

# **Texas Medication Cleanout™**

## **How We Got Started & What We've Learned**

Jeanie Jaramillo, PharmD and Ronica Farrar, EMT-P

**Program History:** Began in 2003.

**Program Funding:** Poison prevention funds and grant funds.

### **How did your program get started?**

As staff at our regional poison control center, we began researching specifics for take-back programs in 2003 as a poison prevention effort. What we found at that time was that there was not a lot of information out there and what was available was limited and usually specific to other states. We continued to research the topic utilizing our fourth year pharmacy student interns, making “baby steps” of progress each year. In early 2009, our city’s school district contacted the pharmacy school and expressed an interest in a partnership to host a take-back event. Fortunately, the poison center is affiliated with the pharmacy school and since I am a faculty member, the intermediary contact was aware of my interest in a program. We conducted a meeting with our poison center staff, school district staff, and city management personnel.

### **What challenges have you faced getting started?**

#### **Top Challenges**

- 1. Finding a waste management vendor that could or would accept medications from a community take back program for disposal.**
- 2. Determining whether hazardous waste requirements were applicable and if so how and which ones.**
- 3. Obtaining law enforcement buy-in.**
- 4. Funding.**

### **How did you overcome these hurdles?**

A set of stakeholders at the table initially proposed having dumpsters from behind a local superstore brought to the front parking lot and to have participants drive by and dispose of their meds in the dumpster. The rationale was that, in this way, no one would be “taking possession” of the meds and no laws would be violated. Then at the end of the day, a city waste collection truck would pick up the dumpster, transport it to the landfill, deposit and immediately bury the contents. This invoked some immediate concerns from poison center staff; a call to the State Board of Pharmacy confirmed that this would still be considered “taking possession” of others’ meds and thus a violation of the law. In addition to this obstacle, we wanted to push for a program model that would facilitate the collection of data for academic purposes and to support change to prescribing and marketing practices.

Because previous attempts (2-3 years prior) to gain law enforcement support had failed, we decided to approach the City Commission in an effort to gain support. We presented a PowerPoint to the City Commission and provided statistics related to poisoning, drug abuse,

misuse, and environmental contamination. The City Commission supported our efforts and subsequently requested that the police department assist with a program. We believe that presenting at the City Commission meeting and gaining support of its members was instrumental in developing future successful partnerships. The police department agreed to provide officers for a take-back event thereby allowing us to collect both controlled and non-controlled substances.

Our initial request to a local hospital for assistance with medication disposal was declined since we were unable to provide a financial estimate of related disposal costs. At that point, we went to our university's safety department to determine if we could utilize their contracted waste management service. The director was very supportive and was able to, after much negotiation, obtain an agreement of the waste management vendor to accept medications from a community take-back event. Since the collection items would be generated from households only, the waste management vendor was exempt from the hazardous waste requirements of the Resource Conservation & Recovery Act. However, we still had to consider state and local requirements. This was difficult as we were asking questions that had never been asked before. Provisions existed within the Texas Administrative Code regarding hazardous waste. Ultimately, it was determined that a take-back event would be exempt from these provisions if the collection of hazardous pharmaceutical components amounted to less than 100 pounds per year. These components could include pharmaceuticals such as nicotine patches, warfarin tablets, and nitroglycerin.

We encountered another hurdle with the Drug Enforcement Administration. Local representatives referred us to regional representatives -- who referred us to national -- who then referred us back to regional representatives. The concept was relatively new to our representatives so there was no real consensus on how to manage take-back event requests. Ultimately, we were told that requirements for notification of take-back events, or the lack thereof, were at the discretion of each Special Agent in Charge (SAC) and that our SAC did not require formal notification. They did state that in order for an event to be legal, law enforcement had to be involved and that law enforcement agency/entity had to have a policy in place for the secure storage (maintenance of custody) and disposal of controlled substances. As time has passed, our DEA representatives now request formal notification for events to include contact information for the participating law enforcement agency.

### **Suggestions for broadening community support**

- 1. Reach out to relevant groups**
- 2. Provide referenced statistics to stakeholders**
- 3. Provide information to law enforcement regarding the link between prescription drug abuse/misuse and criminal activity.**
- 4. Provide drug abuse/misuse statistics to school districts or drug prevention entities.**
- 5. Detail your information to the specific agency's interest**

## Texas Medication Cleanout™ Coalition

Group	Responsibilities
<b>Texas Panhandle Poison Center of Texas Tech University Health Sciences Center's School of Pharmacy</b>	<ul style="list-style-type: none"><li>• Event development, implementation, logistics, volunteers, coordination, disposal vendor, safety plan.</li></ul>
<b>Amarillo Independent School District</b>	<ul style="list-style-type: none"><li>• Marketing to parents &amp; community, planning, material distribution, use of print shop, partial funding through <i>Safe Schools/ Healthy Students</i> program.</li></ul>
<b>Amarillo Police Department</b>	<ul style="list-style-type: none"><li>• Officers to staff events, controlled substance removal, secure storage, destruction, security for events, assistance with planning.</li></ul>
<b>City of Amarillo</b>	<ul style="list-style-type: none"><li>• Approved the program and police department's involvement.</li></ul>
<b>Local businesses</b>	<ul style="list-style-type: none"><li>• Complimentary or discounted food for volunteers, paper bags for medication collection, cones and traffic flow assistance, internet provider for wireless access.</li></ul>