

SAN MATEO COUNTY SAFE DRUG DISPOSAL

DRUG STEWARDSHIP PLAN

PROPOSAL

February 28, 2020

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SUBMITTED BY:



INMAR
intelligence

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LIFE IN CHECK[™]

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Cover Letter

February 28, 2020
San Mateo County
Environmental Health Division
2000 Alameda de las Pulgas, Suite 100
San Mateo, CA 94403

Inmar Rx Solutions, Inc. (“Inmar”) hereby submits this proposed product stewardship plan pursuant to the San Mateo County ordinance numbers 04736 and 4302. As opioid and Rx diversion continues to threaten the health of San Mateo County’s citizens and disrupt local ecosystems, Inmar stands uniquely positioned to protect public safety. Inmar possesses the required legal, regulatory, and operational infrastructure to develop and operate a product stewardship program in San Mateo County. Currently, Inmar services nearly 1,200 drug collection bins in 42 states and the District of Columbia, and has safely disposed of 59.5 tons of consumer returned medication to date.

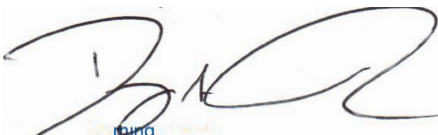
As the largest pharmaceutical reverse distributor in the United States, Inmar has relationships with 90% of all pharmaceutical manufacturers. Through conversations and meetings with these producers, Inmar has discovered a high level of interest from them in Inmar operating the product stewardship program on their behalf. Inmar is seeking to become an approved product stewardship program operator for the San Mateo County Environmental Health Division. Once approved, Inmar will leverage its relationship in the manufacturer community to recruit them as participants in the program.

Inmar currently has 230 Rx Returns clients in San Mateo County, of which 150 are retail pharmacy clients. Inmar will engage these pharmacies to become authorized collection sites. Inmar will utilize hospitals with on-site pharmacies and law enforcement agencies as necessary to meet the goals of convenient and ongoing access for county residents.

Inmar is open to speak further about our Product Stewardship Program and welcomes the opportunity to do so. Please contact Domingo Isasi, VP of Consumer Drug Take-Back Solutions at domingo.isasi@inmar.com to arrange a meeting.

This Product Stewardship Program will be fully financed by the Drug Manufacturers that participate in Inmar’s Product Stewardship Program for San Mateo County.

Sincerely,



Domingo Isasi
Vice President, Consumer Drug Take-Back Solutions

I. Introduction

Inmar submits this Stewardship Plan ("Plan") for Unwanted Drugs in compliance with the San Mateo County Safe Drug Disposal Ordinance, San Mateo County Code Chapter 7.90.010 – 7.90.160 ("Ordinance"). All capitalized terms not otherwise defined shall have the same meaning as in the Ordinance."Inmar's Stewardship Plan also meets all requirements specified in Article 9.1 of Title 16 CCR Division 17 for Prescription Drug Take-Back Services."

Inmar's Stewardship Plan will provide a comprehensive safe drug disposal stewardship program that will include compliant drug collection methods supported by outreach and education programs to increase resident awareness and participation. The Stewardship Plan program will provide safe, secure, and convenient access on an ongoing basis for residents across the county and will be funded by participating covered manufacturers. The program will also provide reporting on collection metrics and results of resident education and outreach campaigns.

II. Contact Information

✓ Ordinance 04736 Section 4.116.040(a)

A. Inmar Plan Liaisons

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Winston Salem, NC 27101
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B. Producer(s)

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Director, Finance
1 Tower Center Boulevard, Suite 2200
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Phone: 732-253-5954

III. Collection Methods for Unwanted Covered Drugs

✓ Ordinance 04736 Section 4.116.040(b)

A. CONVENIENCE

✓ Ordinance 04736 Section 4.116.050(b)(1)

✓ Ordinance 04736 Section 4.116.050(b)(3)

Inmar will set up a collection system that provides convenient and equitable access to residents across the county as outlined in the Ordinance 04736 Section 4.116.050(b)(1). Drop-off sites are searchable to residents in Google Maps, simply by typing “Drug Disposal,” or other similar phrases in the Google Maps applications.

Pursuant to Ordinance 04736 Section 4.116.050(b)(1) Inmar will seek to establish a minimum of one drop-off site for every 20,000 residents throughout the county, geographically distributed to provide reasonably convenient and equitable access. We will ensure there is never less than five drop-off sites per Supervisorial District. As required by Ordinance 04736 Section 4.116.050(b)(3) Inmar will give preference to locating drop-off sites at retail pharmacies and law enforcement agencies.

Inmar currently has 230 Rx Returns clients in San Mateo County, of which s150 are retail pharmacy clients. Appendix A includes a list of locations which would utilize a drop box as the collection method upon becoming a Collector. Upon plan approval, the quantity of drop-off sites required will be evaluated and adjusted based on analyses as Inmar consults with the Department for detailed information on population centers.

Inmar has no concerns about our ability to meet the convenience standard provided in Ordinance 04736 Section 4.116.050(b)(1), however to ensure the best possible access for citizens, Inmar also provides mail-back services and collection events which are described in more detail below.

B. COLLECTION BIN SPECIFICATIONS AND DESIGN

✓ Ordinance 04736 Section 4.116.040(b)

✓ Ordinance 04736 Section 4.116.050(d)

Inmar’s collection bin is made in the USA and designed for excellence. Produced from 16 gauge cold-rolled steel, and with an easy-to-use, Americans with Disabilities Act (ADA)-compliant drop-box design, residents can easily drop unused medications through the drop door and into the shippable container and inner liner inside. The container is a 275lb rated box with a 6 mil, DEA-compliant liner.

There are several unique features that enhance the effectiveness and security of the Inmar collection bin. For example, the top of the collection bin is sloped, limiting the ability to stack items on top. In addition, the drop slot features an extended metal drop door that lowers into the container to detect when product capacity is reached. When the drop door encounters resistance within the collection bin, it is an indication that it is time to change the container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the collection bin to be in proximity to an electrical outlet. Lastly, the container access door is reversible to allow for convenient placement in any appropriate location in the pharmacy.

Per DEA requirements, the collection bin must be installed in the line of sight of the pharmacy and bolted to the floor or a permanent fixture. The Inmar collection bin has pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins. The Inmar collection bin will have signage that communicates what is and is not allowed to be placed inside. The signage will also feature a website and toll-free telephone number so users of the program can ask questions and find more information. Inmar will work with the Environmental Health Division of the County of San Mateo to design signage that meets the needs and requirements of the program. See Appendix B for examples of signage.

Inmar's DEA- and ADA-compliant collection bin is sent to the authorized collector along with enough supplies for 3 returns. Supplies include:

- Pre-addressed, pre-paid serialized containers
- Serialized inner liners to protect against puncture and provide a liquid barrier
- Easy-to-use, serialized zip ties to seal each inner liner compliantly
- Absorbent pad for placement in the bottom of the inner liner bag





Kiosk components

Pick-Up and Disposal

For the safe on-site removal of contents and servicing of drug take-back collection bins, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each authorized collector to develop a collection program schedule that works specifically for their location - either an on-site or self-service option as outlined below.

With either of the service models outlined below, the focus will be on each authorized collector to develop a program that works specifically for their location.

A support help desk will also be established that will assist the authorized collectors with set-up, administration and operation of the collection bin at the collection sites.

Self-Service Returns

Inmar will train authorized collectors to service the containers on their own to allow for expedited servicing as desired. The steps to service a container are fast, efficient and DEA-compliant. Inmar will provide authorized collectors with training materials including step-by-step instructions for tracking, sealing, replacing and shipping collection containers. See attached Steps to Start, FAQs and Installation Instructions provided Appendix C.

Optional On-Site Pick-Up Service

Inmar may offer on-site service for the collection, replacement and shipping of full containers. On-site service will be provided by a qualified service representative. To remain compliant with the DEA, the authorized collector will need two employees to oversee the service process with the collection bin.

Auto-Replenishment of Collection Bin Supplies

Auto-replenishment of the supplies needed to collect and transport returned medications is provided in "kits" of three. Each kit includes: pre-labeled and pre-paid cardboard box containers, liquid barriers and serialized, puncture-resistant inner liners. Upon receipt of the second return within the kit, Inmar automatically ships another kit with a set of three containers/supplies. This auto-replenishment reduces the amount of inventory maintained at the collection site while maintaining sufficient replacement supplies to keep the collection bin continuously operable.

Optional On-Site Pick-Up Service

Inmar will offer on-site service for the collection, replacement and shipping of full containers. This all-inclusive program removes the burden for the authorized collector and the pharmacy staff.

Inmar will initiate standard service intervals for each collection site. Once a pattern of usage has been established, the service schedule will be adjusted with the agreement of the authorized collector to provide the best overall service with minimal interruption.

Inmar will work with the collector to adjust the schedule based on utilization of the receptacle.

The "Pre-Scheduled Service Event" will include:

- Observation of the condition of the receptacle upon arrival
- Notification to the pharmacy personnel of arrival
- Coordination of 2 pharmacy personnel to witness change out of receptacle supplies

- Removal, packaging and documentation of the container from the receptacle
- Replenishment of new supplies for renewed operation
- General clean-up and wipe down of receptacle
- Notation of container serial number removed, and serial number installed along with signatures by 2 pharmacy employees (witnesses)
- Removal of full container to be placed behind the pharmacy counter to await FedEx pick up.
- Final signature from pharmacy personnel of completion of Service Event.

C. MAIL-BACK ENVELOPE PROGRAM

✓ Ordinance 04736 Section 4.116.050(b)(5)

As required by Ordinance 04736 Section 4.116.050(b)(5), Inmar will provide prepaid and pre-addressed take-back return envelopes, free of charge, to disabled or homebound County residents. Mail-back envelopes will be provided at mail-back distribution location sites, and will also be available directly from Inmar via the program website and toll-free 800 number.

Mail-Back Envelope Distribution Sites

Return envelopes will be distributed at approved mail-back distribution sites. Consumers will be able to locate the mail-back distribution sites nearest to them on Inmar's LifeInCheck™ Consumer Drug Take-Back program website, <https://rxdisposal.lifeincheck.com/>.

Inmar will establish mail-back distribution locations to supplement service in any area underserved by collection sites. Inmar currently has 52 Rx Returns clients in San Mateo County, of which six are retail pharmacy clients. Inmar will evaluate and contact these retail pharmacies as potential collection sites or mail-back distribution sites as needed. Inmar will utilize hospitals with on-site pharmacies and law enforcement agencies as necessary to meet the goals of equitable and reasonably convenient access for residents across San Mateo County. However, it is our expectation that the majority of authorized collection sites will be retail pharmacies.

Inmar will also work with San Mateo County, local law enforcement agencies and local communities to determine the appropriate number mail-back distribution sites and their specific locations.

Requesting Return Envelopes

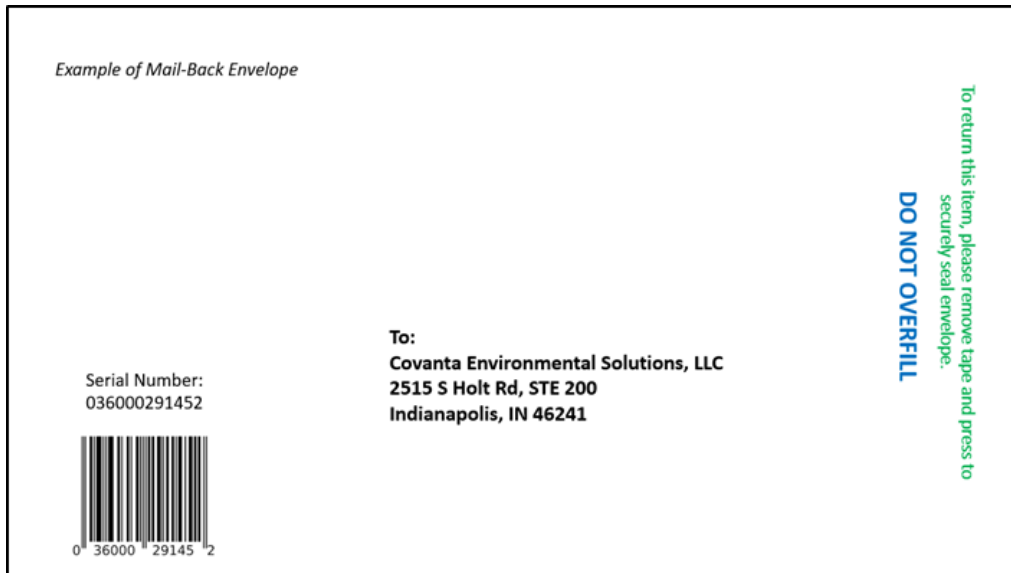
Consumers will be able to request return envelopes via Inmar's LifeInCheck™ Consumer Drug Take-Back program website (<https://rxdisposal.lifeincheck.com/>) or the Inmar LifeInCheck™ Consumer Drug Take-Back toll-free phone line. As required by subsection (b)(5) the stewardship plans toll-free telephone number and website will be provided in English, Spanish, Chinese and Taglog.

Mail-back envelopes will meet DEA requirements per DEA Rule § 1317.70(c):

- Pre-addressed, postage paid
- Nondescript, and not indicate what may be inside
- Water-proof, tamper-evident, tear-resistant, and sealable
- Contain a unique ID number that allows for tracking

- Include instructions for the user that indicate the process for mailing the package, substances that can be sent, notice that packages can only be mailed in the US customs territory and notice that the only packages provided by the authorized collector will be accepted
- No personally identifiable information will be required

A sample envelope is shown below.



Mail-Back Envelope Tracking

Mail-back envelopes distributed by authorized mail-back distributors will be tracked in a method similar to the collection bin collection containers. Mail-back envelopes will have a unique, serialized identification number. When envelopes are distributed to consumers requesting them, the authorized collector employee will make note of this event on a serialization tracking sheet. Once the envelope arrives at the destruction facility, the serial number will be noted before final disposition.

Mail-back envelopes distributed directly to consumers via the website or via toll-free phone number requests will be tracked by Inmar when sent to consumers and tracked at the destruction facility when they are returned by consumers directly to the facility.

This tracking process will allow Inmar to report the number of mail-back envelopes distributed and returned in the Annual Reporting provided to the Department, as required.

