



**SAFE MEDICINE DISPOSAL PROGRAM:
 GUIDANCE FOR THE IMPLEMENTATION OF A SINGLE SYSTEM OF PROMOTION AND
 PROGRAM GOALS**

I. Authority

Pursuant to the San Mateo County Ordinance No. 04736 for Safe Medicine Collection ("Ordinance") sections 4.116.060(c) and 4.116.140 (b), the Director of San Mateo County Environmental Health Services ("Director") shall provide guidance on the development of a single system of promotion and work with the Stewardship Organization(s) to define goals for collection amounts, education, and promotion for a Stewardship Plan.

II. Scope

This guidance document applies to any producer participating in a Stewardship Plan or Stewardship Organization designated by a Producer or group of Producers to act as an agent on behalf of one or more Producers to develop and implement and operate a Stewardship Plan, which has been approved, or submitted for review by the Director under the Ordinance.

The County of San Mateo is dedicated to advancing equity. The Ordinance requires the Stewardship Plan(s) to provide reasonably convenient and equitable access for County residents in all supervisorial districts to meet the convenience goals pursuant to Section 4.116.050(b). Outreach must come from an equity lens considering race, ethnicity, socioeconomic status, etc., to develop and implement outreach encouraging residents to reach their full potential by addressing health disparities, e.g., language barriers and lack of access to health care.

This guidance document must be implemented along with the requirements of the Ordinance.

III. Stewardship Plan Goals

1. All Stewardship Plan(s) must meet the following requirements for convenient and equitable access to County residents:
 - a. The location of the drop-off sites and/or mail-back distribution sites shall be evenly dispersed across the County and each supervisorial district to provide equitable access for residents.
 - b. The Director will provide feedback to the Stewardship Organization(s) on geographical areas that need to be served to address specific needs regarding equity; for example, areas with low scores on the [Healthy Places Index \(HPI\)](#).
 - c. In populated areas with no access to drop-off sites or mail-back distribution sites within five miles, the Stewardship Plan(s) shall implement joint collection events at least annually to provide convenient access for residents.



2. Collection amounts

- a. Stewardship Organization(s) or its representatives shall service drop-off sites for the collection, replacement, and shipment of containers with Unwanted Covered Drugs in compliance with applicable laws and regulations. The frequency for collection will be set based on the generation patterns of each location. In addition, Stewardship Organization(s) shall establish methods for the collector to request this service in the event that the kiosk fills up in a shorter period. The expedited service must be provided within 48 hours.
- b. The collector may be allowed to self-service the drop-off sites for the collection, replacement, and shipment of containers with Unwanted Covered Drugs if they can provide a more expedited service than the service described above, comply with applicable law and regulations, and receives required training from the Stewardship Organization.
- c. Stewardship Organization(s) will routinely verify compliance with laws and regulations and timeframes and procedures for the service of the kiosks.

3. Education goals

- a. Stewardship Plan(s) must jointly design and distribute promotional material.
- b. At least every two years, all Stewardship Organization(s) shall review existing outreach material to update the design and content based on the evaluation of media and public outreach, results of the biennial survey, and feedback provided by the Department and stakeholders. Outdated printed outreach materials shall be replaced within one year after the last update.
- c. Persons handling unwanted covered drugs collected under the Stewardship Plan must possess the required training to operate in compliance with policies and procedures when handling unwanted covered drugs under the Stewardship Plan. Stewardship Organization(s) shall:
 - i. Implement routine assessments to verify compliance with training requirements for collectors, transporters, and waste disposal facilities at least annually. Training records shall be maintained and made available.
 - ii. Provide collectors with a mechanism to complete applicable training when handling unwanted covered drugs at no cost to collectors.
 - iii. Establish a system to ensure collectors complete the applicable training before handling any unwanted covered drugs, or as required by a regulatory requirement, whichever is sooner, and

4. Promotion goals

- a. The promotion effectiveness of the Stewardship Plan(s) shall be measured by the target audience's awareness of the Safe Medicine Disposal Program, which will be measured in the Biennial Survey as described in Section 4.116.060(a) of the Ordinance.
- b. The minimum awareness goal shall be 50% of the total survey participants shall be aware of the collection program.



