A Product Stewardship Plan
For Unwanted Medicine from Households

Contra Costa County, California
June 15, 2018
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I. Introduction

MED-Project LLC ("MED-Project"), on behalf of the participating companies as described in Appendix A, submits this Product Stewardship Plan ("Plan") for Unwanted Medicine in compliance with Chapter 418-16 of the Contra Costa County Ordinance Code ("Ordinance"). The Ordinance requires pharmaceutical Producers\(^1\) to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from Contra Costa County households.

II. Contact Information

The primary contact person for MED-Project is:

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III. Plan Definitions

Available Languages are English, Spanish, Chinese, and Vietnamese.

Carrier is United Parcel Service, Inc., the common carrier used by Vendor to transport Unwanted Medicine.

County means the unincorporated area of Contra Costa County.

DEA is the U.S. Drug Enforcement Administration.


Kiosk Drop-Off Site is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine.

Kiosk Drop-Off Site Host is the designated contact person or persons at the Kiosk Drop-Off Site.

Law Enforcement Agency or LEA is a federal, state, tribal, or local law enforcement office or agency.

Mail-Back Services is the provision of pre-paid, pre-addressed envelopes or other packages for the collection and disposal of Unwanted Medicine.

Plan or Product Stewardship Plan is the product stewardship plan presented in this submittal by MED-Project.

Program or Product Stewardship Program is the product stewardship program set forth in this Product Stewardship Plan.

Residents or County Residents means human beings who reside in the unincorporated area of the County.

Service Technicians are service personnel trained to remove and transport the Unwanted Medicine from Program kiosks. Service Technicians will be managed by Vendor.

Take-Back Event is an event at least 6 hours in length at a location accessible to the public conducted by MED-Project with oversight by law enforcement for the collection of Unwanted Medicine.

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\(^1\) All capitalized terms used but not otherwise defined herein shall have their respective meanings set forth in the Ordinance.
Unwanted Medicine is defined in Section IV of this Plan.

Vendor is any vendor retained by MED-Project to carry out its obligations under the Program.

IV. Unwanted Medicine

For the purposes of the Plan, “Unwanted Medicine” includes all materials identified as “Covered drug[s]” under Ordinance § 418-16.202(e) that qualify as “Unwanted covered drug[s]” under Ordinance § 418-16.202(q). Unwanted Medicine does not include the following:

i. Expired undispensed samples direct from physicians’ offices;
ii. Unused or expired drugs from hospitals and institutions;
iii. Bulk animal pharmaceuticals from farms (business use);
iv. Vitamins or supplements;
v. Herbal-based remedies and homeopathic drugs, products, or remedies;
vi. Compressed cylinders, and inhalers;
vii. Iodine-containing medications;
viii. Mercury-containing thermometers;
ix. Cosmetics, shampoos, sunscreens, toothpaste, lip balm, antiperspirants, or other personal care products that are regulated as both cosmetics and nonprescription drugs under the federal Food, Drug, and Cosmetic Act (Title 21 U.S.C. Chapter 9);
x. Hard surface and toilet disinfectant cleaners;
xii. Drugs administered in a healthcare setting;

Collection of Unwanted Medicine

The Plan provides services to collect Unwanted Medicine, including controlled substances. The collection methods and any applicable legal requirements are described below.

A. Unwanted Medicine Collection Program Implementation

1. Outreach

Per Ordinance § 418-16.206(c)(1), MED-Project initially notified 163 retail pharmacies and 33 LEA locations in the County of the opportunity to participate as a Kiosk Drop-Off Site Host. MED-Project performs outreach to these locations through calls and emails with the goal of establishing Kiosk Drop-Off Sites distributed throughout the County. As part of this outreach, MED-Project asked if the sites were interested in participating in the Program, whether the sites currently host a kiosk or other services for the disposal of Unwanted Medicine, whether pharmacies are DEA registrants, and if the sites would like more information regarding the Program.

See Section XIII.A for collection limitations imposed by the DEA Rule.
LEAs, pharmacies, and other eligible DEA registrants that currently host kiosks in the County may transition into the Program upon entering into an agreement with MED-Project. Existing drop-off sites are available at the following locations:

<table>
<thead>
<tr>
<th>Pharmacy kiosk hosts:</th>
<th>LEA kiosk hosts:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. City Center Pharmacy</td>
<td>1. Contra Costa Regional Medical Center Sheriff’s</td>
</tr>
<tr>
<td>Brentwood</td>
<td>Substation</td>
</tr>
<tr>
<td>2. Walgreens – Walnut Creek</td>
<td>2. CCC Sheriff’s Field Operations Building</td>
</tr>
<tr>
<td>3. Walgreens – El Cerrito</td>
<td>3. City of Clayton, Police Department, City Hall</td>
</tr>
<tr>
<td></td>
<td>4. City of Concord, Police Department</td>
</tr>
<tr>
<td></td>
<td>5. City of Martinez, Police Department, City Hall</td>
</tr>
<tr>
<td></td>
<td>6. Town of Moraga, Police Department</td>
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<tr>
<td></td>
<td>7. City of Orinda, Police Department, City Hall</td>
</tr>
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<td></td>
<td>8. City of Pleasant Hill, Police Department</td>
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<tr>
<td></td>
<td>9. City of San Ramon, Police Department</td>
</tr>
<tr>
<td></td>
<td>10. City of Walnut Creek, Police Department, City Hall</td>
</tr>
<tr>
<td></td>
<td>11. City of Richmond, Police Department</td>
</tr>
<tr>
<td></td>
<td>12. City of San Pablo, Police Department</td>
</tr>
<tr>
<td></td>
<td>13. City of Pinole, Police Department</td>
</tr>
</tbody>
</table>

2. Implementation

MED-Project has begun work with LEAs and pharmacies identified during outreach (see Section V.A.1.) to determine interest in having Kiosk Drop-Off Site Host signed agreements. MED-Project is working to satisfy the collection system requirement established in Ordinance § 418-16.214(a)(2) through signed agreements with Kiosk Drop-Off Site Hosts. Ninety days after Plan approval, MED-Project will commence operation of the Program. MED-Project will seek to provide three Kiosk Drop-Off Sites in each supervisorial district in the unincorporated areas of the County, and where that is not feasible, MED-Project will satisfy the collection system requirement in the unincorporated areas of the County through quarterly Take-Back Events at three locations and Mail-Back Services in any supervisorial district where signed agreements have not been obtained from three Kiosk Drop-Off Site Hosts. See Sections V.C and V.E.2 for details of how the Program will satisfy the collection system requirement.

Collection of Unwanted Medicine will begin at collection locations once agreements have been executed with each location, kiosks have been installed, sites have been trained, and, in the case of pharmacies, all requirements of the DEA and the California State Board of Pharmacy have been met.

Mail-Back Services will be available to disabled and home bound Residents upon request, thereby offering more opportunities to dispose of Unwanted Medicine.

3. Convenience

MED-Project will assess performance, gauge feedback, and revise its approach as appropriate. As implementation proceeds, MED-Project shall continue to approach organizations that may be available as future Kiosk Drop-Off Site Hosts on an annual basis. These organizations are listed in Appendix B.

The Plan will be implemented in a flexible manner, offering coverage to Residents through a combination of Kiosk Drop-Off Sites, Take-Back Events, and Mail-Back Services. Current activities taking place prior to Plan approval include outreach to LEAs and pharmacies regarding their interest and ability to participate in the Program as Kiosk Drop-Off Sites and outreach to potential Take-Back Event Hosts. Over the course of
implementation, Kiosk Drop-Off Sites will be established to the extent that (1) additional eligible LEAs and/or DEA-registered pharmacies agree to participate, and (2) contracts can be executed with such entities. MED-Project will conduct supplemental Take-Back Events and provide Mail-Back Services in any supervisorial district where agreements to host a kiosk have been signed by fewer than three Kiosk Drop-Off Site Hosts. Contracts outlining the responsibilities of all involved parties will be drafted, reviewed by appropriate entities, and signed by all parties before MED-Project installs kiosks or schedules Take-Back Events with an LEA or pharmacy.

Once MED-Project obtains three agreements in a supervisorial district with Kiosk Drop-Off Site Hosts, these supplemental services shall cease within the district, however mail-back services for disabled and home bound Residents will be available. See Section V.E.2 for more information about the availability of Mail-Back Services.

For more information regarding Take-Back Event scheduling, coverage, and frequency, see Section V.C.

4. Fees and Costs

MED-Project will pay all administrative, operational, and disposal costs and fees associated with the collection of Unwanted Medicine as a part of the Program.

B. Kiosk Drop-Off Sites

Kiosk Drop-Off Sites will be placed across the County to meet the collection system requirement established by the Ordinance. This network will provide Residents several different outlets to participate in the Program. Kiosk Drop-Off Site Hosts will accept unwanted Medicine from Residents during all regular business hours.

1. Kiosk Drop-Off Site Locations

MED-Project contacted 163 pharmacies and 33 LEAs located in the County about the opportunity to serve as a Kiosk Drop-Off Site Host. Of the locations contacted, 94 pharmacies and 29 LEAs expressed interest in participating in the Program. These interested Kiosk Drop-Off Site Hosts are identified in Appendix C. A map of the interested and potential Kiosk Drop-Off Site Host locations is below.
MED-Project will continue outreach via emails, phone calls, and in-person site visits to potential Kiosk Drop-Off Site Hosts that have not expressed interest in Program participation until the collection system requirement has been met and annually thereafter. These sites are listed in Appendix D. MED-Project will balancing the need to meet the service convenience requirement with the potential for outreach fatigue on the part of potential sites.