D. COLLECTION EVENTS

✓ Ordinance 04736 Section 4.116.040(b)

Inmar will provide kiosks at regional locations convenient to the public and will conduct and promote drug drop-off day in conjunction with a local law enforcement agency.

For convenience of the public, Inmar will work with the Department, local law enforcement agencies and local communities to determine the appropriate number of drop-off day events and their regional locations.

Inmar actively participates in the two national drug take back days annually. The nearly 1,200 kiosks that Inmar has placed throughout the United States promote every day being drug take-back day. Examples of these activities are located in Appendix D.

E. SAFETY AND SECURITY

✓ Ordinance 04736 Section 4.116.050(b)(1)

Inmar provides significant training to our participating authorized collectors and strictly follows the DEA guidelines for the proper handling of the take-back collection bins and inner liners. This begins with the proper training of the authorized collector in the compliant operation of the collection bins and proper preparation, removal and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar is very strict in our compliance to the DEA guidelines.

Additional information on how Inmar manages documentation and tracking can be found in section IV. More detail on patient privacy practices is also provided in section VI.

F. COLLECTOR

✓ Ordinance 04736 Section 4.116.050(b)(3)

✓ Ordinance 04736 Section 4.116.050(b)(4)

Inmar will give preference to Retail Pharmacies and law enforcement agencies as drop-off sites and will ensure they are able to meet the requirements within three months of their offer to participate. Appendix A includes a list of locations which would utilize a drop box as the collection method upon becoming a Collector. Inmar can also provide drop-off sites at hospital locations.

G. DROP OFF SITES

✓ Ordinance 04736 Section 4.116.050(b)(4)

✓ Ordinance 04736 Section 4.116.050(c)

Pursuant to Ordinance 04736 Section 4.116.050(d) Inmar will accept covered drugs from residents during all hours that the retail pharmacy, law enforcement agency or other collector is normally open for business.

All drop-off sites will utilize secure collection bins/collection bins as described in section (d). Per DEA requirements, the collection bin must be installed in the line of sight of the pharmacy and bolted to the floor or a permanent fixture. The Inmar collection bin has pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

In the unlikely event that more than one Stewardship Plan operates a drop-off site at a particular location, Inmar agrees that each drop-off site will accept all Covered Drugs. Additionally, in compliance with Ordinance 04736 Section 4.116.050(c), Inmar will operate a drop-off site within each county-owned pharmacy, either independently or in collaboration with other stewardship plans.

IV. Handling and Disposal

- ✓ Ordinance 04736 Section 4.116.040(c)
- ✓ Ordinance 04736 Section 4.116.070

Inmar complies with all local, state and federal laws and regulations applicable to disposal of pharmaceutical waste and controlled substances.

In accordance with Ordinance 04736 Section 4.116.070(a) Inmar subcontracts with a trusted, permitted, partner for hazardous waste disposal.

Drug take-back containers will be sent from the authorized collector directly to Clean Harbors for destruction as Inmar’s approved hazardous waste incinerator. Clean Harbors Aragonite, located in Grantsville, UT, will properly dispose of all collected drug take-back liners. Clean Harbors Aragonite is a permitted hazardous waste incinerator that meets the requirements of 40 C.F.R. parts 60 and 62.

FedEx is our transporter from the pharmacy to the Clean Harbors facility.

Inmar’s DOT permit info:

- DOT Permit #: 050417 550 019Z
- DOT Special Permit #: 20255

Name	Address	EPA ID	Type
Clean Harbors Aragonite	PO Box 1339 Grantsville, UT 84029	RC0331049	Hazardous Waste Incinerator DEA Reverse Distributor

V. Policies and Procedures

✓ Ordinance 04736 Section 4.116.040(d)

Inmar operates drug take-back boxes across 42 States and the District of Columbia as part of its operations today and maintains compliance with all Federal and State rules and laws. Upon approval to act as a “Stewardship Organization,” Inmar will ensure that it acts in compliance with all applicable laws, rules and regulations as specified by the program requirements and require by contract where applicable that Vendors and drop-off Sites are also compliant with all laws, regulations and legal requirements.

Inmar, drop-off sites, and vendors will specifically be required to comply with The Controlled Substances Act, 21 USC SS 801-971 and 21 CFR SS 1317; United States Department of Transportation Hazardous Materials Regulation, 49 CFR parts 100-185; All applicable San Mateo County Rules and Regulations.

The DEA Rule defines authorized collectors as law enforcement agencies and additionally as retail pharmacies, reverse distributors, hospitals or clinics with onsite pharmacies and certain other entities that are registered with DEA as an authorized collector.

Inmar requires a signed agreement with retail locations ensuring their commitment to compliant operation of the Take-Back collection bin and shipping of contents in compliance to the DEA regulations. A refusal to sign the agreement or comply with the DEA regulations would be a reason why a retailer could be excluded from the San Mateo County Stewardship Plan.

Documentation and Tracking

Collection containers and inner liners will have a serialized identification number to enable tracking at all stages of the return process illustrated below.



Shipment from Inmar



Receipt at Collection Site



Storage and Use at Collection Site



Sealing and Shipment from Collection Site



Arrival and Destruction at Destruction Facility

Tracking is well-documented as evidenced by the Inmar serialization tracking form that is included in full as Appendix C and referenced below. This form must be completed and witnessed by two authorized collection site employees, which assures compliance and safety across the program, and internally by both the stewardship organization and the collector.

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DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy		Address of Collecting Pharmacy			Collecting Pharmacy DEA #:		

SERIAL NUMBERS	Date Received by (1 Signatures)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	Size of Liner	Address of Reverse Distributor/Disposal Site	Reverse Distributor/Disposal Site DEA #
Ex: 32587	4/26/19	4/26/19 John Jones	5/26/19 John Jones	5/27/19 John Jones	Ex: 18 Gallon	1515 S Holt Road Indianapolis, IN 46241	Ex: 123456
	John Jones	Sally Smith	Sally Smith	Sally Smith			

The purpose of this form is to document the use of the serialized inner liner throughout the collection process and to help the authorized collector meet record-keeping requirements. Inmar will require each authorized collector to understand and comply with all Federal, State and local regulatory requirements pertaining to take-back pharmaceuticals applicable at the authorized collector's registered location.

The serial numbers, date received and signatures of the authorized pharmacy employees must be completed upon receipt of the container and inner liner. As illustrated above, the date-in-use is to be completed with authorized pharmacy employee signatures upon installation of the collection bin. The date the container and inner liner are removed from the collection bin is also to be noted with signatures. Finally, the date the container and inner liner are shipped is noted with authorized signatures.

Authorized collectors must maintain a copy of the completed form, and other records as applicable, on file at the authorized collector's registered location for at least two years

Transport

The collector will properly seal, store securely and arrange for pickup of the sealed inner liner and its contents from the registered location in a manner consistent with DEA regulations. The container will include a pre-addressed and prepaid shipping label. The common carrier representative will take possession of the liner and deliver the liner to an approved destruction facility for witnessed incineration.

Disposal

Once the container/inner liner arrives at the destruction facility, the serial number will be noted before final disposition.

This tracking process will allow Inmar to report the number of collection site containers/inner liners distributed and returned in the Reporting provided to San Mateo County, as required.

Compliance with Applicable Laws

Inmar operates across 42 states and the District of Columbia and maintains compliance with all federal and state rules and laws. Upon approval to act as an "Operator," Inmar will ensure that it acts in compliance with all applicable laws, rules and regulations as specified by the program requirements and require by contract where applicable that Vendors and Collection Sites are also compliant with all laws, regulations and legal requirements.

Inmar's drug collection bins are DEA- and ADA-compliant and provide environmental protection from unwanted drug residue. The units are equipped with a four-point locking system with hidden steel deadbolts that are activated when locked for strengthened security. They contain pre-drilled holes at the bottom of the unit for easy installation to securely bolt them to the floor in each approved collection site. The internal container and supplies protect against puncture and provide a liquid barrier to prevent seepage and/or spillage.

Inmar's Training Materials, found in Appendix C, aid collection sites in proper drug collection bin installation, which helps optimize the security of the unit. The Training Materials also include information on receptacle operation, inner container materials assembly and placement, regulated shipping instructions, program FAQs, and serialization tracking. All of these inclusions maximize the safety and security of any person involved in the program at the collector level.

VI. Patient Privacy

✓ Ordinance 04736 Section 4.116.040(e)

Inmar provides significant training to our participating authorized collectors and strictly follows the DEA guidelines for the proper handling of the program collection bins and inner liners. This begins with the proper training of the authorized collector in the compliant operation of the collection bins and proper preparation, removal and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar strictly complies with State and Federal statutes and regulations including but not limited to the DEA guidelines cited below.

According to the DEA - As provided in §§ 1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned mail-back packages shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a collection receptacle or mail-back package. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into a collection receptacle.

Inmar has a long history of serving both commercial and government clients with stringent program requirements. For example, Inmar's pharmacy applications manage Protected Healthcare Information (PHI) and are HIPAA compliant. Additionally, as part of Inmar's Rx Returns (reverse distribution) business, we work very closely with regulators to implement compliant procedures covering the DEA, Boards of Pharmacy, EPA, and other tangential regulatory entities. Data protection, privacy and adherence to applicable regulations are the foundation of Inmar service capabilities.

Any and all patient information on drug packaging will be promptly destroyed.



Inmar has a long history of serving both commercial and government clients with stringent compliance standards such as the protection of Protected Health Information (PHI) and HIPAA.

VII. Public Education Effort and Promotion Strategy

- ✓ Ordinance 04736 Section 4.116.040(f)
- ✓ Ordinance 04736 Section 4.116.060

A. PROMOTION

- ✓ Ordinance 04736 Section 4.116.060(a)(1)

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the drug take-back program and maximize participation as required by Chapter 7.90 San Mateo County Safe Drug Disposal Ordinance Chapter 7.90.090. In addition to preventative education, Inmar's strategy is designed to ensure that where and how to return covered drugs is widely understood by residents, pharmacists, retail pharmacies, health care facilities and providers, veterinarians, and veterinary hospitals.

A leader in the promotions space for nearly 40 years, Inmar has a unique set of core capabilities relative to other prospective program operators, specifically in consumer marketing and activation. Thus, in addition to traditional outreach methods (signage, written materials, etc.), Inmar is able to drive participation among covered entities with modern, high-impact tactics such as influencer marketing and targeted media.

The individual components of Inmar's public outreach strategy are detailed below. Across all tactics, key messages will include, but not be limited to, the following:

- Encourage safe storage of drugs in the home (especially around children and teens)
- Dangers of drug misuse (i.e., not taking medicines as prescribed)
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Arrival of a safe drug take-back solution with instructions for how to locate and participate
- Consumer Drug Take-Back Day promotion

If more than one drug take-back program is approved by the department, Inmar will seek to coordinate its promotional activities with other approved programs within 12 months after the other program is approved. Inmar's LifeInCheck™ Consumer Drug Take-Back website will ensure that all covered entities can easily identify, understand, and access the collection services provided by Inmar and other program operators. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved programs.

B. STANDARDIZED INSTRUCTIONS

- ✓ Ordinance 04736 Section 4.116.060(a)(2)

Inmar provides Collectors with easy to understand and standardized instructions explaining how to use the collection kiosk. Training material provided to authorize collectors include:

1. FAQs
2. Container Instructions
3. Steps to Start Document
4. Installation Reference Guide
5. Serialization Tracker

Training material samples are provided in Appendix C.

Collection Receptacle Signage

The collection receptacles themselves will be readily recognizable. The standard color for the receptacles is bright green for easy identification, and each receptacle is adorned with clear graphical instructions in both English and Spanish for proper use. Please see Appendix B for an image of the collection receptacle and disposal instructions.

C. WEBSITE AND TOLL-FREE NUMBER

✓ Ordinance 04736 Section 4.116.060(a)(3)

Website

Inmar will provide a mobile-optimized website, appropriately translated into specified languages, which will publicize collection options and educate covered entities on proper disposal practices. Inmar will use enhanced search engine optimization to ensure easy location and access.

Specifically, the website will:

- Leverage Inmar's collaboration with Google Maps to allow covered entities to find the nearest collection site or mail-back distribution site via an interactive map. The list of locations will be updated monthly to ensure accuracy.
- Allow covered entities to request prepaid return envelopes.
- Feature links to LifeInCheck™ social media pages for more useful content.

Retailers or pharmacies interested in participating in the drug take-back program will be able to request more information through the website.

Please see Appendix D for images of the website interface and functionality.

Toll-Free Number

Inmar will operate a multi-lingual, toll-free call center which covered entities can call to learn more about the drug take-back program, take-back events, and drug disposal best practices. Consumers will also be able to request information about the nearest collection site or mail-back envelope distribution site, or request that a prepaid return envelope is sent to them.

Callers with medical emergencies will be directed to call 911. Patients with medication-related questions will be directed to contact their health care provider(s).

Authorized collectors will also be able to call the toll-free number to request on-site receptacle maintenance and support.

Outreach Materials

Inmar provides easily-consumable educational materials for dissemination to interested parties including residents, pharmacists, retailers and health care practitioners upon request and at no charge.

These materials will:

- Provide instruction on how to safely store covered drugs at home
- Inform of the risks of disposing of covered drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
- Outline how to participate in the drug take-back program for safe disposal of covered drugs

All materials will be easily understandable by covered entities with varying levels of English proficiency and will leverage explanatory graphics to aid in comprehension.

Please see Appendix D for example materials.

Collector Marketing Support

To drive awareness and participation at a local level, Inmar will provide individual authorized collectors with a variety of marketing assets at no charge, including in-store signage, social media content kits, press release templates, a radio ad script, and scripts for pharmacy staff to let covered entities know that they can safely dispose of their covered drugs at that location. Authorized collectors will be able to request additional marketing materials through the help desk.

Please see Appendix D for example materials.

Social Influencer Marketing

The 2016 acquisition of Collective Bias gave Inmar the ability to execute robust, data-driven social influencer marketing programs that activate shoppers and patients alike. On average, Inmar executes approximately 500 such programs annually.

Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling content that can drive awareness and inspire participation among covered entities. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the covered entities receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, however, based on the program requirements outlined in Chapter 7.90 San Mateo County Safe Drug Disposal Ordinance Section 7.90.100, Inmar's recommendation would be one, or a combination of, the following:

- Tips for safe storage of medications in the home prior to disposal
- Education about the implications of improper drug disposal
- Promotion of the drug take-back program, including directions on where and how to participate

Inmar executed a social influencer marketing program promoting drug take-back in April of 2019 which yielded exceptional results (see Sub-Section 7 for more information on impact measurement and reporting). The campaign generated 11.4MM impressions, but, more importantly, the posts themselves were highly engaging. The average click-through-rate (CTR) was 4.5% (a historical CTR benchmark in this category is 1.5 - 2.0%) and users spent an average of one minute and eight seconds on each post. Both metrics suggests users found the content compelling and useful. ROI for social influencer marketing campaigns is measured in terms of return on Total Media Value (the combined value of earned and paid media for the campaign). In this case, TMV return was favorable

at 2.1x.

Please see Appendix D for sample social influencer content. We also invite you to view some of the top performing posts linked below:

- [*Life in Check Consumer Drug Take-Back receptacle | National Prescription Drug Take-Back Day* by *Meagan Harrell*](#)
- [*5 Easy Tips to Declutter Your Closet + Safe Medication Disposal* by *Valerie Clement*](#)
- [*How to Dispose of Unused Medications Safely - Mom Always Knows* by *Elizabeth Hurt*](#)

Targeted Media

Inmar’s expert paid media team actively monitors social influencer content for the highest performers - looking beyond vanity metrics to focus on deeper measurements such as views and engagements. The most engaging content is promoted across social platforms as well as off-site media to amplify the message around drug take-back to a targeted cohort of covered entities.

Lastly, in partnership with PlaceIQ, Inmar offers targeted ad units that allow messages to be delivered to covered entities that are physically near or in selected locations (e.g., near a collection receptacle) and provide after-action metrics, such as Place Visit Rate, which demonstrate in-store foot traffic among your target audience.

Impact Measurement

In accordance with Chapter 7.90 San Mateo County Safe Drug Disposal Ordinance Section 7.90.100, Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar’s measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

All paid and organic activity is measured using the industry’s most powerful analytics suite to capture true ROI. Reporting will include:

- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post)

D. BIENNIAL SURVEY

✓ Ordinance 04736 Section 4.116.060(a)(3)

Inmar will conduct a biennial survey of San Mateo County Residents as well as pharmacists, veterinarians and health professionals who interact with patients on use of medicines after the first full year of operation of the Stewardship Plan. The aim of the survey questions will be to measure the percent awareness of the Stewardship Plan, assess to what extent 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 non-prescription drugs used in the home.

Draft survey questions will be submitted to the Director for review and comment at least 30 days prior to the initiation of the survey. Results of the survey will be reported to the Director and made available to the public on the website required in subsection (a)(3) within 90 calendar days of the end of the survey period. The privacy of all survey respondents will be maintained.

E. LANGUAGE TRANSLATION

✓ Ordinance 04736 Section 4.116.060(b)

All outreach methods will be translated into English, Spanish, Chinese and Tagalog.

F. MULTIPLE STEWARDSHIP PLANS

✓ Ordinance 04736 Section 4.116.060(c)

Inmar will work with the Director to develop a single system of promotion for all stewardship plans when multiple plans exist.

VIII. Short-term and Long-term Goals

✓ Ordinance 04736 Section 4.116.040(g)

	Short-Term (2020)	Long-Term (2021+)
Collection	<ul style="list-style-type: none"> • Initiate program operation • Place 25 drop-off sites (5 per supervisorial district) • Establish mail-back service and/or take-back events in areas that are underserved by collection drop-off sites (3,000 lbs.) 	<ul style="list-style-type: none"> • Increase drop-off site locations to provide convenient and equitable access which meets or exceeds one drop-off site for every 20,000 residents
Education & Promotion	<ul style="list-style-type: none"> • Phase 1 website functionality updates: <ul style="list-style-type: none"> ○ Return envelope requests ○ Educational materials uploaded ○ Collector collection bin maintenance resources and requests ○ Drop-off site and return envelope distribution site list updated (ongoing) • Multi-lingual, toll-free call center launch • Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) 	<ul style="list-style-type: none"> • Phase 2 website functionality updates <ul style="list-style-type: none"> ○ Collection site and return envelope distribution site list updated (ongoing) • Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts) • Inmar will continue to monitor and optimize promotional initiatives as dictated by the metrics detailed under “Impact Measurement” in Section VI

IX. Additional Plan Considerations

✓ Ordinance 04736 Section 4.116.040(h)

Existing Providers of Pharmaceutical Waste Services

To the extent that existing providers of pharmaceutical waste are already in operation, Inmar will determine if coordinating efforts creates efficiencies for the county and improves convenient and equitable access for county residents.

Furthermore, to the extent that there are other stewardship organizations, Inmar will seek to coordinate its activities with said programs within 12 months after Inmar’s stewardship program is approved. Inmar’s LifeInCheck™ Consumer Drug Take-Back website will ensure that all consumers can easily identify, understand, and access the collection services provided by Inmar and other stewardship organizations. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved programs.

Package Separation & Recycling

DEA § 317.75(c) prohibits handling substances after they have been deposited into a collection kiosk. For this reason, Inmar is unable to separate and recycle drug packaging. However, Inmar can execute educational programs, as outlined in Section VI, to encourage county residents to separate unwanted covered drugs from their packaging and recycle the packaging prior to disposal.

Even though regulations prevent us from recycling drug packaging, Inmar still has a vested interest in reducing waste and improving our environment. Through our RX Returns and related business lines Inmar has saved over 20,000 barrels of oil, recovered over 11,000 megawatts of clean energy and powered over 900 homes in just the past two years alone. We will continue to look for opportunities to expand our eco-friendly efforts in San Mateo County.



Inmar Energy Metrics

Megawatts of Clean Energy Recovered:

2017 = 5,436
2018 = 5,643

Barrels of Oil Saved:

2017 = 9,896
2018 = 10,270

Homes Powered for a Year:

2017 = 482
2018 = 495

X. Reporting

✓ Ordinance 04736 Section 4.116.090

Within six months after the end of the first 12-month period of operation, and annually thereafter for a period covering January 1 – December 31, Inmar will submit a report describing the program's activities during the previous reporting period. The report will include:

- (1) A list of participating producers
- (2) The amount by weight of covered drugs collected, including the amount by weight from each collection method used
- (3) A list of drop-off sites
- (4) The number of mailers provided for disabled and/or home-bound county residents
- (5) The locations where mailers were provided, as applicable
- (6) The dates and locations of collection events held, as applicable
- (7) The transporters used and the disposal facility or facilities used for all covered drugs
- (8) Whether any safety or security problems occurred during collection, transportation or disposal of unwanted covered drugs during the reporting period and, if so, what changes have or will be made to policies, procedures or tracking mechanisms to alleviate the problem and to improve safety and security in the future
- (9) A description of the public education, outreach and evaluation activities implemented during the reporting period
- (10) A description of how collected packaging was recycled to the extent feasible, including the recycling facility or facilities used
- (11) A summary of the stewardship program's goals, the degree of success in meeting those goals in the past year, and, if any goals have not been met, what effort will be made to achieve the goals in the next year
- (12) The total expenditures of the stewardship program during the reporting period.

XI. Inmar Overview

As opioid and Rx diversion continues to threaten the health of San Mateo County’s citizens and disrupt local ecosystems, Inmar stands uniquely positioned to protect public safety.

Inmar is the leading provider of pharmaceutical reverse supply chain services in the nation. More than 90% of pharmaceutical manufacturers use our services, as well as 50,000+ retail pharmacies and 5,000+ hospital pharmacies. All told, more than 80% of all returned Rx products (more than 98 million pieces) pass through Inmar’s facilities each year for secure and fully-compliant processing and disposal. Inmar maintains over 50 licenses related to Rx returns, and participates in regulatory agency inspections including DEA and state agencies. In addition, Inmar has nearly 40 years of experience and handles 2.1 billion promotion transactions annually in the consumer promotions space. This experience can be leveraged to drive consumer education and participation in the San Mateo stewardship program. In 2017, Inmar launched the LifeInCheck Consumer Drug Takeback program deploying our full set of capabilities and deep pharmacy relationships to help communities protect against drug diversion and negative environmental impacts by removing unused, expired, and surplus pharmaceutical products from communities. Through the LifeInCheck program, we have the required legal, regulatory, and operations infrastructure in place, currently service 1,200 collection bins in 42 states and the District of Columbia, and have safely disposed of more than 60 tons of consumer returned medication to date.

Experience With Medication Disposal Programs

Inmar has experience servicing large medication disposal programs in the public and private sectors. This experience branches out not only to understand and comply with regulations, but to the management of large, long-term project implementations by skilled program managers.

Additionally, Inmar provides an oversight team which acts as an internal point of escalation for program management. This oversight team empowers the project manager with the ability to acquire additional resources and program direction as necessary to meet the needs of the program. By providing this support, our management team will be made aware immediately if any aspect of the program requires additional action. The direct communication of program performance encourages an effective system of accountability, helping Inmar avoid any issues that could affect the on-time, on-budget delivery of services in compliance with contract requirements. We have provided the resumes of key individuals who will either participate in the operations or oversight of the San Mateo stewardship program in Appendix G.

To further demonstrate the types of implementations and operations that Inmar has recently performed successfully, below is a brief description of projects of similar size and scope:

1. Department of Defense (DoD) – Defense Logistics Agency (DLA)

For the DoD, Inmar’s reverse distribution service handles and properly disposes of pharmaceutical and medical supplies dispensed by the pharmacy and any related waste materials that may arise out of un-returnable pharmaceuticals. We also assist recipients in achieving maximum credit return and in processing any related waste that may arise out of non-returnable pharmaceuticals. This service agreement includes all Continental United States locations for the Army, Navy, Air Force and Coast Guard.

2. Strategic National Stockpile, a division of the Office of the Assistant Secretary for Preparedness and Response

For the Centers for Disease Control (CDC), Inmar's reverse distribution service handles and properly disposes of medical material waste disposal services. On a monthly basis, Inmar disposes of hazardous and non-hazardous medical material and equipment and provides all applicable forms, labels, and placards required to ship designated products to the contractors processing facility. This contract services all the work orders related to the Division Strategic National Stockpile (DSNS).

3. *Partnership with Blue Cross Blue Shield of North Carolina and Mutual Drug*

In 2018, Blue Cross Blue Shield of North Carolina (Blue Cross NC) collaborated with the Mutual Drug Company to place 85 Inmar consumer drug take-back receptacles in 75 North Carolina counties. Inmar facilitated the implementation and logistics of the program including contracting with each participating location, receptacle placement, and collection of medication. Inmar further supported this program by providing marketing materials that helped generate considerable publicity. Letters of recommendation from Blue Cross NC and Mutual Drug are included in this proposal, confirming the success of this partnership.

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Appendix A: List of Proposed Drop-off Sites

Retail	KAWANO, DAVID K MD	1 BAYWOOD AVENUE	94402
Hospital	MACROGENICS, INC., COMPANY LICENSE	1 CORPORATE DR.	94080
Hospital	GENENTECH, INC.	1 DNA WAY	94080
Retail	DBA: CVS/PHARMACY # 09807	10 BAYHILL SHOPPING CTR	94066
Hospital	PETERSON, RUSSELL GUY DVM	100 ANSEL LANE	94028
Retail	KPNC-SAN MATEO MOB OP #339-Clinic	100 FRANKLIN PKWY W	94403
Retail	MILLS PENNINSULA HEALTH SVCS	100 S SAN MATEO DR STE 3155	94401
Unknown	HUGHES, PAUL E MD	100 S. ELLSWORTH AVE	94401
Hospital	MILLS-PENINSULA HEALTH CENTER PHARMACY	100 S. SAN MATEO DR.	94401
Retail	MACHTINGER, STEVEN B MD	100 SOUTH ELLSWORTH AVENUE	94401
Unknown	ORTHOPEdic INSTITUTE OF THE BAY AREA	100 SOUTH SAN MATEO DRIVE	94401
Retail	KAISER PERMANENTE PHARMACY #339	1000 FRANKLIN PKWY W FLOOR 1	94403
Retail	DAVITA REDWOOD CITY 2217	1000 MARSHALL ST	94063
Retail	PACIFIC FAMILY MEDICINE CLINIC	1001 BROADWAY SUITE 302	94030
Retail	DBA COSTCO PHARMACY #147	1001 METRO CENTER BLVD	94404
Retail	ABUNTO, MARIA V MD	1001 SNEATH LANE	94066
Retail	CHOW, JOHN C MD	101 S SAN MATEO DR STE 100	94401
Retail	FIORE, MICHELLE M MD	1010 LAUREL STREET	94070
Retail	KASHYAP, VIKAS MD	1022 HELM LANE	94404
Retail	KAUFMAN, JENNIFER L MD	103 GILBERT AVENUE	94025
Retail	JACOBY, DAVID A MD	1036 LAUREL ST	94070
Retail	DBA: CVS/PHARMACY # 09329	1039 EL CAMINO REAL	94063
Hospital	3-V BIOSCIENCES, INC, .	1050 HAMILTON COURT	94025
Hospital	SAFEWAY PHARMACY #0305	1071 EL CAMINO REAL	94063
Retail	ANCKER, MEGAN L MD	1098 FOSTER CITY BLVD. SUITE 104	94404
Hospital	BERKSHIRE PHARMACY	11 BERKSHIRE AVE	94063
Retail	DBA: CVS/PHARMACY # 09172	11 EL CAMINO REAL	94070
Retail	SAFEWAY PHARMACY #1138	1100 EL CAMINO REAL	94002
Hospital	KAISER-REDWOODCITY	1100 VETERANS BLVD	94063

