



**OFFICE OF THE ATTORNEY GENERAL  
COMMONWEALTH OF VIRGINIA**

# **HOSTING A SUCCESSFUL PRESCRIPTION DRUG TAKE-BACK EVENT**

**A ROADMAP FOR LOCAL COMMUNITIES  
IN VIRGINIA**

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PRESCRIPTION DRUG TAKE-BACK TASK FORCE

# HOSTING A SUCCESSFUL PRESCRIPTION DRUG TAKE-BACK EVENT

## A ROADMAP FOR LOCAL COMMUNITIES IN VIRGINIA

### Introduction

Unused medications in homes create a public health and safety concern because they are highly susceptible to accidental ingestion, theft, misuse and abuse. Almost twice as many Americans (6.8 million) currently abuse pharmaceutical controlled substances than the number of those using cocaine, hallucinogens, heroin and inhalants combined according to 2012 National Survey on Drug Use and Health.

Moreover, every day, on average, 2,500 teens use prescription drugs to get high for the first time, according to the Partnership for a Drug-Free America. Studies show that a majority of abused prescription drugs are obtained from family and friends, including from the home medicine cabinet. Public health officials now call prescription drug abuse an epidemic that is plaguing the nation.

On October 13, 2010, the federal Secure and Responsible Drug Disposal Act of 2010 was signed into law. The Disposal Act, in an effort to curtail the prescription drug abuse epidemic, amended the Controlled Substances Act to authorize the U.S. Drug Enforcement Administration (DEA) to develop and implement regulations that would allow Americans to dispose of their expired, unused or unwanted prescription medications in a safe and responsible manner on any day. Those regulations became effective on October 9, 2014.

The new regulations expand the disposal options available to collect controlled substances from ultimate users to include take-back events, as well as mail-back programs and collection receptacles operated and maintained by DEA authorized collectors. Local communities should continue to hold take-back events with law enforcement to prevent prescription drug abuse and to safeguard the environment.

### Organizing a Collection Event

#### **Before the Event**

- **Planning:** Planning for the event should start about four (4) months in advance of the collection event.
- **Funding:** Local communities will need to consider the potential costs of a take-back event and identify possible funding sources. Primary expenses include:
  - costs for hauling and incinerating the medications collected;
  - costs for off-duty law enforcement officers, unless the police department or the DEA is willing to provide regular duty officers;
  - costs for publicizing the event (i.e., posters, flyers, possible paid advertising on radio and in community papers, etc.)

The medications collected must be transported and incinerated by companies approved by the Virginia Department of Environmental Quality (DEQ). Check with the solid waste manager within the appropriate Virginia DEQ Regional Office for the names of permitted waste haulers and incineration facilities that can transport and incinerate expired, unused and unwanted medications (<http://www.deq.virginia.gov/locations>).

The cost of transport and incineration can be significant. The local police department will have a system in place to dispose of controlled substances they have seized, including prescription medications. The local police department may be willing to accept the medications collected at a take-back event and dispose of them at no cost with other controlled substances that will be destroyed. As another option, some incineration facilities may be willing to provide no-cost incineration of such medications.

A list of potential partners for helping to plan, support, publicize or provide funding for take-back events is included in Appendix A.

- **Local Police Department Cooperation:** Obtaining the cooperation of your local police department prior to the event is essential. Because the collection site will accept controlled substances in Schedules II - V, members of the local police department or the local DEA must be present at the collection event to supervise the receipt of the controlled substances until their final destruction pursuant to the federal Controlled Substances Act (21 U.S.C. § 822). The request for assistance should be in writing and there should be a follow-up letter/memo sent to confirm the collection specifics and duties of the police officers.

In addition, pursuant to Va. Code § 19.2-386.23(A)(2), prior to the destruction of controlled substances in Schedules II – V, the chief law-enforcement officer of the locality or his designee must obtain the written consent of the Commonwealth’s Attorney for the locality to order destruction of the drugs. Moreover, after the destruction, a written statement under oath reporting a description of the drugs destroyed and the time, place and manner of destruction, must be made to the chief law-enforcement officer of the locality and to the Virginia Board of Pharmacy by the officer to whom the order of destruction is directed.

