Alameda MED-Project

Medication Education & Disposal

A Product Stewardship Plan For Unwanted Medicine From Households

Alameda County, California January 30, 2015

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I. Introduction

Alameda MED-Project LLC (Alameda MED-Project), on behalf of the participating companies identified in Appendix A, submits this Product Stewardship Plan ("Plan") for Unwanted Medicine in compliance with Alameda County's "Safe Drug Disposal Ordinance", Alameda County Health and Safety Code Sections 6.53.010 – 6.53.120 ("Ordinance"), and the Alameda County Safe Drug Disposal Regulations (as amended October 16, 2013) ("Regulations"). The Ordinance and Regulations require pharmaceutical Producers¹ to develop a Product Stewardship Program to finance and manage the disposal of Unwanted Medicine within Alameda County.

II. Stewardship Organization

The Pharmaceutical Product Stewardship Working Group (PPSWG), a group of pharmaceutical Producers, has established a limited liability company, Alameda MED-Project, as the Stewardship Organization for the Plan. Participants in the Alameda MED-Project and the Plan will share costs to implement the Plan in a manner reasonably related to each participant's market share by units sold in Alameda County. Stericycle has been selected as the collection, transportation and disposal vendor for the Plan.

III. Contact Information

The Plan Owner is the Alameda MED-Project. The Plan Liaison is familiar with the Plan and has the authority of the Stewardship Organization to make binding representations and determinations related to the Plan. The contact information for the Plan Liaison for the Alameda MED-Project is:

Carrie Hoffman, Plan Liaison 1155 15th Street, Suite 500 Washington, DC 20005 202-530-6291 choffman@amsnavista.com

All capitalized terms used but not otherwise defined herein shall have their respective meanings set forth in the Ordinance and/or Regulation.

IV. Plan Definitions

Alameda MED-Project is a limited liability company established by the Pharmaceutical Product Stewardship Working Group (PPSWG), a group of pharmaceutical Producers, to serve as the Stewardship Organization for the Plan required under the Alameda Health & Safety Code, Chapter 6.53.

Chain Pharmacy is one of a group of pharmacies under common control, operation or ownership with locations inside of and outside Alameda County.

Collection Site Host is the designated contact person, or persons, at the collection site.

Collection Site is the location of a hosted kiosk or take-back event.

Collection Vendor is Stericycle, Inc. ("Stericycle").

DEA is the U.S. Drug Enforcement Administration.

Healthcare Pharmacy is a pharmacy that is located inside a medical facility such as a hospital, outpatient surgical facility or senior center.

Independent Pharmacy is a pharmacy that is local to the county and independently owned.

Law Enforcement Agency or "LEA" is a Sheriff's Office, or Police Department.

Maintenance Technicians are service personnel that are trained to provide services related to the kiosk. This includes, but is not limited to, installation and response to damaged kiosks. Maintenance Technicians will be employed by, managed and directed by the Alameda MED-Project contracted vendor.

Plan is the Product Stewardship Plan presented in this submittal.

Product Stewardship Plan is a product stewardship plan as required under the Alameda County Ordinance and Regulations.

Product Stewardship Program is a program financed and operated by Producers to collect, transport and dispose of Unwanted Medicine.

Service Technicians are service personnel trained to remove and transport the Unwanted Medicine from the kiosk. Service Technicians will be employed, managed and directed by the Alameda MED-Project contracted vendor.

Stewardship Organization is an organization designated by a group of Producers to act as an agent on behalf of each Producer to operate a Product Stewardship Program.

Unwanted Medicine is defined in Section 7.

V. Plan Goals

Understanding the impact and effectiveness of the Plan is important. Alameda MED-Project will undertake a number of steps to assess the impact of the Plan, including its education and outreach component, on an annual basis. The short term goals of the Plan will coincide with the first annual report, while the long term goals are expected to be completed within three years. Section VIII will provide more details on the phased approach to achieving the goals. The approach includes:

Goal Area	Short Term/1st Year of Plan	Medium-Long Term/2 nd & 3 rd Year of Plan
Collection	~20 kiosks in Law Enforcement Agencies. 3 kiosks within the first 90 days. See Appendix C for a list of LEA locations.	Include additional LEA locations assuming viable locations are available.
	12 take-back events supervised by Law Enforcement Agencies, approximately one per month. 1 take-back event in the first 30 days assuming viable locations are available.	Under the federal Drug Enforcement Administration (DEA) September 9, 2014 regulation concerning management of controlled substances, 79 Fed. Reg. 53,520 ("DEA Rule"), Alameda MED-Project is not eligible to be a DEA registered collector of controlled substances, including "inadvertently collected" controlled substances. Because the available evidence demonstrates that controlled substances are inadvertently collected in take-back programs, Alameda MED-Project is exploring how it can support an expanded program for collection sites under a Phase II of an Alameda Product Stewardship program, and still comply with the DEA Rule. Alameda MED-Project will try to achieve an aggregate of ~100 locations by the end of year 3.
		12 take-back events per year consistent with year 1 objective and continued review of the distribution of take-back events throughout the County.

Education & Public Outreach	Develop baseline number of website page views or unique visitors.	On an ongoing basis, Alameda MED-Project may revise and/or add communications materials based on changes to the Plan.
	Develop baseline number of Law Enforcement Agencies, community groups; pharmacies (independent, healthcare, and chain); and other third parties contacted. Number of media outlets receiving press advisory.	As part of annual planning for year-two, Alameda MED-Project will conduct an annual review of media and public outreach as well as collect feedback from community groups in order to make adjustments and improvements to our strategy and tactics.
	Percentage of County community centers reached. Number of messages to MED-Project returned within predetermined timeframe.	
Regulatory Outreach	Contact members of the classes of potential collector entities identified and invite them to participate in the Plan on the basis set forth in the relevant template agreement. Set targets based on identities of classes of collectors.	

VI. Annual Report

An annual report will be provided to the Department Liaison on or before a year after the Plan approval date. The annual reports for the remaining 2 years will occur on the approval anniversary date. This report will be provided in the format required by the Department and will contain a Report Narrative and Report Data. The report will include an update on the Product Stewardship Program, including a list of the year's activities, and progress in achieving the established goals.

VII. Unwanted Medicine

For purposes of the Plan, "Unwanted Medicine" includes all materials identified as "Covered Drugs" under the Alameda County Health and Safety Code Section 6.53.030.3. According to this provision of the Ordinance, Covered Drugs means "all drugs defined in 21 U.S.C. § 321(g) (1) of the Federal Food, Drug and Cosmetic Act (FFDCA) covered under 21 U.S.C § 353(b) (1) of the FFDCA, including both brand name and Generic Drugs." However, Unwanted Medicine does not include the following:

- Nonprescription drugs;
- ii. Expired undispensed samples direct from physicians' offices;
- iii. Unused or expired drugs from a hospital and institutions;
- iv. Bulk animal pharmaceuticals from farms (business use);
- v. Vitamins or supplements;
- vi. Herbal-based remedies and homeopathic drugs and similar products;
- vii. Contact lens disinfectants:
- viii. Antidandruff products, shampoo;
- ix. Cosmetics, soaps, antiperspirants, antiseptic skin cleansers, medicated skin care products;
- x. Sunburn protectants;
- xi. Mouthwashes:
- xii. Hard surface and toilet disinfectant cleaners;
- xiii. Pill organizers;
- xiv. Physician Administered Drugs drug administered in hospitals or other clinical settings whereby a patient never handles drug product;
- xv. Medical devices typically used inside or outside the home (i.e., in hospitals or other clinical settings);
- xvi. Sharps (e.g., needles);
- xvii. Unloaded medical devices required to be loaded by the patient;

Combination products, as defined in 21 CFR 3.2(e), include products comprised of a drug delivery device and a prescription drug or biological product. Combination products subject to the Ordinance and Regulations include only unwanted or unused preloaded vials, pouches or containers that contain a usable quantity of covered substance. Based on FDA definitions and Alameda County guidance, the following are not subject to the Ordinance and Regulations and are not included in this Plan:

- · Used, empty containers, vials, and pouches
- Pre-loaded products with a sharp attached containing prescription or over the counter medications
- · Auto injectors

A Medical device is defined in Section 201(h) of the Federal Food, Drug, and Cosmetic Act as:

- "an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent, or other similar or related article, including a component part, or accessory which is:
- recognized in the official National Formulary, or the United States Pharmacopoeia, or any supplement to them,
- intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in man or other animals, or
- intended to affect the structure or any function of the body of man or other animals, and which does not
 achieve its primary intended purposes through chemical action within or on the body of man or other animals
 and which is not dependent upon being metabolized for the achievement of any of its primary intended
 purposes."

Subject to the above, the Stewardship Organization will collect all Unwanted Medicine from households as contemplated under the Ordinance, regardless of who produced them, unless excused from this requirement by the Department as of the approval of the Plan. Waste streams generated by or managed by any commercial or industrial entity will not be managed under the program.

VIII. Unwanted Medicine Collection Description

The Plan includes two approaches to collecting Unwanted Medicine: kiosk sites and take-back collection events. This section of the Plan discusses how Unwanted Medicine will be collected, how each of the approaches is designed, how Unwanted Medicine will be tracked and handled safely and securely, and how the overall collection footprint and infrastructure will fully comply with all applicable local, state and federal laws and regulations. Kiosks will accept Unwanted Medicine in pill, capsule, or liquid form. Alameda MED-Project will work with Law Enforcement Agencies if they have a collection program for controlled substances. Additional details are found in Section VIII.B.2.

