

All on board for change: Implementing a sustainable, hospital-wide Rx waste management program

Presented by
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Biographical Overview



Cristina Indiveri, M.S.

Support Services Administrator, Yale-New Haven Hospital

- Under Cristina's direction, YNHH is supported in the development of ongoing sustainability initiatives, assessment and data collection, goal setting and creating a culture of environmental excellence.
- Cristina's expertise lies in the areas of implementing sustainable operations and oversight of support areas for the hospital.
- Cristina serves as the Vice President of the Environmental Advisory Group for VHA, is a member of the American College of Healthcare Executives and earned her M.S. at Georgetown University.



Paulette O'Hara
Major Account Executive, Stericycle

- 23 years of health care industry experience.
- Paulette's expertise lies in Paulette's expertise lies in waste educating and managing compliant practices, including program design for hospital staff members and affiliates.
- Paulette has developed and performed training programs for hospital staff in the areas of proper segregation of all waste streams including bio-hazardous, pharmaceutical recycling and hazardous waste.



WorkSMART Framework

Objective

Comprehensive effort to engage employees to remove waste, reduce unnecessary expenditures, eliminate unnecessary work and re-work, streamline processes, and improve efficiency throughout Yale-New Haven Hospital

Complimentary Structures

Employee Engagement Subcommittee

- Solicit and respond to employee suggestions
- Implement approved employee suggestions
- Host employee rewards celebrations

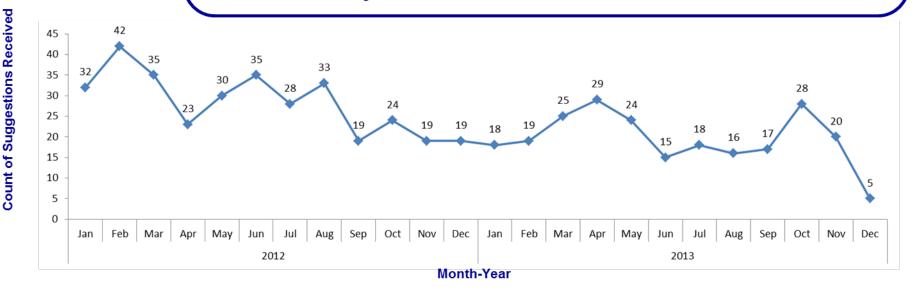
Waste Reduction, Efficiency and Sustainability Subcommittee

- Eliminate waste and improve efficiency in six targeted organization-wide areas
- Collaborate with Hospital and System counterparts



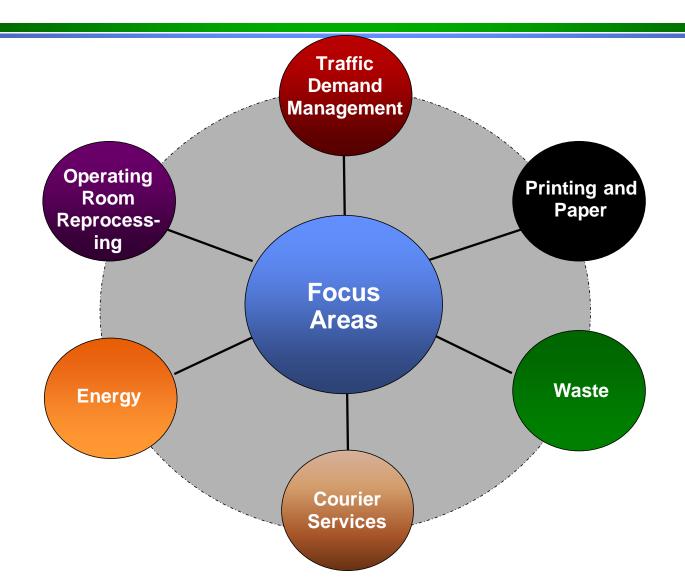
Employee Suggestion Trend

573 suggestions have been submitted by Yale-New Haven Hospital employees on the WorkSMART portal between January 1, 2012 and December 9, 2013





WorkSMART Focus Areas





Learning Objectives

- Outline pharmaceutical waste disposal regulatory requirements and associated risks of violating standards
- Examine how to effectively educate and on-board cross-functional teams on pharmaceutical waste management
- Learn how to successfully implement a pharmaceutical waste management program
- Detail methods to minimize risk and stay ahead of the compliance curve



Why Is This Important?