As required under Ordinance § 418-16.214(a)(4), within three months of their offer to participate (unless the collector requests a longer time-frame), the Program will include as a Kiosk Drop-Off Site any retail pharmacy or LEA willing to serve voluntarily as a Kiosk Drop-Off Site for Unwanted Medicine and able to meet all applicable laws, regulations, and other legal requirements. Locations currently serving as a drop-off site may participate in the Program by signing agreements with MED-Project and modifying their DEA registrations if required. The process for modifying DEA registrations is outlined in Section XIII.A.1. MED-Project will work with the Kiosk Drop-Off Site Host to transition to the Program and Vendor.

See Section V.C for more information on Take-Back Events and Section V.E et seq. for Mail-Back Services.

2. Drop-Off Site Kiosk Placement and Maintenance Program

Kiosk installation shall be the responsibility of MED-Project at LEA and pharmacy Kiosk Drop-Off Sites if the Kiosk Drop-Off Site Host has identified a placement location. All kiosks in the Program must be securely placed and maintained inside a collector’s registered location or LEA’s physical location in accordance with DEA Rule §§ 1317.75(d)(1) and 1317.35(a). At pharmacies, kiosks will be placed in the immediate proximity of a designated area where controlled substances are stored and at which an employee is present (i.e., can be seen from the counter), pursuant to § 1317.75(d)(2). At a hospital or clinic with an on-site pharmacy, kiosks will be placed in an area regularly monitored by employees but not near areas of the facility where emergency or urgent care is provided. § 1317.75(d)(2)(i). Kiosk placement will also comply with any
applicable Board of Pharmacy requirements. Costs associated with installation and maintenance will be paid by MED-Project per the contracts with the Kiosk Drop-Off Site Hosts.

The maintenance program will address items such as:

- Periodic inspection of kiosks to monitor general wear and tear;
- Service Technician access to the kiosks during regularly scheduled pick-ups and scheduling of service if necessary; and
- Reporting by the Kiosk Drop-Off Site Host of damage to a kiosk or requested maintenance service.

3. Kiosk Specifications

A kiosk will be offered to all host locations. Pursuant to DEA Rule § 1317.75(e), MED-Project kiosks at pharmacies will:

- Be securely fastened to a permanent structure;
- Be securely locked, substantially constructed containers with a permanent outer container and removable inner liner;
- Include a small opening in the outer container that allows contents to be added to the inner liner, but does not allow removal of the inner liner’s contents;
- Prominently display a sign indicating that only Schedule II-V controlled and non-controlled substances are acceptable to be placed in the kiosk; and
- Have the small opening in the outer container locked or made inaccessible to the public when a Kiosk Drop-Off Site employee is not present.

The proposed design of the pharmacy kiosk and proposed signage (Appendix E) satisfies these requirements through the use of heavy gauge steel; multiple locking mechanisms, including a locking mechanism on the drop slot; a tamper-proof slot; and commercial hinges. The design will increase the likelihood of consumer participation by providing easy access to wheelchair users. The locking mechanism on the drop slot will prevent kiosk over-flow once the container has reached its maximum level and is locked by the Kiosk Drop-Off Site Host. MED-Project pharmacy kiosks will come with appropriate regulatory signage and instructions, including an instruction to remove or strike out personal information from any Unwanted Medicine and packaging before depositing them and language required under the DEA Rule\(^2\) and by the Board of Pharmacy. Kiosk signage will provide information about what is and is not accepted in the kiosk.

Additionally, under § 1317.60(a), MED-Project kiosk inner liners will:

- Be waterproof, tamper-evident, and tear-resistant;
- Be removable and sealable immediately upon removal without emptying or touching kiosk contents;
- When sealed, make the contents of the inner liner not viewable from the outside;
- Clearly indicate the size of the inner liner; and
- Bear a permanent, unique barcode for tracking purposes.

MED-Project kiosks and inner liners will also comply with Board of Pharmacy requirements.

While the DEA Rule does not require LEA kiosks to meet these same requirements, MED-Project will offer these kiosks and inner liners to LEAs. See DEA Rule at 53531.

\(^2\) Specifically, as required under § 1317.75(e)(4), all kiosks will prominently display a sign stating that: “Only Schedule II-V controlled and non-controlled substances that are lawfully possessed by the ultimate user are acceptable to be placed in the kiosk. Schedule I controlled substances, illicit or dangerous substances, and any controlled substances not lawfully possessed by the ultimate user may not be placed in the kiosk.”
4. **Kiosk Collection**

Under § 1317.05(c)(2)(iv), pharmacy Kiosk Drop-Off Sites must dispose of sealed inner liners and their contents either on-site, through common or contract carrier delivery to or pick-up by a distributor or reverse distributor, or with DEA assistance.

Section 1317.75(c) prohibits the counting, sorting, inventorying, or individual handling of any substances deposited into a pharmacy kiosk. Additionally, § 1317.60 limits inner liner access to employees of the collector and requires two employees to immediately seal the inner liner upon its removal from the pharmacy kiosk’s permanent outer container. See § 1317.60(b), (c). Section 1317.75(g) provides that pharmacy kiosk inner liner installation or removal shall be performed “by or under the supervision of at least two employees of the authorized collector.” The pharmacy kiosk sealed inner liner must not be opened, x-rayed, analyzed, or otherwise penetrated. See § 1317.60(c).

At LEA Kiosk Drop-Off Sites, Vendor and the LEA will maintain any records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEAs’ recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. Law enforcement will record the unique barcode number and size of the sealed inner liner transferred to Vendor. See § 1317.35. Additionally, any Unwanted Medicine will be stored in a manner to prevent the diversion of controlled substances and consistent with the LEA’s standard procedures for storing illicit controlled substances. See § 1317.35. Collected Unwanted Medicine will be transferred to the disposal facility in a manner to prevent the diversion of Unwanted Medicine and consistent with the LEA’s standard procedures for transferring illicit controlled substances. See § 1317.35.

MED-Project’s Kiosk Drop-Off Site collection system complies with these DEA requirements for pharmacy and LEA Kiosk Drop-Off Sites. Vendor, pharmacies, and LEAs participating in the Plan will keep all records required under the DEA Rule, including those required under §§ 1304 and 1317.35. Pharmacy Kiosk Drop-Off Site Hosts and Vendor will be instructed never to count, sort, inventory, or individually handle kiosk contents. However, pharmacy kiosks will be located where an employee is present affording employees the opportunity to visually inspect Unwanted Medicine that Residents attempt to deposit. See Section V.B.2. LEA kiosks will be located inside the LEA’s physical location. See Section V.B.2. MED-Project’s kiosk drop-off site collection system will also comply with all applicable Board of Pharmacy requirements.

Pick-up of Unwanted Medicine collected at Kiosk Drop-Off Sites will be scheduled for all Kiosk Drop-Off Sites year-round based on their regular business hours and volume collected. When arriving at a Kiosk Drop-Off Site, the kiosk will be reviewed by the Service Technicians for any damage.

A Service Technician will arrive at the Kiosk Drop-Off Site with a pre-printed shipping label. Unwanted Medicine will be securely removed from the kiosk by Service Technicians and Kiosk Drop-Off Site employees following standard operating procedures meeting all DEA requirements. Specifically, two Kiosk Drop-Off Site employees will hold the two keys to unlock the kiosk. Once the kiosk is unlocked, the inner liner will be removed from the kiosk and immediately sealed, a new inner liner will be installed, and the two Kiosk Drop-Off Site employees will lock the kiosk. The inner liner provided in the kiosk will be opaque to prevent visual recognition of the contents. The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.

Under the supervision of two Kiosk Drop-Off Site employees, the Service Technicians will package the sealed inner liner for shipping. The unique identifier of the inner liner will be matched to the tracking number on the shipping label. The Service Technician will schedule a pickup from the Carrier to be completed within a few business days and leave the packaged, sealed inner liner with the Kiosk Drop-Off Site Host for storage in compliance with all applicable laws, regulations, and other legal requirements until Carrier pickup.
Vendor will prepare the materials for shipment and perform applicable pre-transportation functions to comply with Department of Transportation (DOT) Hazardous Materials Regulations.

5. **Frequency of Pick-Up**

Initially, all Kiosk Drop-Off Site Hosts not previously hosting a kiosk will be scheduled for a monthly pick-up from the kiosk. MED-Project will communicate with the Kiosk Drop-Off Site Host in the event the frequency of pick-up needs to be changed based on the volumes collected over time. Vendor will monitor volumes collected per service to ensure that all sites are receiving the appropriate service frequency. Vendor will manage pick-up services as frequently as necessary to prevent overflow of the kiosk without providing unnecessary interruption to the participating Kiosk Drop-Off Site. Moreover, Vendor will monitor the weight of Unwanted Medicine generated at each participating Kiosk Drop-Off Site.

6. **Procedures if a Kiosk is Full Prior to Scheduled Pick-Up**

The Kiosk Drop-Off Site Host shall be instructed to lock the drop-slot to the kiosk when the kiosk is full and notify MED-Project of the need for service if prior to the scheduled service date.

Vendor shall provide a network of trained Service Technicians. Vendor will direct service to a trained Service Technician who is in closest proximity to the Kiosk Drop-Off Site requesting the service. This process provides for a timely response to Kiosk Drop-Off Sites requiring service prior to the scheduled date.