Combination products subject to the Ordinance and Regulations from which the drug or biological product cannot be separated from its delivery device will be collected at take-back events, due to size, bulk and shape, which may interfere with or block a kiosk slot or potentially impact in other ways a kiosk or workers tending to a kiosk. Information gathered at take-back events will aid in determining the need for any special disposal requirements for such combination products. In the case of combination products that contain a drug or biological product that is a solid dosage form that can be separated from the drug delivery device, the Unwanted Medicine may be placed in a kiosk for disposal after separation from the device. Liquids will be collected at law enforcement kiosks and take-back events; modifications to the Plan regarding liquids collection may be proposed as part of annual reports based on collection history.

A. Compliance Requirements

Alameda MED-Project shall structure and operate the Plan in full compliance with all applicable Federal, State and local laws and regulations. In addition, implementation of the Plan is subject to the processes and procedures of the participating Law Enforcement Agency ("LEA").

B. Kiosk Sites

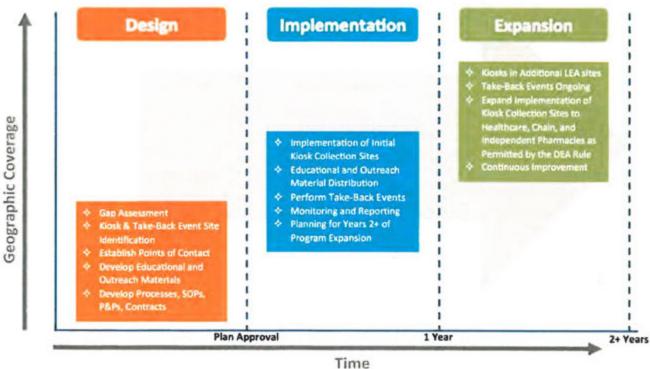
Kiosk locations will be strategically placed across Alameda County, which will be initially located in Law Enforcement Agencies to provide a convenient network of collection sites. The Collection Sites selected to participate in the Plan are intended to provide a network of locations both in the diversity of the sites as well as a geographic location that will enable participation in the program by the variety of residents of Alameda County. This network will provide the residents of Alameda County a number of different outlets to participate in the program. Alameda MED-Project intends to locate kiosks at Law Enforcement Agencies throughout the County, in both the incorporated and unincorporated areas. This will offer convenient access while providing a strong network of collection.

1. Phased Approach

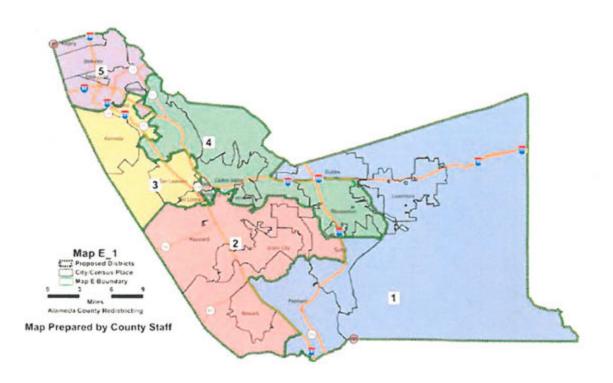
Overview

The Plan will be implemented in phases, including current activities underway prior to Plan Approval. This phase is considered the Design Phase. Phase I, initiating upon Plan Approval and continuing through the first year of operation, is the Implementation Phase. The second and third years of operation will comprise Phase II, or the Expansion Phase. Phase I proposes to implement kiosks at approximately 20 Law Enforcement Agency sites, while also initiating take-back events on a monthly basis to supplement kiosk collection and support varying geographic areas. Phase II proposes to expand the scope of kiosk collection sites, to the extent permitted by the DEA Rule, while continuing to conduct monthly take-back events. Monitoring information and feedback will be an ongoing effort in order to create a continual process of improved service delivery. The current version of the more detailed Project Plan is provided in Appendix B.

HIGH LEVEL RELEASE PLAN



A map of the 5 Districts within Alameda County (see below) illustrates the wide geographical range falling under the Plan, with each of the Districts housing approximately 300,000 residents. Districts 1, 2, and 4 cover the majority of square mileage of the County, with District 1 being the largest geographical area, at more than 50% of the total square mileage in Alameda County. A higher proportion of take-back events will be scheduled throughout the year in the larger Districts to accommodate the geography and distant spread of residents, thereby offering more opportunities to dispose of Unwanted Medicine.



District Map in Alameda County

http://www.acgov.org/redistricting/documents/Map_E_1_with_Pop_Summary.pdf

Design Phase

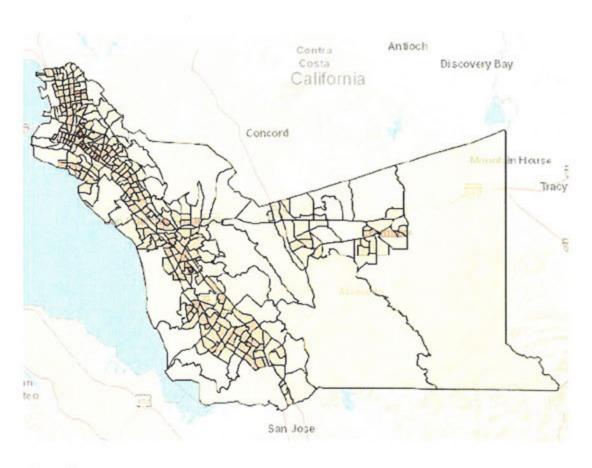
Design for Phase 1 has begun and communication with Law Enforcement Agencies across Alameda County, targeting the initial approximately 20 sites for Year 1 implementation, is in progress. The latest LEA point of contact list for proposed initial kiosk sites across Alameda County can be viewed in <u>Appendix C</u>.

The map and distribution of proposed LEA sites throughout Alameda County for Phase I is below. The City of Berkeley is not included in this Plan as it is currently excluded from the Ordinance.



LEA Sites Proposed to Implement Kiosks in Year 1 in Alameda County

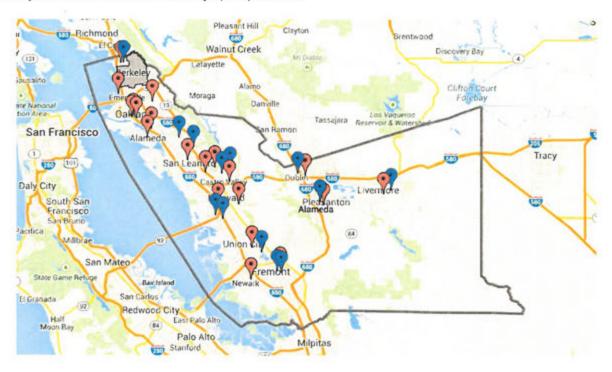
Alameda County has a diverse geography (see below), with high population density along the coastal range, and increasing population growth in the east corridor including Pleasanton, Dublin, and Livermore (the Tri-Valley area). Kiosk placement and take-back events will target these concentrated areas, as well as dispersed areas, where residents are required to travel longer distances to dispose of Unwanted Medicine.



Legend: Persons Per Square Mile: by Census Tract 26.3 - 2392.2 2500.0 - 5127.7 5311.3 - 6425.9 5487.9 - 12143.8 12369.9 - 17674.1 18064.2 - 26007.5 282624 - 53046.0

Population Density by Census Tract in Alameda County, 2010 http://factfinder2.census.gov

Health fairs, community events, and gatherings are targeted as opportunities for future take-back events. Organizations and sponsors of these events will be contacted in order to assess feasibility of adding a take-back event and to gain further understanding into the demographic that attends each event so that a variety of populations can be reached throughout the year. A list of events that will be targeted for future take-back events is listed in Appendix D. Take-back events for Year 1 will be confirmed or modified within 90 days of Plan approval. A majority of these events are in the Districts of Alameda County where residents may need to travel longer distances to access kiosk sites. By targeting these regions for take-back events, Alameda MED-Project will give residents additional opportunities to dispose of Unwanted Medicine. Law enforcement agency personnel shall be present at all take-back events. A map of the proposed LEA kiosk collection sites (red) and Community Events that may serve as future take-back days (blue) is below.



Proposed Year 1 LEA Kiosk Sites (red) and Take-Back Events (blue) in Alameda County

Demographic information continues to be analyzed, including race/ethnicity, language, age, and geographic data, in order to appropriately direct outreach and create educational materials to best serve the unique needs of each area. Alameda County demographics continue to evolve, with significant growth in the Asian and Hispanic populations over the last 10 years.

Efforts to ensure that materials are appropriately targeted, translated, and available to these populations will be pursued with Associations, Agencies, and Organizations that can be viewed in <u>Appendix E</u>.

During the Design Phase, an internal Communication Matrix, Site Readiness Assessment Methodology, and Change Management Process will be established in order to effectively and efficiently manage communications and notifications, processes and procedures, as well as issues and requested changes. And upon Plan approval, Agreements and Contracts will be finalized with vendors and other Program participants. In addition, all LEA kiosk sites that will be implemented in Year 1 will be identified, and the first three monthly take-back event dates and sites will be scheduled. The remaining take-back events for Year 1 will be identified to maximize access within the County, and several mechanisms of communication and education will be in place, such as the website and toolkit.

A mixture of kiosk collection sites and take-back events will be coordinated and distributed to best reach the demographics and geography of each District. A summary of kiosk sites and events by District is below.

