

REQUEST FOR ACTION

To: Zoe Heller
Director

From: Clark Williams
Branch Chief, Statewide Technical and Analytical Resources
Branch

Request Date: December 5, 2024

Decision Subject: Consideration of The Drug Takeback Solutions Foundation's
Revised 2023 Annual Report for Home-Generated Sharps Waste

Action By: December 26, 2024

Summary of Request

The Drug Takeback Solutions Foundation (The Foundation) submitted its revised 2023 annual report, titled, *The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2023 Annual Report (Revised 2023 Annual Report)* on, 2024. This Request for Action presents a summary of staff's analysis regarding The Foundation's *Revised 2023 Annual Report* and The Foundation's home-generated sharps waste stewardship program.

Background

The Foundation is a stewardship organization that, as reported in its *Revised 2023 Annual Report*, represents 23 covered entities under its approved stewardship plan for home-generated sharps waste, titled, *Stewardship Plan for Home-Generated Sharps Waste (Plan)*. Public Resources Code (PRC) section 42033.2(a)(1) states that, on or before March 31, 2022, and each year thereafter, a program operator shall submit to the Department of Resources Recycling and Recovery (CalRecycle) a report that describes the stewardship program activities during the previous reporting period of one year. The Foundation submitted its 2023 annual report, titled, *The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2023 Annual Report (2023 Annual Report)* on March 29, 2024. CalRecycle determined the *2023 Annual Report* was complete and notified The Foundation on April 29, 2024, pursuant to PRC section 42033.2(d)(1) and Title 14 of the California Code of Regulations (14 CCR) section 18973.1(b). On June 27, 2024, CalRecycle disapproved The Foundation's *2023 Annual Report* in the Request for Action (RFA), titled, *Consideration of The Drug Takeback Solutions Foundation's 2023 Annual Report for Home-Generated Sharps Waste (June 2024 RFA)*. On July 29, 2024, CalRecycle issued a notice to The Foundation, titled, *Notice Regarding Disapproval of The Drug Takeback Solutions Foundation's 2023 Annual Report for Home-Generated Sharps Waste (July 2024 Notice)*. The Foundation was required to revise and resubmit its 2023 annual report within 60 days of receipt of the *July 2024 Notice* (i.e., by September 27, 2024), to address the deficiencies identified in the *June 2024 RFA* and meet the requirements identified in the *July 2024 Notice*.

On September 27, 2024, The Foundation submitted its *Revised 2023 Annual Report*, which is the subject of this RFA. CalRecycle has 90 days to approve, disapprove, or conditionally approve the *Revised 2023 Annual Report* pursuant to PRC section 42033.2(d)(2) and 14 CCR section 18973.1.

The purpose of this RFA is to examine whether The Foundation has corrected the requirements noted as unmet in its previous submission and to identify, to the extent feasible, aspects of non-compliance that might be apparent from the revised annual report. Director decisions on annual reports do not necessarily impact actions taken by CalRecycle's Waste Permitting, Compliance, and Mitigation Division or its independent Office of Audits. Furthermore, nothing in this RFA hinders CalRecycle's right to pursue enforcement actions for instances of non-compliance identified through other means, such as field inspections, nor does it affect CalRecycle's authority to conduct its own audits of The Foundation, including a review of the independent certified public accountant audit, for compliance with statute and regulations and consistency with the program operator's stewardship plan, annual report, and annual program budget pursuant to PRC section 42033.4(b)(3).

Staff Analysis

Staff evaluated The Foundation's *Revised 2023 Annual Report* to determine whether the requirements of statute, regulations, and The Foundation's *Plan* were met, as reported by The Foundation, as directed in the *June 2024 RFA* and *July 2024 Notice*. The sections below present a summary of staff's analysis of The Foundation's *Revised 2023 Annual Report* and select components of its home-generated sharps waste stewardship program.

CalRecycle requested that The Foundation explain its revisions so that CalRecycle can better understand why the information provided in the revised annual report is correct. In numerous instances, The Foundation declined to explain the change or provided an explanation that failed to give the reader confidence that the revised information was correct. CalRecycle did not find any requirement unmet solely because of the inadequacy of the explanation; however, it does give CalRecycle reason for concern.

Mail-Back Program

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to PRC sections 42033.2(b)(8) and 42032.2(d)(1)(F)(i) and 14 CCR sections 18973.3(f)(2), 18973.1(a), and 18973.5(c)(2)(B).