Service timelines will be assessed based on the specific characteristics of the Kiosk Drop-Off Site's need. If necessary, Vendor will be able to respond within hours of the request. If the request does not require an urgent response, Vendor will plan the response within two to three business days of the request. Vendor will not exceed one business week from the initial request. In the interim, pharmacy Kiosk Drop-Off Site Hosts shall be instructed to secure the kiosk and its contents in accordance with DEA requirements.

7. **Unplanned Event Preparedness**

Vendor maintains a network of emergency responders that can be called on in the case of an emergency or spill incident. Vendor ensures compliance of all service providers through a business confidential qualification process. This process reviews the compliance history, management structure, financial stability, and other key indicators of a reliable emergency response service provider. Emergency responders will bring all equipment necessary to manage the specific needs of the Kiosk Drop-Off Site requiring an emergency response.

A major event, such as a flood, earthquake or fire, may require a response by a service team. This event can jeopardize the security characteristics of the kiosk as well as the structural integrity of the participating location. The team will assess the safety of the area along with the locations to be serviced. Once it is determined the area is safe for access, the team will work to secure the kiosk and remove its contents.

Along with major event preparedness, Vendor provides timely responses to events that may cause an inconvenience to the Kiosk Drop-Off Site Host. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Kiosk Drop-Off Site Host will contact MED-Project via the dedicated phone number or email address. Vendor is able to respond within two to three hours in most cases when notified of a need for an urgent response. If the request is an emergency that poses an immediate threat to the environment or health, the Kiosk Drop-Off Site Host is advised to call 911. If the request is not urgent or an emergency, Vendor will typically respond to a service location within two to three business days of an event not requiring an urgent response.

In addition, personal items that a resident inadvertently drops into a kiosk (i.e. dentistry, watch, keys, wallet, etc.) will not be retrieved and will not be treated as an unplanned event.
C. Take-Back Events

Ninety days after Plan approval, MED-Project will conduct a gap assessment of signed agreements with Kiosk Drop-Off Site Hosts. Thirty days after the gap assessment, MED-Project will schedule quarterly Take-Back Events at three locations in any supervisiorial district where the collection system requirement is not met through signed Kiosk Drop-Off Site agreements.

Federal, state, tribal, or local law enforcement shall oversee all Take-Back Events. If possible, MED-Project will work to conduct the Take-Back Events in coordination with other scheduled events (i.e., Earth Day celebrations, Health and Wellness Fairs) to maximize convenience to Residents. Targeted events can be viewed in Appendix F. In situations where a location in the Supervisorial District is not available, MED-Project will work with the participating LEA to host the event at other locations available to the public.

Due to the continuously changing schedule of Take-Back Events, the list of take-back dates and locations will be maintained on the MED-Project website as events are scheduled.

1. Method

Hosting of Take-Back Events is contingent upon participation and oversight by contracted LEAs. MED-Project will work with participating LEAs to ensure Take-Back Events are compliant and successful. Events will be promoted and communicated to the public through local communication channels as outlined in Appendix G.

The process of conducting Take-Back Events will meet all applicable laws, regulations, and other legal requirements. MED-Project will contract with LEAs to oversee Take-Back Events. These contracts will provide for the collection, transportation, and disposal of Unwanted Medicine from Take-Back Events and ensure that all requirements of participating LEAs are met. MED-Project will work with LEAs to accommodate any reasonable requirements.

2. Procedures

MED-Project will partner with LEAs to ensure that at least one law enforcement officer oversees collection at all Take-Back Events pursuant to DEA Rule § 1317.65(a), (b). The law enforcement officers will maintain control and custody of all Unwanted Medicine collected at Take-Back Events from collection until secure transfer, storage, or destruction of the Unwanted Medicine, as required by § 1317.65(b). Only ultimate users and persons authorized to dispose of an ultimate user decedent’s property in lawful possession of controlled substances in Schedules II-V may transfer these substances to the LEA during the event. § 1317.65(e). No other person will handle controlled substances at Take-Back Events under § 1317.65(e); however, Vendor may assist LEAs in the collection of Unwanted Medicine at Take-Back Events. See DEA Rule at 53539.

Take-Back Events will typically be staffed by at least two Vendor employees. Vendor will work in coordination with MED-Project and LEAs to monitor and ensure collection of all material at Take-Back Events is compliant with all applicable laws, regulations, and other legal requirements and meets the expectations of the planned event. Vendor will work in conjunction with local law enforcement to ensure all material is placed in a compliant collection receptacle and securely shipped to meet all applicable laws, regulations, and other legal requirements. Any material that is not Unwanted Medicine or does not meet legal requirements will be rejected.

Vendor and the LEA will maintain all records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA’s recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. Any collected Unwanted Medicine will be stored to prevent the diversion of controlled substances and consistent with the LEA’s standard procedures for storing illicit controlled substances. Any storage of Unwanted Medicine by Vendor will also comply with the applicable
security requirements of §§ 1301 and 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances.

Vendor will package Unwanted Medicine inner liners, match the unique inner liner identifier to shipping labels, and prepare the inner liners for shipment in compliance with all applicable laws, regulations, and other legal requirements. Collected material will be weighed following the completion of each event. With the sealed inner liners remaining under the control and custody of the LEA, Vendor will assist the LEA with the transportation of the sealed inner liners to the LEA’s facility. Vendor will schedule a pickup from the LEA facility to take place within a few business days of the event.

D. Disposal of Unwanted Medicine

Vendor and Carrier shall manage the Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events in compliance with all applicable laws, regulations, and other legal requirements. Carrier shall deliver Unwanted Medicine collected from Kiosk Drop-Off Sites and Take-Back Events to the reverse distributor facility identified in Section X.C.1.

All Unwanted Medicine will be destroyed no later than 30 calendar days after receipt at the reverse distributor facility from the Carrier. See Section X.C. for additional details.

All inner liners will be destroyed in accordance with all applicable laws, regulations, and other legal requirements at the disposal facility identified in Section X.C.2.

E. Unwanted Medicine Mail-Back Services

MED-Project will provide Mail-Back Services for Unwanted Medicine at no cost to disabled and home bound Residents. MED-Project will also offer Mail-Back Services to all Residents in supervisorial districts where the required number of Kiosk Drop-Off Sites have not yet been obtained through agreements signed by Kiosk Drop-Off Site Hosts. Mail-back packages will be pre-paid and pre-addressed, and Mail-Back Services will comply with all applicable laws, regulations, and other legal requirements.

1. Mail-Back Services for Unwanted Medicine

Pursuant to DEA Rule § 1317.70(c), the mail-back packages for all Unwanted Medicine will be:

- Nondescript and without any markings or information potentially indicating that they contain Unwanted Medicine, including controlled substances;
- Water and spill-proof, tamper-evident, tear-resistant, and sealable;
- Pre-addressed with and delivered to Vendor’s registered address;
- Pre-paid;
- Provided with a unique identifier enabling tracking; and
- Provided with instructions indicating the process for mailing back the packages, a list of accepted substances, a notice about mailing restrictions, and a notice that only packages provided by Vendor will be accepted for destruction.

Ultimate users and persons lawfully entitled to dispose of an ultimate user decedent’s property will not be required to provide any personally identifiable information when using Mail-Back Services to dispose of Unwanted Medicine. See § 1317.70(d). As required under § 1317.70(e), Vendor will only accept mail-back packages it made available (or packages lawfully forwarded under DEA requirements). Within three business days of receipt, Vendor will notify the DEA if it receives mail-back packages likely containing controlled substances that Vendor did not make available or did not agree to receive pursuant to DEA requirements. In accordance with § 1317.70(f), when mail-back packages are received, only Vendor employees will handle the mail-back packages. Mail-back packages will not be opened, x-rayed, analyzed, or otherwise penetrated upon receipt by Vendor. See § 1317.70(f). Vendor and MED-Project will keep all records required under the DEA Rule, including those identified in § 1304.22(f).
See Appendix H for a sample package and package specifications.

2. Mail-Back Package Availability

Disabled and home bound Residents may request mail-back packages for Unwanted Medicine by calling the call center or through a link on the MED-Project website. Upon such request, mail-back packages complying with all applicable federal, state, and local laws, regulations, and other legal requirements will be shipped to Residents within 5 to 10 business days.

Mail-back packages will contain an insert with instructions for use and information about other options for disposing of Unwanted Medicine in the Available Languages. See Appendix H for a sample package insert.

Ninety days after Plan approval, MED-Project will conduct a gap assessment of established Kiosk Drop-Off Sites. If fewer than the required number of sites have been obtained through agreements signed by Kiosk Drop-Off Site Hosts in any supervisorial district in the unincorporated areas of the County, MED-Project will supplement Kiosk Drop-Off Sites by offering Mail-Back Services to all Residents in the supervisorial district. Until MED-Project has signed agreements with three Kiosk Drop-Off Site Hosts in the supervisorial district, MED-Project will communicate via website and social media to Residents in the district notifying them of the opportunity to request a mail-back package through the MED-Project call center or website. Once agreements have been signed with three Kiosk Drop-Off Site Hosts within a district, MED-Project will offer Mail-Back Services only to disabled and home bound Residents.

3. Mail-Back Package Collection and Disposal

Requests to receive mail-back packages will be taken through the call center or a link on the MED-Project website.

