



July 1, 2022

Chris Smith
President
The Drug Takeback Solutions Foundation
635 Vine Street
Winston-Salem, NC 27101

Sent via e-mail

Re: CalRecycle's Completeness Determination of The Foundation's Annual Program Budgets for Covered Drugs and Sharps

Dear Mr. Smith:

The Department of Resources Recycling and Recovery (CalRecycle) received The Drug Takeback Solutions Foundation's (The Foundation) annual program budgets for covered drugs and home-generated sharps waste on June 6, 2022, titled, *The Drug Takeback Solutions Foundation Annual Program Budget for Covered Drugs* and *The Drug Takeback Solutions Foundation Annual Program Budget for Home Generated Sharps*, respectively. Title 14, California Code of Regulations (14 CCR) section 18973.1(b) requires CalRecycle to determine if the annual program budgets are complete and notify The Foundation of its determinations within 30 days of receipt.

Staff reviewed The Foundation's annual program budgets for completeness pursuant to the requirements in the Public Resources Code (PRC) sections 42033.2(a)(2) and (c) and 14 CCR sections 18973.1(b) and 18973.6 and found the annual program budgets incomplete. These completeness determinations are separate from the compliance determinations that CalRecycle will conduct once it receives annual program budgets it determines are complete pursuant to 14 CCR sections 18973.1(d) through (f). Attachment 1 identifies the additional information required and additional information, for illustrative purposes only, that The Foundation can consider when preparing its revised annual program budgets.

The Foundation must resubmit its annual program budgets to CalRecycle within 30 days of CalRecycle's notification that its annual program budgets are incomplete. If CalRecycle determines, upon resubmittal, that The Foundation's annual program budgets are complete, CalRecycle shall have 90 days from the date of receipt of the resubmitted annual program budgets to review for compliance with all statutory and regulatory requirements and approve, conditionally approve, or disapprove the annual program budgets.

Questions regarding this letter may be directed to pharmasharps@calrecycle.ca.gov.

Re: CalRecycle's Completeness Determination of The Foundation's Annual Program Budgets for Covered Drugs and Sharps

Regards,

Date: July 1, 2022

Signed by: Mindy McIntyre, Chief Deputy Director
on behalf of Rachel Machi Wagoner, Director

Attachment 1. Additional Information Required in The Foundation's Annual Program Budgets for Covered Drugs and Sharps

Cc: Jason Smyth, Supervisor, Pharmaceutical and Sharps Unit
Becky Haworth, Environmental Scientist, Pharmaceutical and Sharps Unit
Mary Curry, Environmental Scientist, Pharmaceutical and Sharps Unit
Morgan Buchan, Environmental Scientist, Pharmaceutical and Sharps Unit

Attachment 1. Additional Information Required in The Foundation’s Annual Program Budgets for Covered Drugs and Sharps

Number	Statute / Regulation Reference	Annual Program Budget	Comment
1	14 CCR 18973.6(a)	Drugs and Sharps	Include all required contact information for the person responsible for submitting and overseeing the program budget on behalf of the program operator.
2	14 CCR 18973.6(b)(5)	Sharps	Include costs related to capital costs, including, but not limited to, fixed, one-time, tangible purchases
3	14 CCR 18973.6(e)	Sharps	Include a description of the types of activities relative to each line item cost category, specifically capital costs.

Staff Observations regarding The Foundation’s Annual Program Budgets for Covered Drugs and Sharps, for Illustrative Purposes Only

Number	Statute / Regulation Reference	Annual Program Budget	Comment
1	14 CCR 18973(a)	Drugs and Sharps	Ensure the documents are in compliance with section 7405 of the Government Code, and the Web Content Accessibility Guidelines 2.0 published in 2008 by the Web Accessibility Initiative of the World Wide Web Consortium at a minimum Level AA success criteria to allow for posting on the department’s website pursuant to 14 CCR section 18973(a).
2	14 CCR 18973.6(c)	Drugs and Sharps	Include a description justifying why the reserve level amount indicated is appropriate.