1. Describe how The Foundation ensured it provided and initiated the distribution of a sharps waste container and mail-back materials for ultimate users at every point of sale when products covered under its plan were sold, as described in its approved plan and pursuant to PRC sections 42033.2(b)(8) and 42032.2(d)(1)(F)(i) and 14 CCR sections 18973.3(f)(2) and 18973.1(a).
2. Include the number of point of sale locations that initiated the distribution of sharps waste containers and mail-back materials to ultimate users, pursuant to PRC section 42033.2(b)(8) and 14 CCR section 18973.1(a).

3. Describe how The Foundation tracked when each instance that a point of sale location initiated the distribution of a sharps waste container and mail-back materials to ultimate users, pursuant to PRC sections 42033.2(b)(8) and 42032.2(d)(1)(F)(i) and 14 CCR sections 18973.3(f)(2), 18973.5(c)(2)(B), and 18973.1(a).

Analysis: Requirement 1 Not Met, Requirements 2 and 3 Met

The *2023 Annual Report* stated that 203 point of sale locations were able to provide sharps waste containers and mail-back materials to ultimate users but did not include a number for how many point of sale locations were able to initiate the distribution of sharps waste containers and mail-back materials to ultimate users. The Foundation's *Revised 2023 Annual Report* describes how 203 point of sale locations have the ability to provide and initiate. Of the 203 point of sale locations, 99 locations were provided with sharps waste containers and mail-back materials to provide to ultimate users and 69 point of sale locations initiated the distribution of sharps waste containers and mail-back materials to ultimate users. Additionally, The Foundation's *Revised 2023 Annual Report* clarifies that "initiation of orders on behalf of the Ultimate User is offered as an alternative if Ultimate Users do not want a Mail-Back Unit distributed to them at the Point of Sale," consistent with its *Plan*. However, since only 99 of the 203 point of sale locations were provided with sharps waste containers and mail-back materials to provide to ultimate users, it was not possible for an ultimate user to have the choice of being provided with a sharps waste container and mail-back materials at all locations. Additionally, on page 2 of the *Revised 2023 Annual Report*, The Foundation states it "focused heavily during the Reporting Period on increasing the number of Point of Sale Locations providing or initiating Mail-Back Units to Ultimate Users." Based on The Foundation's description of point of sale locations "providing" or (emphasis added) "initiating," and its metrics where only 99 of the 203 point of sale locations were prepared to provide a sharps waste container and mail-back materials to an ultimate user at the point of sale, it is unclear if The Foundation is providing and initiating as described in its *Plan*. Additionally, The Foundation describes how it "continues its efforts in rural counties that have not requested Mail-Back Units," which fails to demonstrate that The Foundation is providing and initiating in those counties. The *Revised 2023 Annual Report* also includes *Attachment C – Mail-Back Unit Distribution By County*, that lists the number of sharps waste containers and mail-back materials distributed in 54 counties and the method of distribution. In 28 of the 54 counties, The Foundation did not provide sharps waste containers and mail-back materials at the point of sale. In 24 of those 28 counties The Foundation did not initiate the distribution of a sharps waste container and mail-back materials at the point of sale. The Foundation is required to provide and initiate the distribution of sharps waste containers and mail-back materials for ultimate users at every point of sale when covered products under its program are sold. The Foundation's *Revised 2023 Annual Report* fails to demonstrate it is operating its program to provide and initiate the distribution of sharps waste containers and mail-back materials at the point of sale pursuant to statute and its approved *Plan*. Therefore, The Foundation did not meet requirement 1.

The *2023 Annual Report* described how point of sale locations use “an ordering mechanism via the neutrally branded website, www.sharpstakebackcalifornia.org, whereby Point of Sale locations order Mail-Back Units on behalf of Ultimate Users that are shipped to arrive within 5 business days.” The *June 2024 RFA* described how it was unclear why The Foundation provided point of sale locations with a coordinated website instead of with its own ordering portal, as described in its *Plan*. The Foundation’s *Revised 2023 Annual Report* states that “enrolled Point of Sale Locations are always provided with a link directly to the Foundation’s website (www.safemedicinedrop.com/mailback-casharps) and do not access the jointly-operated Program website where they would be redirected to MED-Project half of the time for the ordering of Mail-Back Units.” The Foundation’s *Revised 2023 Annual Report* states that “the incorrect website was initially provided in error.” Therefore, The Foundation met requirement 2.