Residents will be directed to follow the instructions provided in the mail-back package and to place their Unwanted Medicine in the pre-addressed/pre-paid package. The United States Postal Service estimates up to three business days for delivery of First Class Mail. The mail-back package shall be sent to an approved disposal facility and handled in compliance with all Applicable Laws. Upon arriving at the medical waste disposal facility listed in Section X.F, the mail-back packages will be scanned for verification of receipt and incinerated. Any storage of filled mail-back packages by Vendor will comply with the applicable security requirements of DEA Rule Section 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. All Unwanted Medicine will be destroyed promptly.

VI. Plan and Collection Goals

The short- and long-term goals of the Plan are described generally as follows. Additional detail on implementation is provided in Section V.A.2.

MED-Project anticipates that establishment of Kiosk Drop-Off Sites will begin within 90 days of approval of the Plan. Once all drop-off locations are fully operational, the program expects to collect approximately 360 pounds per Kiosk Drop-Off Site during each calendar year, based on collection totals in other jurisdictions. Assuming 15 Kiosk Drop-Off Sites are operational for a full year, MED-Project anticipates collecting approximately 5,400 pounds of Unwanted Medicine from Kiosk Drop-Off Sites in 2019. See section V.B. for more information about Kiosk Drop-Off Site collection.

Until the collection system requirement is met, MED-Project anticipates supplementing Kiosk Drop-Off Sites through Mail-Back Services and Take-Back Events. Based on Take-Back Event collection totals in other jurisdictions, MED-Project anticipates collection of 50 to 200 pounds of Unwanted Medicine per Take-Back Event.
MED-Project mail-back packages have a capacity of 8oz. per package. Due to the lack of information available from current MED-Project Programs, MED-Project’s estimated collection totals in 2018 could vary based on actual usage. Collection in 2018 will be used to adjust subsequent years’ collection goals.

Data from 2018 will be utilized to establish baseline collection and estimate collection goals for future years.

<table>
<thead>
<tr>
<th>Anticipated Collection Amounts (Lbs.):</th>
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<tr>
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<tr>
<td>2018</td>
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<tr>
<td>Kiosk Drop-Off Sites</td>
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<tr>
<td>Take-Back Events &amp; Mail-Back</td>
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<tr>
<td>Pounds Collected</td>
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<thead>
<tr>
<th>Goal Area</th>
<th>Short-Term</th>
<th>Long-Term</th>
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<tbody>
<tr>
<td>Collection</td>
<td>Approximately 1,500 pounds of Unwanted Medicine collected through Kiosk Drop-Off Sites, Mail-Back Services, and Take-Back Events.</td>
<td>Approximately 5,400 pounds of Unwanted Medicine collected through Kiosk Drop-Off Sites, Mail-Back Services, and/or Take-Back Events. Increased reliance on established Kiosk Drop-Off Sites and limited or no collection through Take-Back Events or Mail-Back Services.</td>
</tr>
<tr>
<td>Education &amp; Promotion</td>
<td>Develop baseline number of website page views or unique visitors. Establish a baseline of LEAs; retail pharmacies; other pharmacies (healthcare, etc.); community groups; and other third parties contacted, and report appropriate statistics as outlined in the Annual Report section of this Plan. Establish a baseline number of media outlets receiving press advisory, with a minimum of five outlets. Establish a baseline percentage of community centers reached. Establish a baseline number of messages to MED-Project returned within predetermined timeframe.</td>
<td>On an ongoing basis, MED-Project may revise and/or add communications materials based on changes to the Plan. MED-Project will evaluate media and public outreach in order to make adjustments and improvements to the Program. The review will consider percent awareness of the Stewardship Plan, assess to what extent Kiosk Drop-Off Sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and nonprescription medicines used in the home. A summary of this review will be included in the annual report.</td>
</tr>
</tbody>
</table>

**VII. Patient Privacy**

Instructions at each Kiosk Drop-Off Site Host location will inform people who deposit Unwanted Medicine that they should completely cross out, remove, or otherwise make unreadable all personally identifiable information on the drug containers and packaging before depositing them in the kiosk. In cases where people follow the instructions, there will be no personally identifiable information.
In addition to kiosk signage, all MED-Project promotional and educational materials encourage residents to protect their information by ensuring that identifiable information is not present before depositing containers into kiosks. Examples of MED-Project brochures, signage, and website materials are available in Appendix E and Appendix J.

Vendor has additional protections available for keeping residents’ personal identifiable information safe and secure. Service Technicians are well trained in managing items containing sensitive patient information. Privacy training is part of a Service Technician’s prerequisite for field services. As added protection, the liners for the kiosk will be opaque rather than clear, in compliance with the DEA Rule. This will prevent anyone, including the Service Technician, from seeing any information on the containers placed in the kiosks.

Materials to help Residents cross out any personally identifiable information will also be available at Take-Back Events. This will ensure any patient information on drug packaging will be unreadable.

VIII. Call Center

Questions from Residents will be managed by a call center with an interactive voice response (IVR) system and the support of an operator available during business hours of 9:00am to 5:00pm PST Monday through Friday. If the operator is unavailable, a caller will be able to leave a message to which the operator will respond. All operators shall be trained to respond based on the requirements set by MED-Project.

The IVR will answer general questions, including questions on the following topics:

1. Items that can be disposed;
2. Disposal options;
3. Direction to the Program website and call center operators for additional information; and
4. How to request mail-back packages.

Because the list of Kiosk Drop-Off Sites and Take-Back Events is subject to change, Residents will be directed to the MED-Project website or to an operator for detailed information about kiosk locations and service hours and Take-Back Event times and locations.

IX. Training

Operational procedures, including training, are the responsibility of the Kiosk Drop-Off Site. MED-Project will support training if agreed to with the Kiosk Drop-Off Site. Additionally, MED-Project will manage a support hotline to answer questions and monitor comments for participating Kiosk Drop-Off Sites.

The support hotline will support two general communication functions:

1. Answer questions and monitor comments from participating Kiosk Drop-Off Site Hosts.
2. Support and direct service requests from participating Kiosk Drop-Off Sites.

Messages received from Kiosk Drop-Off Sites will be returned within one business day.

Vendor will comply with all applicable laws, regulations, and other legal requirements. Vendor’s internal training process will address the following:

- Onboarding & on-truck observation of job functions;
- DOT Training;
- DEA Training;
- United States Environmental Protection Agency (“EPA”) Waste Characterization;
- Occupational Safety and Health Administration (“OSHA”) Training;
- Waste Handling Demo;
- Truck Operation;
• DEA Handling Demo;
• Health Insurance Portability and Accountability Act ("HIPAA") requirements;
• OSHA Bloodborne Pathogens Standard;
• Review & Written Test; and
• Perform work under supervision to demonstrate proficiency prior to certification to service client accounts.

A. Service Technician Training

The Service Technicians handling, collecting, and transporting the Unwanted Medicine will complete comprehensive training under the direction of a Certified Hazardous Materials Manager certified Senior Environmental Health and Safety Manager. This training includes instruction on:

• DOT hazardous materials requirements;
• EPA waste characterization requirements;
• Resource Conservation and Recovery Act ("RCRA") hazardous waste requirements;
• DEA controlled substances transfer protocols;
• OSHA requirements; and
• HIPAA requirements.

Service Technicians must complete a 24 or 40-hour Hazardous Waste Operations and Emergency Response Standard ("HAZWOPER") course. Additionally, Service Technicians must complete annual refresher training that includes an 8-hour training on DOT, HAZWOPER, HIPAA, OSHA, RCRA, and safety and security. Finally, Service Technicians receive ongoing training in the form of daily “tips”, weekly meetings, and online refresher courses. All Vendor employees servicing Take-Back Events or Kiosk Drop-Off Sites or receiving mail-back packages will have a training base similar to that of Service Technicians, with customized training as needed.

X. Transporter and Disposal Facility Information

A. Vendor for Kiosk Drop-Off Sites and Take-Back Events

• Name: Stericycle Specialty Waste Solutions, Inc. will service Kiosk Drop-Off Sites and Take-Back Events.
• Address: 2850 100th Court NE Blaine, MN 55449
• Phone: (612) 285-9865
• Website: www.stericycleenvironmental.com

B. Transporter of Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events

1. Carrier

• Name: United Parcel Service, Inc. will transport Unwanted Medicine from Kiosk Drop-Off Sites to the Stericycle, Inc., Indianapolis, Indiana Facility. United Parcel Service, Inc. may also be used to transport Unwanted Medicine from Take-Back Events to the Stericycle, Inc., Indianapolis, Indiana Facility.
• Address: 55 Glenlake Parkway NE, Atlanta, GA, 30328
• Phone: (800) PICK-UPS
• Website: www.UPS.com/

2. Transporter 1

• Name: Heritage Transport may be used to transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Heritage Thermal Services – Ohio.
• Address: 1626 Research Way, Indianapolis, IN 46231
• Phone: (317) 486-2973
3. Transporter 2

- Name: **Stericycle Specialty Waste Solutions, Inc.** Stericycle Specialty Waste Solutions, Inc. may be used to transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Veolia-Port Arthur.
- Address: 2850 100th Court NE Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericycleenvironmental.com](http://www.stericycleenvironmental.com)

C. Reverse Distributor and Disposal Facility for Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events

1. Reverse Distributor Facility

- Name: **Stericycle, Inc., Indianapolis, Indiana Facility** will receive Unwanted Medicine from the Carrier.
- Address: 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901
- Phone: (317) 275-7530
- Website: [http://www.stericycle.com/](http://www.stericycle.com/)

2. Disposal Facility 1

- Name: **Heritage Thermal Services – Ohio** will incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 1250 Saint George Street, East Liverpool, Ohio, 43920
- Phone: (800) 545-7655
- Website: [http://www.heritage-thermal.com/](http://www.heritage-thermal.com/)

3. Disposal Facility 2

- Name: **Veolia – Port Arthur** will incinerate Unwanted Medicine as an alternative disposal facility to Heritage Thermal Services - Ohio.
- Addresses: 7665 Texas Highway 73, Beaumont, TX 77705.
- Phone: (409) 736-2821
- Website: [www.veiolianorthamerica.com](http://www.veiolianorthamerica.com)

D. Vendor for Mail-Back Services

- Name: **Stericycle Specialty Waste Solutions, Inc.** will provide mail-back packages.
- Address: 2850 100th Court NE Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericycleenvironmental.com](http://www.stericycleenvironmental.com)

E. Shipper of Mail-Back Packages

- Name: **United States Postal Service** will ship mail-back packages to the Stericycle, Inc. Warren, Ohio.
- Address: 475 L’Enfant Plaza, S.W. Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)

F. Disposal Facility for Mail-Back Packages

- Name: **Stericycle, Inc. Warren, Ohio** will incinerate the mail-back packages from United States Postal Service
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
XI. Unwanted Medicine Educational and Outreach Programming

A. Overview

The following communications plan includes a description of the public education and outreach efforts that MED-Project will undertake to educate Residents about the collection and disposal of Unwanted Medicine from households.

