

**Washington State  
Department of Health  
Pharmacy Quality  
Assurance Commission**

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# Drug Take Back Pilot Programs

Beginning in fall 2006, the pharmacy commission approved two pilot programs for

- Group Health Cooperative
- Bartell Drug Company

Pilot Programs included locations, policies and procedures, and the requirement that no pharmacy staff handle medication or take into the pharmacy.

# Commission Drug Takeback Program Guidance

**Review and approval of pharmacy program by Pharmacy Commission prior to implementation.**

**Pharmacies must modify their DEA registration and meet DEA criteria to take back controlled medications in approved receptacles per DEA regulations.**

**Responsible pharmacist's responsibility to ensure all program policies and procedures are followed.**

**Pharmacy staff cannot take drugs back to the pharmacy, behind the counter per WAC 246-869-130.**

**Issues: While the pharmacy commission has used the DEA guidelines to provide a template for pharmacy facilities engaged in drug takeback:**

**There is no statutory authority that specifically addresses takeback programs**

**Program operation may vary from location to location**

**There is a labor cost associated with operating these programs**

## Current Regulations prohibit the return of drugs

### **WAC 246-869-130**

#### **Return or exchange of drugs.**

**except as provided in this rule, prescriptions, drugs, medicines, sick room supplies and items of personal hygiene shall not be accepted for return or exchange by any pharmacist or pharmacy after such prescriptions, drugs, medicines, sick room supplies or items of personal hygiene have been taken from the premises where sold, distributed or dispensed.**

**Despite this regulation, during inspections of pharmacies, commission has found returned drugs within the pharmacy taken back from staff.**

## Finding a Take back program

Takeback programs currently exist in 18 counties in Washington State:

Majority of law enforcement locations in most counties.

Majority of pharmacy locations are in King, Clark and Snohomish county.

Other locations are single pharmacy operations in other counties.

All of these pharmacy locations are pilot programs approved by the commission.

Approvals are good for three years.

Commission staff refer any inquiries about locations to [WWW.TAKEBACKYOURMEDS.ORG](http://WWW.TAKEBACKYOURMEDS.ORG)

**The commission has approved over twenty company and individual take back pilot programs since 2006, including the two pilots .**

**We continue to provide information and support to King County Board of Health engaged in the expansion of programs in pharmacies.**

**Clark County has a substantial take back program they have implemented after working with the Commission.**

**To date, except for Clark County, approvals from the pharmacy commission have been individual pharmacy business organizations interested in drug takeback operation.**

**All applications for such programs have been approved.**

## **Next steps :**

**The commission continues to approve pilot programs to remove Unwanted prescription drugs from our communities.**

**Since controlled drugs are of most concern, we advise any applicant to use the final DEA rule from September 2014 (79 Fed Reg. 53,520) to craft their program and we can provide any prior commission approved pilot programs as a guide for applicants.**

**The commission continues to work with federal, state, county, and local partners to provide a sustainable and consistent method to manage disposal of unwanted prescription drugs.**

# QUESTIONS ??

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