

# Iowa School Medication Waste Guidance



## Medication Waste Guidance

Medication administration in the school setting is a component of the nursing practice. The Iowa Board of Nursing acts in collaboration with the Iowa Department of Education to ensure high standards for delegation and practice of medication administration to promote the health and safety of Iowa school children. Essential elements for medication administration are outlined in Iowa Administrative Code rule 281-41.404(3) and local education agency board policy. Guidance for medication waste that is unclaimed at the end of the school year, turned over to law enforcement, or turned over to parents includes documenting the amount of medication and the name of the medication in the student's medication administration record. This procedure is an important step in providing complete documentation and safe medication administration.

School children often require medications during the school day or during school activities for short term illnesses or chronic health conditions. Often public school districts and accredited nonpublic schools and school nurses find that they have prescribed medications, controlled substances, over-the-counter medications, infectious waste, and hazardous pharmaceutical waste left behind by the student and families at the end of the school year. The Iowa Department of Education (IDOE), Iowa Department of Natural Resources (DNR), and the United States Department of Justice's Drug Enforcement Administration (DEA) have worked together to provide clear and accurate information regarding medication disposal for public school districts and accredited nonpublic schools. The guidance for safe disposal of medications and infectious waste can prevent drug diversion and protect the environment.

There are four categories of medication and waste for potential management of disposal in the school setting:

- **Controlled Substances/Scheduled Medications** which fall under Drug Enforcement Administration Regulations (e.g., Adderall, Focalin, Ritalin, narcotic pain medications)
- **Hazardous Pharmaceutical Waste** (e.g., Warfarin, epinephrine inhalers)
- **Infectious Waste** (e.g., syringes with needles, used auto-injectors, lancets)
- **Nonregulated Medications**, meaning medications that are not controlled/scheduled (e.g., Acetaminophen, Albuterol Inhalers, Prescription Medications)

**Notification to Parents and Forms:** Local education agencies and schools should first attempt to return student medications back to the student's families that have the prescription for the medication if possible. School staff should notify the parent in writing to provide the option for parents to pick their child's medication up from the school at the end of the school year, if the medication is expired, or if the parents have provided authorization for the discontinuation of medication administration in the school setting.

An attached sample notification letter is available for local education agencies and schools to use when notifying parents of expired, discontinued, or unused medications. The notification for parents to pick up their child's medication promotes the likelihood that the medication will be used for the individual in the manner it was prescribed.

**When Medication Is Not Picked Up or is Expired:** Despite efforts after parental notification, schools may be left with a large quantity of infectious waste from school health services and medications in liquid, solid, and aerosol form that need disposed of to promote a

safe educational environment. Procedures for medication and waste disposal after notification has been sent to the parent and the form has not been returned to the school are listed below in this document.

## **FIRST STEP FOR DISTRICTS AND SCHOOLS:**

### **Waste Minimization:**

School personnel should request that the parent calculate how much medication will be needed to allow the child adequate medication coverage to the end of the school year or until the next prescription refill as directed by their medical provider and only have the school manage that amount of medication in the school setting. This action can reduce the amount of medication left over at the end of a school year and represents an option to improve both ecological and human health, while also reducing the expenses associated with healthcare cost of medication replacement.

### **Controlled Substances/Scheduled Medications:**

Under the Secure and Responsible Drug Disposal Act of 2010, school personnel do not have the legal authority to deliver controlled substances to registrants for the purpose of disposal on behalf of the ultimate user. 79 Fed. Reg. 53520, 53546 (Sept. 9 2014). As such, if there is left over controlled substances that have not been picked up by the parents at the end of the school year school personnel should **NEVER** dispose of or transport controlled substances for the purposes of disposal to take-back events or collection receptacle locations. School personnel should contact the School Resource Officer (SRO), local law enforcement, or their local DEA office for assistance with the proper disposal of these substances. *Id.* For more information on Disposal of Controlled Substances go to: [DEA Diversion](#)

### **Nonregulated Medications:**

After a school has determined a particular medication cannot be returned to parents and is not a controlled substance, disposal can be conducted in the following way:

- **ALL NON-REGULATED MEDICATIONS MUST BE RENDERED NON-USABLE BEFORE BEING DISPOSED.**
- **DO NOT FLUSH ANY MEDICATION DOWN A TOILET OR SINK, UNLESS THE PRODUCT INFORMATION STATES THAT IT IS SAFE TO DO SO, AS THEY ARE UNTREATED AND CAN CONTAMINATE LAKES, RIVERS, AND STREAMS.**
- **Liquid Medication:** Fill a sealable plastic bag with a sorbent (e.g., kitty litter, coffee grounds, or sand). Pour the liquid medication into the bag of sorbent and seal. School personnel will need to peel off the label or use a black permanent marker to black out all personally identifiable information on the bottle. The bag may then be disposed of in the school dumpster or receptacle. Best practice for schools would be to ensure that the waste receptacle is locked and tamper-proof. **Do not mix different types of liquid medications due to potential chemical reactions.**

- **Solid Medication (Pill Form):** Pour the medications into the bag and add a small amount of warm water to dissolve it. Pour a sorbent (e.g., kitty litter, coffee grounds, or sand) over the dissolved medication in the plastic bag and seal. School personnel will need to peel off the label or use a black permanent marker to black out all personally identifiable information on the bottle. The bag may then be disposed of in the school dumpster or receptacle. Best practice for schools would be to ensure that the waste receptacle is locked and tamper-proof.

