

NASCSA Survey - June 2015

- Prescriber and Dispenser Controlled Substance Training

- Disposal of Controlled Substances

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* Please indicate your contact information. This information will be helpful should there be any questions or clarification needed on the survey.

Answer	Number of Responses
First Name	27
Last Name	27
Job Title	27
Company Name	27
Work Phone	27
Email Address	27
Address 1	27
City	27
State/Province (US/Canada)	27
Postal Code	27

[View answers](#)

The data reflected in this survey is the result of responses from the following states: Arkansas, Arizona, District of Columbia, Delaware, Georgia, Iowa, Idaho, Kansas, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Montana, North Carolina, North Dakota, New Hampshire, New Jersey, New Mexico, Nevada, Oregon, Pennsylvania, South Carolina, Tennessee, Texas and Wyoming

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Does your state require any type of education for the prescribing of controlled substances in Schedules II-V?

Answer	0%	100%	Number of Responses	Response Ratio
No			19	70.3%
Yes, required by statute or law (briefly describe)			6	22.2%
Yes, by regulation or rule (briefly describe)			2	7.4%
Yes, other (please describe)			1	3.7%
Totals			27	100%

Individual Comments:

- Statute requires practitioner CE on law and renewals every 2 years
- State law follows the federal Combat Meth Act so employees who sell cold medications are required to take training
- Administrative rule that NPs and PAs must obtain training before obtaining DEA registration; both the Board of Medical Licensure and the Nursing Board require 5 hours continuing education in CS prescribing for license renewal (every 2 years)
- Required to have opioid training and register with PMP
- Just enacted by legislature and will be effective October 1, 2015
- Section 40-47-40(2)(a) of the 1976 Code is amended to read:(2) For renewal of an active permanent license biennially, at least two (2) hours of which may be related to

approved procedures of prescribing and monitoring controlled substances listed in Schedules II, III, and IV

- No but highly recommended by the boards of pharmacy, medicine, and nursing. A Pain Policy was developed and approved by all the boards.

3 If your state requires education for the prescribing of controlled substances in Schedules II-V, how long has the requirement been in place?

Answer	0%	100%	Number of Responses	Response Ratio
Less than 6 months			0	0.0%
Less than a year			2	7.4%
More than a year			5	18.5%
Not Applicable			19	70.3%
Other (View all)			1	3.7%
Totals			27	100%

4 Does your state have a way to measure the effectiveness of required education to prescribe controlled substances in Schedules II-V?

Answer	0%	100%	Number of Responses	Response Ratio
Yes (please describe)			2	7.4%
No			9	33.3%
Not Applicable			16	59.2%
Totals			27	100%

Individual Comments:

- We check the training certificates when we inspect the pharmacy.
- Overdose death data

5 Does your state require any specific type of education for pharmacists to dispense controlled substances in Schedules II-V?

Answer	0%	100%	Number of Responses	Response Ratio
No			25	92.5%
Yes, required by statute or law (briefly describe)			2	7.4%
Yes, by regulation or rule (briefly describe)			1	3.7%
Yes, other (please describe)			0	0.0%
Totals			27	100%



Individual Comments:

- Controlled Substances CE required
- Continuing education in area of patient safety regarding opioids and Use of PMP
- The Board of Pharmacy was required to a develop a continuing education program regarding opioid drug abuse and the delivery, dispensing, and provision of tamper-




resistant opioid drugs, but that CE was not initiated. See Occupations Code Section 559.0525

- No. Specific types of CE are not required by statute or rule. All presentations made by board of pharmacy staff to any group include prescription drug abuse.

6 If your state requires specific education for pharmacists to dispense controlled substances in Schedules II-V, how long has this requirement been in place?

Answer	0%	100%	Number of Responses	Response Ratio
Less than 6 months			0	0.0%
Less than a year			0	0.0%
More than a year			2	7.4%
Not Applicable			25	92.5%
Other			0	0.0%
Totals			27	100%




7 Does your state have a way to measure the effectiveness of any education requirement related to pharmacists dispensing controlled substances in Schedules II-V?

Answer	0%	100%	Number of Responses	Response Ratio
Yes (please describe)			2	7.4%
No (please describe)			4	14.8%
Not Applicable			21	77.7%
Other			0	0.0%
Totals			27	100%

Individual Comments:

- We audit continuing education requirements during the renewal period but we do not require specific training.
- Overdose death data

8 Does your state have statues or regulations addressing the disposal of controlled substances in Schedules II-V?

Answer	0%	100%	Number of Responses	Response Ratio
Yes (please describe)			16	59.2%
No (please describe)			9	33.3%
Other			2	7.4%
Totals			27	100%

Individual Comments:

- Compliance with DEA regulations
- In the process of establishing Controlled Substance Regulation that is specific to the type of disposal and State/federal authority controls prior to disposal