IV. Single Promotion System

1. Stewardship Plan(s) shall use a variety of outreach tactics to ensure County residents and pharmacists, retailers of Covered Drugs, and health care practitioners, including doctors and other prescribers, veterinarians, and veterinary hospitals, are reached within the promotion system. Examples of outreach tactics include, but are not limited to:
 - Traditional marketing: Print ads, e.g., local newspapers, direct mail, billboards, radio ads, in-person event tabling, and cold-calling
 - Digital Marketing: Social media (e.g., Facebook, Twitter, Instagram, Nextdoor), emails, blog posts, search engine optimization, digital ads (e.g., Google ads), and influencer marketing.
2. The Stewardship Organization(s) shall coordinate to offer pharmacists, retailers of Covered Drugs, and health care practitioners, including doctors and other prescribers, veterinarians, and veterinary hospitals, printed outreach material, including but not limited to posters, brochures, and cards, to be distributed and/or displayed for their customers to promote the Stewardship Plan(s) collection options. The following should be accomplished:
 - a. Printed outreach material should include, at a minimum, the following information:
 - Proper and safe storage methods of unwanted covered drugs before disposal,
 - Prohibited ways to dispose of unwanted covered drugs,
 - Description of how to safely dispose of unwanted covered drugs under the Stewardship Plan(s),
 - Description of how to return unwanted covered drugs under the Stewardship Plan(s),
 - The location of drop-off sites and/or mail-back distribution sites under the Stewardship Plan(s), and
 - Materials designed to be displayed, such as posters, can be in English but need to include language to redirect non-English speakers to the program website.
 - b. Pharmacists, retailers of Covered Drugs, and health care practitioners, including doctors and other prescribers, veterinarians, and veterinary hospitals, should be contacted at least annually to ensure printed materials provided are available and accessible for their customers. Stewardship Organization(s) will keep records to demonstrate these efforts.
 - c. Printed outreach material shall be accessible for their customers in high-traffic areas, e.g., storefronts, lobbies, and waiting areas.
 - d. Implement a system to identify new pharmacists, retailers of Covered Drugs, and health care practitioners, including doctors and other prescribers, veterinarians, and veterinary hospitals to be reached annually for this purpose.
 - e. The Director, upon request, can provide a list of locations that should be offered materials that will supplement the list above.
3. All Stewardship Plan(s) must coordinate to implement a consistent design of collection bins. The signage on collection bins must include, at a minimum, a list of accepted and not accepted waste, instructions on how to use the kiosk, a toll-free telephone number, and single website URL



address, the name of the drop-off location and phone number, the opportunity to obtain an injector Mail-Back Package, and language to redirect non-English speakers to the program website.

4. All Stewardship Plans shall coordinate with each other and develop a single toll-free telephone number with the following characteristics:
 - a. Call center shall have representatives answering calls twenty-four hours a day, seven days a week.
 - b. Provides support in English, Spanish, Chinese, and Tagalog at a minimum.
 - c. Supports residents with hearing or speech impairment through a teletype (TTY or TDD, Telecommunications Device for the Deaf) device or similar technology.
 - d. Inform the resident of the location of the drop-off kiosks, allows them to request mail-back services, and receive reports of issues with the collection system.

5. All Stewardship Plans shall coordinate with each other and develop a single website with the following characteristics:
 - a. Utilizes a single website URL for residents to access the website.
 - b. Inform the resident of the single toll-free number, location of the drop-off kiosks, and mail-back sites for all Stewardship Plans, allowing residents to request mail-back and report issues with the collection system.
 - c. The website platform must be desktop and mobile-friendly and ADA-compliant.
 - d. Update website information regularly. Critical information regarding the operation of drop-off and mail-back distribution sites, such as non-operational sites, must be updated within 48 hours.

6. All Stewardship Plans shall coordinate and conduct the biennial survey described in Section 4.116.060(a) of the Ordinance. Surveys should be distributed to capture a representative sample of the County's overall population and should be available in multiple formats to address equity, e.g., digital survey forms, mailed surveys, and in-person canvassing.

ADOPTED by the Director, Heather Forshey, Environmental Health Services, on May 12, 2023:

May 4, 2023

Nicolas Saenz

APPROVED as to form and legality, Nicolas Saenz, San Mateo County Counsel