Estimated Population Outreach in Year 1 as a Combination of Klosk Sites and Take-Back Events Proposed Proposed District Total Population* Take-Back Events **Take-Back Events** Comments** Cities: Dublin, Livermore; most of 1 4 3 295,846 Fremont Unincorporated: part of Sunol Cities: Hayward, Newark, Union City, the northern portion of the city of Fremont 2 305,652 4 3 Unincorporated: part of Sunol Cities: Alameda, San Leandro; part of Oakland (including the Chinatown, San 3 301,349 5 1 Antonio, Fruitvale and Melrose areas) Unincorporated: San Lorenzo, part of Ashland Cities: Pleasanton, part of Oakland 310,027 4 3 Unincorporated: Castro Valley, Cherryland, Fairview, Ashland Cities: Albany, Emeryville, Piedmont, part 5 184,817*** 4 of Oakland. *** The City of Berkeley is excluded from the Ordinance. Totals 1,397,691

^{*}http://www.acgov.org/redistricting/documents/Map_E_1_with_Pop_Summary.pdf

^{**}http://www.acgov.org/board/

^{***}http://quickfacts.census.gov/qfd/states/06/0606000.html

Implementation: Phase I: Year 1

In Phase I, encompassing Year 1 of the Program, approximately 20 LEA kiosk collection sites will be implemented, beginning with at least 3 sites within the first 90 days. The LEA sites that currently have kiosks (ACSO, Alameda PD, and Pleasanton PD) will be transitioned to the new program during Phase I. Throughout this process, Alameda MED-Project will seek to identify other possible LEA satellite offices and substations for the future implementation as Collection Sites. As kiosks are deployed, information will be gathered and synthesized into future launches to streamline implementation.

The events, locations, and dates for monthly take-back events for Year 1 will be confirmed, and the first 3 monthly events will be conducted within the first 90 days of implementation. Education and outreach will commence within the first 30 days of implementation, leveraging established contacts.

Phase I is intended to provide a smooth introduction of the training, infrastructure, messaging, and support of multiple stakeholders, systems, and processes. During this period, the program will assess performance, gauge feedback, and revise its approach as appropriate. As Phase II (Years 2-3) approaches, the Alameda MED-Project shall determine, based on its dialogue with DEA, whether and, if so, how to lawfully involve entities other than LEA in the Plan. Assuming that the Alameda MED-Project can lawfully support entities other than LEA under the DEA Rule, it will approach Healthcare, Chain, and Independent Pharmacies, which must be registered collectors of controlled substances under the DEA Rule, to evaluate options for placing kiosks into those locations.

Organizations that may be approached for future kiosk implementation in Phase II are listed in Appendix E. Several non-LEA sites in Alameda County already host kiosks, and those will be evaluated for transition to this Program in Phase II. Specifically, locations such as Eden Hospital and Washington Hospital², as appropriate, will be engaged as they are currently reported to be more active collection locations.

Expansion: Phase II: Years 2 to 3

Phase I (Implementation) activities will be evaluated during Phase II. Additionally, during this phase, Alameda MED-Project will seek to expand the program into other collection channels and sites as described in the prior section. Phase II, as appropriate, will focus on participation of Healthcare, Chain, and Independent Pharmacies that serve a larger population and geographical area. Given the Chain Pharmacies' demonstrated reluctance to participate in voluntary programs currently in place, Alameda MED-Project anticipates that it will take more time and effort to recruit the participation of these sites. Additional kiosk placement in Phase II, as appropriate, will help the Plan achieve wider geographic and demographic participation.

Alameda MED-Project will determine how to address requests to host Collection Sites during Phase II based on existing geographic distribution near the requesting collection site.

Take-back events will continue on an ongoing monthly basis in Phase II. Education and outreach will be continuous, with additional venues and methods identified and added as the Product Stewardship Program expands.

² This data comes from the "Alameda County Safe Medication Disposal Initiative Assessment" report compiled by Joel Kreisberg on July 11, 2014 http://www.teleosis.org/wp-content/uploads/2012/02/AlamedaCo_SafeMedDisposal_Assessment-Final_l.pdf

2. Law Enforcement Locations

The Plan includes outreach to the approximately 20 Law Enforcement Agencies ("LEA") located in the County to host collection kiosks and take-back events. These locations are listed and identified on a map in Appendix C. Alameda MED-Project has made initial contact with each of these locations and will initiate specific agreements with interested LEA locations within 30 days of Plan approval.

3. Law Enforcement Kiosks

Kiosks will be offered to participating LEA locations. For law enforcement agency kiosk locations that do not collect controlled substances, the Plan shall pay all expenses and costs that may be incurred by the LEA collection site. For law enforcement agency kiosk locations that have a collection program for controlled substances, Alameda MED-Project shall, in addition to providing a collection kiosk, pay all collection, transportation and disposal costs of the collected material, assuming that Stericycle performs these collection, transport and disposal activities, and shall reimburse the law enforcement agency for any consumer outreach performed by such agency. The kiosks, kiosk signage, and kiosk servicing will occur as identified in this Plan.

An existing klosk can be used, if it meets the requirements established by the Alameda MED-Project and as outlined by the DEA.

4. Kiosk Placement and Maintenance Program

Kiosk placement shall be the responsibility of Alameda MED-Project at law enforcement agencies not collecting controlled substances, and the responsibility of the LEA if it has a program for the collection of controlled substances. Costs associated with placement and maintenance will be paid or reimbursed by Alameda MED-Project per the agreements with the authorized collectors.

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 the regularly scheduled pick-ups and notification of a Maintenance Technician if necessary.
- · Reporting by the LEA of damage to a kiosk or requested maintenance service.

5. Training

Operational procedures including training are the responsibility of the Collection Site.

Alameda Med-Project will support training from the Collection Vendor as may be specified by future agreements with the Collection Site.

Additionally, the Collection Sites will be introduced to necessary support lines for questions related to the service and/or maintenance of the kiosk. Stericycle will manage a support hotline to support two general communication functions:

- 1. Answer questions and monitor comments for participating collection sites.
- Create a tele-prompt system to manage all general questions from residents of Alameda County.

Questions about the Collections Sites will be managed by live agents from 8:00am to 5:00pm PST Monday through Friday. Calls outside of the available hours will be directed to an answering machine. Calls will be returned when the office is open. All operators will be trained to manage responses based on the requirements set by the Alameda MED-Project.

The tele-prompt service will answer general questions, including questions on the following topics:

- 1. Items permitted to be received in the kiosks
- 2. Hours of operations for the kiosks
- 3. Direction to the program website for additional information

All Service Technicians supplying the kiosks will be trained on the specifics required to safely and efficiently secure the kiosk at the Collection Site. They will be able to effectively communicate the functionality and security features of the kiosk to the Collection Site Host. The Service Technicians servicing the Unwanted Medicine deposited at a kiosk will be independent of the technicians that provide maintenance to the kiosks. This ensures a system of monitored communication and an additional level of security to the management of the plan. The Service Technicians collecting and transporting the Unwanted Medicine will receive privacy training and will be trained on all necessary standards for waste material including, but not limited to, a forty (40) hour training on CAL OSHA'S analog to federal OSHA's Hazardous Waste Operations and Emergency Response "HAZWOPER". The training standards provide professional management of all Unwanted Medicine along with proper documentation of all services at the collection points. Kiosks will come with appropriate regulatory signage and consumer instructions, including an instruction to consumers to remove personal information from any Unwanted Medicine or its packaging before depositing them.

6. Unwanted Medicine Security/Tracking



A kiosk designed especially for Alameda MED-Project will be offered to all LEA host locations. The design of the kiosk and proposed signage (Appendix F) recognizes the paramount importance of security through the use of heavy gauge steel, multiple locking mechanisms, including a locking mechanism on drop slot, a tamper-proof slot and commercial hinges. The design will increase the likelihood of consumer participation by providing easy access even to wheelchair bound users. Additionally, the locking mechanism on the drop slot will prevent kiosk over- flow once the container has reached is maximum level.

The Unwanted Medicine will be securely removed from the kiosk by a Service Technician working for the Collection Vendor. The Service Technician will provide a picture ID to the Collection Site Host and will possess one of two keys to access the Unwanted Medicine within the kiosk. The other key will be in possession of the Collection Site Host. Both keys must be used to access the Unwanted Medicine. Once the kiosk is opened, the Unwanted Medicine will be removed. The liners provided in the kiosk will be opaque to prevent visual recognition of the contents. All liners within the collection container will be effectively secured via plastic zip-tie or other means to prevent contents from spilling.

The contents will be taken to a secure vehicle for containment. The Unwanted Medicine will then be placed in a container for shipment. This container will be marked with a unique barcode label to track the container to the disposal site. The container will be secured with tamper evident tape to prevent removal of any material during transport.

7. Procedures for Pick-Up and Disposal

Pick-up of Unwanted Medicine collected in the kiosks will be scheduled for all Collection Sites based on hours of operations and volume collected.

The Collection Vendor shall manage the Unwanted Medicine from the kiosk in compliance with all applicable legal requirements. Collected materials will be weighed, and their weights recorded, at the local transfer facility at the close of each service day. Containers will be inspected to verify the integrity of the security tape is intact. The shipping container will be bar-coded and secured for shipment to provide safe transport along with unique barcode tracking to the approved disposal facility.

The kiosk will be reviewed by the Service Technician for any damages. If damages are found, the Service Technician will note the need for repair via an electronic reporting log. This electronic report will be transmitted to a Maintenance Technician that will respond to specific repair requests.

All shipments containing the Unwanted Medicine will be transported via permitted ground haulers of waste. The Collection Vendor will utilize leased vehicles to manage the service of the Collection Sites. All vehicles will be permitted and maintained by the Collection Vendor. Permits will comply with all county, state and federal requirements for shipment of the Unwanted Medicine.

All haulers are trained to meet local, state and federal requirements. All haulers will adhere to all security requirements and will be monitored periodically by the Collection Vendor managers to ensure compliance of each hauler.

The Alameda MED-Project proposes that all waste containers will be destroyed in their intact, closed state at a permitted medical waste incineration facility. Following disposal, a Certificate of Disposal ("COD") will be retained via electronic copy.

