



County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

SACHI A. HAMAI
Chief Executive Officer

Board of Supervisors
HILDA L. SOLIS
First District

MARK RIDLEY-THOMAS
Second District

SHEILA KUEHL
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

June 7, 2016

To: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Sachi A. Hamai
Chief Executive Officer

Cynthia A. Harding, M.P.H.
Interim Director, Public Health

Gail Farber
Director, Public Works

RESPONSE TO A MOTION BY SUPERVISOR MICHAEL D. ANTONOVICH ON THE COLLECTION AND DISPOSAL OF UNWANTED PHARMACEUTICAL DRUGS AND SHARPS (MAY 17, 2016, AGENDA ITEM NOS. R-1, 14, AND 57)

On May 17, 2016, the Board of Supervisors approved a motion continuing Agenda Item Nos. R-1, 14, and 57 to June 14, 2016, to permit the Extended Producer Responsibility (EPR) Working Group, in consultation with County Counsel, to work with the California Retailers Association, pharmaceutical manufacturers, sharps manufacturers, and the County's Health Agency on expedited implementation of more immediate options for take-back of medications and sharps, including sponsoring take-back events, hosting collection bins, offering mail-back services, and offering public education and outreach on the proper usage and disposal of medications and sharps to prevent these items from entering our landfills or contaminating our ground water; and report back on a proposed plan, including any recommended changes to the Ordinance that may be required by June 14, 2016.

Per the Board motion, the EPR Working Group and County Counsel met on May 24, 2016 with representatives from the California Retailers Association, pharmacies, pharmaceutical manufacturers, sharps manufacturers, the County's Health Agency, and consulting firms representing the pharmaceutical and sharps manufacturers. The Board Report, Attachment 1, is based on the meeting and input from other stakeholders that have been involved in the

"To Enrich Lives Through Effective And Caring Service"

Please Conserve Paper – This Document and Copies are Two-Sided
Intra-County Correspondence Sent Electronically Only

EPR process. The Report identifies current and proposed pharmaceutical and sharps disposal options, including the advantages and disadvantages of the proposed options; the three options identified by the EPR Working Group; and the preferred option recommended for Board consideration.

Feedback from Retailers and Pharmacies

The retailers and pharmacies were potentially open to limited participation in County or manufacturer sponsored take-back events, provided that law enforcement participates, as required by the Drug Enforcement Administration (DEA) regulations. They would also continue to offer customers the ability to purchase mail-back envelopes and containers for disposal of pharmaceutical and sharps products. The retailers and pharmacies were open to an expanded education and outreach program sponsored and financed by the manufacturers and/or the County. Additionally, CVS Pharmacy offers a grant to law enforcement agencies for the purchase of collection bins and they are also looking into whether or not the grant can be offered to the County's Health Agency. The grant does not provide for disposal or destruction of pharmaceutical products. Walgreens currently hosts collection bins at their seven pharmacies that operate 24 hours a day/seven days a week, but does not have any plans to install additional collection bins at other locations at this time. Three of the seven Walgreens pharmacies meet the Ordinance convenience standard for serving unincorporated area residents.

Feedback from Pharmaceutical and Sharps Manufacturers

The manufacturers currently offer education and outreach programs in other jurisdictions. They offered a similar program to the County, funded for a three-year period, *in lieu of* the Board passing an Ordinance. Also the manufacturers would provide grant funding for law enforcement services at County sponsored take-back events. The manufacturers have not determined the specific amount of the grant as yet. The "Los Angeles County Pharmaceutical & Sharps Safe Disposal Education Initiative," detailed in Attachment 2, represents the manufacturers' proposal for the County and focuses on consumer education about pharmaceutical and sharps disposal through: 1) existing take-back locations in the County, e.g. 21 Sheriff stations, ten public health clinics, nine Household Hazardous Waste centers, and 37 other sharps disposal locations; 2) DEA or County sponsored take-back days; and 3) "in-home" processing of medication for trash collection and disposal in landfills, should a consumer not want to use the existing County collection bin programs or participate in take-back event days.

Feedback from the County's Health Agency

As stated above, Public Health currently has ten public health clinics that accept sharps waste. Additionally, the Health Agency offered to host collection bins at their four hospitals and nine health clinics with on-site pharmacies, provided that the collection bins are funded by retailers or manufacturers. Manufacturers would need to be responsible for disposal and destruction of any pharmaceutical or sharps products collected at County health facilities.

