



COMMONWEALTH of VIRGINIA

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MEMORANDUM

TO: The Honorable Rosalyn R. Dance
Chair, Joint Commission on Health Care

Members of the Joint Commission

FROM: Caroline D. Juran, RPh
Executive Director
Board of Pharmacy

A handwritten signature in black ink, appearing to read "Caroline D. Juran".

DATE: September 30, 2019

RE: Report on effort to promote drug disposal pursuant to the 2019 Appropriations Act

As specified in Item 299, Subsection B of the 2019 Appropriations Act, the Board of Pharmacy was required to report by October 1, 2019 on state and local efforts to promote proper drug disposal methods. Accordingly, we are providing a copy of the report for your review.

This request follows the October 2018 comprehensive report compiled by the Joint Commission entitled, *Pharmacy Drug Disposal Program*. This report is intended to address the enhancement of public awareness of proper drug disposal methods.

We appreciate your review of the report and are available to answer any questions you may have or provide additional information if necessary.

State and Local efforts to Promote Proper Drug Disposal Methods

Authority for Study:

The 2019 General Assembly Budget Bill, Item 299 section B, requires that the Board of Pharmacy report to the Joint Commission on Health Care by October 1, 2019, on state and local efforts to promote proper drug disposal methods, including existing community-based collection and disposal efforts.

Staff for the Study:

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State and Local efforts to Promote Proper Drug Disposal Methods

The 2019 General Assembly Budget Bill, Item 299 section B, requires that the Board of Pharmacy report to the Joint Commission on Health Care by October 1, 2019, on state and local efforts to promote proper drug disposal methods, including existing community-based collection and disposal efforts.

This request follows the October 2018 comprehensive report to the Governor and General Assembly compiled by JCHC titled, *Pharmacy Drug Disposal Program* which is filed as RD272 (2019).¹ This report presented two JCHC approved options:

- Introduce legislation to amend §54.1-3319 of the Code of Virginia to add counseling on medicine disposal to the list of topics on which pharmacists may counsel persons who present a new prescription for filling
- Introduce legislation (Uncodified Act) directing the Board of Pharmacy to work with stakeholders to determine ways to enhance public awareness of proper drug disposal methods, including existing community-based disposal and collection opportunities.

According to the report, the information required by the budget amendment is intended to address the second option, the enhancement of public awareness of proper drug disposal methods.

Virginia's statewide and local efforts to decrease the availability of divertible drug doses are diverse and widespread. Efforts to both increase access to proper disposal and to decrease the supply prescribed are described below.

Board of Pharmacy Efforts

The Board of Pharmacy updated Guidance Document 110-47 March 29, 2018. Through it, the Board of Pharmacy continues to recommend that pharmacists verbally counsel or provide written information to patients (or their agents) receiving drugs in Schedules II-V and any drugs of concern, and on the importance of proper storage and disposal of unused drugs. The document includes active links to printable educational materials for this purpose. The guidance document continues to be linked from the Virginia Pharmacists' Association site.²

The Board of Pharmacy included in its August 2019 e-newsletter a link to the FDA's new opioid disposal resource, the Safe Opioid Disposal-Remove the Risk Outreach Toolkit, through the article, *FDA Releases Toolkit to Help Promote Safe Opioid Disposal*. The e-newsletter is distributed to over 15,000 licensed pharmacists and nearly 15,000 pharmacy technicians in the Commonwealth. Also included in the article was the National Association of Boards of Pharmacy's Drug Disposal Locator tool available in the AWARe section of the NABP website. Over 6,500 disposal sites are listed in this continually updated database.

¹ RD272 - Pharmacy Drug Disposal Program <https://rga.lis.virginia.gov/Published/2019/RD272>

² <https://virginia-pharmacists.org/2018/04/new-updated-board-pharmacy-guidance-documents/>

Board Regulation 18VAC110-20-211 specifies requirements for a narcotic treatment program, hospital, or clinic with an on-site pharmacy to serve as an authorized collector of previously dispensed drugs for the purpose of destruction. It requires the authorized collector to first notify the board of its willingness to serve in this capacity. To assist the public in identifying an authorized collector, the Board maintains a list of Authorized Collectors of Drugs for Destruction on its website (<https://www.dhp.virginia.gov/Pharmacy/destructionsites.asp>). This list is updated regularly as information is received from current or potential authorized collectors.

The website also has a link to the FDA guidance on this subject (<https://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm>).

The Department of Health Professions is in the midst of a complete redesign of their website. The new Board of Pharmacy site will be more intuitive, more user-friendly and will feature an enhanced section for both dispensers and the public on drug disposal. The new site will be active by the end of the year.

Department of Health Profession Efforts

The Department of Health Professions actively supports biannual Drug Take-Back Days hosted by the Drug Enforcement Administration. The Agency Director posts an announcement and letter on the Agency website, provides banners and visuals for posting on the Agency Intranet, and copies of the letter are disseminated by the boards electronically to their licensees.