8. Frequency of Pick-Up

Initially all Collection Sites will be scheduled for a monthly pick-up from the kiosk. The Collection Vendor will communicate with the Collection Site in the event the frequency of pick-up needs to be increased or decreased based on the volumes collected over time. It is anticipated that the average site will generate up to 40 pounds of Unwanted Medicine per service, per Collection Site. The Collection Vendor will monitor the exact volumes per service to ensure that all sites are receiving the appropriate service frequency. All weights will be confirmed on a scale located at the local transfer facility at the close of each service day. The Collection Vendor will manage services as frequently as necessary to prevent overflow of the kiosk without providing unnecessary interruption to the participating Collection Site. Moreover, the Collection Vendor will monitor the volumes of Unwanted Medicine generated at each participating Collection Site via an electronic catalog retained at the local transfer facility.

The proposed electronic catalog is Stericycle's proprietary software system that also allows for tracking of service data not available in the standard required shipping paperwork. This software system will provide the opportunity for Service Technicians to communicate the need for klosk repairs and other relevant information to ensure the most effective management of the program. This information will be transmitted electronically within 24 hours of a service event to Program Managers. These Managers will direct communications to necessary personnel to provide response and support of the needs of the participating Collection Sites.

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

The kiosk provided to the Collection Site will contain a visual indicator to notify the Collection Site Host if the kiosk is full. Upon such notification that the kiosk is full, the Collection Site Host shall notify the Collection Vendor of the need for service.

The Collection Vendor shall provide a network of trained Service Technicians within Alameda County. The Collection Vendor will communicate this request to field managers responsible for Service Technicians in Alameda County. The Collection Vendor will direct service to a trained Service Technician (refer to training outline in Section VIII.B.9) who is in closest proximity to the Collection Site requesting the service. This process provides for a timely response to Collection Sites requiring service prior to the scheduled date.

Service timelines will be assessed based on the specific characteristics of the Collection Site's need. If necessary, the Collection Vendor will be able to respond within hours of the request. If the request does not require an urgent response, the Collection Vendor will plan the response within 2 to 3 business days of the request. The Collection Vendor will not exceed one business week from the initial request.

10. Patient Privacy

Instructions at each kiosk will inform people who deposit Unwanted Medicine that they should completely cross out, remove or otherwise make unreadable any and all personally identifiable information on the drug containers before depositing them in the kiosk. In cases where people follow the instructions, there will be no personally identifiable information.

For those people who do not to follow the directions on the kiosk, the Collection Vendor has additional protections available for their personally identifiable information. 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. This will prevent anyone, including the Service Technician, from seeing any information on the containers placed in the kiosks. The process for securing the liner will take place at the Collection Site by a Service Technician.

The Collection Vendor will comply with all local, state and federal requirements. Stericycle's internal training process will address the following:

- Onboarding & on-truck observation of job functions five days
- · DOT Training two days
- · Client Service Requirements one day
- DEA Training one day
- · EPA Waste Characterization one day
- OSHA Training one day
- Waste Handling Demo one day
- · Truck Operation one day
- DEA Handling Demo one day
- Review & Written Test one day
- Perform work under supervision to demonstrate proficiency prior to certification to service client accounts. ten days

11. Unplanned Event Preparedness

The Collection Vendor maintains a network of emergency responders that can be called on in the case of an emergency or spill incidents. Stericycle 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. This system ensures that all participating vendors in the program will meet the county requirements as outlined in the Ordinance. Emergency responders will bring all necessary equipment in order to manage the specific needs of the collection site requiring emergency response. Responders will be trained to access and remove a damaged kiosk. The responders will also be trained to adhere to all security requirements required within the program.

A major event, such as a flood, earthquake or fire, may require 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 remove the kiosks within the affected area. Once all repairs are completed at the site, a team will return to install a new kiosk.

Along with major event preparedness, the Collection Vendor provides timely responses to events that may cause an inconvenience to the Collection Sites. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Collection Site Host will contact the Collection Vendor via the dedicated phone number mentioned below. The Collection Vendor is able to respond within two to three (2-3) hours in most cases when notified of a need for emergency response. If the request is not an emergency that poses an immediate threat to the environment or health, the Collection Vendor will respond to a service location within one to two (1-2) business days of the event.

Personal items that a resident inadvertently drops into the kiosk (i.e. dentistry, watch, keys, wallet, etc.) will not be retrieved.

C. Take-Back Events

Within the first 90 days of the plan and based upon agreements for the take-back event, Alameda MED-Project will confirm to the County the locations and times to conduct take-back events for the first year of the program. Targeted take-back events for Year 1 can be viewed in Appendix D. Federal, state or local law enforcement shall be in attendance at all take-back events. Thereafter, on an annual basis, Alameda MED-Project will propose to the County the approximate dates and locations for the following year's take-back events. The initial 90 days will allow Alameda MED-Project to confirm initial locations for the first phase of the implementation and solicit requests from interested stakeholders around which to design the take-back events. As stated in the goals, it is the intention of the Alameda MED-Project to conduct 12 take-back events per year. The Alameda MED-Project will select the location of take-back events based upon demographics and other population diversity characteristics to maximize distribution and County resident access to the take-back events. In general, the Alameda MED-Project will work to conduct take-back events in coordination with other scheduled events (i.e., Earth Day celebrations, Alameda County Fair, Health and Wellness Fairs) to maximize convenience to residents while they are participating in other activities. The take-back events will also be spaced over time in an appropriate manner (i.e., approximately monthly) to provide residents regular opportunities to participate.

1. Method

The Alameda MED-Project will coordinate, as appropriate, take-back events with applicable Alameda County offices and personnel, including law enforcement. Events will be promoted to county residents through local communication channels including outreach to local print, broadcast and online media identified in Appendix G and Appendix H and outreach to local community organizations and government agencies, including those identified in Appendix E. This approach is further developed in the section of the Plan devoted to public education and outreach. The process will meet all applicable legal requirements, and provide a compliant and cost-effective method for waste characterization, transportation and disposal.

2. Security

The events will be adequately staffed to provide effective monitoring of the event. All Unwanted Medicine collected during the event will be managed under the oversight and direction of Law Enforcement.

3. Procedures

The process for the take-back events will meet all applicable legal requirements and provide proper security measures. Law enforcement shall be present at all take-back events to provide security and review of the collected materials. Following the completion of the event, containers will be securely packaged, labeled and shipped in compliance with all applicable legal requirements. Containers will be tracked via barcode to a designated incineration facility.

Take-back events will typically be staffed by two Stericycle employees.

4. Fees and Costs

The Alameda MED-Project shall pay all costs associated with take-back events that do not collect controlled substances. For take-back events associated with a law enforcement program for controlled substances, the Alameda MED-Project shall provide appropriate collection receptacles, pay for the collection, transport and disposal of the collected material with approved vendor, reimburse the law enforcement agency for any consumer outreach performed by such agency, and identify the event as part of the consumer outreach performed by the Alameda MED-Project.

IX. Transporter and Facility Information

A. Transporter

Name: Stericycle, Inc. Hayward, CA

Address: 30542 San Antonio St., Hayward, CA 94544

Phone: 510-471-0920

Website: www.stericycle.com

Type: Regulated Medical Waste - Department of Toxic Substance Control Hauler Registration #3400

DOT ID number: CA120281

· Permit status: All relevant permits are active and in good standing. A list is available upon request.

· Penalty record (5 year): No compliances issues.

How transporter will be used: This transporter will be utilized to service all collection sites and carry the
material to a designated transfer station for transfer to a dedicated medical waste incinerator. Please
reference below.

B. Disposal Facility

· Name: Stericycle, Inc.

· Address: 3140 North 7th Trafficway, Kansas City, KS 66115

Phone: 913-321-3923

· Website: www.stericycle.com

· Type: Permitted regulated medical waste incinerator including expired and unused pharmaceuticals.

EPA ID number: KSR000509562

· Permit status: Active

Penalty record (5 year): Appendix I

 How will this facility be used: This facility will be utilized to incinerate all pharmaceutical waste recovered from the PPSWG take back program.

X. Unwanted Medicine Educational and Outreach Programming

A. Overview

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

B. Audiences

To effectively educate the public about the Plan, Alameda MED-Project has developed a comprehensive communications campaign featuring both broad communications tactics (e.g., Public Service Announcements ("PSAs"), 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, including education for dispensers of Covered Drugs
- · Retailers of Covered Drugs
- · Health care providers and their patients
- · Veterinary providers and animal owners

Alameda County comprises diverse demographic audiences. This plan details program efforts to reach the varied cultural, language, geographic and age-range demographics, including through outreach to ethnic, community and alternate-language media (Appendix G); outreach to community organizations serving a broad range of audiences (Appendix E); availability of alternate language phone lines (Section X(D)(1)); and availability of educational information through a broad range of channels, including toll free telephone lines, broadcast media, and the Internet.

C. Messages

Alameda MED-Project messaging will focus on two main goals:

- · Educating residents about the appropriate use, storage and disposal of Unwanted Medicine, 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 law enforcement collection kiosks, participation in
 take-back events, and, where no disposal instructions are given on the prescription drug labeling and a takeback program is not available, in-home disposal.

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
- The importance of promptly and properly disposing of Unwanted Medicine
- · How to find and use collection kiosks
- How to properly dispose of Unwanted Medicine
- Privacy issues (removing personally identifiable information from labeled prescription containers)

D. Tools/Communications Channels

The Alameda MED-Project will include a number of components designed to reach consumers and provide consistent access to timely and relevant information, including:

1. Phone

Alameda MED-Project will include a toll-free telephone number [1-800-MED-Proj] for residents to obtain information about collection kiosks, educational materials and other aspects of the Plan for Unwanted Medicine from households.

- ✓ The Alameda MED-Project toll-free telephone line will initially support three languages: English (identified as the preferred language of approximately 87 percent of Alameda County residents discharged from California hospitals from 2010-2012, according to OSHPD data); Spanish (preferred language of approximately 7 percent of same); and a third language to be determined based on demographic make-up of County and demonstrated need (e.g., Cantonese, Vietnamese, Tagalog, Mandarin or Hindi, etc.). Telephone line will also contain an option for callers to be transferred to a staffed call center.
- ✓ A recorded-line script at 1-800-MED-Proj will provide basic information about how the Plan works, where to obtain more information (e.g., the website), and will also include prompts to find a Collection Site 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 J for a sample template of the recorded call script.