Options Considered by the EPR Working Group

Based on the input from the manufacturers, retailers, and Health Agency, as well as feedback from other stakeholders, the EPR Working Group considered three options for expedited implementation of the drug and sharps take-back program:

Option 1: *Amend the Ordinance to require a public education and outreach campaign within 60 days of the effective date of the Ordinance; and quarterly take-back events within 90 days of the effective date of the Ordinance.*

The Ordinance would require that the public education and outreach campaign be approved by the Director of Public Health. The quarterly take-back events would be required until the implementation of an approved stewardship plan. The quarterly take-back event days would cover all five Supervisorial Districts and need to serve a minimum of ten unincorporated area communities. Responsible Stewards would select from a list of Unincorporated Communities pre-approved by the Director as potentially suitable service locations for sponsoring quarterly collection events. To the greatest extent feasible, Responsible Stewards would sponsor an equivalent number of quarterly collection events in each Supervisorial District. The date, location, hours, and plan for each collection event would be submitted to the Director for approval at least 30 days in advance of each event. Quarterly collection events could not be held in the same month as DEA-sponsored take-back event days.

Option 2: *County sponsorship of two pharmaceutical and sharps take-back event days during Fiscal Year 2016-17.*

In Fiscal Year 2016-17, Public Works, with participation from the Sheriff and Public Health, would sponsor two take-back event days with up to ten locations per event day serving the County unincorporated areas. The County departments involved would also promote these take-back events through outreach and education to residents. Upon approval of the Implementation Plan(s), pursuant to the Ordinance, ongoing take-back events would be sponsored by the Responsible Steward(s) as part of their comprehensive take-back program.

Option 3: *Amend the Ordinance to shorten the timeframe for submittal of Stewardship Plans by the Responsible Stewards from nine months to six months.*

Currently, the Ordinance provides Responsible Stewards, individually or collectively, nine months to prepare and submit a plan to the County. Under this option, the timeframe would be reduced to six months.

Recommended Option

The EPR Working Group is recommending that the County implement Option 1 to expedite the take-back program and meet the goals of EPR, consistent with the directive of the August 11, 2015

Each Supervisor
June 7, 2016
Page 4

Board motion. Option 2 would require County departments to commit County funds and is not consistent with the goals of EPR. At the May 24, 2016 meeting, the pharmaceutical and sharps manufacturers expressed concerns that Option 3 would not provide adequate time for the Responsible Stewards to collaborate with the numerous manufactures, retailers and other entities to develop Stewardship Plans and begin implementation of the County's drug and sharps take-back program. Therefore, Option 1 is the preferred option recommended by the EPR Working Group.

SAH:JJ:DPH:DSB
DSP:MJS:acn

Attachments (2)

c: Executive Office, Board of Supervisors
County Counsel
Sheriff
County Sustainability Council
Health Services
Internal Services
Mental Health
Public Health
Public Works
Sanitation Districts of Los Angeles

**REPORT IN RESPONSE TO THE BOARD OF SUPERVISORS MOTION OF MAY 17, 2016
ON IMMEDIATE OPTIONS FOR EXPEDITED IMPLEMENTATION OF THE COUNTY'S
DRUG AND SHARPS TAKE-BACK PROGRAM**

INTRODUCTION

On May 17, 2016, the Board of Supervisors approved a motion continuing Agenda Item Nos. R-1, 14, and 57 to June 14, 2016, to permit the Extended Producer Responsibility (EPR) Working Group in consultation with County Counsel, to work with the California Retailers Association, pharmaceutical manufacturers, sharps manufacturers, and the County's Health Agency on expedited implementation of more immediate options for take-back of medications and sharps, including sponsoring take-back events; hosting collection bins; offering mail-back services; and offering public education and outreach on the proper usage and disposal of medications and sharps to prevent these items from entering our landfills or contaminating our ground water; and report back on a proposed plan, including any recommended changes to the Ordinance that may be required by June 14, 2016.

The Board motion was introduced to provide take-back options available to residents as soon as possible recognizing that the proposed take-back Ordinance, once adopted, will take thirty days to become effective; and thereafter manufacturers will have nine months to submit a proposed Stewardship Plan. Upon Plan approval, manufacturers will have another three months to implement the Plan; meaning it will be a minimum of 13 months before adequate take-back options become available to residents.