- **DEA Approval:** Request approval from DEA by letter to hold the event about four (4) months in advance of the event. Your letter to DEA requesting approval should specify that you will have local police officers on-site. Approval should be obtained in accordance with the procedure for disposing of controlled substances set out in Title 21 CFR § 1307.22. See Appendix B. The letter to the DEA requesting approval should be addressed to:

Attn: Office of Diversion Controlled  
8701Morrissette Drive  
Springfield, VA 22152

- **Publicity:** A consumer awareness campaign is needed to communicate the proper procedures for returning expired, unused, or unwanted medications and to motivate citizens to participate in the program. It is important for citizens to know what they can and cannot bring to the collection site. Expired, unused, or unwanted prescription and

over-the-counter medications and vitamins, and veterinary medications are acceptable. Chemotherapy drugs and radioactive materials are unacceptable. To ensure anonymity and privacy, participants should be advised to use a black permanent marker to conceal any personal information on the container.

The advertising should make it clear that the event is for the returning of unwanted or expired drugs that have been dispensed to an individual. Drugs that are stored in a medical facility or physician's office that have not been dispensed to a specific patient may not be accepted via a take-back program.

NOTE: "Medical sharps" (i.e., hypodermic needles, pen needles, intravenous needles, syringes, lancets, and other devices that are used to penetrate the skin for the delivery of medications) are often listed as not accepted, but it is important to prepare for their acceptance with secure medical sharps collection containers on site. See Appendix B.

- **Multiple locations:** Collection programs must be easy to use. The program should be free to the public and should be provided at multiple locations on different dates, if possible, during hours when people are likely to be able to drop off their items, i.e., after typical work hours or on weekends. Each location should be easily accessible to participants and include, if possible, an outside drive-thru drop off. Many collection programs have been sited at pharmacies, local police precincts, local parks and fairgrounds with large parking lots and easy access to and from such sites.

### **During the Collection**

- **Staffing:** Because it is likely that controlled substances in Schedules II – V (for which only law enforcement officers may legally accept) will be collected, at least one law enforcement officer must be present at the collection site. However, the presence of at least two officers is recommended. In addition, there should be at least two volunteers and a data entry person. Each site should have sufficient drop-off bins or bags for collection of the medications.
- **Safety:** Contact with some medications can pose safety and health risks to collection participants. Some drugs are skin contact hazards and others have dusts that are inhalation hazards. Anyone working the event who may contact the containers of medications should wear latex or non-latex gloves at all times when handling the containers. Avoid accidental ingestion through breathing by considering wearing a facemask. Keep medications in their original packaging to prevent reactions in the collection bin.

Each take-back event should have at least one receptacle for the collection of controlled substances. The collection receptacle should be a securely locked, substantially constructed container with an outer container and a removable inner liner. The outer container should include a small opening that allows contents to be added to the inner liner, but does not allow removal of the inner liner's contents.

An inner liner must meet the following requirements:

- Be waterproof, tamper-evident, and tear-resistant;

- Be removable and sealable immediately upon removal without emptying or touching the contents;
- The contents of the inner liner must not be viewable from the outside when sealed;
- The size of the inner liner must be clearly marked on the outside of the liner (e.g., 5-gallon, 10-gallon, etc.); and
- The inner liner must bear a permanent, unique identification number that enables the inner liner to be tracked.

Drinking or eating directly in the area that the medications are being collected and handled should be avoided. Be sure to remove the gloves before handling any food or beverages. Anyone working with vehicles or lines of traffic at the collection site must wear a safety vest.

- **Record-keeping:** If possible, keep records of the medications and other items that are collected. The most common method is to report total pounds collected with the use of one property voucher at each site (i.e., “500 pounds of assorted medications”). Collection staff may also want to conduct a survey of participants to inquire why the medication is being dropped off, whose medication it was, age of the participant, prior method of disposal, and how did the participant learn about the event. See Appendix C. At the conclusion of the survey, information about preventing drug abuse and the local poison control center hotline could be distributed.

### **After the Collection**

- Medications should never be stored on-site after the event. Such storage creates too great a risk of theft.
- The local police department should be prepared to have the medications transported by a permitted waste hauler under police/DEA escort to an incinerator for destruction or transport the medications to an incinerator themselves.
- In Virginia, expired, unused, and unwanted medications that are collected from individuals through proper disposal methods are typically incinerated in regulated waste incinerators with controls for environmental safety and to minimize air emissions.

