

## Medication Drop Boxes: Crafting a Safe Drug Take-back Program

Diversion of prescribed medications is a major public health problem, contributing heavily to the nation's ongoing opioid epidemic.<sup>1</sup> According to the Drug Enforcement Agency (DEA), more than 70 percent of those who abuse prescription drugs obtain them, usually willingly and for free, from friends or family members who have stockpiled leftover pharmaceuticals.<sup>2</sup> To help combat medicine-cabinet drug diversion, hospitals and clinics across the nation, in collaboration with the DEA, have initiated medication take-back programs. These efforts often feature on-site dedicated drug collection receptacles, more commonly known as "drop boxes." (See "Helpful Tips on Medication Take-back Programs" at right.)

By offering consumers a convenient, secure and anonymous means of discarding outdated and unwanted medications, drop boxes can help reduce haphazard disposal practices and illicit drug transfer and abuse. However, improper use and maintenance of collection receptacles creates a range of potential liabilities for healthcare settings, including theft, loitering and associated crime, environmental contamination and personal injuries due to exposure to toxic substances. This *AlertBulletin*® offers guidelines designed to make drug take-back programs both safer and more efficient, focusing on basic rules and policies, pilferage and tampering prevention, and compliant collection and disposal practices.

### HELPFUL TIPS ON MEDICATION TAKE-BACK PROGRAMS

A growing number of hospitals have launched medication take-back efforts intended to reduce the health and environmental impact accruing from improper disposal of unused medications. Such programs vary, reflecting available resources, partners and disposal options, as well as differing state and local regulations addressing collection, handling and transport of drugs. However, most such programs have certain features in common and may benefit from the following recommendations:

1. **Begin by determining the scope of the program.** Most hospital programs offer consumers multiple options for disposing of unwanted medications, including periodic take-back events, mail-back envelopes and permanent drop boxes.
2. **Register with the Drug Enforcement Agency (DEA)** if the medication take-back program accepts controlled substances. (See [page 2.](#)) [Registration materials](#) are available on the DEA's Diversion Control Division website.
3. **Partner with community-based organizations** – such as law enforcement agencies, retail pharmacies and narcotic treatment programs – to publicize the program and inform consumers about its rules and limitations.
4. **Participate in and help promote local [Prescription Drug Take Back Days](#),** part of a twice-yearly program sponsored by the DEA's Diversion Control Division.
5. **Create and distribute posters, flyers, pamphlets and other educational materials** about the benefits of safe medication disposal, including drug abuse prevention, public safety and environmental protection. (See the [sample consumer awareness posters and pamphlets](#) included in the DEA's National Prescription Drug Take Back Day Partnership Toolbox.)
6. **Educate individual patients about the drug collection program and its procedures** and document these face-to-face communications in the patient health information record.
7. **Survey take-back program participants,** in order to gauge satisfaction levels, detect problems and concerns, and solicit ideas for improvement.

<sup>1</sup> See Sanger-Katz, M. "[Bleak New Estimates in Drug Epidemic: A Record 72,000 Overdose Deaths in 2017.](#)" *New York Times*, August 15, 2018.

<sup>2</sup> See Morgan, D. "[Prescription Drug Abuse Abetted by Family Friends: Study.](#)" Reuters, April 24, 2012. The article also notes that, according to the Centers for Disease Control & Prevention, about three-quarters of all overdose deaths in the U.S. involve prescription drugs.

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Source: "[Lessons Learned: Voluntary Pharmaceutical Take-Back Programs in the Great Lakes States.](#)" Product Stewardship Institute, 2013.

## PROGRAM PARAMETERS

Medication take-back programs are designed for anonymous disposal of modest amounts of expired or unused household medications by consumers and patients. They are *not* intended for use by hospitals, clinics, physician offices, on-site pharmacies or other healthcare facilities, which are responsible for safely and appropriately managing their pharmaceutical waste in accordance with local, state and federal environmental regulations. This ban on institutional use should be clearly spelled out on receptacles and conveyed to hospital or clinic staff members.

**Generally permitted items.** Comprehensive drug collection programs typically accept the following prescription and over-the-counter medications:

- Pills, tablets and capsules.
- Liquids and nasal sprays, in quantities under 4 ounces or 120 milliliters.
- Creams, ointments and patches.
- Vitamins and other nutritional supplements.
- Sample pharmaceuticals.
- Pet medications.