2. Website

Upon Plan approval, Alameda MED-Project will develop the Alameda County website with capability for mobile devices as well. Information available to users includes locations of collection kiosks, educational materials, frequently asked questions and responses, public outreach events (e.g., take-back events).

- ✓ The Alameda County website will be accessible from Alameda MED-Project (www.med-project.org)

 and available for public access within 60 days of Plan approval. The Plan currently includes a sample mockup of the Alameda County website and supporting pages from the landing page. Appendix K

 provides the proof of concept for each page.
- ✓ The Alameda County website will also include access to the public relations toolkit in a downloadable format (see "Materials" section of this plan, Section X.D.3 below) and contact information for residents. The toolkit available on the website includes a flyer/brochure (Appendix L), a public service announcement available in broadcast and audio versions, and a frequently asked questions (FAQ) document which will be reviewed and updated periodically.
- Community and government organizations and other public interest groups seeking materials to promote the program are encouraged to access these resources.

3. Materials

Educational materials about the program and on how to properly dispose of Unwanted Medicine will be available through the website, at in-person take-back days, through potential third party partners and community organizations, and at kiosk-collection sites. Alameda MED-Project's approach will depend upon agreement and participation by third party partners and community organizations.

The Plan includes sample educational brochure and sample media advisory for promoting in-person take-back events (Appendix M).

4. Media Outreach

The Alameda MED-Project will include public outreach, such as traditional and social media outreach, educational signage and community events. Specifically, Alameda MED-Project will promote the toolkit as well as the take-back events using the available channels described in the Plan. Outreach efforts will encourage media outlets and third party groups to download and use the toolkit. The Alameda MED-Project will coordinate outreach for scheduled take-back event to promote participation by residents. The following materials support the unwanted medicine educational and outreach programming for Alameda County:

- ✓ Please see <u>Appendix J</u> for a sample education and outreach call script with the toolkit including flyers in <u>Appendix L</u> and website information included in <u>Appendix L</u>. Alameda MED-Project's approach will depend upon agreement and participation by community organization.
- ✓ Please see Appendix G for a sample media list of key outlets that reach county residents.
- Please see <u>Appendix H</u> for sample digital- and hyper-local social media networks/ outlets. Note: Successful dissemination of information within these networks will be contingent upon their agreement to post or tweet the content provided.
- ✓ Please see Appendix M for a sample template media advisory announcing a take-back event.

E. Collaboration with the County Officials and Community Organizations

Alameda MED-Project will work in collaboration with the Alameda County Department of Public Health as appropriate to build on existing community outreach resources, such as local organizations, media lists, available public media outlets, etc. Once the Plan is approved, the following activities will be initiated:

- · Briefing Materials Provided to Support Coordination with County Officials:
 - Alameda MED-Project will provide access to Educational and Outreach Programming materials, including the sample brochure (included as the Appendices), to relevant County Departments and officials.
- Outreach through Community Organizations:
 - ✓ The Alameda MED-Project will further promote the Plan in Alameda County by engaging relevant stakeholders and community organizations. For example, the Alameda MED-Project plans to arm community organizations, including those identified in Appendix E, with the toolkit, including flyers and website information, included in Appendix L. Alameda MED-Project's approach will depend upon agreement and participation by community organization.

F. Disclaimer

The written and verbal educational materials and public outreach tools required by the Ordinance and implementing Regulations that are disseminated under this Product Stewardship Plan will include a disclaimer similar to the following: "The material has been provided for compliance with Alameda's Safe Drug Disposal Ordinance and does not necessarily reflect the views of the Plan Owner or individual producers."

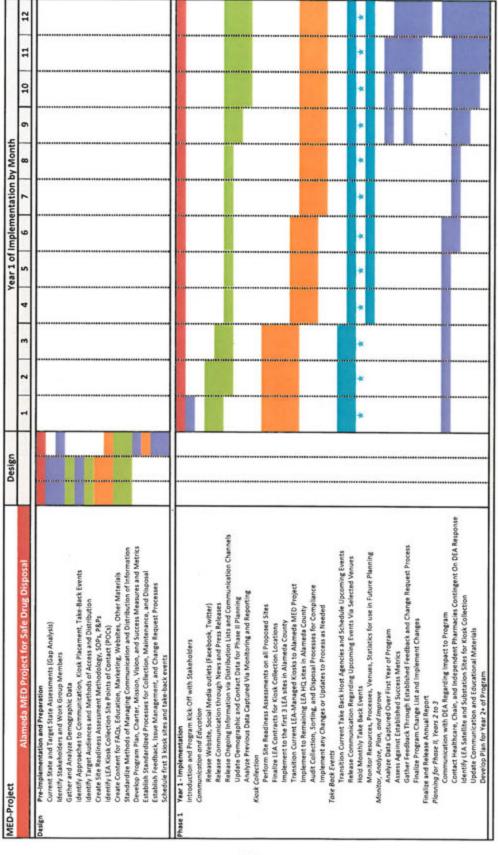
Appendix A

Alameda MED-Project Participants

The Pharmaceutical Product Stewardship Working Group (PPSWG), a group of pharmaceutical Producers, has established a limited liability company, Alameda MED-Project LLC as the Stewardship Organization for the Plan. The Participants in the Alameda MED-Project are provided to the County on an on-going basis. List last submitted to the County on January 30, 2015.

Appendix B

Detailed Project Plan For Design and Implementation



Appendix C

Alameda County Law Enforcement Agency Point of Contact List

The following sites have been contacted, and a point person is in the process of being identified for each location. A "yes" in the column titled "Kiosk" indicates that there was a kiosk in this location prior to the submission of this Plan.



#	LEA Site	Kiosk In Place Today
1	Alameda County Sherriff's Office (ACSO) 1401 Lakeside Drive Oakland, CA 94612 (510) 272-6878	Yes
2	Alameda Police Department 1555 Oak Street Alameda, CA 94501	Yes
3	Albany Police Department 1000 San Pablo Ave Albany, CA 94706 (510) 525-7300	No
4	BART Police Department Chief of Police – Kenton W. Rainey 800 Madison Street Oakland, California 94607 (877) 679-7000	No

Appendix C Continued

#	LEA Site	Kiosk In Place Today
5	California Highway Patrol Golden Gate Division Castro Valley Location (375) 21020 Redwood Road Castro Valley, CA 94546 (510) 581-9028 Area Commander: Christopher J. Sherry Lieutenant Commander	No
6	California Highway Patrol Golden Gate Division Dublin Location (390) 4999 Gleason Drive Dublin, CA 94568-7643 (925) 828-0466	No
7	California Highway Patrol Golden Gate Division Hayward Location (345) 2434 Whipple Road Hayward, CA 94544-7808 (510) 489-1500	No
8	California Highway Patrol Golden Gate Division Oakland Location (370) 3601 Telegraph Avenue Oakland, CA 94609-2426 (510) 450-3821	No
9	California State University, East Bay Police Services 25800 Carlos Bee Boulevard, Hayward, CA 94542 (510) 885-3791 upd@csueastbay.edu Chief Sheryl Boykins	No
10	Dublin Police Services Chief of Police - Tom McCarthy 100 Civic Plaza Dublin, California 94568 (925) 833-6670	No
11	East Bay Regional Parks Police Department Chief of Police - Timothy Anderson 17930 Lake Chabot Road Castro Valley, California 94546 (510) 881-1833	No
12	Emeryville Police Department Chief of Police - Ken James 2449 Powell St. Emeryville, California 94608 (510) 596-3700	No
13	Fremont Police Department Chief of Police - Richard Lucero 2000 Stevenson Blvd. Fremont, California 94538 (510) 790-6800	No

Appendix C Continued

#	LEA Site	Kiosk In Place Today
14	Hayward Police Department Chief of Police - Diane E. Urban 300 W Winton Ave. Hayward, California 94544 (510) 293-7272	No
15	Livermore Police Department Chief of Police – Michael Harris 1110 S Livermore Ave Livermore, California 94550 (925) 371-4900	No
16	Newark Police Department Chief of Police – James Leal 37101 Newark Blvd. Newark, California 94560 (510) 578-4237	No
17	Oakland Police Department Chief of Police – Sean Whent 455 7th St. Oakland, California 94607 (510) 238-3455	No
18	Oakland Housing Authority (OHA) Police Department 1180 25th Ave, Oakland, CA 94601 (510) 535-3100	No
19	Oakland Unified School District (OUSD) Police Services 1000 Broadway Oakland, CA 94607 (510) 434.7790	No
20	Piedmont Police Department Chief of Police – Rikki Geodes 403 Highland Avenue Piedmont, California 94611 (510) 420-3000	No
21	Pleasanton Police Department 4833 Bernal Ave. Pleasanton, CA 94566	Yes
22	San Leandro Police Department Chief of Police – Sandra R. Spagnoli 15001 Foothill Road San Leandro, California 94578 (510) 577-2740	No
23	Union City Police Department Chief of Police – Brian Foley 34009 Alvarado Niles Rd. Union City, California 94587 (510) 471-1365	No

^{*}Information from Alameda County contact list, dated November 17, 2014

Appendix D

Past Community Events That May Serve as Future Take-Back Events

The following examples of past events that will be targeted as potential future take-back days based on timing and geographic needs:

- Alameda County Fairgrounds, Pleasanton, CA District 4
- · Annual Health Aging Fair, Hayward, CA District 2
- Annual Health and Wellness Fair, Oakland, CA Districts 3, 4
- Annual Senior Health and Wellness Resource Fair, Castro Valley, CA District 4
- · Bay Area Earth Day Events (throughout Alameda County) Districts 1 through 5
- Four Seasons of Health Expo, Fremont, CA Districts 1, 2
- Health and Fitness Fair, Dublin CA District 1
- Health and Wellness Fair, Albany, CA District 5
- · Healthy Living Festival, Oakland, CA Districts 3, 4
- Healthy Parks, Healthy People Festival, Fremont, CA Districts 1, 2
- . Men's Health; Music In The Park and Men's Expo, Castro Valley, CA District 4
- St. Rose Hospital's Annual Health Fair, Hayward, CA District 2
- Tri-Valley Regional Health Fair, Livermore, CA District 1

Appendix E

Possible Contact List For Outreach and Education to the Community

The following are Associations, Agencies, and Organizations will be contacted for assistance with outreach and education to the community. They will also be contacted to participate as potential future kiosk host sites or take-back event sponsors. Alameda Med-Project will also contact existing sites hosting kiosks.

