Pharmaceutical Stewardship

Subcommittee Briefing and Discussion

March 31, 2016
Ad Hoc Subcommittee and Staff

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Today's Agenda

✓ Pharmaceutical Stewardship Policy
  • Implementation updates on other county laws
  • Review of PhRMA comment letter and responses

✓ Review of Draft Operational Plan for SHD Oversight

✓ Update on Open Public Comment Process

✓ Chair Wrap-up and Next Steps
Pharmaceutical Stewardship Policy

Implementation Updates

Review of PhRMA comment letter
County Pharmaceutical Stewardship Laws: Implementation Update

Timeline of Passage:

- Alameda: 2012
- King: 2013
- San Francisco, San Mateo, Santa Clara, Marin: 2015
- Santa Cruz: 2016

Delay Due to Unsuccessful Pharma Associations Lawsuit

Producers’ Stewardship Plans accepted by Alameda & King.
Santa Cruz received a Stewardship Plan in March 2016.
Stewardship Plans due to other CA counties during 2016.
Legislation proposed in Los Angeles County & Cook County, IL.
Alameda County Safe Drug Disposal Ordinance Implementation


Feb. 2015  Stewardship Plan Approved.
  Alameda MED-Project Plan representing ~ 320 producers.
  Plan only proposed collection events. Alameda law did not specifically require secure drop boxes.

Aug. 2015  1 collection event held.


March 2016  2 collection events held.

2016 Ramp-up  24 events planned for 2016.
  MED-Project Plan working to install drop boxes.
Two Stewardship Plans Accepted by King County

King County MED-Project
Medication Education & Disposal

Formed by PPSWG (Pharmaceutical Product Stewardship Work Group)

372 Producers
Feb – Initial Plan Submitted for Review
April – REJECTED

June - Revised Plan Submitted
Oct. - REJECTED
Dec. - Re-Revised Plan Submitted

March 2016 – ACCEPTED and designated the Independent Plan.

return2meds

Subsidiary of Call2Recycle
12 Producers

Feb – Initial Plan Submitted
April - REJECTED

June - Revised Plan Submitted

Snohomish Health District

June 16, 2016
Start Date for Standard Plan and Independent Plan
Collection Services for King County Under Approved Stewardship Plans

Combined number of secure medicine drop boxes according to two plans as submitted in 2015:

- 67 retail pharmacies
- 35 hospitals or clinics
- 25 law enforcement offices
- 127 total with more signing up

Any underserved areas will have collection events or mailers.
Pre-paid mailers available for homebound residents.
PhRMA Comment Letter

- Review and discussion on industry concerns

- Staff responses and background information on specific issues
Review of Draft Operational Plan for SHD Oversight
## Current Snohomish Partnership for Secure Medicine Disposal Program

### Staffing Responsibilities

- **SHD:** 0.5 FTE-EHS for logistical support of law enforcement drop box program.

- **SRDGTF:** 4 staff of the Snohomish Regional Drug & Gang Task Force (SRDGTF) have responsibilities for oversight, supervision, administration, and operations.
  - ~39 hours per month for drop boxes and ~88 hours per year for two DEA-coordinated collection events (at different hourly salaries).

  Other in-kind staff support not quantified:
  - Staffing for box maintenance at each police facility;
  - Evidence room employee time;
  - Staff time from Everett evidence control Officers to pick-up medicine boxes from some locations, during 2016.
  - 2-3 staff for medicine transport to incineration facility in Brooks OR, as needed.
  - Staff transport of medicines to DEA headquarters after twice-a-year collection events.

### Funding Sources & Amounts

- **Public Funds**
  - **SHD:** ~$80,000 annually from state grants and SWD MCU funds. ~$5,000 supplies plus staff compensation.
  - **SRDGTF:** All funding from SRDGTF internal budget, no dedicated funding source for medicine return.
    - ~$97,730 annually for staff time annually from SRDGTF budget.
    - ~$58,000 in costs of two vehicles (purchase, fuel, maintenance) used by SHD staff for medicine take-back and other SRDGTF/SHD business.

### Services for Residents

- 25 law enforcement drop boxes with limited hours.
  - ~13 pharmacy drop boxes, not accepted controlled substances.

