

Faith Lutheran School

Disposal of Medication Policy

Often a school may find that medications left behind by the student and families. The Wisconsin Department of Natural Resources (DNR), US Department of Justice Drug Enforcement Administration (DEA) and Wisconsin Department of Public Instruction (DPI) have worked together to provide clear and accurate information regarding the disposal of medications in schools. The safe disposal of medication can prevent diversion and protect the environment.

- 1. If at all possible, give medications back to students/families who have the prescription for the medication.**
 - a. Call the parent and ask if they would like to pick up the medication at the school or have you mail it home. This reduces the cost to the school for disposal and makes it more likely that the medication would be used instead of discarded.
 - b. A school does not have to notify DEA or the US Postal Service of such mailings.
 - c. DPI does not recommend that schools give any controlled substances to the students to take home due to the danger of drug diversion and other safety concerns.
 - d. Other drugs may be sent home with the students, if the parents agree.

- 2. When returning the medication is not possible, then the school must assume responsibility to manage the pharmaceutical waste.**
 - a. Because schools are institutions, they must follow state laws for businesses and institutions for managing the waste. These laws are outlined on the DNR's pharmaceutical waste web pages:
<http://dnr.wi.gov/org/aw/wm/pharm/pharm.htm>
<http://dnr.wi.gov/org/aw/wm/pharm/nonhousehold.htm>
 - b. Please note that schools are considered institutions and that household medication collection sites may not accept pharmaceutical waste from institutions and businesses.

- 3. There are four categories of medications for management of disposal:**
 - a. Controlled substances which fall under Drug Enforcement Administration regulations (e.g., narcotic pain medication, stimulants like Ritalin);
 - b. Hazardous waste medications, which fall under state and federal hazardous waste regulations (e.g., vaccines containing mercury, Coumadin, chemotherapy pills);
 - c. Infectious waste, which fall under state medical waste regulations (e.g., syringes); and
 - d. All other medications, which fall under state and federal non-hazardous solid waste regulations (e.g., aspirin).

4. The most difficult category to identify is hazardous waste. Here is a link to a guidance document about how to identify hazardous waste medications:

<http://dnr.wi.gov/org/aw/wm/publications/aneupub/wa1257.pdf>.

- a. Legally speaking, the decision about whether a waste is a hazardous waste or not, is known as a “waste determination” or “evaluation” and schools must document how they made that decision, for each medication. If it is not possible or too time-consuming for a school to determine if a discarded medication is a hazardous waste or not, the best thing to do is to assume it is a hazardous waste and manage it as such.

5. Here are the disposal options for pharmaceutical waste left at schools:

a. Controlled Substance Medication Waste

- i. Schools should turn this waste over to their local police department or to a waste disposal company that has DEA authorization to accept it.

b. Hazardous Medication Waste & Options for disposal of hazardous waste include:

- i. Schools may take advantage of the state hazardous waste contract to manage hazardous waste medications. This is often much less expensive than hiring an independent contractor. All state of Wisconsin agencies, institutions and campuses (e.g., University of Wisconsin-Madison and University of Wisconsin system) are **required** to use the state contract. Additionally, Wisconsin municipalities, including public schools, **may** use the state contract. NOTE: "Municipality" is broadly defined and includes school districts in the definition at:
<http://vendornet.state.wi.us/vendornet/procman/prod30.asp>
- ii. Schools may hire their own hazardous waste contractor to dispose of waste. A list of licensed hazardous waste transporters is available at: <http://dnr.wi.gov/org/aw/wm/faclists/>
- iii. Schools may not take hazardous waste medications to a local Clean Sweep collection site unless that site is also authorized to take waste from Very Small Quantity Generators businesses and institutions **and** if that site is accepting medications. A list of Very Small Quantity Generator collection sites can be found at the following website: <http://datcp.state.wi.us/arm/agriculture/pest-fert/pesticides/clean-sweep/>

Note: Scroll down to the current year collection schedule and click on the link that mentions “VSQG” collections or drug collections. You should also review this web page before contacting the VSQG site near you: <http://datcp.state.wi.us/arm/agriculture/pest-fert/pesticides/clean-sweep/businesses.jsp>

c. Infectious Medication Waste

- i.** If a school is unable to return sterile syringes to the student or family, it may donate them to an animal shelter or veterinarian. If unable to return an unexpired epinephrine syringe (EPI pen), a school may keep the EPI pen for use in a life-threatening emergency. Upon expiration, the EPI pen is an infectious waste.
- ii.** All syringes to be discarded, even sterile unused syringes, fall under state medical waste regulations. To learn more about disposal options for syringes, see this DNR web page: <http://www.dnr.wi.gov/org/aw/wm/medinf/sharps.htm>
- iii.** Household “sharps collection stations” **may** choose to accept small amounts of sharps from businesses and institutions. Schools may also use the state waste contract to dispose of infectious waste or hire their own infectious waste contractor. For more information, see the DNR publication “For Generators of Small Amounts”:
<http://www.dnr.wi.gov/org/aw/wm/publications/aneupub/wa815.pdf>
- iv.** Lists of licensed infectious waste transporters and of registered sharps collection stations are available at: <http://dnr.wi.gov/org/aw/wm/faclists/>

d. Non-hazardous Medication Waste

- i.** After a school has determined that a particular medication can not be returned, is NOT a controlled substance or infectious waste, and is NOT a hazardous waste, then the school may discard the waste through incineration at a licensed incinerator or into a licensed solid waste landfill. School staff members should crush, suspend in water and add to kitty litter or unused coffee grounds. For more information, see points 3 and 4 under “Disposal Options” on this DNR webpage:
<http://dnr.wi.gov/org/aw/wm/pharm/nonhousehold.htm>