MEETING WITH RETAILERS AND MANUFACTURERS

In response to the Board motion, a meeting was held on May 24, 2016 with the California Retailers Association (CRA) and some of their members, including representatives from CVS and Walgreens; organizations representing pharmaceutical manufacturers including the Pharmaceutical Research and Manufacturers of America (PhRMA), Consumer Health Products Association (CHPA), Generic Pharmaceutical Association (GPhA), Biotechnology Innovation Organization (BIO), and California Life Sciences Association (CLSA); sharps manufacturers and representative organizations including the Advanced Medical Technology Association (AdvaMed) and Medtronic; consulting firms representing the pharmaceutical and sharps manufacturers including EK & Ek, Cerrell Associates, Knabe, Englander and Associates, Arnie Berghoff & Associates; and the EPR Working Group which included members from the Health Agency, Public Works, the Chief Executive Office, Sheriff's Department, County Counsel, and the Sanitation Districts of Los Angeles County.

At the meeting, the May 17, 2016 Board motion was discussed, including the plan that needed to be prepared and changes to the Ordinance that may be required, pursuant to the Board motion. There was a brainstorming session on potential options that could be implemented quickly. The meeting provided an open environment encouraging participants to share ideas and options focused on an expedited implementation process. Prior to the conclusion of the meeting, the options presented were reviewed to ensure that the report to the Board would capture the ideas and positions of each affected stakeholder group. The following expresses the represented stakeholders' discussions and options offered to expedite the take-back program as well as input from other stakeholders that have participated in this EPR process.

FEEDBACK FROM CRA, CVS AND WALGREENS

Current Approach to Pharmaceutical and Sharps Take-Back:

The representative from CRA expressed that some of its members, including CVS and Walgreens, currently participate in take-back events sponsored by the federal Drug Enforcement Administration (DEA). They also provide education and outreach materials to their customers on pharmaceutical and sharps disposal. Additionally, Walgreens recently launched a program to host collection bins for medications at approximately 500 retail locations nationwide, seven of which are located in Los Angeles County. Three of the Walgreens locations meet the Ordinance convenience requirements in serving the County's unincorporated areas. The representative stated that Walgreens does not have plans for installing additional collection bins at their remaining 108 locations in the County at this time.

Representatives from CVS discussed its current grant program. The grant program funds collection bins for law enforcement agencies. However, CVS does not cover the cost of collection and disposal of the waste materials; these costs would need to be borne by the law enforcement agencies. The representatives stated that CVS does not have current plans to voluntarily install collection bins at their store locations.

The CRA noted that several of its members currently offer mail-back envelopes for sale, at approximately \$5 per envelope, for proper disposal of pharmaceutical waste. The price of the envelope also covers the disposal cost to retailers. The envelopes are only offered upon the request of a customer. The pharmacies also offer containers for sharps disposal and for "in-home" drug disposal.

Proposed Options:

- CVS stated that it would consider providing collection bins to County hospitals and health clinics, with on-site pharmacies, that have security personnel, as required by the DEA.
- CRA, Walgreens, and CVS were open to an expanded education and outreach program sponsored and financed by the manufacturers and/or the County.
- The retailers and pharmacies were potentially open to limited participation in County or manufacturer sponsored and financed take-back events.
- Retailers could make mail-back envelopes available to customers at no cost, if the manufacturers or County were to cover the cost.
- CRA noted that it could further encourage their customers to purchase mail-back envelopes.

Advantages:

- County hospitals and health clinics, with on-site pharmacies, could obtain the collection bins free of charge, if CVS determines it can provide the bins and remain in compliance with DEA regulations.

- It is possible that more customers would purchase mail-back envelopes with additional encouragement from pharmacies.
- Potential participation of pharmacies as collection sites, in or near the unincorporated areas, would provide convenience for consumers.

Disadvantages:

- Collection and disposal of the pharmaceutical and sharps waste from County hospitals and health clinics, with on-site pharmacies, would require manufacturer financing that cannot be implemented without the adoption of an EPR Ordinance. However, note that once adopted, the Ordinance does not require Responsible Stewards to place collection bins at County hospitals and health clinics with on-site pharmacies.
- County hospitals and health clinics, with on-site pharmacies, are limited in number and most are not located within the unincorporated areas of the County.
- Consumers would have to pay for the mail-back envelopes, impacting participation. This is also not consistent with the August 11, 2015 Board motion to provide safe, convenient, and financially sustainable take-back options for consumers.