**Prohibited items.** The following highly toxic, volatile, non-pharmaceutical, and/or potentially contaminated or illegal items *cannot* be disposed of in medication drop boxes:

- Illicit drugs.
- Chemotherapy-type agents.
- Aerosol cans or inhalers.
- Hydrogen peroxide and alcohol.
- Needles, lancets and injectables.
- Medical devices, e.g., glucometers, blood pressure cuffs, etc.
- Medical device batteries.
- Thermometers and other mercury-containing instruments.
- Biological waste.
- Non-medical chemicals, such as cleaning products.

**Controlled substances.** In order to collect discarded opioids and other narcotics, hospitals and clinics must have an on-site pharmacy and register with the DEA, pursuant to the DEA Secure and Responsible Drug Disposal Act of 2010. Federal regulations permit eligible healthcare facilities to administer a mail-back program; maintain receptacles for controlled substances listed in Schedule II, III, IV or V; and collect controlled and non-controlled drugs together. (To see the provisions of the 2010 act, visit [“Disposal of Controlled Substances, Final Rule”](#) in the Federal Register.)

## PHYSICAL SAFEGUARDS

Drop boxes should display essential explanatory information and consumer alerts, and be equipped with certain safety features to prevent tampering, theft and personal injury. When installing a collection receptacle, ensure that it ...

- **Is in a well-lit area** free of obstructions and tripping hazards.
- **Is mounted in plain view** of nursing staff and/or security personnel.
- **Is securely attached** to the floor or lobby wall.
- **Has a one-way deposit drawer** and lockable side door.
- **Contains an inner liner** that cannot be removed through the deposit drawer opening.
- **Prominently lists acceptable items**, as well as prohibited ones.
- **Clearly describes the process** for depositing expired and unused medications.

For optimal theft prevention, consider installing a security camera near the drop box.

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## COLLECTION AND REMOVAL PROTOCOLS

To maximize safety and efficiency and reduce potential liability, medication take-back programs must be supported by formal policies governing the deposit, removal and disposal of surplus and expired drugs. The following suggested guidelines can be adapted as necessary:

- **Require that pills and tablets be placed in a sealed container of some kind**, either in the original bottle or a resealable plastic bag.
- **Request that liquids, gels and creams be kept in the original container**, which is then placed in a resealable plastic bag.
- **Direct consumers to remove personal information from medication containers** or blot out identifiers with a permanent marker, in order to protect their privacy.
- **Advise consumers to recycle empty pill bottles** or other containers whenever possible.
- **Designate well-trained staff members or pharmacists to periodically remove the collected drugs** from the receptacle, typically at least twice a month.
- **Educate designated employees about sharps-related injuries** and other hazards associated with emptying drop boxes.
- **Train staff members to take necessary precautions in handling discarded medications** and to implement response protocols in the event any hazardous, biomedical or infectious waste should spill. Document the dates of all training sessions and the names of the attendees.
- **Record the number of items in each collection** and the total weight for program documentation, planning and evaluation purposes. (Use a [standard reporting format such as this one](#), scrolling down to page 48.)

- **Sort the collected items by category** – i.e., acceptable or unacceptable, controlled or non-controlled – and record and track the names of medications, as well as the quantities originally dispensed (if known) and the amounts disposed of.
- **Contact a regional DEA agent for assistance with the safe disposal of controlled substances and other collected drugs.** Dumping pharmaceuticals in landfills or flushing them into sewer systems is an environmentally unsound practice and is strictly prohibited.

Medication drop boxes are both an important public health tool and a source of risk to hospitals, clinics and other healthcare settings. By drafting and enforcing formal policies that accord with all relevant regulations and statutes, leadership can help minimize organizational liability, facilitate proper disposal of unused and expired pharmaceuticals, and reduce the potential for drug abuse and environmental damage.

### QUICK LINKS

- [Disposal of Unused Medicines: What You Should Know](#). U.S. Food & Drug Administration (FDA). Last updated December 18, 2018.
- [Drug Disposal Information](#). U.S. Department of Justice, Drug Enforcement Administration, Diversion Control Division.
- [Medicine Disposal: Questions and Answers](#). FDA, updated September 27, 2018.



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