While MED-Project operates an education and outreach program specific to each individual Plan, MED-Project websites, signage, and printed material will provide consistent branding across all counties to the extent possible.

B. Audiences

To effectively educate the public about the Plan, MED-Project has developed a comprehensive communications campaign featuring both broad communications tactics (e.g., media advisories, etc.) as well as targeted outreach to audiences directly involved in the distribution and use of medicines to Residents. These audiences include:

- General public
- Pharmacies and Retailers of Covered Drugs
- Health care providers
- Veterinary providers
- Public health facilities
- Law enforcement agencies

This Plan details efforts to reach the varied cultural, geographic, and age demographics, including through outreach to local media (Appendix G); outreach to community organizations serving a broad range of audiences (Appendix B); and availability of educational information through a broad range of channels, including a toll-free call center, broadcast media, and the internet.

Demographic information, including race/ethnicity, age, and geographic data, will be analyzed to appropriately direct outreach and create educational materials to best serve the unique needs of Residents. Efforts to ensure that materials are appropriately targeted and available to these populations will be pursued with associations, agencies, and organizations that can be viewed in Appendix B.

C. Messages

MED-Project messaging will focus on the following goals:

- Educating Residents about the appropriate use, storage, and disposal of Unwanted Medicine,
- Educating Residents about the availability of Mail-Back Services and Take-Back Events, and
- Providing Residents with clear steps to properly manage the disposal of their Unwanted Medicine, including following instructions found on the medicine label, use of Kiosk Drop-Off Sites, use of available Mail-Back Services, and availability of Take-Back Events.

Key points of emphasis will include:

- The importance of taking medicines as prescribed by your health care provider;
- The importance of adhering to and completing your provider-prescribed therapy;
- The importance of properly and securely storing medicines locked, out of reach of children, and inaccessible to visitors;
- The importance of promptly and properly disposing of Unwanted Medicine;
• How to find and use Kiosk Drop-Off Sites;
• How to properly use the Mail-Back Services provided;
• How to properly dispose of Unwanted Medicine; and
• Privacy issues (removing personally identifiable information from labeled prescription containers).

D. Tools/Communications Channels

The Program will include several components designed to reach Residents and provide consistent access to timely and relevant information. Distribution of materials will include audiences such as LEAs, pharmacies, health care providers and systems, health associations, local government agencies, and other community organizations and will be evaluated regularly for effectiveness. Tools and communication channels will include:

1. Phone

MED-Project will provide a toll-free telephone number (1-844-MED-PROJ) for Residents to obtain information about Kiosk Drop-Off Sites, educational materials, and other aspects of the Program. The toll-free number will provide:

• The MED-Project toll-free telephone line will provide an option for callers to be transferred to a staffed call center.
• A recorded-line script at 1-844-MED-PROJ will provide basic information about how the Program works, where to obtain more information (e.g., the website), and will also include an option to talk with an operator to find a Kiosk Drop-Off Site, request Mail-Back Services, or find a Take-Back Event in the caller’s ZIP code or local area.
• The recorded call script will include language directing callers with medical emergencies to call 911. Patients with medication-related questions will be directed to contact their health care provider(s).

Please see Appendix I for a sample template of the recorded call script.

2. Website

MED-Project is developing a mobile-friendly website with translations in the Available Languages. Information available to users will include locations of Kiosk Drop-Off Sites, educational materials, frequently asked questions and responses, Mail-Back Services information, and Take-Back Event dates and locations.

• The Plan includes a sample mockup of the website and its supporting pages. Appendix J provides a proof of concept for each page.
• The website will also include access to a public relations toolkit in a downloadable format (see Section XI.D.3) and contact information for Residents. A toolkit available on the website includes a brochure (Appendix K) and a frequently asked questions (FAQ) document (Appendix K) which will be reviewed and updated periodically. Translations of the brochure and FAQ will be available in the Available Languages.
• Community and government organizations and other public interest groups seeking materials to promote the Program will be encouraged to access these resources.

3. Materials

Educational materials about the Program and describing how to properly dispose of Unwanted Medicine will be provided in the Available Languages through the website, potential third-party partners, community organizations, and at Kiosk Drop-Off Sites. These partners will include pharmacies, health care facilities, and veterinary facilities. MED-Project will also provide local governments and other interested parties with materials covering the proper disposal of Unwanted Medicine. Until the Collection system requirement has
been met, MED-Project will promote the Mail-Back Services through additional educational materials that will be made available to all Residents (see Appendix K).

The Plan includes a sample of the educational brochure (Appendix K) and media advisory promoting Take-Back Events (Appendix L). An additional sample brochure has been created to provide information regarding Mail-Back Services available to Residents (Appendix K). Educational materials use plain language and explanatory images to promote consumer education and collection options to Residents with limited English proficiency.

4. Media Outreach

The Program will conduct public outreach through media such as traditional and social media, posting of educational signage, and at community events. Public outreach through written materials will be conducted in the Available Languages. Outreach efforts will encourage media outlets and third-party groups to download and use the toolkit. MED-Project will coordinate outreach for scheduled Take-Back Events to promote participation. The following materials support the Unwanted Medicine educational and outreach programming:

- Please see Appendix I for a sample education and outreach call script with the toolkit, including flyers in Appendix K and website information included in Appendix J.
- Please see Appendix G for a sample list of key media outlets.
- Please see Appendix M for a sample list of social media outlets.
- Please see Appendix L for a sample template media advisory announcing Take-Back Events.

5. Broadcast Outreach

MED-Project will utilize local television outlets to conduct outreach to Residents. Outreach will be conducted through local print, online, television, and radio outlets, as well as through outlets specifically targeting the diverse demographic communities within the County. Please see Appendix G for a sample media list of key outlets.

E. Collaboration with County Officials and Community Organizations

MED-Project will work in collaboration with the County as appropriate to build on existing community outreach resources, such as local organizations, media lists, available public media outlets, etc. MED-Project will conduct the following outreach efforts:

- Briefing Materials Provided to Support Coordination with County Officials:
  - MED-Project will provide access to Educational and Outreach Programming materials, including the sample brochure (see Appendix K), to relevant departments and officials.

- Outreach through Community Organizations:
  - MED-Project will further promote the Program by engaging relevant stakeholders and community organizations, for example, by providing community organizations identified in Appendix B with the toolkit included in Appendix K.

- Briefing Materials Provided to Support Collaboration with Home Health Care Providers.
  - MED-Project will collaborate with home health care providers to promote the use of Mail-Back Services by disabled and homebound residents. MED-Project will provide home health care providers with the brochure included in Appendix K.

F. Disclaimer

The written and verbal educational materials and public outreach tools that are required by the Ordinance and disseminated under this Product Stewardship Plan will include a disclaimer similar to the following: “This material has been provided for the purposes of compliance with legislation and does not necessarily
reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.”

XII. Packaging

The Ordinance requires that a Plan consider “[s]eparation of covered drugs from packaging to the extent feasible to reduce transportation and disposal costs; and [r]ecycling of drug packaging to the extent feasible.” Ordinance §§ 418-16.208(h)(2) and 418-16.208(h)(3).

MED-Project has considered and evaluated options for the separation and recycling of drug packaging. Separating and recycling drug packaging collected under the Plan would require the management of separate waste streams at Kiosk Drop-Off Sites and Take-Back Events: a waste stream for drug packaging and a waste stream for the drugs themselves.

While drug packaging is expected to constitute a significant amount of the waste incinerated under the Plan, MED-Project has concluded that separation of inner and/or outer packaging from Unwanted Medicine or recycling packaging would raise three significant concerns:

1. Separating and recycling drug packaging could result in the disclosure of confidential patient information appearing on prescription drug packaging;
2. Separating and recycling drug packaging could increase the potential of releases and leakage of Unwanted Medicine; and
3. Separating and recycling drug packaging could increase diversion risks by adding additional steps to the collection process and because drug packaging is used in drug counterfeiting and would be a diversion target itself.

For these reasons, the Plan does not provide for the separation and recycling of packaging from Unwanted Medicine.

MED-Project education and outreach materials instruct Residents to return Unwanted Medicine at a Kiosk Drop-Off Site, via Mail-Back Services, or at a Take-Back Event in its original container or in a sealed bag. These materials encourage Residents who transfer their Unwanted Medicine in a sealed bag to recycle all remaining packaging.