FEEDBACK FROM PHARMACEUTICAL AND SHARPS MANUFACTURERS

Current Approach to Pharmaceutical and Sharps Take-Back:

The pharmaceutical and sharps manufacturers propose to voluntarily implement an education and outreach plan in Los Angeles County that they have implemented in other jurisdictions. This proposal is being offered *in lieu of* the Board's adoption of the Ordinance.

Proposed Options:

- The manufacturers were open to providing grant funding for law enforcement services, for a period of three years, at County sponsored take-back events. The amount of the grant was not specified at the meeting.
- The manufacturers would sponsor the "Los Angeles County Pharmaceutical & Sharps Safe Disposal Education Initiative," detailed in Attachment 2. This program is focused on consumer education about pharmaceutical and sharps disposal, specifically highlighting the following options:
 1. Existing collection locations in the County, e.g. 21 Sheriff stations, ten public health clinics, nine Household Hazardous Waste (HHW) centers and 37 other sharps disposal locations;
 2. DEA or County sponsored take-back events; and
 3. "In-home" processing of medication for trash collection and disposal in landfills.

A substantially similar option was previously presented to the Board Offices and the EPR Working Group. Two adjustments were made to the manufacturers' proposal:

- Rather than primarily promoting “in-home” trash disposal of unwanted pharmaceutical waste, the new campaign would first encourage residents to make use of existing take-back programs, such as collection bins funded by the County and take-back events sponsored by the DEA or the County, while encouraging trash disposal as the third option; and
- Offset a portion of the additional costs associated with promoting the County’s take-back and collection bin program through a three-year grant to the Sheriff. The grant-funding amount to be provided to the Sheriff was not specified. Additionally, the outreach and education plan would require further collaboration with the County to ensure that residents are offered a robust education and outreach campaign that promotes environmentally sustainable options.

The manufacturers indicated that the mail-back option was too expensive for further consideration.

Advantages:

- Many aspects of this proposal could be launched in 30 to 60 days.
- This proposal would offset an unspecified portion of the Sheriff’s increased costs for a three-year period.

Disadvantages:

- The EPR Working Group is opposed to any education and outreach program that promotes “in home” disposal in the trash that ultimately will be disposed of in landfills, potentially prove harmful to the environment, and pose health and safety risks to County constituents.
- This proposed Option is being offered *in lieu of* the Ordinance and is limited to a three-year period. As such, it would not provide County residents with a long-term solution for a safe, convenient, and sustainably financed option for collection and disposal of pharmaceutical and sharps waste, per the directive of the Board's August 11, 2015 motion.
- An outreach and education option does not provide a comprehensive EPR program.
- The Sheriff’s collection program is already beyond capacity. Expansion would require taking valuable resources away from the Sheriff’s main mission and responsibility of providing law enforcement services in the County.
- Additional education and outreach will further increase participation without the assurance of an ongoing long-term funding source for the Sheriff.
- The 21 Sheriff’s collection bins, 10 public health clinics, nine HHW centers and 37 non-County operated sharps collection sites do not meet the convenience standards stipulated in the Ordinance and are not sufficient to serve the one million unincorporated area residents and ten million County residents.

FEEDBACK FROM THE COUNTY'S HEALTH AGENCY

Current Approach to Pharmaceutical and Sharps Take-Back:

Currently, the Health Agency partners with the Department of Public Works (DPW) to participate in the Countywide Sharps Waste Management program; 14 public health clinics offer free sharps containers to County residents and 10 of these clinics also accept filled sharps containers from residents for disposal.

Proposed Options:

The Health Agency stated it does not have funding to sponsor independent take-back events, however, the Agency could:

- Host collection bins at the four County hospitals and nine health clinics, with on-site pharmacies, provided that the manufacturers fund the bins, and the collection and disposal of the pharmaceutical and sharps waste.
- Distribute mail-back envelopes, provided that manufacturers cover the cost of the envelopes, postage and disposal of the envelopes at an appropriate facility.
- Participate in County outreach and education efforts promoting existing take-back programs, including: 1) collection bins hosted by the Sheriff, Walgreens, independent pharmacies, and other locations; 2) County distribution of State-approved sharps containers for disposal at designated collection sites; and 3) County-sponsored take-back event days.

Advantage:

- Participation by the Health Agency to host collection bins, distribute mail-back envelopes, and participate in existing outreach programs would provide immediate options for pharmaceutical waste collection which furthers the County's objective of protecting the environment and public health and welfare.

