To: Iowa Board of Pharmacy

From: Iowa Pharmacy Association

Date: December 28, 2015

RE: Request to Modify Contract for Medication Disposal

The Iowa Pharmacy Association (IPA) is submitting this request for additional funding in the amount of $50,000 as part of the Pharmaceutical Collection and Disposal (Drug Take-Away Program contract with the Iowa Board of Pharmacy. Pursuant to Section 8.2 of the current contract, IPA-2016, with the Iowa Board of Pharmacy, IPA is seeking the support of the Board of Pharmacy to amend the contract budget (Section 5).

As background, the Board of Pharmacy approved to increase the legislative allocation for medication disposal funding by $50,000 at their March 2014 meeting. This approval was made following a presentation by IPA on the history of the medication disposal program, growth of the existing program and anticipated growth as medication disposal programs would be expanded to include controlled substances. The original proposal for the 2015-2016 program was submitted by IPA to the Board of Pharmacy on June 5, 2015 for $125,000 prior to the passage of S.F. 505, for which Sec. 74. Section 155A.43, Code 2015 was passed by the legislature and signed by Governor Branstad. With this amended legislation, the Board of Pharmacy may allocate no more than $175,000 to provide for the administration and management of a pharmaceutical collection and disposal program.1,2

**PROPOSED BUDGET AMENDMENT**

|  |  |  |  |
| --- | --- | --- | --- |
| **AMENDED Contract Expenses** |  | Board of Pharmacy Funding | In-Kind / Match from Pharmacies |
| TakeAway Systems |  |  |
|  | *100 TakeAway systems* | $13,333 |  |
|  |  |  |  |
| Controlled Substance Collection & Disposal |  |  |
|  | *Purchase of MedSafe (10 pharmacies) + DEA-compliant liners (one pack of 4)* | $21,500 |  |
|  | *Installation of MedSafe unit* |  | $1,000 |
|  | *Additional MedSafe liners (packs of 4)* |  | $3,825+ |
|  | *TakeAway envelopes for Controlled Substance mailback* | $5,167 | $5,167+ |
|  |  |  |  |
| Marketing  |  |  |
|  | *Pill Dude Mascot (3 costumes)* | $3,000 |  |
|  | *Update Marketing Materials to pharmacies* | $5,000 |  |
|  | *Controlled Substance Disposal Marketing* | $2,000 |  |
|  |  |  |  |
| Total |  | $50,000 |  |

**AMENDED BUDGET NARRATIVE**

*100 TakeAway Systems:*

Over the past several years, IPA has experienced substantial growth in the current TakeAway program, which collects only non-controlled substances. In the past three contract years with the Board of Pharmacy, IPA has reported the current funding did not cover the anticipated expenses by one month (contract year 2013-2014), three months (2014-2015), and expected 3-4 months (2015-2016). During these periods when funding had been depleted, IPA informed pharmacies that they could purchase a TakeAwayunit*.* Out of an estimated 200 requests during the four month lapse, only two pharmacies paid for additional TakeAway units.

From growth in the number of participating pharmacies and growth in amount of pounds collected by each pharmacy, IPA has worked collaboratively with the Board of Pharmacy to share growing concern over the sustainability of the current TakeAway program. This shared concern led to the passage of S.F. 505 in 2015.

Based on shortages from the past two years, IPA estimates 100 additional TakeAway units will be needed for the current disposal program (without controlled substances) to meet the needs of participating pharmacies through June 30, 2016.

*Controlled Substance Collection and Disposal:*

The amended budget would also address controlled substance disposal through two mechanisms. First, the funding would cover the purchase of 10 MedSafe units for pharmacies in high-risk areas, and provide each of these pharmacies 4 inner liners. The pharmacy would be responsible for the $1,000 installation charge to demonstrate they are committed to serving their community as a controlled substance collection site. If the pharmacy would need additional inner liners over the next year, the pharmacy would be required to purchase additional inner liners. Second, the funding would cover half the cost of the TakeAway envelopes for controlled substance disposal. These TakeAway envelopes would be provided to patients at no-charge through pharmacies currently participating in the TakeAway program for non-controlled substances.

*Marketing*:

When the TakeAway program was initially launched in 2009, an extensive marketing strategy was utilized to educate pharmacists, pharmacies, patients and the general public about the importance of safe medication disposal. With expanded utilization of the program to include controlled substance disposal, a new marketing strategy is needed as well as refreshed marketing materials for all TakeAway-participating pharmacies. Marketing materials may include sample newspaper, radio, and social media ads; bag-stuffers or in-pharmacy materials; handouts and information focused on other healthcare professional associations to ensure other healthcare providers are educated on the extent of the program. Finally, the TakeAway program’s mascot, Pill Dude, will be updated and reconstructed to allow for easier outreach at community-based events by local pharmacies and student pharmacist organizations.

**TakeAway*™* ENVIRONMENTAL RETURN SYSTEM**

IPA has partnered with Sharps Compliance, Inc. (Sharps), a company that specializes in medical waste (i.e. sharps and biohazardous material) disposal through incineration utilizing a mail-back program. Sharps, in partnership with DEA, UPS, and USPS, has developed TakeAway,a turnkey medication disposal program for pharmacies to implement. TakeAway is intended for residential or nursing home pharmaceutical waste, and is not intended for the disposal of pharmaceutical waste from health care facilities or other large generators.