XIII. Compliance with Applicable Laws, Regulations, and Other Legal Requirements

The Ordinance requires that a Product Stewardship Plan describe how all entities participating in the Program will comply with all applicable laws, regulations, and other legal requirements. Ordinance § 418-16.208(e)(2). As described in more detail below, the Plan is designed such that all entities participating in the Program shall comply with all applicable laws, regulations, and other legal requirements.

A. DEA Controlled Substances Act and Implementing Regulations

On October 12, 2010, the United States Congress enacted the Secure and Responsible Drug Disposal Act of 2010 (“Disposal Act”) as amendments to the Controlled Substances Act (“CSA”). The Disposal Act amended the CSA to allow for the expansion of entities to which users can deliver pharmaceutical controlled substances for disposal, subject to regulations to be promulgated. On September 9, 2014, the DEA adopted a rule entitled “Disposal of Controlled Substances” to implement the Disposal Act.

Under the DEA Rule, collection of controlled substances is limited to Schedule II, III, IV, or V controlled substances that are lawfully possessed by an ultimate user or person entitled to dispose of an ultimate
user decedent’s property. See DEA Rule §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Mail-Back Services). Schedule I controlled substances, controlled substances that are not lawfully possessed as described above, and other illicit or dangerous substances will not be collected. Additionally, as these provisions of the DEA Rule limit collection of controlled substances to those lawfully possessed by an ultimate user or certain other persons, pharmacies are prohibited from disposing their own inventory or stock through the Program. See id.; see also § 1317.05.

The DEA Rule provides that LEAs can continue to accept controlled substances for disposal. However, the DEA Rule also provides that pharmacies, reverse distributors, hospitals/clinics with on-site pharmacies, and certain other entities, can register with the DEA as “collectors” and become authorized at their discretion on a voluntary basis to accept controlled substances. The DEA Rule:

- Provides for the collection of controlled substances at Kiosk Drop-Off Sites at LEAs, pharmacies, and hospitals or clinics with on-site pharmacies;
- Provides for collection of controlled substances at Take-Back Events;
- Provides for the use of mail-back programs to collect controlled substances;
- Allows for the commingling of controlled and non-controlled substances;
- Establishes detailed collection, recordkeeping, security, and other measures for all approved collection methods; and
- Provides that all collected pharmaceutical products be destroyed so that the products are rendered non-retrievable.

The Plan is designed such that all entities that are part of the Plan, including Vendor, are individually responsible to comply with their respective compliance obligations under the DEA Rule. Vendor will ensure that the transportation of Unwanted Medicines collected from Kiosk Drop-Off Sites and Take-Back Events, including controlled substances, complies with all DEA requirements, including those in § 1317.

Controlled substances collected pursuant to the Program may be commingled with non-controlled substances at Kiosk Drop-Off Sites, Take-Back Events, and through Mail-Back Services per the DEA Rule. See §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Mail-Back Services).

1. **DEA Registration Modification**

Pursuant to 21 C.F.R. § 1301.51(b), pharmacies may modify their registrations to become authorized collectors by submitting a request to the DEA or online at www.DEAdiversion.usdoj.gov. This request must contain:

- The registrant’s name, address, and registration number (as printed on the registration certificate);
- The collection methods the registrant intends to conduct; and
- A signature in accordance with § 1301.13(j).

See § 1301.51(b). MED-Project will consult with participating pharmacies, as requested, regarding how to modify DEA registrations to become authorized collectors.

A. **United States Department of Transportation (USDOT)**

When transporting Unwanted Medicine, Vendor will ensure compliance with the USDOT Hazardous Materials Regulations.

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3 For Kiosk Drop-Off Site collection, only certain substances “that are lawfully possessed by an ultimate user or other authorized non-registrant person may be collected.” § 1317.75(b). This language is similar to, but slightly different than, provisions limiting collection at Take-Back Events and through Mail-Back Services to ultimate users or other persons (lawfully) entitled to dispose of an ultimate user decedent’s property. See §§ 1317.65(d); 1317.70(b).
B. California State Board of Pharmacy

On June 8, 2017, the California State Board of Pharmacy adopted the Board of Pharmacy Regulations, Article 9.1 of Division 17 of Title 16 of the California Code of Regulations. Largely based on the DEA Rule, the Board of Pharmacy Regulations establish requirements applicable to pharmacies, hospitals/clinics with on-site pharmacies, distributors, and reverse distributors conducting certain drug take-back services. Among other things, the Board of Pharmacy Regulations provide:

- That California-licensed pharmacies and hospitals/clinics with on-site pharmacies must be in good standing with, and notify, the California Board of Pharmacy to host a drug kiosk. See 16 CCR §§ 1776, 1776.1(i).
- That pharmacies must “know and adhere” to all applicable “federal, state, and local requirements governing the collection and destruction of dangerous drugs” when operating a drug take-back program. See 16 CCR § 1776.1(b).
- Drug kiosk placement and monitoring requirements. See 16 CCR §§ 1776.3(b)-(d).
- Drug kiosk inner liner, container, and signage requirements. See 16 CCR §§ 1776.3(f), (h), (m).
- Inner liner handling, storage, and destruction requirements for drug kiosks. See, e.g., 16 CCR §§ 1776.3(h)-(j), 1776.5(a)-(c).
- Pharmacy and reverse distributor recordkeeping requirements. See 16 CCR §§ 1776.5(e)-(f), 1776.6.
- Pharmacy drug mail-back program requirements. See 16 CCR § 1776.2.

The Plan is designed such that all entities that are part of the Plan, including Vendor, are individually responsible for complying with their respective compliance obligations under the Board of Pharmacy Regulations.

XIV. Annual Report

The first annual report will be submitted for the 2018 partial operating year and 2019 operating period by July 1, 2020. An annual report will be provided to the Health Department within six months of the end of the subsequent 12-month period of operation and annually thereafter. Ordinance § 418-16.218.

For the reporting period, the report will include:

- A list of producers participating in the Plan;
- The amount, by weight, of Unwanted Medicine collected from Kiosk Drop-Off Sites and Take-Back Events. For Mail-Back Services, MED-Project will identify the number of mail-back packages destroyed;
- A list of Kiosk Drop-Off Sites;
- The number of mailers provided;
- The dates and locations of Take-Back Events held, if applicable;
- Transporters used;
- All facilities to which Unwanted Medicine was transported;
- Whether any safety or security problems occurred during collection, transportation, or disposal of Unwanted Medicine and, if so, what changes have been made or proposed to alleviate the problem;
- A description of public education and promotion activities;
- A summary of the Product Stewardship Plan’s goals, the degree of success meeting these goals in the past year, and how these goals will be achieved in the next year if they were not met; and
- The total expenditures of the Program.
Appendix A

MED-Project Participants

The list of participating Producers in MED-Project's Program in Contra Costa County is provided to the County on an ongoing basis. The list was last submitted in conjunction with this plan.
Appendix B

Sample Contact List for Outreach and Education to the Community

The following are associations, agencies, and organizations that will be contacted for assistance with outreach and education to the community.

**Health Systems & Clinics:**
- Contra Costa Regional Medical Center
- West County Health Center
- John Muir Medical Center, Walnut Creek
- John Muir Health, Concord Medical Center
- Sutter Delta Medical Center
- San Ramon Regional Medical Center
- Contra Costa County Hospital
- Antioch Convalescent Hospital
- Alta Bates Summit Medical Center Berkeley Campus
- Sutter East Bay Medical Foundation
- UCSF Benioff Children's Hospital Oakland
- Kaiser Permanente

**Health Associations and Societies:**
- Contra Costa Meds Coalition
- Contra Costa Dental Society
- Alameda Contra Costa Medical Association
- California State Board of Pharmacy
- California Pharmacists Association
- Medical Board of California
- California Board of Registered Nursing
- California Nurses Association
- California Department of Healthcare Services
- California Health and Human Services Agency

**Organizations, Districts, and Agencies:**
- Contra Costa County
- Contra Costa County Sheriff
- Contra Costa Fire Protection District
- Contra Costa County Office of Education
- Contra Costa Public Health Division
- Contra Costa Behavioral Health & AOD Division
- Antioch Police Department
- Brentwood Police Department
- Clayton Police Department
- Concord Police Department
- Danville Police Department
- East Bay Regional Park Police
- El Cerrito Police Department
- Hercules Police Department
- Kensington Police Department
- Lafayette Police Department
- Martinez Police Department
- Moraga Police Department
- Oakley Police Department
- Orinda Police Department
- Pinole Police Department
- Pittsburg Police Department
- Pleasant Hill Police Department
- Richmond Police Department
- San Pablo Police Department
- Walnut Creek Police Department
MED-Project will provide the County with a list of participating Kiosk Drop-Off Sites on an on-going basis. Below is a list of locations that have expressed interest in participating as a Kiosk Drop-Off Site. The pharmacy and LEA responses below reflect information provided by the sites surveyed as of November 24, 2017. Chain pharmacy interest expressed was at the local pharmacy level. Chain pharmacy participation could be contingent upon agreement with regional and national offices. MED-Project will continue to outreach and work within the corporate structure where applicable.