Disadvantage:

- Without the manufacturers funding mail-back options, or the bins, and collection and disposal of pharmaceutical and sharps waste, the Health Agency would not be able to implement the above options.

THE EPR WORKING GROUP

Current County Approach to Pharmaceutical and Sharps Take-Back:

DPW provides State-approved, puncture-proof containers free of charge for residents to safely collect their sharps waste. The containers are distributed from 117 distribution sites, including nine permanent HHW collection centers, and 14 public health clinics. The sharps containers are collected at 77 locations including all nine permanent HHW collection centers, as well as 21 Sheriff's stations, and 10 public health clinics. The Sheriff's Safe Drug Drop-Off Program is ongoing, and residents can safely drop off home-generated pharmaceutical and sharps waste at

21 Sheriff stations, 24 hours a day, seven days a week. These 21 Sheriff's stations are also promoted during the twice-a-year DEA-sponsored drug take-back events. DPW's HHW program provides residents with a free outlet to dispose of their pharmaceutical drugs and sharps waste, (except prescription drugs that are considered controlled substances), at a permanent center or collection event in various communities throughout the County.

Proposed County Options:

In order to provide take-back options available to residents as quickly as possible, DPW, with participation from the Sheriff and the Department of Public Health (DPH) would:

- Sponsor two pharmaceutical and sharps collection event days during Fiscal Year 2016-17. For each event, one to two locations would be identified in each Supervisorial District serving the unincorporated areas. Upon approval of the Implementation Plan(s), pursuant to the Ordinance, the Responsible Steward(s) would sponsor ongoing take-back events as part of their comprehensive take-back programs.
- Continue to maintain the collection bins that are located at Sheriff stations, public health clinics, and HHW collection centers.
- Distribute mail-back envelopes from certain County facilities, provided that the funding for printing, mailing, collection, and destruction of the contents is provided by the manufacturers.
- Provide education and outreach as part of existing programs, which could promote the Sheriff's collection bins, Walgreens collection bins, and the County's sharps program. This outreach effort would include a variety of free and low cost options, such as: 1) developing content for the County Channel; 2) publishing articles in the 10 Unincorporated Area Community Connections or other newsletters; 3) developing and distributing Public Service Announcements; 4) posting information on the EPR Website; and 5) using social media, among other media outlets.

Advantages:

- The County would take a leadership role in the pharmaceutical and sharps take-back program by setting an example for Responsible Stewards which would demonstrate the County's commitment to launching a successful and sustainable program.
- County sponsored take-back events would provide residents with immediate take-back options in addition to existing Sheriff station collection bins and DEA semi-annual take-back events.
- This Option is a short-term expenditure but would afford a long-term benefit since manufacturers would cover take-back costs subsequent to these take-back events, pursuant to the Ordinance.
- An outreach and education effort would provide the County an opportunity to promote early start-up programs which would provide residents with knowledge of proper storage and disposal methods and availability of collection bins, take-back events and mail-back services following adoption of the Ordinance.

Disadvantages:

- This Option does not align with the Board's adopted EPR policy on November 5, 2008 as a strategy that places responsibility for end-of-life management of consumer products on the manufacturers of the products while encouraging product design that minimizes negative impacts on human health and the environment at every stage of the product's life cycle.
- This Option shifts the cost for the early implementation from the manufacturers to the County.

OPTIONS CONSIDERED BY THE EPR WORKING GROUP FOR EXPEDITING TAKE-BACK IMPLEMENTATION

The May 24, 2016 meeting, and further follow-up with the pharmaceutical and sharps manufacturers, the retailers and other stakeholders, resulted in three options which would result in an expedited implementation of drug and sharps take-back efforts.

OPTION 1: Amend the Ordinance to require that the Responsible Steward(s) launch a public education and outreach campaign, approved by the Director of Public Health, within 60 days from the effective date of the Ordinance; and conduct quarterly take-back event days within 90 days of the effective date of the Ordinance until implementation of an approved stewardship plan. Each quarterly take-back event day will cover the five Supervisorial Districts and serve a minimum of 10 unincorporated area communities. Responsible Stewards shall select from a list of Unincorporated Communities pre-approved by the Director as potentially suitable service locations for sponsoring quarterly collection events. To the greatest extent feasible, Responsible Stewards shall sponsor an equivalent number of quarterly collection events in each Supervisorial District. The date, location, hours, and plan for each collection event shall be submitted to the Director for approval at least 30 days in advance of each event. Quarterly collection events shall not be held in the same month as DEA-sponsored take-back event days.

