmacy
- Risk Management
- Security
- Waste Management

Collection Receptacle Marketing



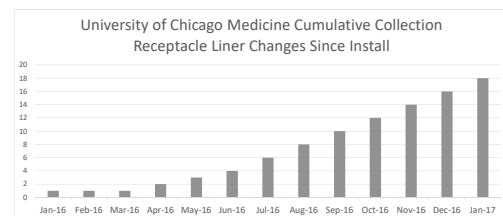
Collection Receptacle Marketing



Collection Receptacle Marketing



Collection Receptacle Success



Lessons Learned

- Read the primary literature (the law)!
- Gain senior and multi-disciplinary leadership stakeholder support
 - Manage expectations and timelines
- Market many ways, and continuously
- Prepare for success, and celebrate it!

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Questions?