The *Revised 2023 Annual Report* explains how The Foundation is able to track each instance that a point of sale location initiates the distribution of a sharps waste container and mail-back materials on behalf of an ultimate user since point of sale locations are provided with a link directly to The Foundation’s website, as discussed above. Therefore, The Foundation met requirement 3.

Metrics

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.5(c)(2)(A), 18973.5(c)(2)(B), and 18973.1(a).

4. Include metrics for sharps waste containers and mail-back materials provided at the point of sale to ultimate users, per county, pursuant to 14 CCR section 18973.5(c)(2)(A).
5. Describe how The Foundation obtained the metric for the number/amount of sharps waste containers and mail-back materials initiated at the point of sale, pursuant to 14 CCR sections 18973.5(c)(2)(B) and 18973.1(a).

Analysis: Requirement 4 Not Met, Requirement 5 Met

The Foundation did not report metrics in its *2023 Annual Report* regarding the amount of sharps waste containers and mail-back materials provided to ultimate users at the point of sale. The Foundation’s *Revised 2023 Annual Report* states that it “intends to implement a survey for enrolled Point of Sale Locations to report on this metric at intervals prescribed by the Foundation in order to capture this metric for future reporting.” Therefore, The Foundation did not meet requirement 4.

As described in the “Mail-Back Program” section above, The Foundation clarifies in its *Revised 2023 Annual Report* that point of sale locations were provided with The Foundation’s website, not the coordinated website as described in its *2023 Annual Report*, and that the coordinated website was provided in error. Therefore, The Foundation met requirement 5.

Education and Outreach

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.1(a), 18973.5(i)(2), and 18973.5(i)(3).

6. For the healthcare provider survey, explain whether covered entities and pharmacists were surveyed pursuant to The Foundation's approved plan. If no covered entities or pharmacists were surveyed, explain why not. Include the percentage of survey respondents that have used the program, which collection method was used, and the method of contact, consistent with The Foundation's approved plan, and pursuant to 14 CCR section 18973.1(a).
7. Include the results of the annual survey of residents and explain and discuss what the survey results reveal regarding ultimate user awareness, program usage, and accessibility, pursuant to 14 CCR sections 18973.5(i)(2) and (3). Describe how The Foundation will use the results to improve the program in accordance with its approved plan.
8. Provide the questions The Foundation used for its surveys of healthcare providers and residents, pursuant to 14 CCR section 18973.1(a).
9. Demonstrate how an ultimate user seeking information on proper sharps disposal navigated to the appropriate webpage for The Foundation's home-generated sharps waste stewardship program, pursuant to 14 CCR section 18973.1(a). Specifically, explain how an ultimate user arrived on the webpage pictured in Figure 12 on page 31 of the *2023 Annual Report*, and understood that answering the question ("Unwanted medication at home?"), may navigate the ultimate user to resources for home-generated sharps waste.

Analysis: Requirements 6, 8, and 9 Not Met, Requirement 7 Met

Page 29 of the *Plan* states that The Foundation will "conduct an annual survey of Covered Entities, pharmacists, and healthcare professionals in the state of California who interact with Ultimate Users" and provide the following data points from its survey:

- Overall number of survey respondents and methods of contact.
- Percentage of survey respondents that are aware of the program.
- Percentage of survey respondents that were exposed to any forms of outreach provided by the program.
- Percentage of survey respondents that have used the program and which collection method was used.
- The percentage of survey respondents that believe the program is convenient.

The Foundation's clarifies in its *Revised 2023 Annual Report* that it conducted a survey of healthcare providers including doctors, nurses, nurse practitioners, physician assistants, pharmacists, pharmacy technicians, dentists, and other healthcare professionals, consistent with its *Plan*, specifically, including pharmacists and healthcare professionals. The Foundation also included the method of contact for the survey of healthcare providers, but did not include the percentage of

respondents that have used the program or which collection method was used. The Foundation did not include covered entities in the list of those surveyed as described in its *Plan*, nor did it explain why it did not survey covered entities. Therefore, The Foundation did not meet requirement 6.

The Foundation includes the results of the annual survey of residents in its *Revised 2023 Annual Report* and explains that it plans to increase awareness for ultimate users through educational materials and media campaigns. Therefore, The Foundation met requirement 7.