July 2015

## APPENDIX A

### LIST OF POTENTIAL PARTNERS FOR PROPER DISPOSAL OF UNWANTED MEDICATIONS

#### National and State Associations

American Association of Retired Persons – [www.aarp.org](http://www.aarp.org)  
American Dental Association – [www.ada.org](http://www.ada.org)  
American Hospital Association – [www.aha.org](http://www.aha.org)  
American Medical Association – [www.ama-assn.org](http://www.ama-assn.org)  
American Nurses Association – [www.nursingworld.org](http://www.nursingworld.org)  
American Pharmacists Association – [www.aphanet.org](http://www.aphanet.org)  
American Water Works Association – [www.awwa.org](http://www.awwa.org)  
Hospitals for a Healthy Environment – [www.h2e-online.org](http://www.h2e-online.org)  
National Association of Boards of Pharmacy – [www.nabp.net](http://www.nabp.net)  
National Association of Chain Drug Stores – [www.nacds.net](http://www.nacds.net)  
National Association of Drug Diversion Investigators – [www.projectdrugdrop.com](http://www.projectdrugdrop.com)  
National Community Pharmacists Association – [www.ncpanet.org](http://www.ncpanet.org)  
National Council on Patient Information and Education – [www.talkaboutrx.org/index.jsp](http://www.talkaboutrx.org/index.jsp)  
Pharmaceutical Research and Manufacturers of America – [www.phrma.org](http://www.phrma.org)  
Product Stewardship Institute – [www.productstewardship.us](http://www.productstewardship.us)  
Virginia Dental Association – [www.vadental.org](http://www.vadental.org)

#### Federal Agencies

Centers for Medicare & Medicaid Services – [www.cms.hhs.gov](http://www.cms.hhs.gov)  
Department of Health and Human Services – [www.hhs.gov](http://www.hhs.gov)  
National Oceanographic and Atmospheric Administration and Sea Grant – [www.noaa.gov](http://www.noaa.gov) and [www.seagrant.noaa.gov](http://www.seagrant.noaa.gov)  
U.S. Department of Housing and Urban Development – [www.hud.gov](http://www.hud.gov)  
U.S. Drug Enforcement Administration - [www.justice.gov/dea](http://www.justice.gov/dea)  
U.S. Environmental Protection Agency – [www.epa.gov](http://www.epa.gov)  
U.S. Fish and Wildlife Service – [www.fws.gov](http://www.fws.gov)  
U.S. Food and Drug Administration – [www.fda.gov](http://www.fda.gov)  
U.S. Consumer Product Safety Commission – [www.cpsc.gov](http://www.cpsc.gov)

#### State Agencies

Virginia Board of Pharmacy – [www.dhp.virginia.gov/Pharmacy](http://www.dhp.virginia.gov/Pharmacy)  
Virginia Department of Environmental Quality – <http://www.deq.virginia.gov/vpdes/Microconstituents.html>  
Virginia Department of Health Professions' Prescription Monitoring Program – [www.dhp.virginia.gov/dhp\\_programs/pmp/default.asp](http://www.dhp.virginia.gov/dhp_programs/pmp/default.asp)  
Virginia State Police – [www.vsp.state.va.us](http://www.vsp.state.va.us)

#### Local Government Agencies

Local Fire Department  
Local Health Department  
Local Police Department  
Local Sheriff's Department  
Local Senior Triad or Senior Advocate  
Local Wastewater Treatment Plant

#### Local Healthcare & Other Organizations

Environmental Groups (i.e., Chesapeake Bay Foundation, Hands Across the River, James River Advisory Council, Sierra Club)  
Family Practitioners  
Local Hospitals  
Local Pharmacies  
Poison Control Centers  
Public and Private Universities  
Regional Drug Free Alliance – Partners for a Healthy Central Virginia – [www.drugfreealliance.org](http://www.drugfreealliance.org)  
Religious Groups  
Veterinary Organizations

## APPENDIX B



- [Home](#)
- [Who We Are](#)
- [What We Do](#)
- [How We Know](#)
- [For Parents](#)
- [For Youth](#)
- [Get Involved](#)
- [Get Help](#)
- [Donate Now!](#)

### Prescription Drug Abuse

The abuse of prescription drugs and over-the-counter cough medicines is the fastest growing form of substance abuse. Locking your medications and disposing of unneeded medications are two important ways of helping prevent access to those who might abuse them.



