

Fentanyl Patch Disposal



On June 29, 2022, [CMS released Phase 3 updated guidance](#) for nursing home surveyors as part of the Phase 2 and 3 Requirements of Participation. Surveyors will begin using this guidance to identify noncompliance on October 24, 2022. Within the Phase 3 updates, CMS has provided new guidance concerning disposal of fentanyl patches, used for pain management.



What's Required

The FDA and manufacturer instructions recommend disposal of used fentanyl patches by folding the patch in half with the sticky sides together and flushing the patch down the toilet or drain. Fentanyl patches are not considered hazardous waste pharmaceuticals by the EPA; therefore, they are not restricted from being flushed down the toilet or drain.

If state and local laws restrict flushing of pharmaceuticals, nursing homes may use drug disposal products or systems for fentanyl patches and other controlled medications. The facility is required to show that the drug disposal product or system minimizes accidental exposure or diversion of the controlled substance.

Using a sharps container, common areas, or resident room trash cans does NOT meet the requirement of preventing accidental exposure or diversion and would therefore NOT be a compliant disposal option for fentanyl patches.



Steps to Facility Compliance

- Ensure fentanyl patches are being disposed of using compliant methods described above.
- Always reference EPA and FDA flushing requirements before flushing medications down the toilet or drain.
- If your facility does not allow flushing of pharmaceuticals based on state and local laws, PharMerica can provide a [MedSafe](#) drug disposal system to meet the requirements for safe disposal.

For more detailed information on fentanyl disposal and FDA and EPA guidelines, refer to the guide: [Fentanyl Disposal: Did You Know?](#)



How PharMerica Can Help

- PharMerica pharmacists can assist the administrator and/or other nursing care center representatives in setting standards and developing, implementing, and monitoring policies and procedures for the safe and effective disposal of medications and related equipment in the facility.
- For each quarterly QAPI meeting, work with your PharMerica pharmacist to prepare a written report summarizing appropriate medication disposal methods and resources available to meet compliance requirements.