The Foundation provides the questions used in its surveys of healthcare providers and residents in its *Revised 2023 Annual Report*, which appear to be different questions, despite The Foundation's statement in its *2023 Annual Report* that it surveyed residents "using the same questions as those surveys sent to providers." Additionally, the survey questions and corresponding results appear to conflict with its reported metrics. The Foundation is required to report on its home-generated sharps waste stewardship program's education and outreach activities, pursuant to 14 CCR section 18973.5(i). It is unclear how questions related to "expired and/or unwanted medicines" inform The Foundation about its stewardship program for home-generated sharps waste. For example, it is unclear how The Foundation determined that, of the healthcare providers surveyed, "67[percent] stated that they were aware of the Program for Ultimate Users to safely dispose of Sharps," "Only 19[percent] stated they were not aware of the Program," and "14[percent] reported that they were unsure of their awareness of the Program" when the question was "Are you aware of the program for residents to safely dispose of expired and/or unwanted medicines in California?" Therefore, The Foundation did not meet requirement 8.

The *2023 Annual Report* included a picture of a webpage listed as "The Foundation's individual website homepage," that appears to prompt the user to enter their zip code in response to the question "Unwanted medication at home?" The *June 2024 RFA* described how it was unclear how the question pertaining to "unwanted medication" applied to ultimate users seeking disposal options for home-generated sharps waste and asks The Foundation how an ultimate user would navigate to the "ordering page" that is pictured on page 31 of the *2023 Annual Report*. The Foundation's *Revised 2023 Annual Report* describes how an ultimate user enters their zip code into the search bar under "Unwanted medication at home?" which then prompts an ultimate user to select "California Sharps" or "California Medicine." The Foundation also notes that the webpage "is no longer advertised" and was "utilized by the Foundation until the jointly operated website was available for use starting on October 26, 2023." This suggests that the website prompting ultimate users to answer, "Unwanted medication at home?" was the only website where ultimate users could request sharps waste containers and mail-back materials for almost 11 months out of the 2023 calendar year. It remains unclear how the question pertaining to "unwanted medication" applies to ultimate users seeking disposal options for home-generated sharps waste, when there are distinct programs for drugs and sharps. Therefore, The Foundation did not meet requirement 9.

Based on The Foundation's *Revised 2023 Annual Report*, The Foundation met some of the education and outreach reporting requirements.

Service Providers

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973(d), 18973.5(d)(2), and 18973.5(l).

10. Clarify whether any updates were made to service providers in 2023, pursuant to 14 CCR section 18973(d).
 - a. If service provider updates were made, confirm the information provided pursuant to 14 CCR section 18973.5(d)(2) is correct.
11. If any updates were made to service providers in 2023, provide a description and evaluation of the process for selecting service providers, pursuant to 14 CCR section 18973.5(l).

Analysis: Requirements 10 and 11 Met

The Foundation clarifies that no updates were made to its service providers in 2023, but that its Service Provider “utilized their contracted destruction facilities which were included on the Foundation’s provided list of destruction facilities.” Therefore, requirements 10 and 11 are met.

Reimbursement and Removal Requests

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to

12. Clarify whether The Foundation provided each local agency reimbursement for transportation and disposal costs of home-generated sharps waste, pursuant to 14 CCR sections 18973.3(g)(1) and 18973.5(p).
13. Clarify whether The Foundation considers removal of home-generated sharps waste as an option when responding to local agency requests, as described in its approved plan, pursuant to 14 CCR sections 18973.3(g)(1) and 18973.5(p).
14. Consistently identify whether reimbursements were provided, pursuant to 14 CCR sections 18973.5(m) and 18973(d).

Analysis: Requirements 12, 13, and 14 Met

The Foundation clarifies in its *Revised 2023 Annual Report* that it provided each local agency, upon request, reimbursement for transportation and disposal costs of home-generated sharps waste. Therefore, The Foundation met requirement 12.

Page 19 of The Foundation’s *Plan* describes “selecting either reimbursement or removal from the household hazardous waste facility” in response to a local agency request. The *Revised 2023 Annual Report* clarifies that The Foundation has not received any requests for removal of home-generated sharps waste from a local agency but would consider and report requests for removal, if received. Therefore, requirement 13 is met.

The *Revised 2023 Annual Report* consistently identifies where The Foundation provided reimbursements to local agencies. Therefore, The Foundation met requirement 14.

Actual Expenses for Departmental Administrative Fees

Requirement: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.1(a) and 18973.5(q).

15. Include the actual expense for the departmental administrative fee or clarify why the departmental administrative fee is listed as \$0, pursuant to 14 CCR sections 18973.1(a) and 18973.5(q). If the incorrect number was initially provided, the reason why it was included initially should also be noted.

