



OFFICE OF THE ATTORNEY GENERAL
COMMONWEALTH OF VIRGINIA

HOSTING A SUCCESSFUL PRESCRIPTION DRUG TAKE-BACK EVENT

A ROADMAP FOR LOCAL COMMUNITIES IN VIRGINIA

PREPARED BY ATTORNEY GENERAL KENNETH T. CUCCINELLI, II'S
PRESCRIPTION DRUG TAKE-BACK TASK FORCE

Community Coalitions of Virginia
Substance Abuse Free Environment, Inc.
Virginia Association for Hospices and Palliative Care
Alfred M. Jacocks, Jr., Retired Chief, Virginia Beach Police Department
Virginia Board of Pharmacy
Virginia Department of Environmental Quality
Virginia Department of Health Professions
Virginia National Guard Counter Drug Program
Virginia Department of State Police
Virginia Office of the Attorney General
Virginia Prescription Monitoring Program
United States Drug Enforcement Administration



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Introduction

More than 7 million Americans abuse prescription drugs, according to the 2009 Substance Abuse and Mental Health Services Administration's 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.

Currently, there are no legal means to transfer possession of certain prescription drugs for disposal. On October 13, 2010, the Secure and Responsible Drug Disposal Act of 2010 was signed into law. The U.S. Drug Enforcement Administration (DEA) will now develop regulations that will allow Americans to dispose of their expired, unused or unwanted prescription medications in a safe and responsible manner on any day. Until permanent regulations are in place, local communities need to continue to hold one-day take-back programs 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/waste/disposal.html>).

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. For example, since launching their Prescription for Safety Program (Rx4Safety) in 2010, Covanta Energy-from-Waste facilities have destroyed more than 30,000 pounds of unwanted medications free of charge from collections held by municipalities, community groups, and law enforcement agencies across the nation. Based on the program's success and encouragement by its partners and clients, Covanta Energy Corporation has decided to extend the program through the end of 2011.

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 § 1307.21. See Appendix B. The letter to the DEA requesting approval should be addressed to:

Ava A. Cooper-Davis
Special Agent in Charge
Drug Enforcement Administration
Washington Field Division
800 K Street NW
Suite 500
Washington, DC 20001

- **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 C.

- **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.

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 D. 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.

April 2011

APPENDIX A

LIST OF POTENTIAL PARTNERS FOR PROPER DISPOSAL OF UNWANTED MEDICATIONS

National and State Associations

State Agencies

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

Virginia Board of Pharmacy – 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
Virginia State Police – 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

Federal Agencies

Local Healthcare & Other Organizations

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

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
Religious Groups
Veterinary Organizations

APPENDIX B



Chesterfield County, Virginia Police Department

10001 Iron Bridge Road – P.O. Box 148 – Chesterfield, VA 23832-0148
Phone: (804) 748-1266 – Fax: (804) 748-6265 – Internet: chesterfield.gov



COLONEL Thierry G. Dupuis
Chief of Police

September 17, 2010

Ava A. Cooper-Davis
Special Agent in Charge
Drug Enforcement Administration
Washington Division
800 K Street NW, Suite 500
Washington, DC, 20001

Dear Ms. Cooper-Davis:

I would like to formally request your permission for the Chesterfield County Police Department, as a member of SAFE, our community's substance abuse prevention coalition, and in collaboration with the Virginia Poison Center, to hold a medication disposal event on Saturday, November 13, 2010, between the hours of 10 a.m. and 2 p.m. This will be held at Rockwood Park, 3401 Courthouse Road, which is centrally located and provides convenient and safe ingress and egress for citizens.

Chesterfield County is a large suburban county of 318,000 residents that borders the City of Richmond. We held a very successful event in April 2010 and we hope to coordinate our efforts in the future to coincide with the national medicine disposal event.

The Virginia Poison Center and SAFE will be handling the planning, advertising and logistics of the event and I have assigned Capt. Hal Moser to serve as liaison from the Police Department to SAFE and the Virginia Poison Center. Chesterfield County law enforcement officers will be present throughout the event and will have sole control over and possession of both controlled and non-controlled substances. At the end of the event they will follow departmental procedures for secure disposal of all items collected.

Since this event is only two months away, and much planning has already occurred, we would appreciate your prompt response. Thank you.

Sincerely,

Thierry G. Dupuis
Chief of Police

APPENDIX C



For immediate release
November 1, 2010

Contact:
Wayne Frith
(804) 516-1655
frith.safe@earthlink.com

AMERICAN MEDICINE CHEST CHALLENGE COMING TO CHESTERFIELD, COLONIAL HEIGHTS NOV. 13

Highlights of the national challenge will include medication take-back events at Rockwood Park and the Colonial Heights Community Building

CHESTERFIELD COUNTY, VA — On Saturday, Nov. 13, SAFE, Chesterfield County's substance abuse prevention coalition, will be coordinating the American Medicine Chest Challenge in Chesterfield County. The event also will take place in communities across the U.S. and will challenge residents to take the five-step American Medicine Chest Challenge:

- Take inventory of their prescription and over-the-counter medicines
- Lock their medicine chests
- Dispose of unused, unwanted and expired medicines in their homes or at an American Medicine Chest Challenge disposal site
- Take their medicines exactly as prescribed
- Talk to their children about the dangers of prescription drug abuse

SAFE, in collaboration with Chesterfield County police, will host a medication take-back event at Rockwood Park, 3401 Courthouse Road. A take-back event also will be held at the Colonial Heights Community Building, 157 Roanoke Ave., sponsored by the CADRE coalition and Colonial Heights police. Residents are encouraged to drop off any unneeded or expired prescription and over-the-counter medicines, including pet medicines, between 10 a.m. and 2 p.m.

The Virginia Poison Center, Regional Drug-Free Alliance, Chesterfield TRIAD and Richmond Family Magazine are also sponsors of the local American Medicine Chest Challenge.

The abuse of prescription and over-the-counter drugs is a growing problem throughout the U.S. Seventy percent of people who abuse medicines get them from friends or family, often without their knowledge. Medicine disposal events help people rid their homes of these medications in an environmentally responsible way.

Free medication lockboxes will be randomly distributed at the Chesterfield event to encourage locking up medications that you use.

For more information about the American Medicine Chest Challenge, visit www.americanmedicinechestchallenge.com or www.chesterfieldsafe.org, or call 804-796-7100.

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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

- » 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



SPONSORED BY:



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

APPENDIX D

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!