Health Systems:

Kaiser Permanente

Sutter Health

Alta Bates Summit Health Care

ValleyCare Health System

Children's Hospital and Research Center

Alameda Health System

Eden Township Healthcare District

Fremont Hospital

St. Rose Hospital

Washington Hospital Healthcare System

Health Associations:

California State Board of Pharmacy

The Medical Board of California

California Board of Registered Nursing

California Board of Vocational Nursing

California Department of Health Care Services

California Health and Human Services Agency

Alameda County Pharmacy Association

Chain Pharmacies:

CVS Pharmacies

Walgreens Pharmacies

Rite Aid Pharmacies

Safeway Pharmacies

Lucky Pharmacies

Walmart Pharmacies

Organizations, Districts, and Agencies:

CalRecycle

Alameda County Social Services Agency

Alameda County Public Health Department

Municipal Utilities Districts

Water Quality and Water Agencies

School Districts

Alameda County Board of Supervisors

Sunol Citizen's and Advisory Council

Sample - Not for Distribution. All text subject to change pending review and approval by Alameda County.

Appendix F

A. Sample Picture of Kiosk





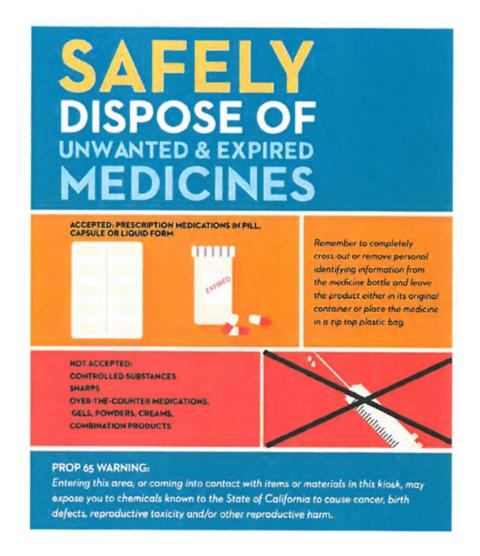
The secure kiosk is available in two sizes. The full size (shown) is approximately 42"tall x 19"wide x 20.5"deep (without handle). The counter top version is approximately 31"tall x 19"wide x 20.5"deep (without handle).

The design of the kiosk recognizes the paramount importance of security through the use of heavy gauge steel, multiple locking mechanisms, tamper-proof slot and commercial hinges, meeting the stringent requirements under law. At the same time, it doesn't forsake function with its accessibility and ease of use.

Appendix F

B. Sample Kiosk Signage for Kiosks Not Accepting Controlled Substances

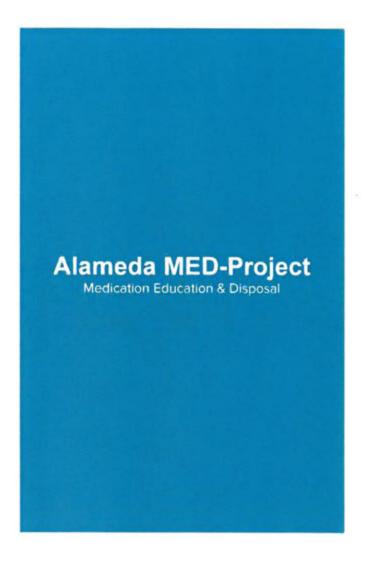
Top of Kiosk Key Art 42" tall x 19" wide x 20.5" deep



Appendix F

C. Sample Kiosk Signage for Kiosks Not Accepting Controlled Substances Continued

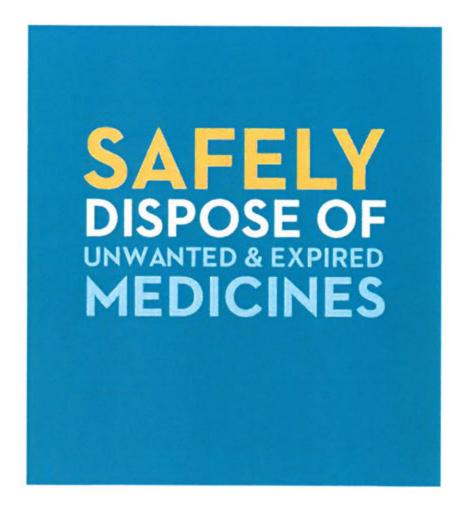
Side Panel of Kiosk 42" tall x 19" wide x 20.5" deep



Appendix F

D. Sample Kiosk Signage for Kiosks Not Accepting Controlled Substances Continued

Front Panel of Kiosk 42" tall x 19" wide x 20.5" deep



Appendix G

Sample Media List

The following is a representative list of key media outlets to help educate Alameda County residents about proper disposal of expired or unwanted medicines. The list includes local print, online, television and radio outlets, as well as outlets specifically targeting the diverse demographic communities within the County.

Print Outlets	City/Coverage Area	
Alameda Journal	Alameda	
Alameda Sun	Alameda	
AsianWeek (Asian-Americans: Online)	National; Bay Area	
Berkeley Daily Planet	Berkeley	
Contra Costa Times	Alameda County	
Daily Californian (UC Berkeley)	Berkeley	
East Bay Express	Oakland	
E'ville Eye Community News	Emeryville	
Fremont Bulletin	Fremont	
Fremont Tribune	Fremont	
Hayward Daily Review	Hayward	
La Opinion (Spanish)	Statewide	
Oakland Local	Oakland	
Oakland Post (African American)	Oakland	
Oakland Tribune	Alameda County	
Piedmont Daily	Piedmont	
Pleasanton Weekly	Pleasanton	
San Francisco Bay View (African American)	Alameda County	
San Francisco Chronicle	Alameda County	
San Jose Mercury News	Alameda County	
The Alamedan	Alameda	
The Argus	Fremont	
The Daily Review	Alameda County	
The Independent	Pleasanton	
The Montclarion	Oakland	
The Piedmont Post	Piedmont	
The Piedmonter	Piedmont	
Tri-City Voice	Fremont, Newark, Union City, H	

Television Outlets	City/Coverage Area		
(GO (TV, ABC)	Alameda County		
KDTV (TV, Univision)	Alameda County		
KNTV (TV, NBC)	Alameda County		
KOVR (TV, CBS)	Alameda County		
KPIX (TV, CBS)	Alameda County		
KQED (TV, PBS)	Alameda County		
KTVU (TV, Fox)	Alameda County		
Peralta TV (Public Access)	Alameda County		
Radio Outlets	City/Coverage Area		
KALW-FM (School District)	Alameda County		
KALX-FM (UC Berkeley)	Berkeley		
KCBS-AM	Alameda County		
KCRH-FM (College; Hayward)	Hayward		
KDOW-AM	Alameda County		
KGO-AM	Alameda County		
KKSF-AM	Alameda County		
KPFA-FM Alameda County			
	Alameda County		

Appendix H

Sample Digital and Local Social Networks

The following is a representative list of local organizations and their social media networks in Alameda County. Alameda MED-Project will reach out to relevant groups to help promote Alameda County drug take-back days.

Outlet	Facebook	Twitter
510 Families	https://www.facebook.com/510Families	"@510families"
Alameda Alliance	https://www.facebook.com/alamedaallianceforhealth	"@Alameda Alliance"
Alameda Biogs		"@Alamedans"
Alameda Buzz		"@AlamedaBuzz"
Alameda County	https://www.facebook.com/AlamedaCounty	"@AlamedaCounty"
Alameda County Fair	https://www.facebook.com/alamedacountyfair	"@ACFair"
Alameda Health Consortium	https://www.facebook.com/alamedahealthconsortium	"@ACHealthCenters"
Alameda Health System	https://www.facebook.com/AlamedaHealthSystem	"@AlamedaHealth"
Alameda Patch	https://www.facebook.com/AlamedaPatch	"@AlamedaPatch"
Alameda Rotary Club	https://www.facebook.com/RotaryClubOfAlameda	"@alamedarotaryclub
Alameda-Contra Costa Medical Association		"@EastBayDocs"
Albany Patch	https://www.facebook.com/AlbanyPatch	"@AlbanyPatch"
CA Medical Assn	https://www.facebook.com/cmaphysicians	"@cmaphysicians"
California Pharmacists Association	https://www.facebook.com/CAPharm	"@capharm"
City of Fremont	https://www.facebook.com/cityoffremont	"@Fremont_CA"
City of Hayward	https://www.facebook.com/cityofhayward	"@cityofhayward"
City of Livermore	https://www.facebook.com/cityoflivermore	"@cityoflivermore"
City of Oakland	https://www.facebook.com/CityofOakland	"@CityofOakland"
City of Union City	https://www.facebook.com/CityOfUnionCity	"UnionCity_Gov"
	https://www.facebook.com/downtownoak?fref=pb&hc_los	
Downtown Dakland Association	ation=profile_browser	
East Bay Loop	https://www.facebook.com/theloopeastbay	"@EastBayLoop"
	https://www.facebook.com/pages/Eastmont-Wellness-	
Eastmont Wellness Center	Center/131624876909152?ref=br_tf	
Fremont Petch	https://www.facebook.com/FremontCAPatch	"@FremontPatch"
	https://www.facebook.com/pages/Livermore-Public-	
Livermore Library	Library/99365063645	"@livlibrary"
Dakland Local	https://www.facebook.com/oaklocal	"Oaklandlocal"
Dakland Magazine	https://www.facebook.com/oaklandmagazine	"@eastbay365"
	https://www.facebook.com/pages/Oakland-Police-	
Dakland Police Department	Department-Oakland-CA/391011254354978	"@oaklandpoliceca"
Dakland Public Library	https://www.facebook.com/Daklibrary	"@oaklibrary"
Parents Press EB	https://www.facebook.com/parentspress	"@parentspressEB"
San Leandro Rec and Human Services Depart	m https://www.facebook.com/sanleandrorec	
United Seniors of Oakland and Alameda Cou	in https://www.facebook.com/usoac1	"@usoac1"