In addition to the Board of Pharmacy, other individual boards, through both regulation and publication, promote proper drug disposal methods. The Board of Medicine Regulations Governing the Prescribing of Opioids and Buprenorphine became final August 2018. By regulation, prior to initiating opioid treatment for chronic pain, the prescriber is required to include in discussions with the patient the patient's responsibility for, "securely storing the drug and properly disposing of any unwanted or unused drugs."³

The Board of Veterinary Medicine's Opioid Regulations contain a similar admonition:

Prior to prescribing or dispensing a controlled substance, the veterinarian shall document a discussion with the owner about the known risks and benefits of opioid therapy, the responsibility for the security of the drug and proper disposal of any unused drug.⁴

The BOVM prepared a flier for licensees to use when counseling clients about proper drug disposal that is readily available and can be reproduced for distribution.⁵

Virginia Departments of Health and Behavioral Health and Developmental Services

³ Regulations Governing Prescribing of Opioids and Buprenorphine, 18VAC85-21-60(B)

⁴ 18VAC150-20-174(C)

⁵ https://www.dhp.virginia.gov/vet/docs/VetMedOpioidFlyer_PrintVersion.pdf

As noted in the 2019 JCHC report, VDH and DBHDS implement agency-level initiatives to encourage appropriate medicine disposal. Using funds from the federal Opioid Prevention, Treatment – Recovery (OPT-R) grant (2018-2019), DBHDS distributes medicine deactivation packets, prescription medicine lock boxes for consumers, and smart pill bottles. DBHDS reports that over 200,000 individuals were served through nearly 700 encounters during the first year of funding. Tabulated encounter data appears as Appendix 1. VDH’s local offices also offer medicine destruction pouches free-of-charge to consumers.⁶

The Commonwealth of Virginia

Attorney General Mark Herring’s office produced a one-pager on prescription drug abuse and proper disposal.⁷ It details easy-to-understand tips for proper disposal. It also cautions against disposal of medications in toilets or sinks and against sharing medications with friends and family.

Community Efforts

According to their website, The Project Stewardship Institute (PSI) seeks to ensure that those who design, manufacture or sell consumer products take responsibility for reducing negative impacts to the economy, environment, or public health. A national group, in Virginia drug take-back is a major PSI focus.⁸ Their website offers links to collection sites in police stations, law enforcement facilities, and pharmacies. It also contains active links to national resources including the DEA, National Association of Boards of Pharmacy Foundation’s AWARe platform, National Community Pharmacists Association (DisposeMyMeds, a tool to locate pharmacy-based drug take-back locations), and the Walgreens Pharmacy Kiosk Program. The Walgreen’s safe medication disposal program has placed over 1000 disposal kiosks nationwide, 30 of those are in Virginia.

NABP’s Foundation program, AWARe, produces a drug safety news publication that is distributed bi-weekly. A recent edition (July 25, 2019) included an article titled *Grandparents Urged to Secure Medications When Visiting or Hosting Grandchildren*. The article noted that in a recent survey in Michigan that 72% of respondent grandparents admitted to keeping medications in a purse or bag when visiting grandchildren.⁹

The Community Coalitions of Virginia (CCoVA) participates with The Urgent Love Initiative¹⁰. This is a nonprofit initiative spanning 26 counties. One of the goals of the program is to place a drop box in every pharmacy in the catchment area. Through their work, any locally owned (independent or franchise) pharmacy in the state is able to secure everything to place and maintain an on-site drop box for as little as \$50/month with a three year contract. It is incrementally more expensive for high-traffic pharmacies. Everything is included that is required for DEA

⁶ RD272, page 3

⁷ <http://www.oag.state.va.us/files/Tips.pdf>

⁸ <https://www.productstewardship.us/page/1059#>

⁹ <https://www.uspharmacist.com/article/grandparents-medications-arent-secure-enough-when-grandchildren-visit>

¹⁰ <https://www.urgentlove.org/>

compliance: the stainless steel box, shipping it to the pharmacy, the box liners for collection, the shipping cost and destruction of the medications. The size of the stainless steel box that a pharmacy receives is tailored to the pharmacy based on their anticipated volume. The pharmacy receives instructions on how to amend their pharmacy *dispensary* license to allow for *collection*. Urgent Love Placed their first box at Market Street pharmacy in New Castle in May. Mr. Walter Boyle is the local contact.

Arlington County accepts unused, unwanted, or expired medications any day at any time at three locations.¹¹ The service is anonymous and free.

The Bedford County Sherriff's office partners with CVS to provide a no-charge drug collection box that is available round the clock under video surveillance.¹²

Fairfax County has drop boxes at 15 of the 242 pharmacies in the county and at all police stations. The Fairfax County Health Department developed a brief survey for pharmacies in the county in an attempt to identify barriers to the provision of storage or disposal information. Dr. Ben Schwartz is the Fairfax County contact for their drug disposal efforts.

The Loudoun County website prominently features drug disposal methods.¹³ It provides the location of six non-pharmacy drop locations, information on other ways to safely dispose of medication, a printable flier, as well as other information.