- Trace amounts of pharmaceuticals were measured in the drinking water of at least 46 million Americans (Associated Press, 2008)
- Hospitals are a major source of pharmaceutical use
- Inspectors have begun targeting hospitals' pharmaceutical waste programs
- Risk of potential fines and negative publicity are real
- New EPA proposal will be very specific to pharmaceutical waste regulations for healthcare



What do the Numbers Tell Us?

- In 2012 *Pharmacy, Purchasing & Products* surveyed 416 hospitals and found that:
 - 92% of pharmacy directors placed high priority on pharmaceutical waste management
 - 71% of pharmacists had a program in place for RCRA hazardous pharmaceutical waste
 - 54% felt their program was fully compliant, 35% partially compliant and 11% non-compliant



Why is implementing a pharmaceutical waste disposal program such a challenge?



Challenge #1: Stakeholder Buy-In

- Key Stakeholders:
 - Nurse Managers and Nurses
 - Operation Room Department Managers
 - Emergency Room Staff



Key Stakeholders

NURSING / PATIENT CARE

- Review On-Floor Waste Identification
- · Proper Collection and Segregation of Pharmaceutical Waste

ADMINISTRATION

- Budget Approval
- Addresses Multi-Departmental Challenges
- · Emphasizes the Importance of Successful Program to Entire Facility / System

EDUCATION

- Facilitate Initial Training at "Go Live"
- Maintains Training Materials
- Maintains Training Records
- Manages Ongoing Education
- Integration of Training Modules into New **Employee Orientation**
- Integrate Training Materials in the Computer Based Learning System

FULL PARTICIPATION LEADS TO SUCCESSFUL AND TIMELY PROGRAM ROLLOUT

PHARMACY

- Submits Initial Formulary Data for Characterization
- Establishes and Maintains Internal Waste Identification System
- Manages Pharmaceutical Waste Returned to Pharmacy
- Submits Formulary Additions
- · Review Controlled Substance Policy and Procedure
- Review Chemotherapy Waste Policy and Procedure
- · Determine Management Process of Samples Within the Hospital

PROGRAM CHAMPION / PROJECT LEAD

- Typically a Dual Role of Safety / Pharmacy
- Communication Point Person
- Supports Program
- Multi-Departmental Liaison
- Coordination of Implementation Activities



ANESTHESIA / OPERATING ROOM MANAGER

· Proper Collection and Segregation of Pharmaceutical Waste



EMERGENCY DEPARTMENT

· Proper Collection and Segregation of Pharmaceutical Waste

SAFETY / ENVIRONMENTAL SERVICES / HOUSEKEEPING / **FACILITIES**

INFECTION CONTROL

Waste Collection Containers

· Approve Disposal Procedure of

· Review Procedure for Managing

· Proper Collection and Segregation of

Pharmaceutical Waste

RADIOLOGY

Approve the Placement of Pharmaceutical

Pharmaceutical Waste from Isolation Rooms

Pharmaceutical Waste Remaining in a Syringe

- Container Management and Replacement in Satellite Accumulation Areas (SAA)
- Management and Inspections of Central Accumulation Area (CAA)
- Coordination of Waste Shipments
- · Responsible for the EPA Requirements
- Responsible for DOT Requirements