**Dry Powder or Meter Dosed (non-epinephrine) Prescription Inhalers:**

Traditionally, many inhalers have contained chlorofluorocarbons (CFCs), a propellant that damages the protective ozone layer. However, CFCs have been phased out of inhalers since 2013 and are being replaced with more environmentally friendly inhalers. Prescription inhalers should be returned to the parent of the child, who the medication is prescribed for, or to the student, whom has permission to self-administer their medication, in the school setting. If returning the inhaler to the parent or student is not an option, the school should render the inhaler non-usable by placing the inhaler in sorbent (e.g., kitty litter, coffee grounds, or sand) in the plastic bag and seal. School personnel will need to peel off the label or use a black permanent marker to black out all personally identifiable information on the inhaler or packaging. The bag may then be disposed of in the school dumpster or receptacle. Best practice for schools would be to ensure that the waste receptacle is locked and tamper-proof.

- **Do not mix different types of solid medications due to potential chemical reactions.**
- **Infectious Waste (e.g., Needles, Lancets, and Auto-Injectors):** School personnel should immediately place used needles and sharps in a sharps disposal container to reduce the risk of needle sticks, cuts, or punctures to the handler of the infectious waste and others in the school setting. All sharps containers should be made of heavy duty plastic, clear so easy determination of the container's fill status can be seen, able to close with a tight fitting, puncture proof lid without sharps being able to come out, upright and stable during use, leak-resistant and properly labeled. For more information on safe sharps disposal of infectious waste go to [www.fda.gov](http://www.fda.gov). Infectious waste in Iowa is regulated in Iowa Administrative Code rule 567-109.9 (455B, 455D). Schools may communicate with local providers (e.g., healthcare agencies, county health departments, mail back programs, and medical waste companies in their community) for treatment and disposal. To locate Iowa's list of infectious waste companies and hazardous waste contractors, go to <http://iwrc.org> (cont.)

**DO NOT THROW NEEDLES AND OTHER SHARPS IN THE TRASH, TOILET, OR RECYCLING BIN.**

**DO NOT REMOVE, BREAK, BEND, OR RECAP USED NEEDLES AND OTHER SHARPS.**

- **Hazardous Pharmaceutical Waste:** Iowa Regional Collection Centers (RCC) collect hazardous wastes from businesses and households that are considered “Conditionally Exempt Small Quantity Generators of Hazardous Waste,” meaning less than 220 pounds of hazardous waste in a month. Please go to: <http://www.adnr.gov/Environment/HouseholdHazardousMaterials/RegionalCollectionCenters/RCCLocations.aspx> to access a list of all of the regional collection centers in Iowa. Some RCCs for Hazardous Waste, collect sharps, and medications for proper disposal. It may be beneficial to contact your local Regional Collection Center. Region 7 of the Environmental Protection Agency administers the RCRA C (Hazardous Waste) program for the State of Iowa. The contact information for questions is (913)551-7003 or Toll-Free: 1-800-223-0425.  
**Abandoned epinephrine inhalers are considered hazardous waste:** Disposal Instructions should be listed on the labeling of inhalers and aerosol products because they could be dangerous if punctured or thrown into a fire or incinerator. Best practice would be to return the inhaler to the parent of the child who the medication is prescribed for or to the student who has permission to self-administer their medication.

For further assistance, please contact: Nicole Proesch, Attorney, Iowa Department of Education: [nicole.proesch@iowa.gov](mailto:nicole.proesch@iowa.gov) or Melissa Walker, School Nurse Consultant, Iowa Department of Education: [melissa.walker@iowa.gov](mailto:melissa.walker@iowa.gov) or the Iowa Department of Natural Resources at:

515-725-8200.

## Disposal of Medications(s) Parent/Guardian Notification Letter

Date: \_\_\_\_\_

Dear Parent/Guardian:

Your Child \_\_\_\_\_ has the following unused

Medication(s) in the school office/nurse's office:

\_\_\_\_\_  
\_\_\_\_\_

Expired medication(s) in the school office/nurse's office:

\_\_\_\_\_

Please complete and return this letter. If we do not receive this completed form from you before the end of the school year, we will dispose of the medications.

I will pick it up at school

Please dispose of the medication

\_\_\_\_\_  
Parent/Guardian Signature

**PLEASE RETURN THIS FORM TO THE SCHOOL OFFICE/NURSES OFFICE BY:**

\_\_\_\_\_  
(Date)

Sincerely,

\_\_\_\_\_  
School Personnel/School Nurse

\_\_\_\_\_  
Title