Hospital	FIVE PRIME THERAPEUTICS INC, SCOTT LEIKE	111 OYSTER POINT BLVD	94080
Hospital	AMGEN SF, LLC	1120 VETERANS BOULEVARD	94080
Retail	LUCKY PHARMACY #749	1133 OLD COUNTY RD	94070
Retail	TARGET STORES T-1054	1150 EL CAMINO REAL	94066
Retail	KAISER FOUNDATION HOSP, INC	1150 VETERANS BLVD	94063
Hospital	KAISER FOUNDATION HEALTH PLAN	1150 VETERANS BOULEVARD	94063
Unknown	MILLS, PAUL J MD	1155 JOHNSON ST	94025
Retail	DBA: WALGREENS # 06655	1160 BROADWAY	94010
Retail	SUNSHINE CENTER PHARMACY	1166 MISSION RD	94080
Retail	DAVITA RX LLC	1178 CHERRY AVENUE	94066
Retail	KAISER PERMANENTE PHARMACY #377	1190 VETERANS BLVD	94063
Retail	KPNC-Redwood City Oncology 377-Clinic	1190 Veterans Blvd, 2nd Floor	94063
Hospital	PENINSULA HUMANE SOCIETY	12 AIRPORT BLVD.	94401
Hospital	KAISER SOUTH SAN FRANCISCO MEDICAL CENT	1200 EL CAMINO REAL	94080
Unknown	SCHOENBERGER, JOHN STEVEN MD	1213 EATON AVE.	94070
Hospital	CRYSTAL SPRINGS PET HOSPITAL,INC	122 DE ANZA BLVD.	94402
Hospital	HERON THERAPEUTICS INC, HERON THERAPEUTI	123 SAGINAW DRIVE	94063
Retail	ROSENBAUM, KENNETH MARK MD	123 SOUTH SAN MATEO DRIVE	94401
Retail	DBA: CVS/PHARMACY # 09977	124 DE ANZA BLVD	94402
Retail	YOUNG, SONNY S (DO)	125 SHOREWAY RD, SUITE A	94070
Retail	AAHLAD, SUBHA Y MD	1295 E HILLSDALE BLVD	94404
Retail	UNIVERSITY HEALTHCARE ALLIANCE	1300 CRANE ST	94025
Retail	DBA: CVS/PHARMACY # 09690	1301 BROADWAY ST	94063
Retail	HOWARD, STEVEN	1301 SHOREWAY RD,	94002
Retail	RITE AID #5903	1320 WEST HILLSDALE BLVD.	94403
Retail	LUCKY PHARMACY #748	1322 EL CAMINO REAL	94066
Retail	DBA: CVS/PHARMACY # 00550	1324 SAN CARLOS AVE	94070
retail	CVS PHARMACY # 16746	133 SERRAMONTE CTR	94015
Retail	DBA CVS/PHARMACY #10165	135 PIERCE STREET	94015
Retail	RITE AID #5890	1400 LINDA MAR BOULEVARD	94044
Retail	DBA: WALGREENS # 02126	1414 EL CAMINO REAL	94070

Retail	BULLOCK, PETER JOHN MD	143 BIRCH ST	94062
Hospital	ANTHEIA, INC., ANTHEIA, INC.	1430 OBRIEN DR	94025
Retail	SAFEWAY PHARMACY #1547	1450 HOWARD AVE	94010
Hospital	PENINSULA HUMANE SOCIETY & SPCA	1450 ROLLINS ROAD	94010
Retail	DAVITA DALY CITY 3805	1498 SOUTHGATE AVE STE 101	94015
Hospital	DELPOR, INC., DELPOR, INC.	150 N HILL DR	94005
Retail	KINI, DIVYA MD	1500 SOUTHGATE AVE STE 204	94015
Hospital	MILLS-PENINSULA MEDICAL CENTER PHARMACY	1501 TROUSDALE DR.	94010
Hospital	CIRCUIT THERAPEUTICS, INC.	1505 O'BRIEN DR	94025
Retail	COSTCO WHOLESALE NO 475	1600 EL CAMINO REAL BLVD	94080
Retail	SONG, ELISA H MD	1601 EL CAMINO REAL	94002
Retail	CO, CHI KO	161 S SPRUCE AVE	94080
Hospital	ANCHOR DRUGS	161 SOUTH SPRUCE AVE	94080
Retail	SAFEWAY PHARMACY #0970	1655 EL CAMINO REAL	94402
Hospital	SEQUOIA HOSPITAL	170 ALAMEDA DE LAS PULGAS	94062
Hospital	INC, THRESHOLD PHARMACEUTICALS	170 HARBOR WAY, SUITE 300	94080
Retail	RITE AID #5885	170 SAN MATEO ROAD	94019
Retail	COLLEGE OF SAN MATEO HEALTH CENTER	1700 W HILLSDALE BLVD BLDG 1 RM 147	94402
Retail	MD2 - MENLO PARK	1706 EL CAMINO REAL	94027
Hospital	GLOBAL BLOOD THERAPEUTICS, INC.	171 OYSTER POINT BLVD	94080
Retail	MID PENINSULA ENDOSCOPY CTR	1720 EL CAMINO REAL	94010
Retail	DBA CVS/PHARMACY #17710	1775 EAST BAYSHORE ROAD	94303
Retail	WEINSTEIN, LESLIE R MD	1800 SULLIVAN AVE	94015
Hospital	SHIGIHARA DDS, PH.D, TAKASHI	181 - 2ND AVENUE	94401
Retail	BURLINGAME FAMILY HEALTH MEDICAL GROUP	1820 OGDEN DR	94010
Retail	A & O PENINSULA PHARMACY	1828 EL CAMINO REAL	94010
Hospital	DONAHUE, JOSEPH, P. MD	1849 BAYSHORE HWY, 3RD FLOOR	94010
Unknown	OKUMU, KRIS	1850 SULLIVAN AVE STE 330	94015
Retail	RITTENHOUSE, DOUGLAS E MD	1850 SULLIVAN AVENUE	94015
Retail	DBA: CVS/PHARMACY # 09899	186 EL CAMINO REAL	94080
Retail	LAKOWSKY, ALEXANDER MD	1860 EL CAMINO REAL STE 321	94010

Retail	DBA: CVS/PHARMACY # 09811	1871 EL CAMINO REAL	94010
Retail	SANTANA, SONIA R DO	1885 BAY RD	94303
Retail	CENTER FOR DISCOVERY	1895 ALTSCHUL AVE	94025
Retail	TSUNG, SOA YEE MD	1900 EL CAMINO REAL	94027
Unknown	REMEDY	1900 O'FARRELL ST	94403
Hospital	SETON MEDICAL CENTER	1900 SULLIVAN AVENUE	94015
Retail	DBA: WALGREENS # 03296	191 EAST 3RD AVE.	94401
Retail	US HEALTHWORKS 528	192 BEACON ST	94080
Hospital	COWING, CHRIS C DVM	1940 BEACH PARK BLVD	94404
Hospital	CAMINAR FOR MENTAL HEALTH	2 EDGEWOOD COURT	94014
Retail	RITE AID #5891	200 FAIRMONT SHOPPING CENTER	94044
Hospital	SAFEWAY PHARMACY #0668	2100 RALSTON AVENUE	94002
Retail	DREW CENTER PHARMACY	2111 UNIVERSITY AVENUE	94303
Retail	RITE AID #5893	2150 ROOSEVELT AVENUE	94061
Retail	DBA: WALGREENS # 00324	216 WESTLAKE CENTER	94015
Retail	DBA: WALGREENS # 01807	22 SAN PEDRO RD	94014
Hospital	SAN MATEO MEDICAL CENTER	222 W. 39TH AVE	94403
Retail	CVS PHARMACY # 16490	2220 BRIDGEPOINTE PKWY	94404
Retail	DBA: WALGREENS #15397	2238 WESTBOROUGH BLVD	94080
Hospital	NORTH PENINSULA VETERINARY EMERGENCY	227 NORTH AMPHLETT BLVD	94401
Hospital	RINAT NEUROSCIENCE CORPORATION, A WHOLLY	230 E GRAND AVE	94080
Retail	DBA COSTCO PHARMACY #1042	2300 MIDDLEFIELD ROAD	94063
Retail	SHARMA, VANDANA B MD	2407 SHARON OAKS DR	94025
Retail	CVS PHARMACY # 16112	2485 EL CAMINO REAL	94063
Hospital	CAMINAR HAWTHORNE HOUSE	251 JACKSON AVENUE	94601
Retail	DBA: WALGREENS #12257	260 EL CAMINO REAL	94010
Hospital	CAMINAR FOR MENTAL HEALTH	2600 S. EL CAMINO REAL	94403
Hospital	PORTOLA PHARMACEUTICALS, INC	270 EAST GRAND AVENUE	94080
Retail	NOB HILL PHARMACY #628	270 REDWOOD SHORES PARKWAY	94065
Hospital	MID PENINSULA ANIMAL HOSPITAL	2707 EL CAMINO REAL	94061
Retail	MAHER, MIRIAM	2710 MIDDLEFIELD RD	94063

Hospital	CYTOKINETICS INC	280 EAST GRAND AVE	94080
Hospital	TED'S VILLAGE PHARMACY INC	29 W 25TH AVE	94403
Hospital	HO, BETTY M MD	2900 WHIPPLE AVE	94062
Retail	CASTRO, LUIS	2900 WHIPPLE AVE STE 140	94062
Retail	NAND, PRIYASHEELTA (MD)	2950 WHIPPLE AVENUE	94062
Retail	THE VILLAGE DOCTOR	2979 WOODSIDE RD	94062
Hospital	SHUBERT, JOSEPH L MD	301 INDUSTRIAL AVE	94070
Hospital	PALO ALTO MEDICAL FOUNDATION	301 INDUSTRIAL RD.	94070
Retail	WOODSIDE VILLAGE PHARMACY	3048 WOODSIDE ROAD	94062
Hospital	MEDICAL CENTER PHARMACIES INC	3137 JEFFERSON AVE	94062
Retail	LESSANI, N DAVID MD	319 CHURCH STREET	94019
Hospital	ATTN: BERNARD MURRAY	324 LAKESIDE DR	94404
Retail	DBA: CVS/PHARMACY # 09330	325 SHARON PARK DR	94025
Hospital	JENNINGS, CATHERINE ANNE DVM	325M SHARON PARK DRIVE	94025
Retail	NGUYEN, THANG, C (MD)	328 N. SAN MATEO DRIVE SUITE A	94401
Retail	ONE MEDICAL	329 PRIMROSE RD FL 2	94010
Hospital	INC, PROTHENA BIOSCIENCES	331 OYSTER POINT BLVD	94080
Retail	DBA: WALGREENS # 02939	333 EL CAMINO REAL	94066
Hospital	DIGESTIVE DIAGNOSTIC CENTER INC	333 GELLERT BLVD	94015
Retail	NGM BIOPHARMACEUTICALS, INC., "NGM"	333 OYSTER POINT BLVD	94080
Hospital	SRI INTERNATIONAL, ..	333 RAVENSWOOD AVE	94025
Hospital	PACIFIC ENDOSCOPY ,LLC	3351 EL CAMINO REAL	94027
Retail	SUJANSKY, ULRIKE DORIS	34 N. SAN MATEO DR.	94401
Retail	TRAYNIS, ARNOLD I MD	340 DNA WAY	94080
Retail	RITE AID #5892	340 WOODSIDE PLAZA	94061
Retail	HERNANDEZ, VIVIEN	341 WESTLAKE CENTER	94015
Retail	LIVEWELL MEDICAL CLINIC	343 EL CAMINO REAL, SUITE 1	94080
Retail	ROBBINS, HARVARD MORRIS	35 W 20TH AVE APT 208	94403
Retail	MANNON, CAROLYN J MD	3500 ALAMEDA DE LAS PULGAS STE 200	94025
Hospital	ACELRX PHARMACEUTICALS INC.	351 GALVESTON DR	94063
Retail	DBA: CVS/PHARMACY # 09752	375 GELLERT BLVD	94015
Retail	CHINESE HOSPITAL PHARMACY	386 GELLERT BLVD	94015

Retail	FEI, HAILING MD	39 BIRCH STREET, SUITE A	94062
Hospital	KAISER S. SAN FRAN DALY CITY	395 HICKEY BLV	94015
Retail	DBA: WALGREENS # 03346	399 EL CAMINO REAL	94080
Retail	NIHON BAY CLINIC	40 N SAN MATEO DR	94401
Retail	HALF MOON BAY PHARMACY	40 STONE PINE ROAD	94019
Retail	INTERACTIVE WELLNESS	401 BURGESS DR STE B	94025
Retail	CAREKINESIS	401 SOUTH CANAL STREET	94080
Retail	DBA: WALGREENS # 05006	4070 S EL CAMINO REAL	94403
Hospital	STANFORD MEDICINE OUTPATIENT CENTER	420 BROADWAY ST	94063
Retail	DBA: CVS/PHARMACY # 09833	4242 S EL CAMINO REAL	94403
Hospital	MARINER ADVANCED PHARMACY CORP	43 EAST 3RD AVE	94401
Retail	DBA WALGREENS #07970	45 S EL CAMINO REAL	94030
Hospital	STANFORD HEALTH CARE PAVILION C-1 PHARMA	450 BROADWAY	94063
Hospital	PAGE, LORRAINE	450 DONDEE ST STE 5	94044
Hospital	ABBVIE STEMCENTRX, LLC	450 E. JAMIE COURT	94080
Hospital	LPCH CHILDREN'S HOME PHARMACY	4600 BOHANNON DRIVE	94025
Retail	CLEMENTINA L MANIO MD	483 GRAND AVE	94080
Retail	CHOW, HOWARD K MD	50 SOUTH SAN MATEO DRIVE	94401
Retail	CVS PHARMACY # 16111	5001 JUNIPERO SERRA BLVD	94014
Retail	DBA: WALGREENS #11261	520 PALMETTO AVE	94044
Retail	SAFEWAY PHARMACY #2719	525 EL CAMINO REAL	94025
Retail	RYDFORS, JAN T MD	570 PRICE AVE	94063
Hospital	MENLO PARK SURGICAL HOSPITAL	570 WILLOW RD.	94025
Retail	PURISIMA FAMILY MEDICINE	575 KELLY AVENUE	94019
Retail	DBA: CVS/PHARMACY # 09216	60 CABRILLO HWY N	94019
Retail	GREENSPAN, AVRAM C MD	609 PRICE AVE SUITE-104	94063
Retail	DBA: WALGREENS # 05365	6100 MISSION STREET	94014
Retail	DBA: WALGREENS # 00625	615 BROADWAY	94030
Unknown	MERCK RESEARCH LABORATORIES, ...	630 GATEWAY BLVD.	94080
Retail	LU, HUMPHREY	640A PURISSIMA ST	94019
Retail	DBA: WALGREENS # 07087	643 SANTA CRUZ AVE	94025
Hospital	SAN MATEO SURGERY CENTER	66 BOVET ROAD	94402