This Option was not considered at the May 24, 2016 meeting; however, a representative of the EPR Working Group contacted respective representatives of the pharmaceutical and sharps manufacturers and retailers to obtain their feedback on this Option. The pharmaceutical and sharps manufacturers do not support the industry sponsoring take-back events during the first year after the Ordinance is adopted. The Industry restated that if the Ordinance passes in any form, it would remove their participation in an outreach and education program and associated grant funding for County take-back events.

OPTION 2: Conduct two County-sponsored pharmaceutical and sharps collection event days in Fiscal Year 2016-17, (DPW, Sheriff, and DPH), serving the unincorporated areas. There would be one to two site locations selected per Supervisorial District for each event day. Upon approval of the Implementation Plan(s), pursuant to the Ordinance, the Responsible Steward(s) would subsequently sponsor ongoing take-back events as part of their comprehensive take-back program.

It is estimated that the cost for the County's proposed drug take-back events for FY 2016-17 would be approximately \$50,000 for each event day, a total of \$100,000 for the two event days; \$36,000 would be available for each event day from the Solid Waste Management Fund and \$14,000 contributed as in-kind services from the Sheriff and DPH, e.g. security and site

locations. The first event day could be held as early as August 2016 with the outreach and education efforts beginning within 30 days from adoption of the Ordinance.

OPTION 3: Amend the Ordinance to shorten the timeframe for submittal of Stewardship Plans by the Responsible Stewards from nine months to six months.

The drug and sharps manufacturers indicated that compliance with the Ordinance with an expedited implementation plan would not be possible due to the complex nature and requirements in developing a Stewardship Plan, including coordination of numerous stakeholders and manufacturers.

EPR WORKING GROUP RECOMMENDATION

Of the three Options presented above, Option 1 is the **preferred option** being recommended by the EPR Working Group to expedite the take-back program and meet the goals of EPR, consistent with the directive of the August 11, 2015 Board motion.

Option 2 would require County departments to commit County funds and is not consistent with the goals of EPR.

Manufacturers expressed concerns that Option 3 would not provide adequate time for them to collaborate with the numerous manufacturers, retailers and other entities to develop Stewardship Plans.

OPTION 1 PLAN IMPLEMENTATION STEPS

1. Amend the Ordinance to require that the Responsible Steward(s) launch a public education and outreach campaign, approved by the Director of Public Health, within 60 days from the effective date of the Ordinance; and conduct quarterly take-back event days within 90 days of the effective date of the Ordinance until implementation of an approved stewardship plan.
2. Select 10 unincorporated area communities that will be served by the quarterly collection events covering the five Supervisorial Districts.
3. Prepare a list of Unincorporated Communities as potentially suitable service locations for quarterly collection events.
4. Identify the date, location, hours, and plan for each collection event at least 30 days in advance of each event. The quarterly collection events cannot be held in the same month as DEA-sponsored take-back event days.
5. Identify the outreach media that would yield the maximum viewership/readership of educational and outreach materials about planned pharmaceutical and sharps take-back events.
6. Plan and coordinate with the Sheriff for services, as required by the DEA, at each of the take-back event locations.

Los Angeles County Pharmaceutical & Sharps Safe Disposal Education Initiative



Program Overview and Recommended Components

Overview

The manufacturers of prescription medications, over-the-counter medicines and sharps recognize their role in helping consumers in Los Angeles County better understand how to use, store and dispose of their medicines and used sharps. To address this information gap and help consumers avoid the potential mishandling, misuse and abuse of medicines and sharps, Los Angeles County could benefit from robust education program that can change perceptions, raise awareness, motivate changes in behavior towards proper disposal, and deliver measurable results.

The manufacturers of these products are deeply committed to working with the County and other stakeholders to address these issues. As part of this commitment, the industry has proposed to design, fund and manage the "Pharmaceutical & Sharps Safe Disposal Education Initiative" for the use and benefit of Los Angeles County residents. The comprehensive, innovative education program is a multiyear, multichannel, multilingual campaign that is customized for the County's diverse citizenry. The goal of this program is to increase awareness and understanding of the importance of taking all medicines as prescribed and directed, how to safely store your medicines and sharps in your home, and the process for disposing of medicines and sharps properly, through existing collection points, or if necessary through in-home disposal. Because of environmental concerns about landfills, the campaign will support the County's drug return program through a grant to the Sheriff.

