



Vermont Association of Chain Drug Stores

To: Representative Ann Pugh
Cc: House Human Services Committee

From: Heather Shouldice

Date: January 24, 2022

Re: H.462 An act relating to miscellaneous Department of Health programs

We strongly urge your committee to consider the current statewide take back program which year over year has increased the collection of unused prescription drugs as the primary take back program. Ancillary programs like mail back envelopes, kiosks, and programs like DisposeRx, are available and offer options that fit best into each pharmacy setting.

As noted in the April 2021 Prescription Drug Take Back Day press release, Health Commissioner Mark Levine, MD said *“more than half of the people who misuse prescription medication get it from a friend or relative, often straight out of the medicine cabinet. Which is why timely, safe disposal of unused and unwanted medications makes a huge difference in preventing misuse and diversion.”*

Today, all VACDS members participate in a program that meets the needs of consumers for unused medication based on access and pharmacy setting. These unused drugs could be contaminated with infectious diseases or hazardous substances posing potential risks to pharmacists and the public. As we know from prior year statewide collections, at least 10% of unused prescription drugs collected are opioids, so everything in the collection boxes need to be treated as such.

Important to note the process is not simple or inexpensive:

- Purchase kiosk for est. \$2,000 per store
- Purchase the collection bags
- Set up a system with qualified pharmacy staff to be approved to handle the placement of the numbered bag
- store in a secure area until removed from site
- Hire a “qualified handler” of the bags to remove from site
- Pay for the destruction of the medication
- Needs to be a federally approved site

States that mandate kiosks in a pharmacy setting typically provide funding for each kiosk which is funded by the pharmaceutical companies. Other States have noted that from recent data during the pandemic indicates that abuse and drug overdoses are the result of illegal street drugs rather than prescription drugs. Increased Kiosks locations will not address this problem.

The pandemic has shown us that patients want convenience. Mail back envelopes and annual collections days are working. Patients do not want to have to come into the pharmacy just to dispose of unused drugs if they can simply drop it at a collection event, mail back, or bring to a public safety location. Today, Vermont has public 24-hour available drug collection stations at the sheriff's office.

What is your committee's goal? How much more unused drugs do you predict to collect? If the goal is "safe" disposal of unwanted drugs, we urge the committee to focus on enhancing the state-wide take back day through public safety.

We would ask that you consider the overarching goals of a robust take-back program:

- **Protect Patient Health and Safety:** Maintain a physical separation between pharmacies and locations that take back consumers' unused drugs.
- **Provide Consumers with Safe and Appropriate Methods:** Provide consumers with a safe and effective means to return their unused drugs, such as a mail back program using prepaid envelopes or law enforcement sanctioned state municipal waste collection programs.
- **Ensure Necessary Funding:** Establish feasible funding sources such as through drug manufacturers or state hazardous waste resources.

During this unprecedented pandemic along with workforce stresses, this is not the time to mandate that all pharmacies participate in the Vermont Kiosk program by December 31, 2022. Pharmacies are stretched thin like all healthcare workers because of the pandemic, and we have no clear idea when this will be over.

Funding the program would be a way of encouraging locations to install a collection box rather than mandating. According to the last statewide collection day, Vermont had a record setting collection of unused drugs 3.5 tons from over 55 collection sites throughout the state. What is the metric that says the collections days, mail back envelopes and public safety locations aren't enough?

We would also be willing to look at a solution for areas in Vermont that have few pharmacies or constraints to public safety to drop unused prescriptions, but it is unnecessary to have them in all locations.

**VACDS represents traditional drug stores to supermarkets with pharmacies – from regional chains with three stores to national companies. Chains operate more than 40,000 pharmacies across the country and employ more than 3.5 million employees, including 130,000 pharmacists.*

