

**FISCAL NOTE  
PRIVATE COST**

**I. RULE NUMBER**

**Title 20:** Department of Insurance, Financial Institutions and Professional Registration  
**Division 2220** - State Board of Pharmacy  
**Chapter 2** - Pharmaceutical Care Standards  
**Proposed Rule** - 20 CSR 2220-2.095 Collection of Non-Controlled Medication for Destruction

**II. SUMMARY OF FISCAL IMPACT**

<i>Estimate of the number of entities by class which would likely be affected by the adoption of the rule:</i>	<i>Classification by types of the business entities which would likely be affected:</i>	<i>Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:</i>
383	Pharmacies opting to establish a drug return program	\$ 306,400 <i>Y1 Implementation</i>
383	Pharmacies opting to establish a drug return program	\$ 35,473.46 <i>Y1 Implementation &amp; Recurring annually for the life of the rule</i>

**III. WORKSHEET**

**YEAR 1 IMPLEMENTATION COSTS**

<i>Estimated number of Pharmacies</i>	<i>Description of Costs</i>	<i>Calculation of Estimates</i>	<i>Estimated costs for compliance with the rule by affected entities:</i>
383	Collection Receptacle	(383 pharmacies x \$800 per receptacle- <i>one time cost</i> )	\$ 306,400

**ADDITIONAL YEAR 1 COSTS AND RECURRING ANNUAL COSTS**

<i>Estimated number of Pharmacies</i>	<i>Description of Costs</i>	<i>Calculation of Estimates</i>	<i>Estimated costs for compliance with the rule by affected entities:</i>
383	Required Inventory, Record-Keeping, Administrative Tasks	(383 pharmacies x \$14.62 pharmacy technician hourly wage x 1 hour per year)	\$ 5,599.46
383	Inner Liners	(383 pharmacies x \$1.50 per liner x 52 liners per year)	\$ 29,874
<b>TOTAL ANNUAL RECURRING COSTS</b>			<b>\$ 35,473.46</b>

**IV. ASSUMPTIONS**

1. The U.S. Drug Enforcement Administration (DEA) authorized drug return programs in 2014. At this time, data on participants and participation costs is not readily available. The Board made a good faith attempt to estimate costs to ensure compliance with Chapter 536, RSMo.
2. The proposed drug return program is voluntary and not mandatory. Pharmacies are not required to participate. Additionally, complimentary mail back receptacles and materials are currently available. The rule does not prohibit pharmacies from assessing consumer costs/fees; potential costs may be offset by any costs/fees imposed.
3. After consultation with other states and review of other state materials, the Board estimates approximately 25% of Missouri pharmacies (or 383 pharmacies) will establish a drug return program. Costs for collection receptacles were estimated at \$800 per receptacle based on currently available sales information. Costs for inner liners were estimated at \$1.50 per liner with an estimated 52 liners required per year (an estimated weekly removal). The Board estimates these numbers will remain consistent over the life of the rule. Licensing data was based on all Missouri licensed pharmacies at the end of FY 15.
4. The Board estimates approximately 1-hour per year will be required to conduct the inventory, record-keeping, and administrative tasks in the proposed rule which may be performed by a pharmacy technician. Accordingly, an estimated pharmacy technician hourly salary of \$14.62 was used to estimate costs based on the United States Bureau of Labor Statistics Occupational Employment and Wages data for December 2015.
5. The Board estimates medication may be disposed by the average pharmacy in-house without any related costs.