Once agreement with the County is reached, the digital components of the campaign can be launched in a matter of weeks with other communications such as in-store materials and other tactics rolling-out in a phased approach. The biopharmaceutical and medical device industries look forward to partnering with Los Angeles County Supervisors, law enforcement, public health and public works officials and leading health and community stakeholders to ensure the program successfully raises awareness and changes consumer behaviors around this important issue.

Detailed information about the campaign and its execution is included in the following pages.

Campaign Focus

The focus of this campaign is consumer education and empowerment. This means providing consumers with information about how to dispose of their medicines and sharps independently, securely and efficiently, including highlighting existing resources in the County, take-back days, and lastly, through in-home disposal. The campaign would also include information about preventing prescription drug abuse and local resources about available substance abuse treatment options.

Campaign Approach

- **Content:** Develop highly-engaging, relatable, effective and shareable content aimed at capturing and keeping consumers' attention, ensuring that the right messages are being delivered to the right audiences to incite the appropriate action.
- **Channels:** Leverage multichannel, innovative communications platforms such as a mobile app, social media, online news and digital targeting, as well as significant earned media and advertisements in traditional broadcast.
- **Stakeholders:** Partner with pharmacies, grocers, retailers, community groups, senior centers and others to get consumers information when they pick up their medicines and sharps or at key locations and events that reach the County's broad and diverse citizenry.
- **Research-Based Approach:** Use polling and focus groups to test program themes, messages and images with County residents to ensure initial and ongoing messages are effective and compelling and driving measurable awareness and action.



Campaign Message Themes

The campaign messages will focus on the premise that while medicines and sharps play an important role in our society because they assist in the treatment of disease, they must only be used as prescribed and disposed of with care. Each message theme will incorporate a related action that consumers can take to help keep them, their families and their communities safe.

- **Safety:** When over-the-counter or prescription medications are taken and used as intended or prescribed, they help treat diseases from the common to the complex. Medicines increase the quality of our lives and those of our family members, friends and neighbors. But if these medicines and sharps are not used, stored or disposed of with care, devastating consequences can result.
- **Adherence:** It is critically important to take all medicines as prescribed or as indicated on labels for nonprescription medicines. When taking medicines, always follow the recommended dosage instructions and, with prescription medicines, finish the medication unless otherwise directed by a physician. When medications are taken correctly, there is less medicine in our homes to become a potential threat.
- **Storage:** Store medications securely to prevent accidental ingestion or misuse. When medicines are misused or fall into the wrong hands, it can be the result of medications not being properly stored. Keep your medicines up and away and out of reach and sight to prevent accidental ingestion by children, teenagers, visitors and pets, as well as to prevent use of these medicines by anyone other than the person for whom they were intended.
- **Disposal:** There are easy and simple ways to safely and securely dispose of medicines and sharps as soon as they are expired or no longer needed. The campaign will follow the guidance from the Food and Drug Administration on how to dispose of unused medicines,

first focusing on using kiosks or drug take-back days and then recommending in-home disposal if those options do not meet a consumer's needs.

- *Existing Voluntary Community Drop-Off Programs:* Community drop-off (or "take-back") locations allow the public to bring unused, unwanted or unneeded medication to a centralized location for collection and disposal. These voluntary collection sites/bins are often managed in cooperation with law enforcement departments, pharmacies and others. When looking for a community collection program in your area, only seek out programs that are structured to prevent theft or diversion of unused medication and protect patient privacy. Local communities also often organize local medicine collection events (sometimes called "take-back" events). Before attending one of these events, make sure the event is run by law enforcement and structured to prevent theft or diversion. Note: Events, location finders and resources will be linked to on campaign materials.
- *Sharps:* It is against the law in California to dispose of sharps in the trash. There are a number of existing programs where consumers can safely dispose of their sharps. You can look up one of the 616 sharps disposal sites in California by going to www.calrecycle.gov. Pharmaceutical and device manufacturers also provide resources to consumers for how to dispose of their sharps. Note: Resources will be linked to on campaign materials.
- *In-Home Disposal:* Should a consumer not want to use the existing county kiosk program or a take-back day, the campaign will educate consumers on in-home medicine disposal which removes medicines from the home immediately so that the medicine is not available for misuse or abuse. In-home disposal, as detailed by the FDA, involves simple, easy-to-follow steps for the safe and secure disposal of medicines in the home.