TakeAwaysystems are provided to participating pharmacies to collect unused non-controlled substance medications. Each 20-gallon system is lined with plastic for the collection of unused or expired pharmaceuticals. The boxes include pre-paid and pre-addressed shipping through UPS to Sharps Compliance, Inc. for witnessed incineration. These systems are tracked, weighed and tared prior to incineration.

Sharps has provides additional product offerings that align with the passage of Secure & Responsible Drug Disposal Act of 2010 and the subsequent regulations by the DEA. First, DEA-compliant TakeAwayMedication Recovery System envelopes are available to be provided to end-users (e.g., patients, caregivers) to mail-back unused and unwanted controlled substances to the end-user. There are currently 214 TakeAway-participating pharmacies that provide these envelopes at their location for a minimal charge to pharmacies. This represents 42.3% of current participating pharmacies and 29.6% of eligible pharmacies. Second, Sharps Compliances has worked to provide MedSafe units for community pharmacies and long-term facilities as a permanent collection box that is safe and meets the requirements of the DEA regulations. These units are installed by the pharmacy, for which DEA-compliant liners are utilized in each unit to collect all medications placed by the end-user into the MedSafe unit. A common carrier is used to transfer the inner liner; allowing easy compliance with the 3-day rule by the DEA.

**EXPANSION FOR CONTROLLED SUBSTANCES**

With the passage of the Secure & Responsible Drug Disposal Act, pharmacies can serve as a location for a permanent medication disposal site for controlled substances. While IPA submitted comments to the DEA’s proposed rules and provided outreach and education on the steps needed for pharmacy’s to participate, only seven TakeAway*-*participating pharmacies have taken the initial steps to serve as a location for controlled substance disposal. From a recent survey by the Office of Drug Control Policy and the Alliance of Coalitions for Change, Iowa currently has 54 permanent drop-drug locations for controlled substances between pharmacies, law enforcement facilities, or other state facilities.

With the available product offered by Sharps, IPA seeks funding to support pharmacy’s role in controlled substance disposal by providing TakeAway Medication Recovery System envelopes to participating sites at a reduced fee and installation of MedSafe units at 10 pharmacy locations in communities identified as high-risk. This high-risk designation will be based on proximity to nearest permanent drop-box location and statistics from the Iowa Department of Public Health and US Attorney’s Office on prescription medication overdose or death.

While formal data is being collected and analyzed, current anecdotal reports from health care and law enforcement sources point to five counties as opioid overdose hotspots: Johnson, Linn, Blackhawk, Dubuque, and Scott. The US Attorney’s Office in Cedar Rapids has launched a Heroin Prevention Initiative in four of these counties (except Scott). While expansion of controlled substance disposal is seen as one potential solution, IPA will seek to collaborate with pharmacies in these targeted areas while not duplicating efforts of other initiatives.

Within these five counties, there are currently 95 TakeAway-participating pharmacies. Of these 95 pharmacies, 50 of these pharmacies (Hy-Vee & Walgreens locations) currently offer the TakeAway envelopes for disposal of controlled substances.

**OTHER FUNDING REQUEST SUBMITTED: CARDINAL HEALTH FOUNDATION**

At the time of this request, IPA has submitted an additional funding request in the amount of $25,000 to the Cardinal Health Foundation GenerationRx Medication Disposal Grant Program. This grant program provides funding only for promotion and education efforts associated with new or existing community disposal programs, not the purchase of products to conduct the programs themselves. If awarded this grant, this funding would cover the marketing and administration expenses of the program. As such, IPA would submit an additional contract amendment to ensure the expenses are utilized according to requirements by both funding organizations.

1. HF 649 Sec. 88. **MISCELLANEOUS**. **Pharmaceutical** **collection** **and** **disposal** **program** **——** **annual** **allocation.** Of the fees collected pursuant to sections 124.301 and 147.80 and chapter 155A by the board of pharmacy, and retained by the board pursuant to section 147.82, not more than one hundred twenty-five thousand dollars, may be allocated annually by the board for administering the pharmaceutical collection and disposal program originally established pursuant to 2009 Iowa Acts, chapter 175, section 9. The program shall provide for the management and disposal of unused, excess, and expired pharmaceuticals. The board of pharmacy may cooperate with the Iowa pharmacy association and may consult with the department and sanitary landfill operators in administering the program.

2. S.F. 505 Sec. 74. **Pharmaceutical collection and disposal program — annual allocation.** Of the fees collected pursuant to sections 124.301 and 147.80 and chapter 155A by the board of pharmacy, and retained by the board pursuant to section 147.82, not more than one hundred seventy-five thousand dollars may be allocated annually by the board for administering the pharmaceutical collection and disposal program originally established pursuant to 2009 Iowa Acts, ch. 175, §9. The program shall provide for the management and disposal of unused, excess, and expired pharmaceuticals. The board of pharmacy may cooperate with the Iowa pharmacy association and may consult with the department and sanitary landfill operators in administering the program.