Roanoke County dedicates a website page to drug take-back.¹⁴ A prescription drug take-back box placed in the lobby of the Roanoke County Sherriff's office collected 98 pounds of drugs in the first 6 months.

In Rockingham County, the sheriff's office accepts unused prescription drugs any time, which are destroyed in accordance with federal and state guidelines.¹⁵

The city of Virginia Beach has four permanent collection sites available year-round to collect medications and medical sharps.¹⁶ The items are incinerated under the supervision of police personnel in a way that is both environmentally sound and prevents drugs and sharps from diversion.

The Winchester Police department also has a page on their website dedicated to medication disposal.¹⁷

¹¹ <https://recycling.arlingtonva.us/household-hazmat/unwanted-medications/>

¹² <http://bedfordcountysheriff.org/citizen-services/got-drugs-prescription-take-back/>

¹³ <https://www.loudoun.gov/347/Proper-Disposal-of-Unused-Medications>

¹⁴ <https://www.roanokecountyva.gov/1748/Drug-Take-Back-Program>

¹⁵ <http://www.rcso-va.com/drug-take-back.html>

¹⁶ <https://www.vbgov.com/government/departments/communications-office/fact-or-fiction/Pages/Drug-Takeback-Program.aspx>

¹⁷ <https://winchesterpolice.org/safe-disposal-of-meds>

Colleges and universities publicize the need for safe, secure drug disposal and have established drug take-back programs for students, employees, and community members. Virginia Tech accepts unwanted drugs anonymously any time and any day.¹⁸ The University of Virginia has set up a 24-hour drug disposal site in the lobby of the Educational Resource Center.¹⁹

The drug disposal issue has also attracted media interest. The Richmond Times-Dispatch carried a comprehensive article on April 15, 2019: *Here are safe ways to get rid of expired, unused medicine*. The article detailed four options including returning them, disposal kits, mailing them, and throwing them out and included the appropriate how-to directions for each option.

Keen interest in drug disposal stems from data that shows that two-thirds of individuals who develop opioid use disorder started with a prescription medication. Many of these were obtained from medicine cabinets of friends or family. A primary way to limit what must be disposed is through curtailing prescriptions and dispensing. Public awareness, prescriber awareness, and the regulations have all contributed to a decrease in the number of prescription doses of opioids available. Overall, there was a 30% decrease in the number of opioid doses dispensed between January 2017 and June 2018 (29 million to 20 million)²⁰. That number is continuing to fall. In the same period, dispensed sedative doses fell 18%, tranquilizers fell 16%, and stimulants fell 4%.²¹

In the Commonwealth, both the public and the private sectors have directed resources to decreasing the availability of unused prescribed medications. In addition, significantly fewer doses of potentially addicting medications are being prescribed and dispensed.

¹⁸ <https://police.vt.edu/vtpd-services/drug-take-back-program.html>

¹⁹ https://www.dailyprogress.com/news/local/uva-sets-up--hour-drug-disposal-site/article_195d122a-3079-11e8-9f62-53f0eba6d223.html

²⁰ 2018 Annual Report Virginia Prescription Monitoring Program, page 10.

<http://www.dhp.virginia.gov/media/dhpweb/docs/pmp/reports/2018AnnualReport.pdf>

²¹ *ibid*

Appendix 1

DBHDS Drug Disposal Activities and Awareness Marketing

Activity Count (07/01/2018 to 06/30/2019)

Where Funding Source is Virginia SOR

Working off cached data - not live

	Total Activities
Drug Deactivation Packets	24
Drug Take Backs	2
Lock and Talk	5
Media Campaign	19
Multi-Agency Collaboration / Coalition	12
Naloxone Trainings	26
Non-Evidence Based Program	30
Prescription Drug Lock Boxes	22
Rx Bag Stickers	1
Services to Communities/Volunteers	2
Targeted Media Messaging i.e, parents of adolescents, Senior Citizens, Pregnant Women	5
Undefined	523
TOTAL	671

Number Served (07/01/2018 to 06/30/2019)

Where Funding Source is Virginia SOR

And Outcome Type is Media Generated or Services Provided or Community Action or Community Change

Working off cached data - not live

	Youth	Adults	Unknown	Total
Drug Deactivation Packets	46	3,046	-	3,092
Drug Take Backs	-	55	-	55
Lock and Talk	-	268	7	275
Media Campaign	7,039	47,792	-	54,831
Multi-Agency Collaboration / Coalition	-	137	-	137
Naloxone Trainings	105	358	-	463
Non-Evidence Based Program	5,888	112,406	-	118,294
Prescription Drug Lock Boxes	1	719	-	720
Rx Bag Stickers	5,007	14,993	-	20,000
Services to Communities/Volunteers	-	99	-	99
Targeted Media Messaging i.e, parents of adolescents, Senior Citizens, Pregnant Women	1,624	38,343	2	39,969
TOTAL	19,710	218,216	9	237,935

References

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