Retail	RITE AID #5902	666 CONCAR DRIVE	94402
Retail	LUCKY CALIFORNIA PHARMACY #707	6843 MISSION BLVD	94014
Retail	DBA CVS/PHARMACY # 10240	700 EL CAMINO REAL	94025
Hospital	ANCHOR DRUGS II	730 WOODSIDE ROAD	94061
Retail	DAVITA S SAN FRANCISCO AT HOME 5846	74 CAMARITAS AVE	94080
Hospital	OMNIOX INC.	75 SHOREWAY RD, STE. B	94070
Retail	RODRIGUEZ-MAO, GINA L MD	77 BIRCH STREET	94062
Retail	DBA: CVS/PHARMACY # 09554	77 BOVET RD	94402
Hospital	MENLO PARK DIVISION PHARMACY	795 WILLOW RD	94025
Retail	CARRINGTON-TRIBBLE, PAMELA C. (D.O.)	799 MAIN ST	94019
Retail	UK SAB MD INC	80 ARCH ST STE A	94062
Unknown	SAB, UMESH K MD	80 ARCH STREET	94062
Retail	NOWRX	800 BURLWAY RD	94010
Hospital	ONCOMED PHARMACEUTICALS, -	800 CHESAPEAKE DR	94063
Hospital	ATHENA RX HOME PHARMACY	800 GATEWAY BLVD.	94080
Retail	PEDIATRIC WELLNESS GROUP	801 BREWSTER AVE STE 175	94063
Hospital	KAISER FOUND HLTH PLAN	801 TRAEGER AVE	94066
Retail	PAMF REDWOOD CITY CENTER	805 VETERANS BLVD STE 201	94063
Hospital	SAFEWAY PHARMACY #0747	850 WOODSIDE ROAD	94061
Hospital	CORVUS PHARMACEUTICALS INC	863 MITTEN RD	94010
Hospital	CLEAVE BIOSCIENCES, INC., N/A	866 MALCOLM ROAD	94010
Hospital	PETS IN NEED	871 FIFTH AVENUE	94063
Retail	PHARMACA INTEGRATIVE PHARMACY, INC.	871 SANTA CRUZ AVENUE	94025
Retail	DBA: CVS/PHARMACY # 09940	872 N DELAWARE ST	94401
Retail	DBA: WALGREENS # 00063	900 RALSTON AVENUE	94002
Hospital	INCLINE THERAPEUTICS, INC., N/A	900 SAGINAW DRIVE, SUITE 200	94063
Retail	ONE MEDICAL GROUP	900 VETERANS BLVD	94063
Retail	NIMBLE PHARMACY	900 WILLOW RD STE B	94025
Retail	PEDIOATRIC MEDICAL GROUP	901 CAMPUS DR	94015
Retail	KAISER PERMANENTE PHARM 357	901 EL CAMINO REAL	94066
Hospital	THERAVANCE BIOPHARMA US, INC.	901 GATEWAY BLVD	94080
Retail	ODELEYE, MELANIE	901 METRO CENTER BLVD BLDG M3	94404

Retail	KAISER FOUND HLTH PLAN	910 MARSHALL STREET	94063
Retail	LUCKY PHARMACY #710	919 EDGEWATER BLVD	94404
Retail	LUCKY PHARMACY #710	919 EDGEWATER DRIVE	94404
Retail	DAVITA WESTBOROUGH DIALYSIS 4424	925 EL CAMINO REAL	94080
Retail	LIN, MELISSA	925 HAMILTON AVE	94025
Retail	CHAN, ESTHER YT	93 SKYLINE PLAZA	94015
Hospital	KRUSE-ELLIOTT, KRIS T	934 CHARTER ST	94063
Retail	DBA THE PILL CLUB	969 INDUSTRIAL ROAD	94070
Retail	WALGREENS INFUSION SERVICES	975 INDUSTRIAL ROAD	94070
Retail	DBA: CVS/PHARMACY # 09879	987 E HILLSDALE BLVD	94404
Retail	KAISER FOUNDATION HOSPITAL	KFH INPATIENT/OUTPATIENT	94080
Retail	KAISER PERMANENTE ASPEN	PHARMACY NO 376	94063

Appendix B: Kiosk Signage






DRUG DISPOSAL PROGRAM

(PROGRAMA DE ELIMINACIÓN DE DROGAS)

See Directions on Top of Box (Instrucciones arriba de la caja)

For more information, visit rxdisposal.lifeincheck.com or call 1-800-123-4567



CONSUMER DRUG TAKE-BACK

(PROGRAMA DE ELIMINACIÓN DE MEDICAMENTOS)


1 Pull to open drawer
Jale para abrir el cajón

▶

2 Place medications inside
Coloque los medicamentos adentro

▶


3 Close the drawer
Cierre el cajón







 **ACCEPTED** (ACEPTADOS)

Unused or expired prescription medication
(Including Schedule II-V controlled substances)
Medicamentos con receta no consumidos o vencidos (incluidas las sustancias controladas de clasificación II a V)

Unused or expired over-the-counter medication
Medicamentos de venta libre, no consumidos o vencidos

Pet Medication
Medicamentos para mascotas

 **NOT ACCEPTED** (NO ACEPTADOS)

<p>Schedule I controlled substances <i>Sustancias controladas de clasificación I</i></p> <p> Thermometers <i>Termómetros</i></p> <p> Inhalers <i>Inhaladores</i></p> <p> Aerosol Cans <i>Latas de aerosoles</i></p>	<p>Illegal drugs <i>Drogas ilegales</i></p> <p> Lotions/Liquids <i>Lociones o líquidos</i></p> <p> Needles <i>Agujas</i></p> <p> Hydrogen Peroxide <i>Agua oxigenada</i></p>
--	---

Also not accepted: vitamins, minerals, or supplements; herbal-based remedies and homeopathic drugs; personal care products such as cosmetics and nonprescription drugs; medical waste; emptied injector products or emptied medical devices and their component parts or accessories; pet pesticide products contained in pet collars, powders, shampoos, topical applications, or other forms.

Inmar confidential – do not copy, distribute or use without Inmar written permission, 2020
Use or Disclosure of Information Contained on This Sheet is Subject to the Restriction on the First Page of This Submittal.

37



We are proud to work with this location in support of the Consumer Drug Take-Back

Discreet, safe and responsible drug disposal is critical in the fight against the opioid crisis.

DID YOU KNOW?

197

Americans die every day from a **drug overdose**

*National Center for Health Statistics

Each day, more than

1,000

people are treated in **emergency departments** for not using prescription opioids as directed

*Centers for Disease Control and Prevention

77%

of **opioid prescription medications** taken by new users are obtained from a friend or relative

*U.S. Department of Health and Human Services

62%

of **teens** who admit taking medication for non-medical reasons say they get drugs from **medicine cabinets in their homes**

*National Survey on Drug Use and Health, SAMHSA

TOGETHER, WE CAN MAKE A DIFFERENCE!

Tell your friends and relatives about this safe drug disposal location.

For more information on safe drug storage and disposal, as well as information on additional collection options, visit rxdisposal.lifeincheck.com or call 1-800-123-4567

Appendix C: Training Material

Training material provided to authorize collectors include:

1. FAQs
2. Container Instructions
3. Steps to Start Document
4. Installation Reference Guide
5. Serialization Tracker

All of the aforementioned documents are provided on the following pages.



Frequently Asked Questions

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

Frequently Asked Questions

Installation / Removal

Question	Answer
1 How is the receptacle installed?	The receptacle must be affixed to a wall or bolted to the floor for compliance with the Responsible Disposal Act. Inmar provides a printed guide for easy installation.
2 Where are the keys located for the receptacle?	The keys are located in the top bin of the receptacle. Please note there are two sets of keys provided for each lock. We suggest these duplicates be immediately separated and each set stored in a safe place.
3 If I need replacement keys, where is the lock number located?	Each lock has a lock number printed on the outside of the lock. When ordering replacement keys, you will need to reference the receptacle PC number which is located on the inside left of the drop-door.
4 When should I ship the collection container to Inmar?	Full containers should be shipped immediately after the inner liners are sealed and packaged for shipping. The container is sent to you already prepared with a prepaid FedEx shipping label.
5 How will I know when the collection container is full?	The drop-door has an extended tongue that lowers down into the container when the drop-door is closed. When the product builds to a certain height, the door will have some resistance in operation. This will indicate it is time to change the container.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

Frequently Asked Questions

Installation / Removal (Continued)

Question	Answer
<p>6 Are the zip ties the only way the liners are serialized? Is the serial number located anywhere else?</p>	<p>The red locking zip tie is serialized, the inner liner is serialized and the outside of the cardboard shipping container is serialized. These serial numbers all match and are packaged as a kit. Therefore, it is critical that the pieces of the kit stay together throughout usage and return shipping.</p>
<p>7 Do I need to wait until the shipping company is on-site for pickup before I change the container?</p>	<p>As the pickup is standard FedEx, most of our customers change the container and then call FedEx. Please be aware that the DEA requires that the sealed container be held in the controlled substances area during the time between liner removal and pickup.</p>
<p>8 When ordering multiple receptacles, is it required that each receptacle be shipped to the location where they will be installed or can they be shipped to a central location and then transported?</p>	<p>The metal receptacles can be shipped to whatever location you choose. The supplies are shipped separately from our facility in Fort Worth, TX. It will be important to notify your staff to be on the lookout for these supplies so they are not inadvertently discarded.</p>
<p>9 How do I order more collection containers?</p>	<p>Upon receipt of your second returned container, Inmar will automatically send you a supply kit for your next three returns. If you need additional supplies, please contact Inmar via the email address or phone number listed below.</p>

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

Frequently Asked Questions

Compliance / Regulatory

Question	Answer
<p>10 Is there a statement from the DEA allowing for video monitoring of the receptacle?</p>	<p>There is no statement allowing video surveillance. However, the regulations state that regular monitoring by employees is required. This is the exact text from the Regulation Part 1317 Subpart B (1317.75 2(i)): "(i) At a hospital/clinic: A collection receptacle shall be located in an area regularly monitored by employees, and shall not be located in the proximity of any area where emergency or urgent care is provided." VIDEO MONITORING IS NOT ALLOWED IN CALIFORNIA (not part of DEA regulation).</p>
<p>11 Are the items collected considered medical waste?</p>	<p>Household pharmaceuticals collected by take-back programs are not considered medical waste and, therefore, not subject to EPA RCRA rules. The items collected are considered household waste as long as the take-back program rules are followed. That is, no sharps, non-pharmaceuticals, etc. allowed in the receptacles.</p>
<p>12 What should the pharmacist do if they see someone put a "not allowed" substance or item in the receptacle?</p>	<p>Those responsible for monitoring the receptacle should do their best to keep this from occurring. However, the DEA specifies opening the inner liner is not allowed.</p>
<p>13 Can non-controlled medications and controlled substances be placed in the LifeInCheck Consumer Drug Take-Back receptacle?</p>	<p>Yes. Comingling of controlled and non-controlled substances is allowed in the take-back receptacle.</p>

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Frequently Asked Questions

Compliance / Regulatory (Continued)

Question	Answer
14 If a patient asks the pharmacist to place their medications in the receptacle, can they do so?	With an exception for personnel in a long term care facility, the drug owner or a member of his/her household are the only persons allowed to place items in the take-back receptacle.
15 Where can I find information on DEA regulations?	You can access links for DEA registrants, LTCFs and more here: https://www.deadiversion.usdoj.gov/drug_disposal/index.html .
16 Are there any regulations limiting the number of keys I can replicate for these units?	The DEA does not specify anything regarding the keys, only that the receptacle is secure, monitored and that two staff members are present when it is opened.

Marketing/Promotion

Question	Answer
17 Can the pharmacy add a logo to, or brand, the receptacle?	If sponsored subscription has been purchased, then the magnet provided by Inmar must be placed on the front door of the receptacle. The sides can be used for your logo/brand. If the full-price subscription was purchased, then the pharmacy can place a logo/brand on the sides or front.
18 Are there marketing materials available to help me promote my take-back program?	Please contact Inmar for the latest marketing materials. These include signage, social media copy and images as well as language for press releases and ads.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



LIFE **IN** CHECK™
CONSUMER DRUG TAKE-BACK

COLLECTION CONTAINER VISUAL INSTRUCTIONS

CONSTRUCTION, INSTALLATION, REMOVAL AND SHIPPING OF COLLECTION CONTAINER

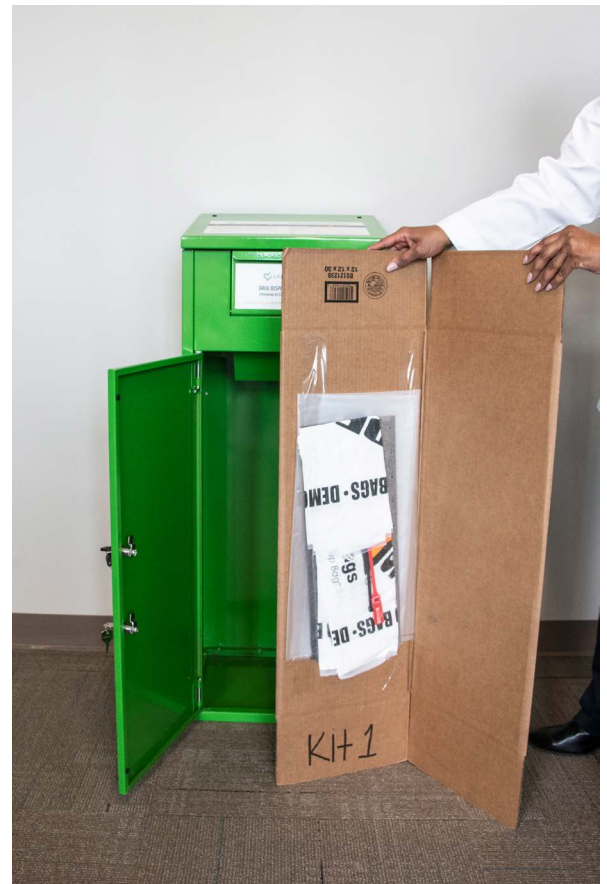
Questions: Contact Consumer Drug Take-Back Client Service Team
take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

KIT CONTENTS

Each shipment contains 3 individually packaged kits with unique components to each kit. **DO NOT rearrange contents between kits.** Each kit contains one of each of the following items:

- 1 Serialized White Opaque Inner Liner
- 2 Clear Outer Liner
- 3 Red Serialized Zip Tie for Inner Liner
- 4 Black Zip Tie for Outer Liner
- 5 Absorption pad
- 6 Numbered and pre-labeled box



IMPORTANT:

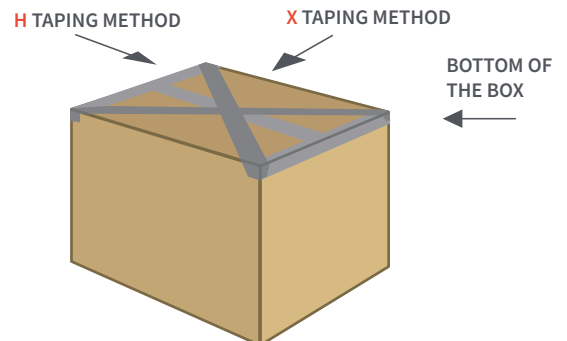
For every shipment – serialized red zip tie, serial number on white inner liner & serial number on cardboard container **MUST MATCH.**

NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

- 1 Document receipt of each inner liner (in columns 1 and 2 of Drug Disposal Serialization Tracking Sheet).
- 2 Close and tape the box bottom. Seal the middle seam and both outside seams. Leave no un-taped spaces along the seams. We recommend 1 strip of tape across the bottom seam, 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.
- 3 Place Clear Outer Liner into the box and fold excess material at top over box flaps.

inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form		LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
<small>Serialization Tracking Sheet should be validated by 2 pharmacy employees.</small>					
SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	
EC 32587	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith	



KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

4 Place Serialized Opaque Inner Liner into the installed Outer Liner and fold excess material at top over box flaps. Leave Red and Black Zip Ties taped to the Inner Liner for later use.