- Administrative Code (rules of the Pharmacy Board) address disposal by registrants, authorizing disposal by reverse distributors or as approved by the Board for a specific registrant and/or specific occurrence. Non-registrant disposal not currently specified.
- We follow the federal law regarding scheduled drugs
- We need to change our regulations to mirror the new federal disposal regulations
- All information concerning the correct disposal is at the FDA or DEA websites
- We will be seeking legislation next year
- State regulations match federal DEA regulations
- Article XXVI of the Pharmacy Practice Regulations
- Would require compliance with federal laws through DEA options
- Chapter 61-04-03 Destruction of controlled substances
- The state Controlled Dangerous Substances regulations sunset at the end of August 2015. The new proposed regulations incorporate the new federal DEA rules for disposal of controlled substances
- Must use a reverse distributor by registrants
- Licensees must use a reverse distributor. No requirements for patients
- Compliance with Federal rule for disposal
- Title 22, state Administrative Code 291.33(c)(7)(A)(xv) either on the prescription label or the written information accompanying the prescription, the statement "Do not flush unused medications or pour down a sink or drain." A drug product on a list developed by the Federal Food and Drug Administration of medicines recommended for disposal by flushing is not required to bear this statement
- State has a law regarding collecting and re-dispensing unused meds but controlled substances are not allowed

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Which of the federally permitted mechanisms of disposal does your state permit?

Answer	0%	100%	Number of Responses	Response Ratio
Mailing via envelopes			19	70.3%
Receptacle collection boxes			21	77.7%
Collection days			21	77.7%
Other			4	14.8%
Totals			27	100%

Individual Comments:

- Nothing specific - We require compliance with DEA regulations
- The state is silent on the matter which allows facilities to follow federal law
- In draft Regulation currently
- State law does not specifically authorize these disposal mechanisms but also does not prohibit these methods. Therefore, since federal law authorizes these methods, Iowa permits these methods by defaulting to federal law

- We are planning to change our regs to mirror the new federal regs
- New rules not final yet
- Reverse distributor
- Please see NH RSA 318-E:1 Pharmaceutical Drug Take-Back Programs Authorized, <http://www.gencourt.state.nh.us/rsa/html/XXX/318-E/318-E-mrg.htm>
- Reverse distributors
- Generally not addressed under a specific state law other than general waste/environmental protection(DEP) laws and general authority of certain facilities to possess drugs. For example, Board of Pharmacy requires pharmacies to submit intent and approval from DEP and Board. Collection days must have approval from DEP and if not through a license healthcare facility/pharmacy or law enforcement, exemption to possess drugs from Department of Health
- The laws and regulations do not specifically mention these methods

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If your state permits receptacle collection boxes, in which type of facility does your state permit collection?

Answer	0%	100%	Number of Responses	Response Ratio
Law Enforcement			21	77.7%
Pharmacy			17	62.9%
Hospital			13	48.1%
Nursing Home			13	48.1%
Opioid Treatment Programs			8	29.6%
Not Applicable			3	11.1%
Other			3	11.1%
Totals			27	100%

Individual Comments:

- The state is silent on the matter which allows facilities to follow federal law
- Law enforcement currently is permitted. All others currently in Regulatory draft
- As permitted under federal law
- Not final yet but our future rules will allow these registrants to have drop boxes. They are not allowed yet at this time
- DEA registered disposal locations
- State has allowed law enforcement for several years through the Project Medicine Drop Box Program. Pharmacies, and other entities allowed under the new federal DEA rules, will need to comply with federal rules in order to implement a collection box
- Currently some Law Enforcement and Pharmacies participation in collection boxes. However, depending on security and final disposal, other entities may qualify to participate in such programs. Interested parties should check with their licensing agency or Board

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Is there a single agency in your state that has oversight authority over disposal?

Answer	0%	100%	Number of Responses	Response Ratio
Yes (please list the agency)			5	23.0%
No			20	76.9%
Totals			26	100%

Individual Comments:

- Dept of the Environment, Pharmaceutical Control, and Department of Water each have some oversight in disposal
- Office of Controlled Substances
- Board of Pharmacy, Department of Public Safety, Department of Natural Resources all share responsibilities
- Board of Pharmacy
- State Department of Health and Environment and the state Board of Pharmacy
- Board of Pharmacy and Pollution Control Agency have jurisdiction
- It will be the state Bureau of Narcotics and Dangerous Drugs
- Department of Justice is leading outreach efforts and stakeholder discussions; Board of Pharmacy is engaged in such activities and fielding many questions/calls about the topic
- There are three agencies that work together the Department of Justice, Board of Pharmacy and Department of Environmental Services
- Division of Consumer Affairs, Drug Control Unit
- Multiple agencies may be involved and have varying jurisdiction depending on how and where the product is handled: Pennsylvania DEP/Environmental Protection, Department of Drug and Alcohol, Department of Health, and Department of State may be involved. Interested parties should check with DEP and if applicable their respective licensing agency or Board
- State Commission on Environmental Quality