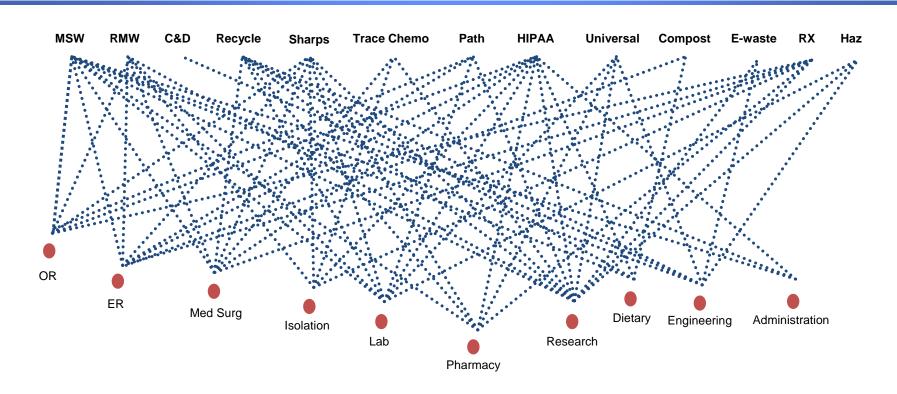


Achieves Compliance with Federal EPA, DOT and State Regulations

- Achieves Compliance with Joint Commission Standards
- Maximizes Awareness, Accuracy and Protection of the Environment
- · Minimizes Disruption to the Existing Duties of Healthcare Staff
- Reduces Corporate / Institutional Liability



Waste Streams are Interconnected



No single department is responsible for managing all hospital waste streams

Waste affects everyone



Challenge #2: Proper Staff Training

- All waste generators must be trained
- Lack of experience causes hospitals to classify all waste as hazardous—a very costly decision
- Staff needs to be trained on differences between hazardous and bio-hazardous waste
- Training must be conducted annually with reinforcement multiple times per year
- OSHA, DOT and EPA require additional training

YALE NEW HAVEN Identify RCRA HEALTH Identify RCRA Hazardous Pharmaceuticals in Formulary

- Listed
 - "P" or "U" list supplied by EPA
 - 1980 was the last year updates were made to list
 - Captures only 25% of hazardous drugs
- Characteristically hazardous
 - Four categories defined by Department of Energy and Environmental Protection
 - Ignitability, corrosivity, reactivity and toxicity



Challenge #3: Proper Segregation

- Least expensive option is to segregate hazardous from non-RCRA hazardous
 - Proper segregation helps manage costs
 - Understand environmental impact
 - Place containers conveniently so implementation is easily adopted



What is Pharmaceutical Waste?

- Pharmaceutical waste is a medication that is:
 - No longer used for its intended purpose
 - To be discarded
- Pharmaceutical waste is LEFTOVER or UNUSED medication contained in:
 - Vials
 - IV's with attached tubing
 - Oral medications
 - Ointments and creams
 - Physician samples





What Drugs Go Where?

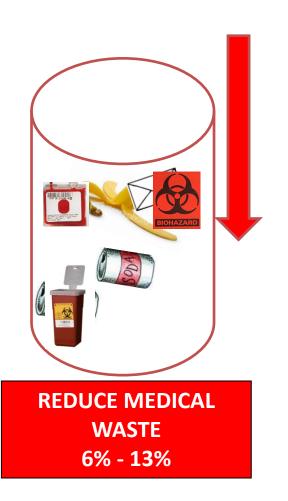
- Hazardous drugs go into the BLACK RCRA container (EPIC will give instruction)
- Examples:
 - Nicotine
 - Nitroglycerin
 - Warfarin

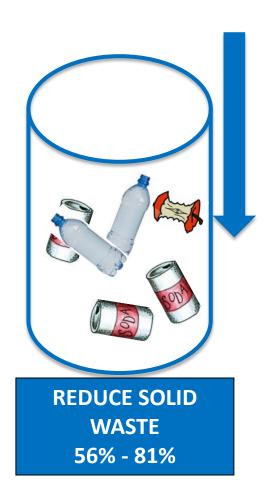
- Non-hazardous drugs go into the BLUE container (no instruction in EPIC)
- Examples:
 - Abilify
 - Clozapine
 - Ibuprofen