5 Place absorbent pad into the installed Inner Liner.



6 Install the double-lined box (now the “Container”) into the Collection Receptacle.

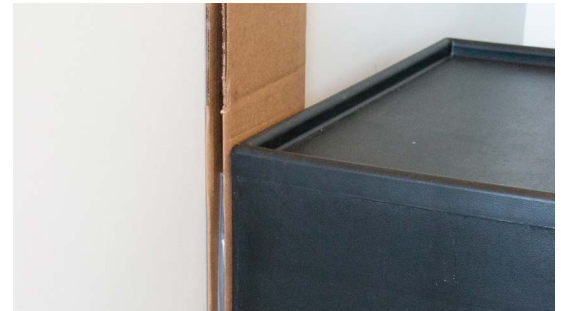


7 Immediately document installation of Container (column 3 of Drug Disposal Serialization Tracking Sheet).

inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form			LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
Serialization Tracking Sheet should be validated by 2 pharmacy employees.						
SERIAL NUMBERS	Date Received by (1 Signature)	Date in Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)		
EC-3287	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith		

KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

8 Store remaining spare kits securely for future use and document storage of spare kits on the Drug Disposal Serialization Tracking Sheet.



inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form		LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
Serialization Tracking Sheet should be validated by 2 pharmacy employees.					
SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	
EC 32587	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith	

9 Lock bottom door and unlock top door to begin drug disposal collection.



10 Use the Drug Disposal Serialization Tracking Sheet to document all “Inner Liner events.”

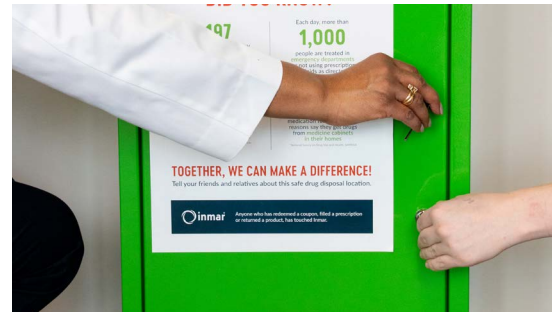
inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form		LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
Serialization Tracking Sheet should be validated by 2 pharmacy employees.					
SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	
EC 32587	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith	

NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

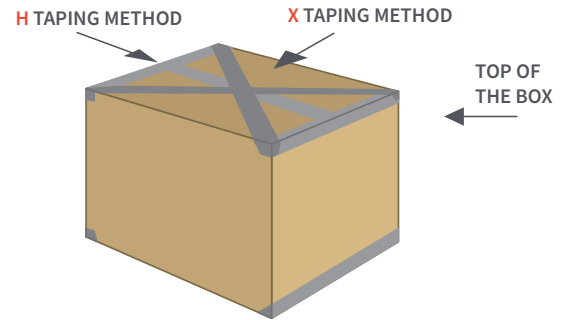
Note: The total weight of the Container ready for shipping may not exceed 66 pounds in weight.

- 1** Unlock and open bottom door.
- 2** Remove full Container from Collection Receptacle. **DO NOT** sort, count or inventory pharmaceuticals or touch contents of Inner Liner prior to sealing.
- 3** Immediately seal the Serialized Opaque Inner Liner securely by gathering and twisting the top of the liner a minimum of 2 times and securely cinching the provided Red Serialized Zip Tie to secure the liner top.
- 4** Seal the Clear Outer Liner securely by gathering and twisting the top of the liner a minimum of 2 times and securely cinching the provided Black Zip Tie to secure the liner top.



KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

5 Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams. We recommend 1 strip of tape across the top seam, 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally. See illustration to right.



6 Document removal of Container (in column 4 of Drug Disposal Serialization Tracking Sheet).

inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form			LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
Serialization Tracking Sheet should be validated by 2 pharmacy employees.						
SERIAL NUMBERS	Date Received (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)		
Ex: 32587	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith		

7 Store the sealed Container in a secure location until shipped. Container is pre-labeled for shipping to Inmar.



8 Document shipping of Container (in column 5 of Drug Disposal Serialization Tracking Sheet).

inmar		Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form			LIFE IN CHECK CONSUMER DRUG TAKE-BACK	
Serialization Tracking Sheet should be validated by 2 pharmacy employees.						
SERIAL NUMBERS	Date Received (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)		
Ex: 32587	John Jones	4/26/18 John Jones Sally Smith	5/26/18 John Jones Sally Smith	5/27/18 John Jones Sally Smith		



PLEASE NOTE:

Your cardboard container is pre-labeled for shipping. This label is pre-paid with FedEx and must not be copied.

Additional charges may apply for non-compliance.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

GETTING STARTED

RECEPTACLE

You will receive your LifeInCheck Consumer Drug Take-Back receptacle and your supplies in separate shipments. After unpacking the receptacle, it must be installed according to the “Responsible Disposal Act” Rule which means it must be connected to a wall or the floor ensuring the receptacle is secure. Your receptacle will come pre-drilled in the bottom to make installation easier. Please see the installation instructions included in this email.

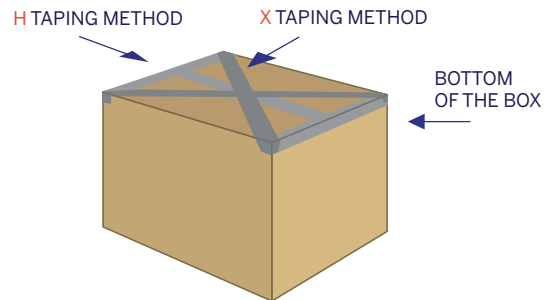
Your usage of the LifeInCheck Consumer Drug Take-Back Program indicates your agreement to accept responsibility for following the Federal Guidelines: DEA’s Final Rule, which implements the Secure and Responsible Drug Disposal Act of 2010 (“the Disposal Act”).

SUPPLIES

After completing proper installation of your LifeInCheck Consumer Drug Take-Back receptacle you should unpack your supplies. Included are supplies to operate your program for 3 returns. Upon receipt of your second container (return) shipment to Inmar, we will automatically send your next 3 return supply package so you will always have the necessary supplies on hand. Staged shipping of your supplies alleviates your need to store large supply quantities. It is important for you to document receipt of the **red serialized zip ties** on your tracking form. To assist, Inmar has provided the LifeInCheck Consumer Drug Take-Back Serialization Tracking sheet.

CONSTRUCTING YOUR INNER CONTAINER

Construct 1 cardboard container applying an appropriate amount of tape to the bottom to ensure safe transportation. We recommend 1 strip of tape across the bottom seam and 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.



PREPARING YOUR CONTAINER FOR USAGE

1. Set the container upright, fold down the flaps on the exterior of the container and insert the clear plastic liquid-barrier bag pushing down into container and folding the top of the bag to overlap the container edges.
2. Document the serial number from the **red serialized zip tie** on your Serialization Tracking sheet.
3. Insert the opaque inner liner bag in the same manner as above. (Use caution to keep the serialized red zip tie affixed to the inner liner as when it was received).
4. Place a single absorbent pad (provided) in the bottom of the inner liner bag.

Your container is now ready to be placed into the receptacle. Additional supplies can be placed in the receptacle to the side of the current container.

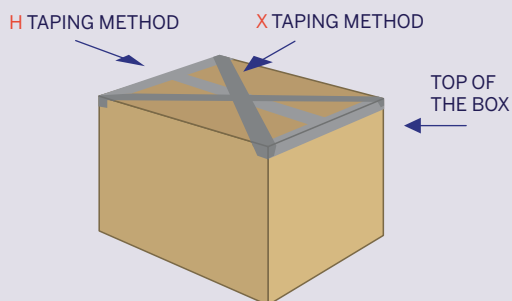
SHIPPING INSTRUCTIONS

1. Unlock and open the door of your drug disposal receptacle and remove the container that has product inside.
2. Gather the top of the opaque inner liner bag, close and secure using the red serialized zip tie that is taped to the inner liner.
3. Document and update the status of the serial number from the red serialized zip tie on your LifelnCheck Consumer Drug Take-Back Serialization Tracking sheet.
4. Gather the top of the clear plastic liquid barrier bag, close and secure using a plain black zip tie.
5. Close the container by folding the cardboard flaps and use the same method of taping as you did for the bottom.

NOTE: All direct contact with the LifelnCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

PREPARING YOUR CONTAINER FOR SHIPPING

- Complete the closure of your cardboard container applying an appropriate amount of tape to the top for safe transportation.
- We recommend 1 strip of tape across the top seam and 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally.



SHIPPING

Your container comes pre-labeled for shipping to Inmar.



REPORTING

Inmar will maintain your modified Form 41 noting destruction date and time on file and will provide it to you upon request.

QUICK STEPS

TO START

- 01** Install LifelnCheck Consumer Drug Take-Back Receptacle per DEA guidelines.
- 02** Properly tape container at bottom.
- 03** Place plastic clear liner inside with top folded over container flaps.
- 04** Place opaque inner liner inside with top folded over container flaps.
- 05** Place absorbent pad in bottom of inner liner.
- 06** Install container inside receptacle.
- 07** Lock bottom door and unlock top door to begin collection.

TO CLOSE

- 01** Open bottom door.
- 02** Remove full container.
- 03** Use red serialized zip tie to secure inner liner bag top.
- 04** Use black zip tie to secure clear plastic bag top.
- 05** Properly tape container at top.
- 06** Container is pre-labeled for shipping to Inmar.

INSTALLATION INSTRUCTIONS

<p style="text-align: center;">ANCHOR FOR CONCRETE FLOOR</p>	<p style="text-align: center;">McMASTER-CARR.</p> <p style="text-align: center;">Flanged Hex Head Screws for Wood</p> <p style="text-align: center;"><small>Hot-Dipped Galvanized Steel, 1/4\"/> <p style="text-align: center;">SCREW FOR WOOD FLOOR</p> </small></p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 10%;">DATE</th> <th style="width: 5%;">SYM</th> <th style="width: 50%;">REVISIONS RECORD</th> <th style="width: 10%;">AUTH</th> <th style="width: 10%;">DR</th> <th style="width: 5%;">CK</th> </tr> <tr> <td>07/18/2017</td> <td>A</td> <td>RELEASED FOR PRODUCTION</td> <td>WM</td> <td>KQ</td> <td></td> </tr> </table> <div style="text-align: right; margin-top: 20px;"> </div>	DATE	SYM	REVISIONS RECORD	AUTH	DR	CK	07/18/2017	A	RELEASED FOR PRODUCTION	WM	KQ	
DATE	SYM	REVISIONS RECORD	AUTH	DR	CK									
07/18/2017	A	RELEASED FOR PRODUCTION	WM	KQ										
<p style="text-align: center;">FIGURE 1</p>	<p style="color: orange; font-weight: bold; margin-top: 0;">INSTALLATION</p> <p style="margin-top: 10px;">STEP 1: PLACE CABINET IN PERMANENT LOCATION</p> <p style="margin-top: 10px;">STEP 2: USING THE CABINET BASE AS A TEMPLATE, MARK FLOOR USING CLEARANCE HOLES AS SHOWN IN FIGURE 1</p> <p style="margin-top: 10px;">STEP 3: DRILL HOLES FOR FLOOR SUBSTRATE</p>	<p style="margin-top: 20px;">Use four clearance holes in bottom for securing cabinet to floor.</p>												

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy	Address of Collecting Pharmacy	Collecting Pharmacy DEA #:

