

Controlled Substance Disposal Program

Frequently Asked Questions

<p>Can you combine Controlled and Non-Controlled Substances?</p>	<ul style="list-style-type: none"> ▪ YES <ul style="list-style-type: none"> ○ All 3 options allow for co-mingling of controlled and non-controlled substances
<p>Can I use this program in an institutional setting for unused dosages?</p>	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ These programs are not the same as a controlled substance being dispensed for immediate administration in an institutional setting in a situation where the entire substance is not used ○ These must still be properly recorded, stored, and destroyed according to current regulations ○ This also applies to most hospice settings
<p>Will Law Enforcement procedures have to change in how they handle, store, transfer, and dispose of controlled substances?</p>	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ Law enforcement agencies will be able to continue with current procedures regarding handling, storage, transfer, and destruction of controlled substances
<p>If I partner with a Law Enforcement Agency to operate a mail-back program am I also exempt from these regulations?</p>	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ Partnering with a law enforcement agency does not allow you to circumvent the regulations ○ The entity that partners with law enforcement to implement an ultimate user disposal program must comply with all laws and regulations
<p>Who can be an “Authorized Collector?”</p>	<ul style="list-style-type: none"> ▪ A Registered <ul style="list-style-type: none"> ○ Manufacturer ○ Distributor ○ Reverse Distributor ○ Retail Pharmacy ○ Narcotic Treatment Program ○ Hospital/Clinic with an on-site pharmacy ▪ Must be registered with DEA for Schedule II controlled substances

<p>Do I have to become an authorized collector if I am one of the above entities?</p>	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ No one is required to become an authorized collector ○ The entities listed above MAY obtain authorization for the DEA to collect
<p>Is there a separate class of registration solely for authorized collectors?</p>	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ Authorized collectors will be limited to those with DEA registrations noted above to allow the DEA to conduct inspections and implement other security measures ○ The DEA does NOT have the authority to specifically register persons for the purpose of collecting and disposing controlled substances from ultimate users
<p>How do I become an authorized collector?</p>	<ul style="list-style-type: none"> ▪ Modification of registration must be completed <ul style="list-style-type: none"> ○ This can be completed online at www.DEAdiversion.usdoj.gov (or click HERE) to modify registration ▪ If collection is discontinued the registration must be updated to reflect this change in activity ▪ No fee for modification of registration
<p>Can a distributor or a reverse distributor manage and maintain a collection receptacle at a retail pharmacy or LTCF?</p>	<ul style="list-style-type: none"> ▪ NO
<p>Who can operate a collection receptacle at a LTCF?</p>	<ul style="list-style-type: none"> ▪ A hospital/clinic with an on-site pharmacy, or a retail pharmacy
<p>Reverse Distributor: How can they acquire controlled substances?</p>	<ul style="list-style-type: none"> ▪ Pick-up the controlled substance from a registrant at the registrant's registered location, OR ▪ Receive the controlled substance from a registrant at the reverse distributor's registered location delivered directly by non-practitioner or by common or contract carrier <ul style="list-style-type: none"> ○ May never be re-routed once on route
<p>Reverse Distributor: What must be done once the controlled substance has been received?</p>	<ul style="list-style-type: none"> ▪ Immediately store or transfer the controlled substance to the reverse distributor's registered location for secure storage until timely destruction or return to the registered manufacturer can occur ▪ Immediately deliver the controlled substance to the manufacturer or manufacturer's agent ▪ Timely destroy the controlled substance

	<ul style="list-style-type: none"> ▪ Immediately deliver the controlled substance to the place of destruction
Reverse Distributor: When does the controlled substance have to be destroyed?	<ul style="list-style-type: none"> ▪ Within 30 days of receipt ▪ Day 1 is the day the controlled substance is physically acquiring through pick-up or delivery
Do destruction facilities have to be registered with the DEA?	<ul style="list-style-type: none"> ▪ NO
Can Non-Registrants still collect non-controlled substances?	<ul style="list-style-type: none"> ▪ YES <ul style="list-style-type: none"> ○ Non-registrants may collect non-controlled substance pursuant to all federal, state, tribal, and local laws and regulations
Can Schedule I controlled substances be collected?	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ Schedule I controlled substances are illegally possessed and may not be collected
Does the controlled substance have to be in a specific packaging?	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ The DEA has not mandated whether a substance must be disposed with or without packaging ○ Collectors may have procedures that prevent collecting certain packaging
Is there a minimum/maximum capacity for collection receptacles?	<ul style="list-style-type: none"> ▪ NO
Is there a maximum duration an inner liner may be kept in a collection receptacle?	<ul style="list-style-type: none"> ▪ NO <ul style="list-style-type: none"> ○ However, the DEA notes that it is the authorized collector's responsibility to provide effective controls and procedures to protect against theft and diversion
If an authorized collector sells mail-back program packages do they have to track packages that were sold but never returned?	<ul style="list-style-type: none"> ▪ NO

Source:

http://www.deadiversion.usdoj.gov/drug_disposal/fact_sheets/disposal_registrant.pdf