I. Purpose

Hypodermic syringes and needles, are defined by New York State, are instruments expressly designed for the introduction of medicines beneath the skin.

Regulations governing the possession of hypodermic needles and syringes in New York State are outlined in section 80.133 of the Part 80 Rules and Regulations on Controlled substances which confers authority to administer the program to the Department of Health under the Certificate of Need Process. This process is intended to evaluate need and authorize educational institutions and persons engaged in commercial, industrial or agricultural activities to possess hypodermic needles and syringes.

The Department of Environmental Health & Safety (EH&S), Biological Safety program serves as a technical resource to individuals and departments seeking to obtain certification to possess hypodermic syringes and needles. The final responsibility for compliance with the statute rests with the applicant. Here at Cornell University, many departments maintain a certificate of need for departmental users. EH&S requires that certificate be posted in the departments’ main office or individual laboratories and copies sent to EH&S for filing. EH&S maintains digital copies of certificates issued to applicants at the Cornell University, Ithaca campus.

II. Scope

This document applies to the use of needles and syringes in research facilities at Cornell University excluding:

a. Weill Medical College
b. Gannett Health Center
c. Cornell University Hospital for Animal
d. University Hospital for Animals Pharmacy
e. others persons or classes of persons whose use falls within the scope of professional activities
   i. veterinarians
   ii. pharmacists
   iii. hospitals
   iv. clinical laboratories
   v. medical institutions
   vi. persons engaged in agricultural activity that provides food for human consumption
   vii. farmers engaged in livestock production or persons supplying such farmers
   viii. Persons certified by the New York State Department of Environmental Conservation as wildlife rehabilitators
III. Roles and Responsibilities

a. Cornell University EH&S is responsible for developing and maintaining the policy on the use of hypodermic needles and syringes in non-clinical and nonpharmaceutical applications for the Cornell, Ithaca campus. As such, the role of EH&S is to provide guidance to campus stakeholders as it relates to licensing and registration, use, security, storage, record keeping and disposal of hypodermic syringes and needles.

b. An applicant may represent any faculty or staff member or departmental unit that submits an application for approval to use hypodermic syringes and needles. This individual/entity is ultimately responsible for understanding and adhering to all applicable state, federal and institutional policies as they relate to the use of hypodermic syringes and needles. This includes responsibility for the actions of individuals with supervisory and custodial responsibilities under the statute.

c. Individuals with designated responsibility for the custody of syringes and needles are responsible for understanding and adhering to state, federal and institutional policies as they relate to the use of hypodermic syringes and needles. This individual is specifically charged with providing a means to safeguard the materials against unauthorized access and maintaining records of receipt and disposition of all hypodermic syringes and needles acquired.

d. Individuals with designated responsibility for supervising the use of hypodermic syringes and needles are responsible for understanding and adhering to state, federal and institutional policies as they relate to the use of hypodermic syringes and needles. This individual is specifically charged with ensuring that staff under their charge is conversant in and compliant with policies governing the use of hypodermic syringes and needles. This individual is also responsible for maintaining records of all hypodermic syringes and needles under their supervision.

e. EH&S monitors compliance with the statute through the Research Area Inspection Program.

IV. Initial Licensing and Registration

Individuals seeking authorization to possess needles or syringes must complete an application from New York State Department of Health. The application must indicate

a. Activity type for which the certificate is being applied
   i. educational institution
   ii. industrial activity
   iii. commercial activity
   iv. agricultural activity

b. Applicant information including name and address

c. Facility information
d. Certifications

e. List of authorized individuals
   i. person responsible for supervising the use of syringes and needles
   ii. list of individuals responsible for the custody of syringes and needles

f. Location where syringes and needles will be used

g. Purpose for the use of syringes and needles

h. Maximum annual usage of syringes and needles

i. Security of syringes and needles
   Hypodermic syringes and needles must be stored in a locked, secure place.
   Spring or combination dial locks cannot be used to secure syringes and needles against unauthorized access.
   i. type of cabinet used for storage of syringes and needles
   ii. location of cabinet used to store syringes and needles
   iii. locks used to secure cabinet against unauthorized access

j. Attestation statement

The completed application and supporting documentation must be mailed to:
   Bureau of Narcotic Enforcement
   433 River Street, Suite 303
   Troy, NY 12180
   (518) 402-0707

V. Compliance Assurance

a. Authorized Individuals
   The submitted documentation must list the names of individuals authorized by the educational institution, commercial or industrial firm to have custody of the hypodermic needles and syringes as well as the names of individuals designated as responsible for supervision of the use of needles and syringes.
   Changes to designated custodial or supervisory personnel must be reported to the Department of Health, Bureau of Narcotic Enforcement within 30 days.

b. Designated Use Areas
   The location of use may include any classroom, laboratory, lecture hall, department or division documented in the certificate of need.
   Any change in the designated use area must be reported to the Department of Health, Bureau of Narcotic Enforcement within 30 days.

c. Storage and Security of Hypodermic Needles and Syringes
Reserve or main stock must be kept in double cabinets secured by suitable locks and keys. Both inner and outer cabinets must be stationary.

**Hypodermic syringes and needles not in reserve or main stocks and not in use must be maintained under suitable locked protection.**

d. Record Keeping

A record of all purchases of hypodermic syringes and needles must be maintained. Storage records must include a running inventory of all hypodermic syringes and needles which indicates the type, size and number of each item purchased, distributed, on hand and the dates of receipt or disposition.

Inventories must be reconciled on June 30th of every year.

A record of destruction of syringes and needles must be kept. This record denotes the type, size and number of each item destroyed the date of destruction and the name of the person responsible for destruction of the item.

Records must account for hypodermic syringes and needles which have been lost or stolen. The record must indicate the kind, number and date of discovery of loss or theft.

A report of loss or theft of hypodermic syringes and needles must be made to the Department of Health Bureau of Narcotic Enforcement immediately upon discovery.

All records must be kept for a period of two years from date of transaction.

e. Destruction of Hypodermic Syringes and Needles

Hypodermic syringes and needles which are no longer useable or required must be destroyed. Final destruction of hypodermic needles and syringes for Cornell University, Ithaca campus is carried out by a third party vendor. This final treatment is in keeping with Department of Health policy and results in total destruction of hypodermic syringes and needles via incineration.

Specifically, regarding the destruction of hypodermic syringes and needles, the statute states

i. Hypodermic units destined for destruction must have the needle detached from the syringe prior to disposal

ii. Hypodermic syringes must be crushed, broken or otherwise rendered inoperable.

iii. Hypodermic needles must be bent prior to disposal.

It is the policy of Cornell University that used needles and syringes or those destined for destruction be placed in approved, rigid, leak proof, puncture resistant container that is prominently labeled with a biohazard sign and the words “BIOHAZARD”. Hypodermic syringes and needles must be placed directly into a sharps container without bending, clipping, breaking, shearing or recapping in order to prevent injury to personnel. Sharps containers are sent for disposal when ¾ full.

f. Inspection

Records and stocks of hypodermic syringes and needles maintained by the unit or individual must be made readily available for inspection by authorized representatives of the State Commissioner of Health.