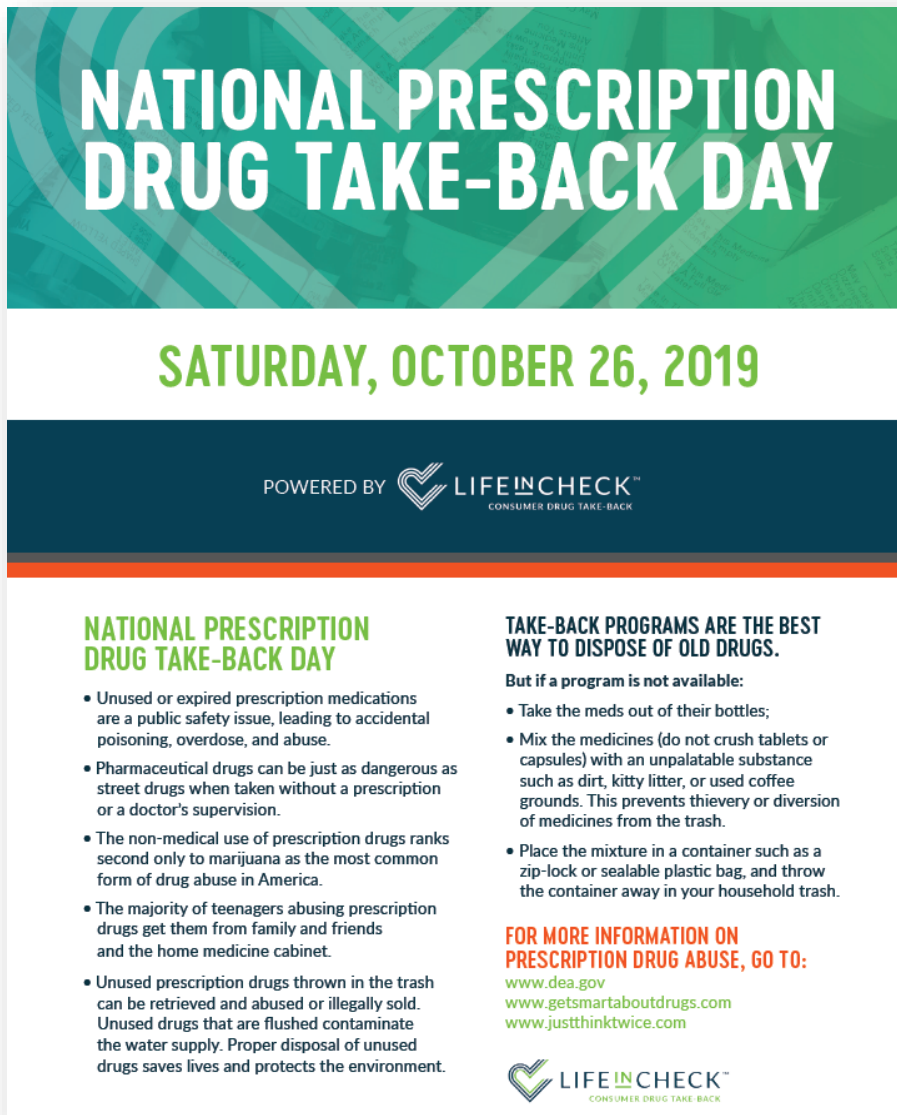
SERIAL NUMBERS	Date Received by (1 Signatures)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)	Size of Liner	Address of Reverse Distributor/Disposal Site	Reverse Distributor/Disposal Site DEA #
Ex: 32587	4/26/19 John Jones	4/26/19 John Jones Sally Smith	5/26/19 John Jones Sally Smith	5/27/19 John Jones Sally Smith	Ex: 18 Gallon	1515 S Holt Road Indianapolis, IN 46241	Ex: 123456

Instructions: Each Inner Liner will bear a permanent, unique identification number to enable tracking on the Inner Liner form. Columns 1 and 2 are to be completed upon receipt of Inner Liner. Column 3 is to be completed upon installation of the container into the collection receptacle. Column 4 is to be completed upon removal of the container from the collection receptacle. Column 5 is to be completed when the Inner Liner is shipped to Med-Turn. Maintain a copy of the completed "Inner Liner form" and other records, as applicable, on file at the collector's registered location for at least 2 years.

The purpose of this form is to document the use of the Inner Liner throughout a collection event. Although proper use of this form is intended to help the collector meet record keeping requirements, requirements may vary based on the registrant location. It is the responsibility of each registered collector to understand and comply with all federal, state and local regulatory requirements pertaining to take-back pharmaceuticals applicable at the collector's registered location. The Inner Liner form is not a DEA Form 41.


Appendix D: Promotion Material

1. Sample Education Materials



NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

SATURDAY, OCTOBER 26, 2019

POWERED BY  **LIFE IN CHECK™**
CONSUMER DRUG TAKE-BACK

NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY


- Unused or expired prescription medications are a public safety issue, leading to accidental poisoning, overdose, and abuse.
- Pharmaceutical drugs can be just as dangerous as street drugs when taken without a prescription or a doctor's supervision.
- The non-medical use of prescription drugs ranks second only to marijuana as the most common form of drug abuse in America.
- The majority of teenagers abusing prescription drugs get them from family and friends and the home medicine cabinet.
- Unused prescription drugs thrown in the trash can be retrieved and abused or illegally sold. Unused drugs that are flushed contaminate the water supply. Proper disposal of unused drugs saves lives and protects the environment.

TAKE-BACK PROGRAMS ARE THE BEST WAY TO DISPOSE OF OLD DRUGS.

But if a program is not available:

- Take the meds out of their bottles;
- Mix the medicines (do not crush tablets or capsules) with an unpalatable substance such as dirt, kitty litter, or used coffee grounds. This prevents thievery or diversion of medicines from the trash.
- Place the mixture in a container such as a zip-lock or sealable plastic bag, and throw the container away in your household trash.

FOR MORE INFORMATION ON PRESCRIPTION DRUG ABUSE, GO TO:
www.dea.gov
www.getsmartaboutdrugs.com
www.justthinktwice.com

 **LIFE IN CHECK™**
CONSUMER DRUG TAKE-BACK



EVERY DAY IS CONSUMER DRUG TAKE-BACK DAY


Working together to protect our families, communities and environment.

GO TO
RXDISPOSAL.LIFEINCHECK.COM
TO FIND A RECEPTACLE NEAR YOU



HOW IT WORKS

- 1** Pull to open drawer
Hale para abrir el cajón
- 2** Place medications inside
Coloque las medicinas adentro
- 3** Close the drawer
Cierre el cajón



LIFE IN CHECK

SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!

DID YOU KNOW?

192 AMERICANS
die every day from a drug overdose.
¹ahr.gov

46 MILLION
people at minimum, in 24 major American metropolitan areas are exposed to pharmaceutical contaminated drinking water.

83% OF PEOPLE
who misuse prescription pain relievers including opioids get them from a friend, relative or others.
²sanitaxa.gov

2. Sample Authorized Collector Marketing Support

**EVERY DAY IS
CONSUMER DRUG
TAKE-BACK DAY**

**STOP BY TO SAFELY
DISPOSE OF YOUR
UNUSED OR EXPIRED MEDS**

**83% OF PEOPLE WHO MISUSE PRESCRIPTION
PAIN RELIEVERS INCLUDING OPIOIDS GET THEM
FROM A FRIEND, RELATIVE OR OTHERS.**
(WWW.SAMHSA.GOV)

**46 MILLION AMERICANS ARE EXPOSED TO
TRACE AMOUNTS OF MEDICATIONS IN THEIR
DRINKING WATER.**
(ASSOCIATED PRESS)

**SAFELY DISPOSE OF YOUR UNUSED
OR EXPIRED MEDICATIONS HERE**

For more information on safe drug storage and disposal, as well
as information on additional collection options,
visit rxdisposal.lifeincheck.com or call **1-800-123-4567**

SPONSORED BY LIFE IN CHECK

SOCIAL MEDIA

Twitter: Crafting the Perfect Tweet

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1084 x 512 pixels*.

Facebook: Appealing to Your Audience

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn't always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 100 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.

SAMPLE POSTS

Copy and paste the following social media posts into your Facebook or Twitter to spread the word about the importance of properly managing leftover pharmaceuticals and drive people to your location. You can also combine them with some of the facts below to drive awareness of the importance of consumer drug take-back programs. Be sure to add one of the accompanying images and to fill in your location's name.

Announcing our new Consumer Drug Take-Back program to safely dispose of unused medications at OUR LOCATION.

OUR LOCATION wants to help you protect your loved ones, the community and the environment! Now you can dispose of unused meds here.

OUR LOCATION wants to help you protect your loved ones, the community and the environment by offering free unused meds disposal.

Got leftover meds? Drop them off at OUR LOCATION – free and easy.

Visit OUR LOCATION to drop off your leftover meds for free – no questions asked.

Leaving leftover drugs in the home can pose health and environmental dangers. Safely dispose of them today at OUR LOCATION!

Drop off your unwanted prescription and OTC meds in the green box at OUR LOCATION.

Rid your home of dangerous, leftover meds today. Bring them to OUR LOCATION to dispose of them safely – no questions asked!

Do you have leftover drugs in your medicine cabinet? Now you can dispose of them easily and safely at OUR LOCATION.

Safe prescription drug disposal is easy. Just find the green box in OUR LOCATION.

Do the right thing: don't flush your meds. Return leftover drugs to a safe take-back location like our green box at OUR LOCATION.

Do the right thing: don't flush your meds. Bring them to OUR LOCATION for proper disposal.

Protect your community – bring your leftover meds to a safe drug take-back program like ours at OUR LOCATION.

Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.

DID YOU KNOW?
192 AMERICANS
 die every day from a drug overdose.*

AT
EVERYDAY IS CONSUMER DRUG TAKE-BACK DAY

Go to rxdisposal.Lifeincheck.com
 to find a receptacle near you

*cdc.gov

LIFE IN CHECK™

SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!

WE ARE PARTICIPATING!

NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

SATURDAY, OCTOBER 26, 2019

SPONSORED BY LIFE IN CHECK™
CONSUMER DRUG TAKE-BACK DAY

SAMPLE PRESS-RELEASE

Use the template included in the press release folder or copy and paste the below to customize your press release and send out to media outlets in your area.

FOR IMMEDIATE RELEASE

CONTACT:
 [Insert contact name here]
 [Insert contact's title here]
 [Phone number]
 [Contact or program email address]
[Web site url if you have a web site](#)

[insert pharmacy name] announces convenient drug takeback program for leftover household medications

[CITY, STATE, TODAY'S DATE] – **[PHARMACY NAME]** announced today it has established a convenient medication takeback program for easy disposal of leftover, unused and out-of-date prescription and over-the-counter medications.

In an effort to help reduce the risk of drugs in the home that can potentially harm children, teens or adults, **[PHARMACY NAME]** has set up a secure, safe drop-off location in its pharmacy at **[ADDRESS]** in **[CITY NAME]**.

Unused medications in the home are a source of drug abuse in millions of homes, with the opioid crisis in the United States fueled in part by that availability. More than 83 percent of opioid prescription medications taken by new users are obtained from a friend, relative or others. Overall, 192 Americans die every day from a drug overdose.

"We want to provide the folks in our community with the safe, secure opportunity to clean out their medicine cabinets and make their homes and communities safer," said **[NAME OF PHARMACY MANAGER OR OWNER]**, of **[PHARMACY NAME]**. "We want to remind people that they should not flush drugs down the toilet. Traces of drugs can appear in community drinking water. Our drug disposal unit, which is easily accessible in the pharmacy, is a great answer to that problem and it's simple to do. All they do is just come in, look for the big green receptacle and take it from there. Drugs can be dropped off with no questions asked."

[PHARMACY MANAGER/OWNER'S LAST NAME] said there are some things that can't be taken in the receptacle, such as inhalers and needles, but pharmacy staff will be on hand to help determine what to do. The collection receptacle will be available in the pharmacy at **[ADDRESS]**, **[DAYS AND HOURS]**.

[PHARMACY NAME] partnered with Inmar to manage this drug take back program. The company has a long history as the industry leader in handling prescription and over-the-counter drug returns safely, securely and discreetly for major and regional chain drug stores as well as independent pharmacies and hospitals across the U.S.

3. Website Interface and Functionality



CONSUMER DRUG TAKE-BACK PROGRAM

FIND YOUR NEAREST DRUG DISPOSAL LOCATION



Every day in America 1,000+ people are treated in emergency rooms for prescription drug abuse and 192 die from drug overdoses. According to the National Institute on Drug Abuse 18 million people in the U.S. over the age of 12 have misused medications at least once in the past year. The opioid epidemic is impacting communities and families across the US - from rural farm towns to highly populated urban areas and across every demographic.

JOIN US AND HELP FIGHT THE OPIOID EPIDEMIC

LifInCheck Consumer Drug Take-Back is working to help educate Americans on the dangers of leaving prescription drugs unattended in the home. From diminishing the risk of drug abuse to helping protect the environment, disposing of your medications properly makes your community a healthier, safe place. **Simply enter your city and state or zip code and search radius and we will provide a list of safe drug disposal locations in your area.**

LOCATIONS

Location: Distance: **FIND!**

YOUR SEARCH RESULTS:

<p> Southside Discount Pharmacy 3085 Waughtown Street Winston-Salem, NC 27107 Get Directions</p>	<p> Walkertown Family Pharmacy 2905 DARROW RD WALKERTOWN, NC 27051 Get Directions</p>
--	---

SHOW ALL RESULTS

✓ ACCEPTED (ACEPTADOS)

- Unused or expired prescription medication (Including Schedule II-V controlled substances)
Medicamentos con receta no consumidos o vencidos (incluidas las sustancias controladas de clasificación II a V)
- Unused or expired over-the-counter medication
Medicamentos de venta libre, no consumidos o vencidos
- Pet Medication
Medicamentos para mascotas

✗ NOT ACCEPTED (NO ACEPTADOS)

- Schedule I controlled substances
Sustancias controladas de clasificación I
 - Illegal Drugs
Drogas ilegales
- | | | |
|---|--|---|
|  Thermometers
<i>Termómetros</i> |  Inhalers
<i>Inhaladores</i> |  Lotions/Liquids
<i>Lociones o líquidos</i> |
|  Aerosol Cans
<i>Latas de aerosol</i> |  Needles
<i>Agujas</i> |  Hydrogen Peroxide
<i>Agua oxigenada</i> |

IN THE NEWS

May 29, 2018
Inmar Launches LifeInCheck Prescription Drug Plan

October 23, 2018
Inmar Enhances Features To Its LifeInCheck Drug Disposal Program to Help Combat The Opioid Epidemic

October 26, 2018
Blue Cross NC, Inmar and Mutual Drug Provide 85 New Drop-Off Boxes for Safe Medication Disposal on National Take Back Day

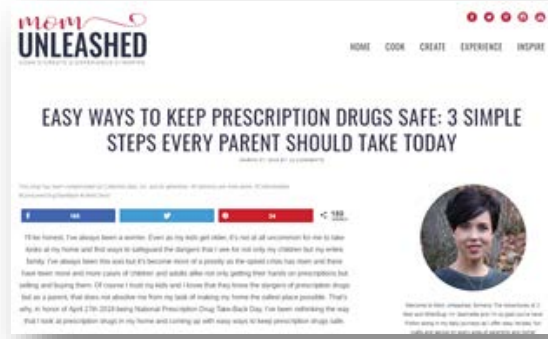


ARE YOU A **PHARMACY OR RETAILER** AND YOU WOULD LIKE TO LEARN MORE ABOUT THE LIFEINCHECK CONSUMER DRUG TAKE-BACK PROGRAM?