Campaign Tactics

The most effective consumer education programs reach target audiences with consistent messages through multiple platforms to increase exposure and awareness of key themes. With the large, diverse population present in Los Angeles County, it is vital that the program uses all available communications channels, both traditional and innovative, to engage and educate consumers. This proven approach will ultimately raise awareness, change behaviors and deliver measurable results. Program tactics include:

- **Grassroots Stakeholder Engagement:** Work with a variety of groups to ensure that physical materials and information (flyers, posters, shelf-talkers, etc.) are available at locations across the County:
 - *Retail Outlets:* Partner with pharmacies, pharmacists, retailers and grocery stores to make materials available at the time of purchase of medicines (already in place).
 - *Government:* Work with County and City elected officials to ensure information is available at government offices, law enforcement locations, libraries, senior and community centers, recreation facilities, etc.
 - *Health and Community Groups:* Work with community clinics, medical associations, health plans, nurses and community-based organizations to provide materials for in-person interactions and events. Activities will also include participation in

There are two key ways to safely dispose of unused or expired medication in your community:
COMMUNITY DROP OFF LOCATIONS
Community drop off locations allow the public to bring unused, unwanted or unneeded medication to a centralized location to be properly disposed of. When looking for a community disposal program in your area, only seek out programs that are structured to prevent theft or diversion of unused medications and protect patient privacy. This means not returning medications to unlabeled or unsupervised drop off locations or bins, as these may contribute to drug abuse and diversion.
To locate a community disposal program in your area, consult the American Medicine Chest Challenge website to find the location closest to you. Or, call your county's trash and recycling service for a list of locations in your area.
LOCAL TAKE-BACK EVENTS
To encourage residents to clean out their medicine cabinets, local communities and often organize a local medication take-back event during various times of the year. Use state law before, let your local take-back event to run by law enforcement and structured to prevent theft, or diversion of unused medication and protect patient privacy.
Alternatively, in-home disposal is always the easiest method to securely dispose of your old meds.

community/health events to directly engage County consumers and providing content to partners for their websites, newsletters and social media channels.

- **Large-Scale, Consumer Outreach:** The campaign will broadcast information in a manner that will blanket the County with consumer-tested, locally-focused messages. This outreach will include:
 - *Media:* Outreach and engagement with regional community newspapers, including op-eds, editorial and reporter briefings, as well as advertorials and purchased ads. Local radio and TV activities, including interviews and PSAs.
 - *Display Advertising:* Paid signage on billboards, in bus shelters and on buses and other County locations
 - *Website:* A comprehensive, consumer-focused website that will be easy-to-use and accessible via mobile and tablet devices. The website will incorporate the steps for safe disposal, directions and lists of local drop-off locations, information about medicine adherence and secure storage, animated videos and infographics and a blog that regularly provides information on key areas of interest.
 - *Social Media:* Active and engaged campaign social media presence, including a Twitter feed, Facebook page and YouTube channel.
 - *Mobile App:* A mobile app that includes information from the website, as well as location services to help people find convenient drop-off locations.
 - *Paid Promotion:* Traffic will be driven to the website via campaign materials and activities, as well as a targeted pay-per-click strategy via Google ad words. The campaign will also create online display ads and promote key campaign messages via social media platforms such as Twitter and Facebook.

Metric & Measurements

The campaign will have key metrics to appropriately measure the results of its activities to ensure that it is meeting stated objectives. The recommendations are based on commonly used education and behavior change principles, as well as learnings from previous campaigns that demonstrated an uptick in positive consumer knowledge and activities around these issues.



Measurement will include assessment of public awareness, knowledge, attitudes and behaviors regarding the importance of proper medication disposal, such as:

- Baseline survey to test program themes, messages and benchmark initial awareness levels
- Annual survey to measure campaign effectiveness and if messages gained traction
- Website traffic monitoring and click through rates from ads
- Online engagement tracking
- Partnerships and materials distribution
- Yearly best practices meeting with Supervisors and staff to discuss campaign and adjust any activities that are not performing as anticipated.

Timeline

While some of the components of the aforementioned plan will require development and planning that will require phase in time for deployment, the vast majority of this alternative can begin implementation within a 30 to 60 day timeframe.