

## Controlled Pharmaceutical Waste Disposal Guideline

### Procedure regarding unclaimed drugs or medications.

#### Current Policy:

#### 516 STUDENT MEDICATION AND TELEHEALTH

#### F: Procedure regarding unclaimed drugs or medications

3. If the unclaimed or abandoned prescription drug is a controlled substance as defined in Minnesota Statutes, section 152.01, subdivision 4, the school district or school personnel is prohibited from transporting the prescription drug to a drop-off box or collection site for prescription drugs identified under this paragraph. The school district must request that a law enforcement agency transport the prescription drug or medication to a collection bin that complies with Drug Enforcement Agency regulations, or if a site is not available, under the agency's procedure for transporting drugs.

#### Idea #1 : Addendum to the school policy

#### Addendum:

3. If the unclaimed or abandoned prescription drug is a controlled substance as defined under Minnesota Statutes section 152.01, subdivision 4, the school district or school personnel is prohibited from transporting the prescribed drug to a drop off box or collection site for prescription drugs identified under this paragraph. **The school district may destroy or dispose of controlled substances in a pharmaceutical waste disposal container with two staff witnesses. The two staff witnesses will document the student's name, medication, time of event, and include the staff witnesses' name. The school district may request that a law enforcement agency transport the prescription drug or medication to a collection bin that complies with Drug Enforcement Agency regulations, or if a site is not available, under the agency's procedure for transporting drugs if the controlled substance does not fit in pharmaceutical waste disposal container.**

#### References:

<https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>

Most products marketed for on-site drug destruction are intended to meet DEA requirements for controlled substances destruction and Minnesota Board of Pharmacy (Board) requirements for legend (prescription) drugs destruction. On-site drug destruction products may not be assumed to render unevaluated or hazardous waste pharmaceuticals non-hazardous under MPCA requirements nor allow you to throw them into the normal trash without evaluation. See Destruction versus disposal on page 7 and Treating pharmaceutical waste at your site on page

18. The MPCA can provide no guidance on whether these products meet DEA or Board standards or are approved for use by the DEA or Board. Only the DEA and Board can answer these questions. See More information on page 21. If you use an on-site drug destruction products to destroy your controlled substance or legend drug wastes for on-site safety reasons, you must manage the resulting mixture as a fully regulated hazardous waste unless you have evaluated it as non-hazardous. A marketing claim that the product renders pharmaceuticals 'inert' or 'safe' is insufficient and may not take the place of evaluation.

<https://www.pca.state.mn.us/sites/default/files/w-hw4-52.pdf>

Pharmaceuticals Schools may come into possession of student pharmaceuticals when they are abandoned at the end of the academic year or when they are confiscated from students. The MPCA recommends that schools first attempt to return pharmaceuticals to students' legal guardians when possible.

Student pharmaceuticals are divided into three categories:

- Non-prescription, also known as 'over-the-counter' (OTC), medications, such as aspirin and ibuprofen
- Prescription, also known as 'legend', medications, such as asthma inhalers and insulin
- Controlled substances, sometimes incorrectly overgeneralized as 'narcotics', such as many attention deficit disorder (ADD/ADHD) and anti-anxiety medications

Schools are strongly discouraged from sewerage any pharmaceuticals for disposal. Sewered pharmaceuticals are not actually treated, but are simply diluted and discharged unchanged into Minnesota lakes and rivers. School staff may transport both non-prescription and prescription pharmaceuticals to a Household Pharmaceutical Collection Site (HPCS), commonly known as a 'Take It To the Box' program, or a 'dropbox', at a participating pharmacy or law enforcement agency for disposal. You may search for HPCSs near your location using the tool on the MPCA's Managing unwanted medications webpage at:

<https://www.pca.state.mn.us/living-green/managing-unwanted-medications>.

Do not report pharmaceutical or vaping-related wastes to the MPCA or Metro County or on your site's annual hazardous waste license application, and do not count them towards the site's hazardous waste generator size.

Only law enforcement agencies may transport controlled substances from schools for disposal. The MPCA recommends that schools work through their school resource officers (SROs), if available, or contact local law enforcement agencies to request pick up and disposal. Non-prescription and prescription pharmaceuticals may also be taken by law enforcement agencies. While law enforcement agencies are not required to provide this service, some will reduce the availability of unwanted drugs in the community. Many regions of the state also are served by multi-agency drug task forces, which may be willing to assist schools if local law enforcement agencies decline. Do not report controlled substance wastes to the MPCA or Metro County and do not count them towards the site's hazardous waste generator size.

Schools may also choose to use an on-site drug destruction product. Schools must determine whether any such product they use meets any applicable U.S. Drug Enforcement Administration (DEA) and Minnesota Board of Pharmacy (Board) requirements for controlled substance destruction; the MPCA cannot make this determination. See the On-site drug destruction products entry in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care issues, at: <https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>.

Idea #2: Create a guideline

**Pros:**

It could be initiated quicker, we could use them quicker

**Cons:**

It may contraindicate the current school policy.

We would maybe need to connect with a lawyer for staff protection if we go with a guideline vs policy change.