CONTACT US 



4. Sample Social Influencer Content



*Geo-targeted ads to store list zip codes and interest targeted ads to key terms such as: caregiver, home care, nursing, nursing home care, pharmacy, substance abuse prevention, rehabilitation hospitals, environmentalism, social responsibility, environmental protection, and social movements



Appendix E: Applicable Permits and Licenses

The following permits have been provided on the following pages:

1. Clean Harbors Board of Pharmacy - Class C - Utah
2. Clean Harbors Controlled Substances
3. Inmar Department of Transportation Special Permit Authorization

License Information

Name:	Clean Harbors Aragonite, LLC
City, State, Zip, Country:	GRANTSVILLE UT 84029 United States
Profession:	Pharmacy
License Type:	Pharmacy - Class C
License Number:	7657561-1710
Obtained By:	Application
License Status:	Active
Original Issue Date:	09/01/2010
Expiration Date:	09/30/2021
Agency and Disciplinary Action*:	YES View Actions
Docket Number:	2015-525

Specialty(s):
Reverse Distributor

Details for Clean Harbors Aragonite, LLC

License Information

Name:	Clean Harbors Aragonite, LLC
City, State, Zip, Country:	GRANTSVILLE UT 84029 United States
Profession:	Pharmacy
License Type:	Limited Controlled Substance-Business
License Number:	7657561-8915
Obtained By:	Application
License Status:	Active
Original Issue Date:	09/01/2010
Expiration Date:	09/30/2021
Agency and Disciplinary Action*:	YES View Actions
Docket Number:	2015-525



U.S. Department
of Transportation

East Building, PHH-30
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

**Pipeline and Hazardous
Materials Safety Administration**

SPECIAL PERMIT AUTHORIZATION

DOT-SP 20255

EXPIRATION DATE: 2021-07-31

GRANTEE: INMAR RX SOLUTIONS, INC.
FORT WORTH, TX

In response to your August 12, 2019 application for party status to DOT-SP 20255 and additional information dated August 22, 2019, INMAR RX SOLUTIONS, INC. is hereby granted party status to DOT-SP 20255 as a shipper only in accordance with 49 CFR 107.107.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at <http://www.phmsa.dot.gov/hazmat/regs/sp-a/special-permits/search>. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, Approvals and Permits Division at (202)366-4535.

Issued in Washington D.C. on **September 04, 2019**.

for William Schoonover
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2019085496 DUNS Number on file: 613608574

Appendix F: Compliance Matrix

Citation	Summary of Applicable Requirements	Plan Sections	Page #
Chapter 4.116.040--Stewardship Plans - Components			
4.116.040(a)	Contact Information	II	05
4.116.040(b)	Collection System Description	III	06-12
4.116.040(c)	Handling & Disposal System Description	IV	13
4.116.040(d)	Policies & Procedures Description	V	14-16
4.116.040(e)	Patient Privacy	VI	17
4.116.040(f)	Public Education Effort & Promotion Description	VII	18-22
4.116.040(g)	Short-term & Long-term Goals	VIII	23
4.116.040(h)	Additional Plan Considerations	IX	24
Chapter 4.116.050--Stewardship Plans – Collection of Covered Drugs			
4.116.050(b)(1)	Reasonable Convenient & Equitable Access	III.A	06
4.116.050(b)(2)	Safe & Secure Systems	III.E	12
4.116.050(b)(3)	Drop-Off Site Preference	III.F	12
4.116.050(b)(4)	Collector/Drop-Off Site Inclusion	III.F	12
4.116.050(b)(5)	Mail-Back Services	III.C	10-11
4.116.050(c)	Drop-Off Sites at County-Owned Pharmacy	III.G	12
4.116.050(d)	Drop-Off Site Hours & Bins	III.G	12
Chapter 4.116.060--Stewardship Plans – Promotion			
4.116.060(a)(1)	Promotion	VII.A	18
4.116.060(a)(2)	Clear Standardized Instructions	VII.B	18
4.116.060(a)(3)	Toll-Free Number & Website	VII.C	19
4.116.060(a)(4)	Biennial Survey	VII.D	21
4.116.060(b)	Language Translation Requirements	VII.E	22
4.116.060(c)	Single System of Promotion	VII.F	22
Chapter 4.116.070--Stewardship Plans – Disposal of Covered Drugs			
4.116.070(a)	Hazardous Waste Disposal	IV	13
4.116.070(b)	Petition for Alternate Disposal	IV	13
4.116.070(c)	Final Disposal Technologies	IV	13
Chapter 4.116.090--Stewardship Plans – Reporting Requirements			
4.116.090(a)(1)	Participating Producer List	X	25

4.116.090(a)(2)	Amount, by Weight, of Collected Covered Drugs		
4.116.090(a)(3)	Drop-Off Site List	X	25
4.116.090(a)(4)	Number of Mailers Provided for Disabled and/or Home-Bound County Residents	X	25
4.116.090(a)(5)	Locations Mailers Provided	X	25
4.116.090(a)(6)	Collection Events Dates & Locations	X	25
4.116.050(a)(7)	Transporters and Disposal Facilities	X	25
4.116.090(a)(8)	Safety & Security	X	25
4.116.090(a)(9)	Public Education, Outreach & Evaluation Activities	X	25
4.116.090(a)(10)	Recycling	X	25
4.116.090(a)(11)	Goals	X	25
4.116.090(a)(12)	Expenditures	X	25
4.116.090(b)	Report Availability	X	25
4.116.090(c)	Reporting Period	X	25

Appendix G: Resumes



Domingo Isasi

Vice President, Consumer Drug Take-Back Solutions

Domingo Isasi, the Vice President and General Manager of Consumer Drug Take Back Solutions at Inmar has more than 20 years of global business leadership experience in Pharma, Reverse Logistics, Technology, Financial Services and the Aerospace and Defense industries.

Domingo's roles at Inmar include leading Inmar's Process Excellence, Mergers & Acquisitions, and Digital Operations divisions. Domingo began his career with 8 years in Law Enforcement, first as a Police Officer then as a Special Agent with the North Carolina State Bureau of Investigations.

Domingo's professional development and training lead to his certification as a Master Black Belt in Six Sigma, Lean Master, and a Project Management Professional, including training in Japan with Toyota and the Shingo Institute.

Domingo has successfully lead business units in driving long term value across the globe including as Chief Operating Officer with assignments in Canada, Mexico, Brazil, Australia, New Zealand, China, Japan, and the United Kingdom.

Domingo received his Bachelor's Degree in Behavioral and Social Sciences from the University of Maryland College Park and his Master of Business Administration in International Business from Wake Forest University.



Ashley Schmidt

Director, Regulatory and Compliance

Experience

5+ Years of Client Account Management Experience

5+ Years of Supporting Client Services for New Product Growth

Director, Regulatory and Compliance

- Develops and directs a strong team of 20+ regulatory compliance analysts on activities related to pharmaceutical reverse distribution and consumer drug returns
- Oversees company compliance activities related to DEA, State Boards of Pharmacy, FDA, EPA, Safety and Security for company facilities
- Provide guidance and direction to operations teams on matters regarding regulatory compliance
- Directs implementation and execution of regulatory compliance policies
- Ensures a comprehensive understanding of existing requirements and ongoing monitoring of new requirements.
- Performs in-depth review and inspection of all compliance policies and procedures to ensure minimal risk for facilities while still allowing the warehouses to effectively conduct business and serve their clients.
- Advocates for regulatory matters affecting the supply chain

Director, Healthcare Client Accounts - Inmar (November 2016 – present)

- Lead a team tasked with managing retail enterprise clients and expanding services to ensure that Inmar is delivering value and aligning with strategic client initiatives
- Manage large strategic retail and wholesale accounts
- Manage client renewal strategies and contract negotiations
- Prioritize needs of multiple accounts and direct client account teams accordingly
- Effectively assess at risk clients and create tactical plans for maintaining and growing business
- Develop and lead Account Management team training
- Lead and manage new client implementations
- Analyze and utilize reporting to provide customer business insights
- Provide analytical results for support of client business needs including but not limited to quarterly Business Reviews
- Provide client services support and insight on company-wide projects, including new product growth

Account Manager - Inmar (January 2012 – April 2014)

- Develop and maintain relationships with strategic clients at all levels to ensure that Inmar is delivering value and exceeding service expectations

- Manage large strategic retail and wholesale accounts
- Position and execute client renewal strategies and negotiations
- Prioritize needs of multiple accounts and direct client account teams accordingly
- Effectively assess at risk clients and create tactical plans for maintaining and growing business
- Develop and lead Account Management team training
- Manage new client implementations
- Analyze and utilize reporting to provide customer business insights
- Provide key Web-tool change management training during on-boarding as determined by the client's business goals
- Provide analytical results for support of client business needs including but not limited to quarterly Business Reviews
- Provide client services support and insight on company-wide projects, including new product growth

Business Development Manager – Inmar (April 2008 – January 2011)

- Closed and realized new and renewal revenue in Pharmacy Financial Management market segments meeting or exceeding goals each year
- 2010 Sales Achievement Award Winner
- Developed and maintained relationships with executive level contacts industry-wide and within assigned client base
- Demonstrated on-going value of services offered to customers
- Successfully renegotiated 3-year contract renewal and managed client relationship with largest PRISM client (annual revenue of \$1.6 million)
- Maintained a high level of knowledge regarding industry competitors and trends in the marketplace
- Led the 2010 launch and conversion rollout of a new product to largest PRISM client generating additional revenue more than doubling Inmar revenue from client
- Provided training and on-going support of PRISM's Web tool, Spectrum to new and existing clients
- Contributed to editing and writing of client communication with regard to products, services and training documents
- Demonstrated ownership, above average work ethic and high level of professionalism and teamwork with co-workers
- Provided Quarterly Business Reviews ensuring customers had clear results of third-party receivable metrics and comparables to industry peers

Certifications

- HIPAA – Fraud Waste and Abuse Certification

Education

Masters of Studies in Law, Wake Forest University – On pace to graduate in May 2019

B.S., Psychology, Appalachian State University



Kirk Herweck

**Director Product & Strategy
Rx Returns and Workplace Solutions**

Experience

10+ years – Product Strategy

Director Product & Strategy Rx Returns & Workplace Solutions (November 2014 – present)

- Responsible for overall market strategy for Rx Returns working with hospital, retail and manufacturers services.
- Lead the team by focusing the product strategy team's creative spirit on solving market problems by leveraging organization's distinctive competencies to create new products at the inception stage.
- Lead team and ensure that all departments are prepared for new product releases and all items are completed to launch the product externally.
- Directing key areas within the product lifecycle for products, including market research, product definition focus, business planning, planning and development, programs, launch readiness and sales support.
- Lead a team of product managers, marketing managers, product intelligence analysts within the product lifecycle.

Vice President, Business Development – EXP Pharmaceutical Services (June 2003 – November 2014)

- Led the development of business plans by performing an objective analysis of a potential market opportunity. Worked with finance team to develop the financial model. Provided oversight for team implementation including migrating to Agile methodology
- Led the definition of the product by describing the product by its ability to solve market problems including features and capabilities of what it delivers
- Worked directly with senior leadership to cut operational costs and increase performance

Education

B.A., Behavioral Science, Missouri Baptist University

Appendix H: Recommendation Letters



BlueCross BlueShield of North Carolina

In 2018, Blue Cross and Blue Shield of North Carolina (Blue Cross NC) announced a [commitment of \\$10 million and key policy changes](http://mediacenter.bcbsnc.com/news/blue-cross-nc-to-invest-50-million-in-community-health-initiatives) (<http://mediacenter.bcbsnc.com/news/blue-cross-nc-to-invest-50-million-in-community-health-initiatives>) to address the opioid epidemic. Our focus on prevention is the foundation of our community investments. Our collaboration with Mutual Drug member pharmacies and Inmar to provide new drop-off facilities across the state of North Carolina for the safe disposal of unused or unwanted prescription medications is huge step providing North Carolinians an easy and safe way to dispose of drugs.

While Take Back Day normally occurs only twice a year, Blue Cross NC's investment funded approximately 85 new medication drop-off sites in North Carolina that will be accessible to consumers year-round. Mutual Drug coordinated with their independent pharmacies across North Carolina to place the Take Back Day drop boxes in locations across the state. The new box locations will allow residents in 75 North Carolina counties to safely dispose of excess medications. By partnering with smaller independent pharmacies for box placement, the drop off locations will reach parts of the state that may not have easy access to medication disposal resources.

Blue Cross NC has been impressed with the ease of on-boarding and roll-out of the program. Inmar has been an excellent partner facilitating the logistics of the returns including contracting with each location, placement of the boxes and overseeing the entire project start to finish. Our reasons for choosing Inmar include the DEA and ADA compliant receptacle designed to be easy to use and having a small foot-print, the all-inclusive supplies for regular returns and the marketing materials available to support the program.

I have personally enjoyed working with Inmar and have found them to be a valued organization for this investment.

Thanks

A handwritten signature in black ink that reads "Cheryl O. Parquet".

Cheryl Parquet

Director, Community and Diversity Engagement

Cheyl.parquet@bcbsnc.com

919-765-4197

April 16, 2019

In April 2018, Mutual Drug met with Blue Cross Blue Shield of North Carolina to develop a partnership where BCBSNC would place Medication Take Back Boxes in Mutual Drug stores. However, to make this alliance successful, we needed a partner who would facilitate the logistics of the returns including the contracting, placement of the boxes, and oversight of the process. Having previous experience with Inmar and understanding of their Take Back Box Program, we invited them to join us on the project. Inmar worked with us on every step of the project and helped to provide insight and direction in a very complementary manner. We began the rollout in early 2019 and the initial reaction from our member stores was terrific. This project received considerable publicity in North Carolina as the effort encompasses 85 stores in 75 counties. Inmar has been receptive to our every request and has worked as our partner to make this project successful.

We are excited about our partnership with Inmar and highly recommend their services.

Gray Stewart, RPh | Director of Pharmacy Professional Services
direct: 919.598.4971 | gstewart@mutualdrug.com



THANK YOU.

INMAR.COM

[linkedin.com/company/inmar/](https://www.linkedin.com/company/inmar/)

635 Vine Street,

Winston-Salem, NC 27101