### Appendix C

**Kiosk Drop-Off Sites with Expressions of Interest**

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<th>Type</th>
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# Appendix D

## Potential Additional Kiosk Drop-Off Sites

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Appendix E

Picture of Kiosk Prototype

The design of the kiosk recognizes the paramount importance of security using heavy gauge steel, multiple locking mechanisms, tamper-proof slot, and commercial hinges, meeting the stringent requirements under law. At the same time, the design provides accessibility and ease of use.
SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

1. Cross out or remove personal identifying information from the medicine bottle.
2. Leave the product in its original container or place solid medicines in a sealed plastic bag. If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.
3. Put medicine in the kiosk.

ACCEPTED: MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.

NOT ACCEPTED: HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, COMPRESSED CYLINDERS, INHALERS, MEDICAL DEVICES, PET PESTICIDE PRODUCTS, SHARPS, ILICIT DRUGS, MERCURY CONTAINING THERMOMETERS AND IODINE-CONTAINING MEDICATIONS.

ONLY SCHEDULE II-V CONTROLLED AND NON-CONTROLLED SUBSTANCES THAT ARE LAWFULLY POSSESSED BY THE ULTIMATE USER ARE ACCEPTABLE TO BE PLACED IN THE KIOSK. SCHEDULE I CONTROLLED SUBSTANCES, ILICIT OR DANGEROUS SUBSTANCES, AND ANY CONTROLLED SUBSTANCES NOT LAWFULLY POSSESSED BY THE ULTIMATE USER MAY NOT BE PLACED IN THE KIOSK.

PROP 65 WARNING: Entering this area, or coming into contact with items or materials in this kiosk, may expose you to chemicals known to the State of California to cause cancer, birth defects, reproductive toxicity and/or other reproductive harm.

For more information about the MED-Project program, please go to www.med-project.org or call 1-844-MED-Proj.
Sample Kiosk Signage

Side Panel Signage

SAFELY
DISPOSE OF
UNWANTED & EXPIRED
MEDICINES

MED-Project™
Medication Education & Disposal
**Sample Kiosk Signage**

**Drop Slot Signage**

**ACCEPTED:** Medications in any dosage form, except for those listed below, in their original container or sealed bag.

**NOT ACCEPTED:** Herbal remedies, vitamins, supplements, cosmetics, other personal care products, compressed cylinders, aerosols, inhalers, medical devices, pet pesticide products, sharps, illicit drugs, mercury containing thermometers and iodine-containing medications.
Sample Kiosk Signage
Sample Pharmacy Contact Information

Name: 123 Pharmacy

Contact: (555) 555-5555
Appendix F

Community Events That May Serve as Future Take-Back Events

The following are examples of events that may be targeted for Take-Back Events based on timing and geographic needs:

- Brentwood Farmers Market
- Danville Farmer’s Market
- Lafayette Farmer’s Market
- Earth Day
- Pinole Farmer’s Market
- Art and Wine Festival, Clayton, CA
- City-Wide Garage Sale, Hercules, CA
- Clayton Cleans Up Day
- Community Clean Up Day, Hercules, CA
- Contra Costa County Fair, Antioch, CA
- Culture in the Community Celebration, San Ramon, CA
- Oakley Out of the Darkness Community Walk, Oakley, CA
- Senior Holiday Luncheon, Danville Senior Center, Danville, CA
Appendix G
Sample Media List

The following is a representative list of key media outlets to help educate residents about proper disposal of Unwanted Medicine. The list includes local print, online, television, and radio outlets.

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<tr>
<td>CCTV, Ch 27</td>
<td>Contra Costa TV</td>
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Appendix H
Sample Mail-Back Package

**Description:**
Plastic Package with Merchandise Return Label and instructional flyer

**Page Size:**
Package: Outer Dimension: 8.25” x 12”
MAIL-BACK PACKAGE IS FOR
UNWANTED OR
EXPIRED
MEDICATIONS

ACCEPTED: Medications in any dosage form, except those listed below, in their original container or sealed bag.

NOT ACCEPTED: Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, aerosols, medical devices, sharps, illicit drugs and iodine-containing medications.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of the MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
MED-Project
Medication Education & Disposal

DISPOSAL OPTIONS:

1. CHECK THE PACKAGE
   If there are specific instructions for disposal on the label, package, or package insert, please follow those instructions.

2. CONVENIENT LOCATIONS
   To find convenient locations in your area, visit www.med-project.org for more information.

3. MAIL-BACK
   Mail-back services for Unwanted Medicines, are available to disabled and home bound residents upon request. Visit www.med-project.org to order a mail-back package.

4. TAKE-BACK EVENTS
   Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. Visit www.med-project.org for information on events in your area.

For more information about the MED-Project program, please go to www.med-project.org or call 1-844-MED-Project.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of the MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
Thank you for calling the information line for the Medication Education and Disposal Project, or MED-Project.

- If you are experiencing a medical emergency, please hang up and dial 9-1-1.
- If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call California Poison Control at 800-222-1222.
- Unwanted Medicine Kiosks are located throughout your local area and provide convenient options for disposing of expired or Unwanted Medicines. **Press 3** for more information about convenient kiosks.
- Take-back events may be available in your area. **Press 4** for more information.
- Mail-back services are available to Residents. **Press 5** for more information.
- You may **press 0** at any time to speak with an operator about disposal options.
- MED-Project is a consumer education campaign dedicated to proper medication use and consumer disposal.
- MED-Project reminds you that taking your medicine as directed by your health care provider is critically important to your health.
- If you have questions about your medication, please hang up and dial your health care provider.
• For additional questions about the proper disposal of expired or unwanted medications from households, please go to www.med-project.org or press 0 to talk to an operator.
• To hear this menu again, please press 1.
• Thank you for calling MED-Project.

Unwanted Medicine Kiosk Drop-Off Site Script for when 3 is selected:

• Kiosks to collect expired and Unwanted Medicine are located throughout your local area. To locate the kiosk site nearest you, or for precise information about kiosk site contact information, press 0 to speak with an operator or visit med-project.org to search by your zip code.
• Kiosks accept medications in any dosage form in their original container or sealed bag. No herbal remedies, vitamins, supplements, cosmetics or other personal care products; compressed cylinders, and inhalers; medical devices; pet pesticide products; sharps; illicit drugs; or iodine-containing medications will be accepted.
• If you do transfer your medications to a sealed bag before placing it into a kiosk, please be sure to recycle all remaining packaging.
• To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
• To repeat this information, press 3.
• To return to the main menu, please press 1.
• Thank you for calling MED-Project.

Take-back Event Script for when 4 is selected:

• MED-Project is working with local law enforcement and other community organizations to offer Unwanted Medicine take-back events in your area. For a complete list of take-back events, please press 0 to speak to the operator or visit: www.med-project.org.
• Medications in any dosage form in their original container or sealed bag are accepted at take-back events. No herbal remedies, vitamins, supplements, cosmetics or other personal care products; compressed cylinders, and inhalers; medical devices; pet pesticide products; sharps; illicit drugs; or iodine-containing medications will be accepted.
• If you do transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
• To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
• To repeat this information, press 4.
• To return to the main menu, please press 1.
• Thank you for calling MED-Project.

Mail-back Package Script for when 5 is selected:

• Mail-back services are available to Residents who are disabled or homebound.
• To request a mail-back package, please press 0 to talk to the operator or visit www.med-project.org. 
• Unwanted medicine mail-back packages accept medications in any dosage form in their original container or sealed bag. No herbal remedies, vitamins, supplements, cosmetics or other personal care products; compressed cylinders, aerosols, and inhalers; medical devices; pet pesticide products; sharps; illicit drugs; or iodine-containing medications will be accepted.
• If you do transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
• To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
• To repeat this information, press 5.
• To return to the main menu, please press 1.
• Thank you for calling MED-Project.
Appendix J
MED-Project Website

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider. However, if you have expired or unwanted medication, proper disposal is important and easy.

CLICK ON ANY OF THE RECOMMENDED DISPOSAL OPTIONS BELOW TO LEARN MORE

CHECK THE PACKAGE
CONVENIENT KIOSKS
MAIL BACK
TAKE-BACK EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
CHECK THE PACKAGE

If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions.

To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.

Source: www.fda.gov/ForConsumers/ConsumerUpdates/acmt01953.htm, last updated January 24, 2018.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
CONVENIENT KIOSKS

Community kiosk drop-off sites allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal.

ACCEPTED: Medications in any dosage form, except for those listed below, in their original container or sealed bag.

NOT ACCEPTED: Herbal remedies, vitamins, supplements, cosmetics, other personal care products, compressed cylinders, inhalers, pet pesticide products, medical devices, sharps, illicit drugs, mercury containing thermometers and iodine-containing medications.

To find the nearest disposal locations for unwanted medicine enter your zip code below.

Enter your zip code [ ] SUBMIT

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
MAIL-BACK

Mail-Back Services are available to disabled and home bound residents upon request.

Please complete the below form to request a pre-paid, pre-addressed mail-back package. Instructions for disposal will be provided with all mail-back services.

Select your Package type*

Contact Information

First Name*

Last Name*

Email

Address*

Address 2

City*

State*

Zip Code*

SUBMIT REQUEST

CHECK THE PACKAGE  CONVENIENT KIOSKS  MAIL BACK  TAKE-BACK EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
TAKE-BACK EVENTS

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. The local authorities and MED-Project may also sponsor drug take-back events in your area.

ACCEPTED: Medications in any dosage form, except for those listed below, in their original container or sealed bag.

NOT ACCEPTED: Herbal remedies, vitamins, supplements, cosmetics, other personal care products, compressed cylinders, inhalers, pet pesticide products, medical devices, sharps, illicit drugs, mercury containing thermometers and iodine-containing medications.