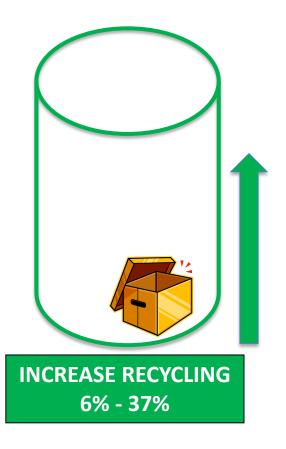




Waste Segregation





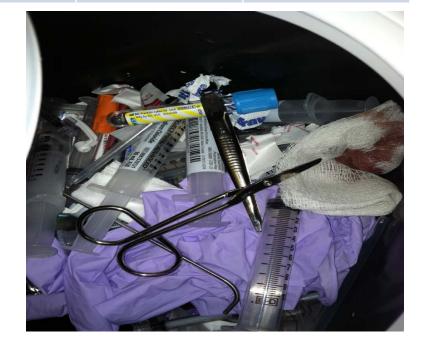




Price Difference in Disposal Methods

Waste Stream	Solid Waste Cost per <u>Ton</u>	Recycled Cost per <u>Ton</u>	RMW Cost per <u>Ton</u>	Hazardous Waste Cost per <u>Pound</u>
Average	\$126	\$90	\$1015	\$3.10 (\$6200/ton)







Challenge #4: Proper Disposal

- Locate a central accumulation area for pharmaceutical waste
- Dual waste is the most expensive option, costing up to 50% more when bio-hazardous and hazardous are combined
- Incineration of waste at a facility for hazardous waste is the next most expensive option
- Environmental regulations have limited the number of incinerators in the U.S.



How has Yale-New Haven Hospital effectively overcome these challenges facility-wide?



Yale-New Haven Hospital

- Two New Haven campuses:
 - York Street Campus
 - Saint Raphael Campus

- Yale-New Haven Children's Hospital
- Yale-New Haven Psychiatric Hospital
- Smilow Cancer Hospital at Yale-New Haven



- Founded in 1826
- Fourth oldest voluntary hospital and one of the largest hospitals in the U.S.
- Primary teaching hospital of Yale University School of Medicine
- Magnet Nursing designation
- 12,000 employees
- 2,500 volunteers
- 1,541 inpatient bed capacity



Pharmaceutical Program



Results in significant cost savings

Complies with waste disposal regulations

Health and safety of patients, employees, community



Sustainable environment and preservation of resources



Rx Program Highlights

- Implemented reusable containers to reduce waste
- EPIC displayed waste disposal method to encourage proper waste segregation
- Changes in container location
 - All containers are located in centralized areas
- New process for returning incompatible hazardous medications to pharmacy



Waste Disposal Guidance

- The hospital formulary was analyzed to determine the proper disposal method
- EPIC instructions emphasize proper segregation of hazardous drugs
 - Example: "Dispose leftover medication in the black hazardous waste container"
- Non-hazardous items do not have EPIC instructions as they make up the majority of the formulary



Incompatible Hazardous Rx Waste

- Incompatible Hazardous Pharmaceuticals
 - Rx waste CANNOT be placed in the same container with other Rx waste because it may result in a dangerous chemical reaction
- EPIC informs if a medication is incompatible by saying "seal in a ziploc bag and return to the Pharmacy"
- Example items that can not go into the containers on the unit:
 - Examples: Ammonia aromatic, Glycopyrrolate, Inhalers,
 Pyridoxine HCL (9 medications total)



What Drug Goes Where?

Message	Waste types	Action
Without instructions in EPIC	Non-hazardous waste	Dispose waste in blue container
With instructions in EPIC	Hazardous waste	Dispose waste and/or wrappers in black container according to instructions in EPIC
With instructions in EPIC	Incompatible waste	Seal in ziploc bag & return to Pharmacy via "out bin" (not tube system)