Appendix I

Disposal Facility Penalty Record

Stericycle Location	Date	Address	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
Kansas City	11/16/2009	3140 North 7th Trafficway Kansas City, KS 66115	Kansas Deprtment of Health and Environment	Consent Order for failing to submit the annual emission inventory on time.	\$1,000.00	Closed

Appendix J

Sample Template: Education and Outreach Call Script [1-800-MED-Proj]

Alameda MED-Project

Medication Education & Disposal

- Thank you for calling the information line for the Alameda Medication Education and Disposal Project, or Alameda MED-Project.
- Para continuar en español marque cuatro.
- 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.
- If you have questions about your medication, please hang up and dial your health care provider.
- Be sure to store medications properly to prevent accidental ingestion or misuse by others in your household, especially children.
- Alameda MED-Project is a consumer education campaign dedicated to proper medication use and consumer disposal.
- Alameda MED-Project reminds you that taking your medicine as directed by your health care provider is critically important to your health.
- If you have expired or unwanted medications, press 1 to hear options.

Script for when 1 is selected:

- To protect your privacy, remove or black out all personally identifiable information on a prescription label before disposing of your medications.
- If there are any instructions for disposal on your medication's label or patient information that accompanies the medication, please follow those instructions.
- Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines.
 For information on currently scheduled take-back days, please visit www.med-project.org/take-back-days, or press 2 to leave a message for the Alameda MED-Project Coordinator.
- Prescription medicines in pill, capsules or liquid may be turned in at kiosks. Over-the-counter products, injectables or needles will not be accepted. For information on how to properly dispose of sharps such as needles, please visit the CalRecycle website at www.calrecycle.ca.gov.
- If no disposal instructions are given on the prescription drug labeling and no take-back program is available
 in your area, throw the drugs in the household trash following these steps.

- Remove them from their original containers and mix them with an undesirable substance, such as
 used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and
 unrecognizable to people who may intentionally go through the trash seeking drugs).
- Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.¹
 - o To repeat this information, press X.
 - o To return to the main menu, please press 0.
 - For additional questions about the proper disposal of expired or unwanted medications from households, please go to www.med-project.org/AlamedaCounty or press 2 to leave a message for the Alameda MED-Project Coordinator.

Script for when 2 is selected:

- You have reached the voice mailbox for the Alameda County Coordinator for the Alameda MED-Project.
- If you are experiencing a medical emergency, please hang up and dial 9-1-1.
- If you have questions about your medication, please hang up and dial your health care provider or your pharmacist.
- Please leave your name, telephone number and ZIP code as well as a brief message explaining your question and someone will be in touch with you within [X].
- To repeat this information, press X.
- o To return to the main menu, please press 0.
- To hear this menu again, please press 3.
- Thank you for calling Alameda MED-Project.

http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm, page last updated May 19, 2014



Alameda MED-Project Website

Alameda MED-Project

Medication Education & Disposal









CHECK THE PACKAGE

If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions. Do not flush prescription drugs down the toilet unless the information on the label, package or package insert specifically instructs you to do so.







TAKE-BACK EVENTS

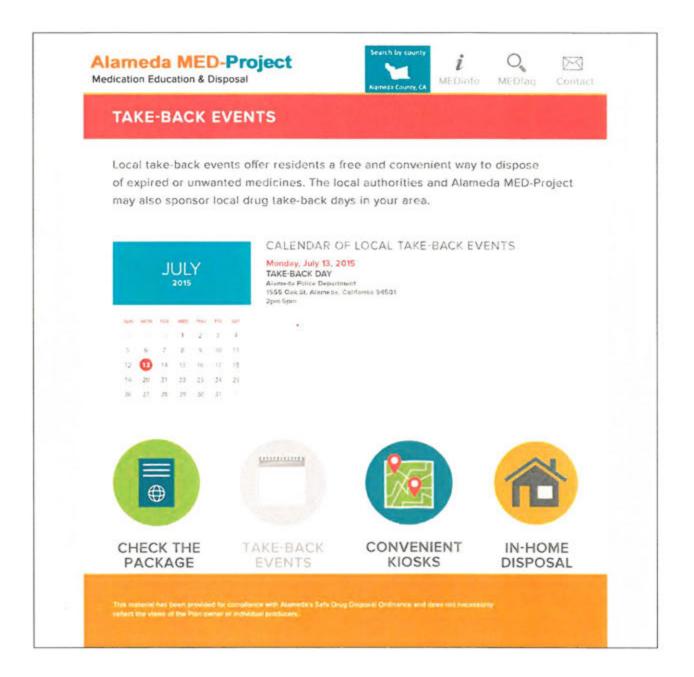


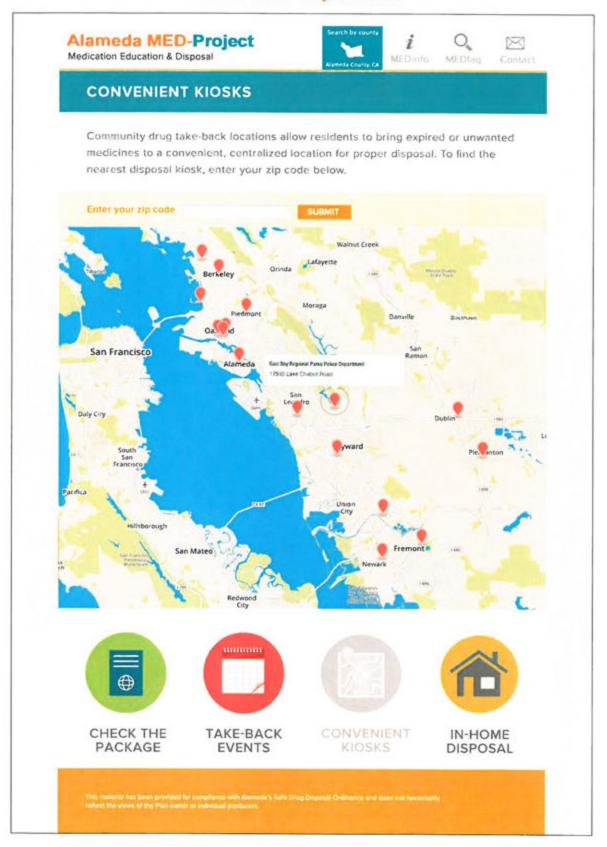
CONVENIENT KIOSKS



IN-HOME DISPOSAL

This meterial has been provided for compliance with Alaheda's Safe Drug Disposal Onlinence and does not necessarily infact the views of the Pien owner or individual producers.





Alameda MED-Project Website

Alameda MED-Project

Medication Education & Disposal









IN-HOME DISPOSAL

If no disposal instructions are given on the prescription drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps. 1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs). 2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.







TAKE-BACK EVENTS



CONVENIENT KIOSKS

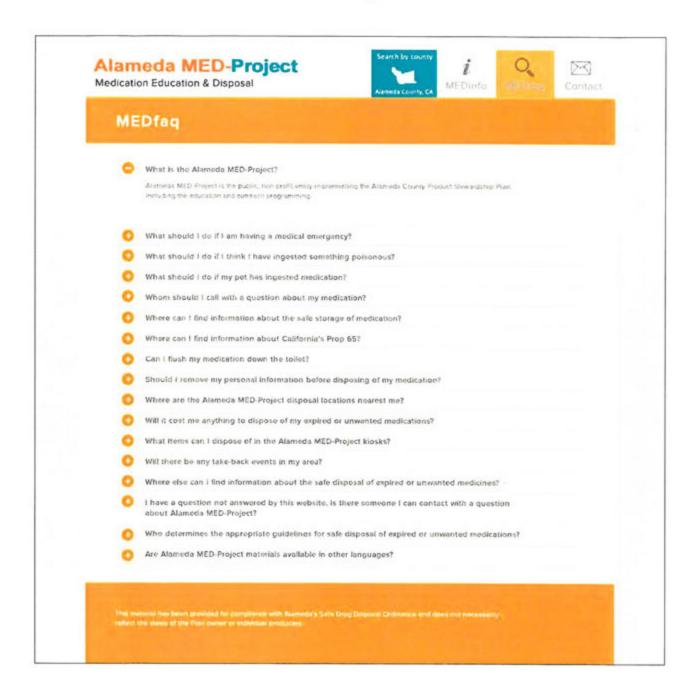


IN-HOME DISPOSAL

Source: Note: Liveue filte gov PorConsumers Consumers/Sentention/PMS3 from text appared May 19-2058

This methnisi has been provided for compliance with Alameda's Sel's Drug Disposal Ordinance and does not necessarily reflect the views of the Plan bener or Individual producers.





