Managing the Regulatory Environment

ADA's Guidelines for Practice Success™ (GPS™)

ADA Tip Sheet on Disposing of Controlled Substances

Controlled substances that have expired, been damaged, are unusable or no longer needed must be disposed of in accordance with the Drug Enforcement Administration's' (DEA) regulations.

Most healthcare facilities dispose of controlled substances by transferring the inventory to a "reverse distributor" who is specially authorized to receive and dispose of them. Be aware that:

- ✓ Reverse distributors are often used by healthcare facilities that have a large supply of Schedule II substances
- ✓ Reverse distributors charge a fee for taking control of the inventory
 - You must complete DEA Form 222 to facilitate any transfer to a reverse distributor
 - Keep a copy of the form with your inventory records for at least two years
- ✓ Your local DEA field office can provide you with a list of authorized reverse distributors
 - A local pharmacist may also be able to provide a listing of approved reverse distributors

Facilities interested in destroying a small quantity of Schedule II substances should:

- Fax a completed DEA Form 41 to the local DEA office
 - They will advise whether that inventory can be destroyed.
 - If the DEA approves the request, one recommended method of disposal involves removing the medications from their containers, mixing them with coffee grounds or kitty litter and then sealing them in a bag or disposable container before placing in the trash.
 - > Two DEA-licensed individuals should witness the process and sign the form confirming that the disposal took place as directed.
 - Inventory records should be updated and forms should be kept on file with your inventory records for at least two years.
 - More information is available in the DEA's <u>final rule on the disposal of controlled</u> substances.

Other medications, including non-controlled substances such as antibiotics, should never be put into the regular waste stream, pour down the drain, flushed through the sewage system, or included in medical waste. Consult the Environmental Protection Agency's (EPA) proposed rule on Management Standards for Hazardous Waste Pharmaceuticals for information on disposal of those products.

Additional information is available in the DEA <u>Practitioner's Manual: An Informational Outline of the Controlled Substances Act</u> and in the <u>ADA FAQ on New Hydrocodone Combination Products (HCP)</u>
Regulations and the <u>ADA FAQ on New Hydrocodone Combination Products (HCP) Regulations</u>, Part 2.

Resources:

DEA Form 222 and DEA Form 41

DEA final rule on the disposal of controlled substances [PDF]

EPA Proposed Rule on Management Standards for Hazardous Waste Pharmaceuticals

DEA Practitioner's Manual: An Informational Outline of the Controlled Substances Act

ADA FAQ on New Hydrocodone Combination Products (HCP) Regulations [PDF]

ADA FAQ on New Hydrocodone Combination Products (HCP) Regulations, Part 2 [PDF]

Reproduction of this material by dentists and their staff is permitted, provided that any reproduction must include the ADA copyright notice. Any other use, duplication or distribution by any other party requires the prior written approval of the American Dental Association. This material is for general reference purposes only and does not constitute legal advice. Dentists should contact qualified legal counsel for legal advice, including advice pertaining to compliance with the regulation(s) discussed in the content of this resource. © 2017, 2022 American Dental Association. All Rights Reserved.

ADA American Dental Association®