CALENDAR OF LOCAL TAKE-BACK EVENTS

Thursday June 14, 2018
TAKE-BACK DAY
Contra Costa Sheriff’s Office
651 Pine St
Martinez, CA 94553
Start Time: 2:00 PM
End Time: 5:00 PM
Link to Website

CHECK THE PACKAGE  CONVENIENT KIOSKS  MAIL BACK  TAKE-BACK EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
MEDinfo

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medications as prescribed by their health care provider and as indicated on the label or packaging. It's also important to keep medications locked, out of the reach of children and inaccessible to visitors.

There are a number of ways to dispose of expired or unwanted medicines and sharps. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the available disposal options.

For additional information on the program, MED-Project has developed an educational toolkit, including:

- Brochure
- Frequently Asked Questions

If you would like any of these materials emailed to you, contact costacounty@med-project.org.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of the MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
MEDfaq

- What is the MED-Project?

MED-Project is the entity implementing the County Product Stewardship Plan, including the education and outreach programming.

- What should I do if I am having a medical emergency?

- What should I do if I think I have ingested something poisonous?

- What should I do if my pet has ingested medication?

- Whom should I call with a question about my medication?

- Where can I find information about the safe storage of medication?

- Where can I find information about California’s Prop 65?

- Can I flush my medication down the toilet?

- Should I remove my personal information before disposing of my medication?

- Where are the MED-Project disposal locations nearest me?

- Will it cost me anything to dispose of my expired or unwanted medications?

- What items can I dispose of in the MED-Project kiosks?

- Will there be any take-back events in my area?

- I am differentially-abled or homebound and unable to go to a kiosk. How can I dispose of my expired or unwanted medicine?

- Where else can I find information about the safe disposal of expired or unwanted medicines?

- I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?

- What is recommended for safe disposal of expired or unwanted medicine in my area?

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
If you are experiencing a medical emergency, please dial 9-1-1. If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Poison Control at 800-222-1222. If you have questions about your medication, please dial your health care provider.

For answers to some frequently asked questions about MED-Project, click here.

Pharmacies and Law Enforcement Offices
If you are a retail pharmacy or a law enforcement agency interested in hosting a drop-box, contact:

Dr. Victoria Travis, PharmD, MBA, MS
Program Director
MED-Project LLC
Phone: (844) 677-6532
Fax: (510) 686-8837
Email: contracostacounty@med-project.org

Drug Producers
If you are drug producer interested in participating in a MED-Project stewardship plan contact:

Phone: (202) 495-3131
Email: compliance@med-project.org

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.
Appendix K
Brochure Mockup

Front of brochure

DISPOSAL OPTIONS

1. CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.
To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packages before disposing of unwanted medicine.

2. CONVENIENT KIOSKS

To find convenient kiosks in your area, visit www.med-project.org for more information.

What items can I dispose of?

ACCEPTED:
MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.

If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

NOT ACCEPTED:
HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, COMPRESSED CYLINDERS, INHALERS, MEDICAL DEVICES, PET PESTICIDE PRODUCTS, SHARPS, ILICIT DRUGS, MERCURY CONTAINING THERMOMETERS AND IODINE-CONTAINING MEDICATIONS.

DISPOSAL OPTIONS

3. MAIL-BACK

Mail-back Services for unwanted medicine are available to disabled and home bound residents upon request. Visit the mail-back section of www.med-project.org to order a mail-back package.

4. TAKE-BACK EVENTS

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. Visit the take-back events section of www.med-project.org for more information on events in your area.

To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or material before using any of the disposal options listed above.

*Source: www.fda.gov/ForConsumers/ConsumerUpdates/ucm320624.htm, last updated December 3, 2013.
WHAT SHOULD YOU DO WITH YOUR UNWANTED OR EXPIRED MEDICINES?

MED-Project
Medication Education & Disposal

SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

There are a number of ways to dispose of expired or unwanted medicines.

For more information about the MED-Project program, go to www.med-project.org/SF or call 1-844-MED-PROJ

What should you do with your expired or unwanted medicines?

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of the MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

MED-Project
Medication Education & Disposal
www.med-project.org

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It’s vitally important that patients take their medicine as prescribed by their health care provider and as indicated on the label or packaging. It’s also important to keep medications locked, out of the reach of children, and inaccessible to visitors.

If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options.

(Source: U.S. Food and Drug Administration)
FAQ Outline

The following are suggested questions to be addressed by the “Frequently Asked Questions” section of the MED-Project website/public relations toolkit. All text is subject to change.

What is the MED-Project?
MED-Project is the entity implementing the Product Stewardship Plan, including the education and outreach programming.

What should I do if I am having a medical emergency?
If you are having a medical emergency, contact emergency medical services immediately by dialing 911.

What should I do if I think I have ingested something poisonous?
If you think you have ingested something poisonous, contact emergency services immediately. Please dial 911 or contact your local poison control center.

What should I do if my pet has ingested medication?
If you believe your pet may have ingested human or animal medication not intended for consumption by your pet, please contact your veterinarian or local animal poison control hotline.

Whom should I call with a question about my medication?
Please direct all questions about your medication to your health care provider.

Where can I find information about the safe storage of medication?
You should follow any storage instructions provided by your healthcare provider and any written instructions provided with your medication or listed on its packaging. In addition, many government agencies provide information regarding safe storage of medication. Possible sources include the National Institutes of Health’s information page and the Center for Disease Control's information page.

Where can I find information about California’s Prop 65?
California’s Office of Environmental Health Hazard Assessment (OEHHA) provides information regarding Proposition 65. Information can be accessed via OEHHA’s Proposition 65 web site, available here: http://oehha.ca.gov/prop65/background/p65plain.html

Should I remove my personal information before disposing of my medication?
Please remove all personal and identifying information from your medication labels and/or its packaging before disposal.

Where are the MED-Project disposal locations nearest me?
MED-Project is providing disposal locations throughout the County. For more information about the location nearest to you, please visit the “Convenient Kiosks” portion of the MED-Project web site or call the hotline at 1-844-MED-PROJ.

Will it cost me anything to dispose of my expired or unwanted medications?
There will be no fee for medication disposal charged at the point of collection.

What items can I dispose of in the MED-Project kiosks?
Kiosks accept medications in any dosage form in their original container or sealed bag. No herbal remedies, vitamins, supplements, cosmetics or other personal care products; compressed cylinders, and inhalers; medical devices; pet pesticide products; sharps; illicit drugs; or iodine-containing medications will be accepted.

If you do transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
Will there be a take-back event in my area?
Please visit “Take-Back Event” portion of the MED-Project website or dial the hotline at 1-844-MED-PROJ to learn about take-back events in your area.

I am disabled or home bound and am unable to go to a kiosk or attend a take-back event. How can I dispose of my expired or unwanted medicine?
Please dial the hotline at 1-844-MED-PROJ or visit the mail-back page of the MED-Project website to request a pre-paid envelope to return your unwanted or expired medicine.

Where else can I find information about the safe disposal of expired or unwanted medicines?
Several government agencies provide information regarding safe disposal of medication. Please refer to the FDA’s website for more information “Consumer Updates: How to Dispose of Unused Medicines.”

I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?
For more information, please dial the hotline at 1-844-MED-PROJ.

What is recommended for safe disposal of expired or unwanted medicine?
Check the Package: Follow any specific disposal instructions on the prescription drug labeling or patient information that accompanies the medicine.

Take-Back Events: Take advantage of programs that allow the public to take unused drugs to a central location for proper disposal. Call your local law enforcement agencies to see if they sponsor medicine take-back programs in your community. Contact your city’s or county government’s household trash and recycling service to learn about medication disposal options and guidelines for your area.

Convenient Kiosks: Transfer unused medicines to collectors registered with the Drug Enforcement Administration (DEA). Authorized sites may be retail, hospital or clinic pharmacies, and law enforcement locations. Some offer mail-back programs or collection receptacles (“kiosks”). Visit the DEA’s website or call 1-800-882-9539 for more information and to find an authorized collector in your community.

Mail-Back Packages: Mail-Back Services for unwanted medicine are available to disabled or home bound residents upon request. Please dial the hotline at 1-844-MED-PROJ or visit the mail-back page of the MED-Project website to request a pre-paid envelope to return your unwanted or expired medicine.

If you have a question about your medicine, ask your health care provider or pharmacist.
MED-Project
Medication Education & Disposal

ADVISORY * * * ADVISORY * * * ADVISORY * * * ADVISORY

MED-Project to Support Take-Back Event on [Date, 2017]
Resident are invited to bring expired or unwanted medications to [Location] from [x time] to [y time] for disposal

Contra Costa County, California, [Date] – The Medication Education & Disposal Project (MED-Project), a consumer education campaign dedicated to responsible medication use and disposal, announced today that it will be supporting a medication take-back event supervised by a local law enforcement agency for consumers in [town] on [date]. All County residents are invited to bring their expired or unwanted medications for disposal. The service is free. [Insert information for residents about what can be collected]. To protect privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials that are brought to this take-back event.

What: MED-Project Medication Take-Back Event – bring your expired or Unwanted Medicines for disposal

When: [Date], [Time]

Where: [Location]

For more information about disposal options for expired or Unwanted Medicine, visit www.med-project.org.

###

Contact:
MED-Project Public Affairs at (844) 677-6532 (844-6PROJECT)
## Appendix M

### Sample Digital and Local Social Networks

The following is a representative list of local organizations and their social media networks in Contra Costa County. MED-Project will reach out to relevant groups to help promote the Program.

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