Alameda MED-Project Website











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 medicines as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent additions or misuse by others in your household, especially children.

There are a number of ways to dispose of expired or unwanted medicines. 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, and Public Service Announcement.

This material has been provided for compliance with Alameda's Safe Drug Disposal Ordinance and does not necessarily reflect the views of the Plan owner or individual producers.

Appendix L

Brochure/Flyer Mockup

MEDICATION & DISPOSAL

What should you do with your expired or unwanted medicines?



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









CHECK THE PACKAGE

TAKE-BACK EVENTS

CONVENIENT

IN-HOME DISPOSAL

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 and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

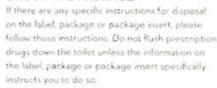
If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options. (Source U.S. Food and Drug Administration)

For more information about the Alameda Med-Project program, please go to www.med-project.org or call 1-800-MED-Proj.

Alameda MED-Project
Medesion Education & Despiral

MEDICATION & DISPOSAL

CHECK THE PACKAGE





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 Alameda MED-Project may all sponsor local drug take-back days in your area. For information on upcoming take-back days, visit www.med-project.org/take-back-events.

CONVENIENT KIOSKS

Community drug take-back locations allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal. To find the disposal kiosks in your area, visit www.med-project.org/medkiosks.



IN-HOME DISPOSAL

If no disposal instructions are given on the prescription drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps.

1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pots, and unrecognizable to people who may intentionally go through the trash seeking drugs). 2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.

Source: www.lda.goe.forConvurcers/Contument/coldes/ucm201653.htm, last updated May 19, 2014

This material has been provided for compliance with Alameda's Safe Drug Disposal Ordinance and does not necessarily reflect the views of the Plan owner or individual producers.

PSA Outline

Alameda MED-Project

Medication Education & Disposal

The following is a proposed outline for a public service announcement (PSA) promoting the Alameda County MED-Project. All text is subject to change pending review and approval.

I. Introduction

- a. First, 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 California Poison Control at 800-222-1222.
- c. If you have questions about your medication, call your health care provider.
- The Medication Education and Disposal Project, or MED-Project, is a consumer education campaign dedicated to proper medication use and disposal by consumers.
- There are a number of ways to dispose of expired or unwanted medications.

II. Disposal Options

- a. <u>Check the Package</u>: If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions.
 - Do not flush prescription drugs down the toilet unless the information on the package specifically instructs you to do so.
- <u>Take-Back Events</u>: Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines.
- c. <u>Convenient Kiosks</u>: Community drug take-back locations at local law enforcement agencies allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal.
- d. <u>In-Home Disposal</u>: If no disposal instructions are given on the prescription drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps.
 - Remove them from their original containers and mix them with an undesirable substance, such as
 used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and
 unrecognizable to people who may intentionally go through the trash seeking drugs).
 - Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.¹

III. Additional Warnings

- Taking medication as prescribed by your health care provider is critically important to your health.
- Always store medications securely to prevent accidental ingestion or misuse by others in your household, including children.

IV. Closing

 For more information on the Alameda MED-Project or any of the available disposal options, visit www.medproject.org, or call the MED-Project toll-free phone line at 1-800-MED-PROJ (1-800-699-7765).

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http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm, page last updated May 19, 2014

FAQ Outline

The following are suggested questions to be addressed by the "Frequently Asked Questions" section of the Alameda MED-Project website/public relations toolkit. All text is subject to change pending review and approval.

· What is the Alameda MED-Project?

Alameda MED-Project is the public, non-profit entity implementing the Alameda County 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 regarding 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 <u>information page</u> and the CDC's <u>information page</u>

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

FAQ Outline

· Can I flush my medication down the toilet?

Do not flush prescription medications down the toilet unless the information on the label, package or package insert specifically instructs you to do so.

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

Please remove all personal and identifying information from your medication and/or its packaging before disposal.

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

Alameda MED-Project is providing disposal locations throughout the Alameda County. For more information about the location nearest to you, please visit the "Find the Nearest Disposal Location" portion of the Alameda MED-Project web site, or call the hotline at 1-800-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 Alameda MED-Project kiosks?

Prescription medicines in pill, capsule or liquid form may be turned in at kiosks. Over-the-counter products, injectables or needles will not be accepted. Combination products will only be accepted at take-back events.

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

Please visit the Alameda MED-Project web site or dial the hotline at 1-800-MED-PROJ to learn about upcoming take-back events in your area.

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 FDA's website for more information <u>"Consumer Updates: How to Dispose of Unused Medicines"</u>.

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

For more information, please dial the hotline at 1-800-MED-Proj.

FAQ Outline

What is recommended for safe disposal of expired or unwanted medicine in Alameda County?

The following disposal options and sequence should be considered when disposing of unwanted medicine:

<u>Check the Package</u>: If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions.

 Do not flush prescription drugs down the toilet unless the information on the package specifically instructs you to do so.

<u>Take-Back Events</u>: Local take-back events may be sponsored in your area, and offer residents a free and convenient way to dispose of expired or unwanted medicines.

<u>Convenient Kiosks</u>: Community drug take-back locations at local law enforcement agencies allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal.

<u>In-Home Disposal</u>: If no disposal instructions are given on the prescription drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps.

- Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs).
- 2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.¹

http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm, page last updated May 19, 2014

Sample - Not for Distribution. All text subject to change pending review and approval.

Appendix M

Sample Temple: Take-Back Event Media Advisory

Alameda MED-Project

Medication Education & Disposal

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

Alameda MED-Project to Support Alameda Take-Back Event on [Date, 2014]

Alameda County residents are invited to bring expired or unwanted prescription medications to [Location] from [x time] to [y time] for disposal

Alameda County, California, [Date] – The Alameda Medication Education & Disposal Project (Alameda 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 Alameda County residents are invited to bring their expired or unwanted prescription 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 which are brought to this take-back event.

What: Alameda 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:

Alameda MED-Project Public Affairs 202-xxx-xxxx

Document provided by the Alameda MED-Project at the Public Hearing held February 23, 2015

Alameda MED-Project LLC

1155 15th Street, NW | Suite 500 | Washington, DC 20005

Phone: (202)495-3131 | Fax: (202)530-0659

ppswg@amsnavista.com

ALAMEDA MED-PROJECT RESPONSE TO ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH STAFF RECOMMENDATIONS

The Alameda MED-Project responds below to the Alameda County Department of Environmental Health Staff recommendations for improvements regarding the Alameda MED-Project Product Stewardship Plan.

Recommendations for potential changes identified by Staff on February 10.

Staff Recommendation: Revise the Plan, including signage, so that collection at kiosks, and elsewhere, is not limited to pills, capsules or liquids. Collection at kiosks is for all Unwanted Medicine including gels, powders, crèmes and liquids.

Alameda MED-Project Response: Alameda MED-Project will update kiosk signage, Appendix F, "Accepted" language to say "Unwanted Medicines". The "Not Accepted" language will delete reference to gels, powders, creams and include reference to Controlled Substances, Sharps, Over-the-Counter Medicines and Combination Products.

Staff Recommendation: Messaging in the outreach program should not be limited to law enforcement kiosks, but all collection kiosks.

Alameda MED-Project Response: Phase I of the Product Stewardship Program includes collection only at law enforcement agency kiosks, and thus the messaging for Phase I should remain limited to law enforcement kiosks. If other kiosks are added to the Product Stewardship Program in later phases, messaging will be expanded to include all kiosks that are part of the Product Stewardship Program.

Staff Recommendation: Appendix C should be updated on or before the first annual report to correctly list addresses, and to identify the LEAs that have agreed to host a collection kiosk after contact by Alameda MED-Project.

Alameda MED-Project Response: Alameda MED-Project agrees to suggested change.

Staff Recommendation: Prescription "injectables" are Covered drugs and should be accepted at kiosks.

Alameda MED-Project Response: Alameda MED-Project agrees to strike the reference in Appendix L that states that injectables will not be accepted.

Alameda MED-Project Medication Education & Disposal Alameda MED-Project LLC

1155 15th Street, NW | Suite 500 | Washington, DC 20005

Phone: (202)495-3131 | Fax: (202)530-0659

ppswg@amsnavista.com

Staff Recommendation: In the call script (Appendix (2)), reference to the Alameda MED-Project website should be included when discussing how to find kiosk locations.

Alameda MED-Project Response: Alameda MED-Project agrees to suggested change.

Staff Recommendation: The time-frame for a returned call from the Alameda MED-Project toll-free telephone voice mailbox in not indicated in the Plan (it is a blank space). The recommendation is that calls be returned within 24-hours of their receipt.

Alameda MED-Project Response: Alameda MED-Project agrees to suggested change.

Recommendations for potential changes identified by Staff on February 20

Staff Recommendation: Alameda MED-Project should immediately initiate contact and begin efforts with non-LEA sites, including hospitals and pharmacies currently hosting collection kiosks, to become kiosk locations for the Plan.

Alameda MED-Project Response: Phase 1 focus is to establish collection sites at LEA. During Phase 1 Alameda MED-Project will also begin to make contact with hospitals and pharmacies in preparation for establishing collection sites as outlined for expansion in Phase 2 and 3.

Staff Recommendation: The plan proposes establishing a toll-free telephone line for residents to obtain information about the Program. The Plan does not state when the toll-free telephone line will be in service. The recommendation is that it be in service within 30-days of Plan approval.

Alameda MED-Project Response: Alameda MED-Project agrees to suggested change.

Staff Recommendation: The Plan currently limits itself to working with LEA® that have a collection program for controlled substance. The Plan should also work with LEA® that do not currently have a collection program, to set-up a collection program or kiosk.

Alameda MED-Project Response: Alameda MED-Project agrees that Phase 1 will focus on outreach to all LEAs in Alameda County with the goal of 20 kiosk locations.