**Contact Us**  
**Phone:** 804-796-7100  
**E-mail:**  
[safe@chesterfieldsafe.org](mailto:safe@chesterfieldsafe.org)

#### Other Resources

- [Medicineabuseproject.org](#)
- [Painfullyobvious.com](#)
- [Drugfree.org](#)
- [Stop Medication Abuse](#)

#### Medication Take Backs

The next Medication Take-Back is **Saturday, June 27, 2015 from 9am to 1pm at Ettrick Elementary School, 20910 Chesterfield Ave. Ettrick, VA 23803.**

Medication take-back events provide an environmentally safe way to dispose of unneeded medications and keep them from being diverted for possible misuse.

**What can you bring?** Expired and unused over-the-counter medications and prescription drugs. **NO NEEDLES/SHARPS!** Leave medications in original containers. Questions? Call SAFE at 796-7100.

Although take-backs provide the most environmentally friendly way to dispose of medications, if you can't make a take-back event, there are safe ways for you to dispose of your medications at home. [Learn how.](#)

The Chesterfield Police Department, in partnership with SAFE, has collected over 11,000 pounds of medications, from 3,365 citizens, since take-back events began in 2010.



*A woman with her grandson receives a free medication lockbox at a take-back. Click on the picture for lockbox information.*



*One person brought in this bucket of pills.*

Nationally, prescription drug abuse kills more teens than cocaine, heroin and methamphetamines combined.

The 2014 survey of youth in Chesterfield County revealed that the percentage of youths abusing prescription narcotics, stimulants, sedatives and tranquilizers is still above national averages, but the data does show some decline in the percentage of medication abuse among students since our 2012 survey. More Chesterfield youths are still abusing over-the-counter medications, such as cough medicine, more than are abusing prescription medications. Click [here](#) for helpful information about cough medicine abuse.

APPENDIX B



# Saturday November 13

The day to get rid of your stash!

Safely dispose of your  
unused & expired medicines.

70% of all people who abuse prescription drugs  
get them from friends or relatives

[www.americanmedicinechest.com](http://www.americanmedicinechest.com)

- » Bring your prescription,  
over-the-counter, & pet medicines
- » Leave medicines in original containers
- » Remove or mark out label information

**10am - 2pm**  
**Rockwood Park**  
**3401 Courthouse Road**  
**Richmond, VA 23236**

» Drive through and Drop off »

More information: 804-796-7100 or [chesterfieldSAFE.org](http://chesterfieldSAFE.org)



SPONSORED BY:



Prevent medicine abuse. Prevent accidental poisonings. Protect the environment.

## APPENDIX C

### Medication Disposal Event November 13, 2010 Rockwood Park

Your answers to these questions will help us plan future events. Thank you for your help!

1. **Your home zip code** \_\_\_\_\_
2. **Age** (check one)    \_\_\_ under 30        \_\_\_ 30-50        \_\_\_ over 50
3. **How did you learn about this event?** (check all that apply)  
\_\_\_\_ Radio  
\_\_\_\_ TV  
\_\_\_\_ Poster or flyer  
\_\_\_\_ Banners at Rockwood Park  
\_\_\_\_ Ads in newspapers or other publications  
\_\_\_\_ Internet or on SAFE's web site  
\_\_\_\_ Through my child's school  
\_\_\_\_ At work  
\_\_\_\_ Email, Facebook, Twitter  
\_\_\_\_ Word of mouth  
\_\_\_\_ Other: \_\_\_\_\_
4. **How have you been getting rid of your unwanted medicines in the past?** (check all that apply)  
\_\_\_\_ I hadn't gotten rid of any---just kept them in my home  
\_\_\_\_ Put them into my regular garbage  
\_\_\_\_ Flushed them down the sink or toilet  
\_\_\_\_ Gave them to other people who needed them  
\_\_\_\_ Returned them to the pharmacy  
\_\_\_\_ Returned them to my doctor's office  
\_\_\_\_ Other: \_\_\_\_\_

Your comments are welcome. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**THANK YOU!**