

PharmacyUpdate

New York State Department of Health

Summer 2010

Bureau of Narcotic Enforcement

Pharmaceutical Collection Events

Pharmaceutical collection events serve to keep potentially harmful medications out of the hands of children. The New York State Department of Health's Bureau of Narcotic Enforcement (BNE) encourages communities to sponsor such events to help prevent diversion of controlled substances. Pharmacies can be a part of the solution by either sponsoring an event or passing on information about scheduled events to patients.

BNE is responsible for approving the manner and detail of disposal/destruction of controlled substances by those entities registered by the federal Drug Enforcement Administration (DEA), as well as those licensed by the Department. Similarly, disposal of household pharmaceuticals is guided by the New York State Department of Environmental Conservation (DEC). DOH and DEC have developed a collaborative approval process for community-sponsored pharmaceutical collection events as one method of ensuring proper pharmaceutical disposal that both protects the environment and minimizes the potential for diversion. While pharmaceutical collection events have, to date, been limited to the disposal of household pharmaceuticals, the disposal of pharmaceutical waste generated by facilities/programs licensed by DOH as Class 3A Institutional Dispensers Limited may now also be managed at such events, subject to very specific conditions and approvals.

The pharmaceutical collection event application process imposes reasonable requirements and procedural safeguards to ensure that controlled substances surrendered are not subject to diversion. Specifically, law enforcement must be on-site at all times during each event and take immediate possession of all controlled substances surrendered for subsequent disposal.

Since the inception of the pharmaceutical collection event program, it has been the preference of BNE that licensed pharmacists be involved in the events to identify and inventory controlled substances. BNE's goal has been to ensure that any controlled substances surrendered to law enforcement for subsequent disposal are accurately identified and accounted for. However, in cases where law enforcement takes possession of *all* pharmaceuticals (both controlled and non-controlled) surrendered at an event, the identification and inventorying of controlled substances becomes essential only for purposes of evaluation. Accordingly, the involvement of a pharmacist is not required (but most certainly welcomed). If law enforcement takes possession of controlled substances only, the participation of a licensed pharmacist is required to ensure that the controlled substances are accurately identified and not integrated with any non-controlled substances collected.

Pharmaceutical collection events require approval by DOH and DEC, as well as approval by DEA.

The Application to Conduct a Pharmaceutical Collection Event (Controlled Substances) and associated instructions can be found on the DOH website at www.nyhealth.gov/professionals/narcotic.



National Drug Take Back Initiative

The Drug Enforcement Administration is coordinating a National Take Back Day with state and local law enforcement agencies on September 25, 2010. The program provides an opportunity for law enforcement, prevention, treatment and the business community to collaborate to establish safe collection sites for the public to surrender expired, unwanted or unused controlled substances. Questions about the National Take Back Day can be directed to:

**U.S. Department of Justice
Drug Enforcement Administration
New York Division
99 Tenth Avenue
New York, New York 10011
(212) 337-1193**



**NEW YORK STATE DEPARTMENT OF HEALTH
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