Segregating Rx Waste

	NON-HAZARDOUS WASTE BIN	HAZARDOUS WASTE BINS				ADDITIONAL WASTE BINS			
DISPOSAL LOCATION	Blue Non-Hazardous Waste Disposal Bin	Black RCRA Waste Disposal Bin		Yellow Trace Chemo Disposal Bin	Special Locations	Red Biohazardous Waste Bag	Sharps Bin	Regular Trash Bin	The Drain
INSTRUCTIONS	NO CODE: Place all unused unlisted medication left in vials, IV, etc, in blue buckets. IF empty, throw in TRASH.	P-listed medication on AND any packaging/ myrappers/ containers b	BKC: Place unused Dor U-listed medication into black bucket. (Note in Epic.)	Place trace/empty chemotherapy agents in Yellow bucket.	SP, SPC, SPD, SPLP: Place unused characteristic waste in resealable bag and place in the Pharmacy Out Bin. (Note in Epic)	Place biohazardous waste into red bags. See hospital policy for more information.	Place all empty syringes, with or without a needle into sharps containers.	Throw non-sharps items that are empty, non-hazardous, and non-infectious into the regular trash.	Flush controlled substances and maintenance IVs down the drain.
EXAMPLES	Antibiotics Tylenol Aspirin IV with medication left. Keep tubing attached. Creams and ointments capped. Med-soaked sponges or paper towels Pills and tablets Vials and medication	Nicotine Arsenic Trioxide Epinepherine Nitroglycerine Physostigmine	Leftover opened, partially used chemotherapy Amyl Nitrate Decavac Multivitamins Digoxin All Insilin Occuvite Selenium Sulfide Other identified meds	Empty vials Empty syringes Gowns Gloves Wipes Goggles Empty IV with tubing	Aerosols Inhalers Corrosives Glacial Acetic Acid Glycopyrrolate Sodium Hydroxide Oxidizers Potassium Permanganate Unused Silver Nitrate	Blood and blood product in plastic containers Body fluids (e.g., hemovacs, pleurevacs, wound drains) Blood-saturated materials Bloody suction canisters Blood transfusion tubing and bag Chest tubes	Empty sharps, as long as they have not come in contact with a P-listed agent Fentanyl patches (sticky ends folded together) Broken or unbroken glass contaminated with blood or body fluid	Empty IV bags Med wrappers Paper towels Uncontaminated Gloves Empty drug vials (non P-listed)	Controlled substances Maintenance IV solutions containing any/all of the following: Potassium Chloride Potassium Phosphate Sodium Phosphate Calcium Sodium Bicarbonate Dextrose Saline
SHARPS	No Sharps	Sharps (Syringe/Ampule) Containing Medications Only		Empty Sharps Only	Not Applicable	No Sharps	Empty Sharps Only	No Sharps	Not Applicable
TROLLED	No	No		No	No	No	No	No	Yes



Hospital-Wide Communication

- Huddle on each and every unit
- Daily classroom learning
 - Partnered with waste vendor to ensure new educational session every hour for a week
- E-mail notification
- Newsletter article
- System-wide health stream course



Sustainability Champions

Wanted:

Sustainability Champions







Sustainability Champions are employees who:

- Develop and implement methods to contribute to YNHH's sustainability efforts
- Motivate fellow co-workers to take environmentally friendly actions
- Set an example for peers
- Implement a Green Office Program modified from Harvard University
- Early adopters of sustainable policies



Partnering with Vendors

- Created strategic partnership with waste vendor to create win-win scenarios
- One team working together; no finger pointing, no fault-finding
- Utilized all communication channels for education as a team
 - E-mail, hospital newsletter, posters/signs, staff meetings, huddles, screen savers
 - Emphasize employee safety, regulatory impacts, sustainability and cost
 - Perform random and routine audits to increase accountability
- Provide routine feedback and opportunities for improvement



Sustaining the Rx Program

- Waste audits were performed daily, weekly and monthly
- Units were provided immediate feedback
 - Successes were outlined
 - Opportunities for improvement were depicted as well as photos of current state
- Three citations from audit resulted in action plan
 - Manager was asked to put together an action plan that would be presented to Steering Committee



Results

- Safety and Quality
 - Clear waste segregation program based on "best practice" model
 - Sustainable waste program to create a healthier community and an environment
- Cost Savings
 - In access of \$100,000 based on proper segregation
- Regulatory and Legal Concerns
 - Pharmaceutical waste containers will be removed from individual patient rooms to ensure that they are under the control of the operator



Lessons Learned

- Create a burning platform to encourage change
- Emphasize that all employees are responsible for

managing waste

- Utilize your champions
- Partner with a reliable vendor
- Provide continuous feedback
 - Successes
 - Opportunities for improvement





Contact Information

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