  Only passive education through agency websites and limited outreach.
Implementation of Stewardship Laws

1. Law Takes Effect
2. Program Starts
3. Producers Form/Hire Stewardship Organization
4. Producers Make Agreements with Collectors, Transporters, Facilities, etc.
5. Stewardship Org. Submits Detailed Stewardship Plan
6. Typically 1 Year Deadline
7. Agency Reviews Plan
8. Producers Revise Plan if Not Accepted
9. Plan Accepted

Snohomish Health District
### Staffing

<table>
<thead>
<tr>
<th>Ordinance Implementation Until Plan Submittal (≈ 6 months)</th>
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<tr>
<td>SHD: 0.5 FTE-EHS for 6 months:</td>
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<tr>
<td>• Notifications to producers.</td>
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<td>• Answering queries &amp; disseminating information about ordinance.</td>
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<td>• Review notices of intent to participate.</td>
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<tr>
<td>• Enforcement (warning letters &amp; follow-up) if any non-participating producers.</td>
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**Continuation of Current Snohomish Partnership Program:**

*Same as staff time in column 1.*

### Funding/Services

<table>
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<tr>
<th>Ordinance Implementation Until Plan Submittal (≈ 6 months)</th>
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<td>Public Funds for initial implementation of the ordinance prior to collection of Fees.</td>
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**Continuation of Current Snohomish Partnership Program:**

*Same as funding sources & amounts in column 1.*

**Continuation of Current Snohomish Partnership Program:**

*Same as services in column 1.*
## Staffing

### Plan Review: Approved Plan vs. Disapproved Plan (~3 months)

**SHD:** 0.5 FTE-EHS- for 3 months approximately:
- Plan review, and any petition review.

**If Approved Plan:**
- Notify Producer of plan approval.
- Ensure plan operational by effective date.

**If Disapproved Plan:**
- Notify Producer of plan disapproval, and provide detail of reasons.
- Review resubmitted plans as needed until approved.

**Continuation of Current Snohomish Partnership Program:**

*Same as staff time in column 1.*

## Funding/Services

### Plan Review: Approved Plan vs. Disapproved Plan (~3 months)

**Producers Pay Fees for Plan Review and any Petition Review**

**SHD:** Producers pay actual costs of staff time for plan review through Plan Review Fee. Staff time for other functions reimbursed from source.

**Continuation of Current Snohomish Partnership Program:**

*Same as funding sources & amounts in column 1.*

**Continuation of Current Snohomish Partnership Program:**

*Same as services in column 1.*
### Staffing

**Producers' Stewardship Plan Operation and Oversight**

**SHD:** 0.3 FTE for oversight of program for:
- Periodic monitoring of program activities.
- Investigation of any complaints.
- Enforcement for non-compliance.
- Review of any plan changes.
- Reviewing annual reports.
- Reviewing 4 year plan updates.

**SRDGTF:** In-kind staff time at police facilities hosting drop boxes, but producers coordinate program.

### Funding/Services

**Producers' Stewardship Plan Operation and Oversight**

**Producers Pay for Program Operations, Education, and Actual Costs of SHD Oversight.**

**SHD:** Producers pay actual costs of staff oversight through Annual Operations Fee, and fees for review of any plan changes.

**SRDGTF:** No direct costs. In-kind staff time at police facilities hosting drop boxes.

**At least 25 drop boxes accepting all medicines, including controlled substances, at pharmacies, hospitals and police facilities throughout the county per minimum standard in ordinance.**

**~ 140 drop boxes if all pharmacies & hospitals in county participate.**

**Producers provide active education campaign.**

**All pharmacies have program materials.**
Update on Open Public Comment Process
## Proposed Policy Development Timeline

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<thead>
<tr>
<th>Month</th>
<th>Activities</th>
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<tr>
<td>February</td>
<td>Policy Discussions</td>
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<tr>
<td></td>
<td>Development of Policy Outline for Public Comment</td>
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<tr>
<td>March</td>
<td>Updates at BOH Meetings</td>
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<td>Public Comment Process on Policy Outline: March 25 – April 15</td>
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<td>April</td>
<td>Small Stakeholder Meetings</td>
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<td>Develop Draft Ordinance</td>
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<td>May 10</td>
<td>1st Reading &amp; Public Hearing</td>
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<td>June 14</td>
<td>2nd Reading &amp; Public Hearing</td>
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BOH Ad Hoc Steering Committee Meetings Roughly Every 2 weeks
Update on Open Public Comment Process

Soliciting public comment based on the Ad Hoc Committee's pharmaceutical stewardship policy outline.

Press release – March 28

Preliminary comment period March 25 - April 15

- Accepted via online survey, email, and mail

Public comment at BOH meetings

- May 10
- June 14
Stakeholders

- Community members
- Pharmacies, WA Pharmacy Association
- Hospitals
- Law Enforcement
- Health/medical organizations & healthcare providers
- Substance abuse prevention groups
- Environmental groups
- City governments
- Pharmaceutical manufacturers & associations
- Pharmaceutical Stewardship Organizations: PPSWG and ReturnMeds
- Drug Distributors, Reverse Distributors, Waste Service Providers, Disposal Facilities
Chair Wrap-Up &
Next Steps