Analysis: Requirement 15 Not Met

In the *2023 Annual Report*, The Foundation listed \$0 in departmental administrative fees under its actual expenses incurred in 2023. Its *Revised 2023 Annual Report* describes how \$0 was a “human error” and the actual expenses incurred for departmental administrative fees is \$85,437.02. The Foundation states the new departmental administrative fee value “reflects actual expenses incurred in 2023 based on CalRecycle invoices provided to the Foundation in 2023, which were analyzed pursuant to Generally Accepted Accounting Principles (GAAP), to project remaining 2023 expenses incurred by the Foundation related to CalRecycle administrative fees.” It remains unclear how The Foundation determined that \$85,437.02 represents actual expenses incurred, when The Foundation paid a total of \$551,352.56 for invoices regarding departmental administrative fees in 2023 and the amount it provided is significantly lower than CalRecycle’s records. Moreover, CalRecycle invoiced The Foundation on September 15, 2023, for CalRecycle’s costs from April 2023 through June 2023, totaling \$100,241.31. This invoice for a single quarter of 2023 is still greater than The Foundation’s departmental administrative fee value for the entire year noted as \$85,437.02. Therefore, The Foundation did not meet requirement 15.

Document Submittals

Requirement: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR section 18973(d).

16. Utilize correct statements and consistent terminology within the annual report, pursuant to 14 CCR section 18973(d), as discussed in the *June 2024 RFA* and including, in particular, the items noted in the “Reimbursement and Removal Requests” and “Service Provider” sections of the *June 2024 RFA*.

Analysis: Requirement 16 Not Met

The Foundation’s *Revised 2023 Annual Report* includes consistent descriptions of its “Service Provider,” as well as how reimbursements were provided for local agency requests. However, there are still discrepancies within the *Revised 2023 Annual Report*. For example:

- The Foundation inconsistently refers to the jointly operated, coordinated program operator website as (www.medtakebackcalifornia.org) and (www.sharpstakebackcalifornia.org), introducing new incorrect or inconsistent terminology.
- The *Revised 2023 Annual Report* lists \$988,553.68 for “Total Expenses for Reporting Period,” which was the same total in the *2023 Annual Report*. However, since The Foundation includes an updated value for departmental administrative fees (\$85,437.02), the new total of expenses should be \$1,073,990.70, but is still listed as \$988,553.68.
- As described in the “Education and Outreach” section above,” The Foundation’s results of its survey of healthcare providers in its *Revised 2023 Annual Report* conflict with the questions asked, making it unclear if some of the survey results are accurate.

Therefore, The Foundation did not meet requirement 16.

Additionally, there are instances where The Foundation adjusted the narrative and information in its *Revised 2023 Annual Report* from what was initially provided in its *2023 Annual Report*. The Foundation did not provide an explanation for the changes, or why the information it initially provided was incorrect, making it difficult to determine what activities occurred in 2023. For example, as described in the “Education and Outreach” section above, The Foundation stated in its *2023 Annual Report* that it conducted a survey of 1,000 residents “using the same questions as those surveys sent to providers.” In the *Revised 2023 Annual Report*, The Foundation removed language stating that the surveys were the same and provided the survey questions which appears to demonstrate that ultimate users and providers were asked different questions.

Staff Analysis Conclusion

Based on the information, as reported in The Foundation’s *Revised 2023 Annual Report*, The Foundation met 9 of the 16 requirements CalRecycle identified as deficient in the *June 2024 RFA* and *July 2024 Notice*. Further, The Foundation continues to demonstrate inconsistencies and a lack of clarity in its reporting. CalRecycle does not have a high level of confidence in the accuracy of The Foundation’s document submittals due to the errors described in the “Staff Analysis” section above. CalRecycle may conduct its own audits of The Foundation, including a review of the independent certified public accountant audit, for compliance with statute and regulations and consistency with the program operator’s stewardship plan, annual report, and annual program budget pursuant to PRC section 42033.4(b)(3).

Feedback from Interested Parties

CalRecycle solicited public input on The Foundation’s *Revised 2023 Annual Report* from September 30, 2024, through October 14, 2024, and did not receive any public comments.

Action

Pursuant to PRC section 42033.2(e) and 14 CCR section 18973.1, I hereby:

- Approve The Foundation's *Revised 2023 Annual Report*.
- Conditionally approve The Foundation's *Revised 2023 Annual Report*. Direct staff to identify the conditions to be met for approval and provide written notice to The Foundation within 30 days of signature of this Request for Action, pursuant to 14 CCR section 18973.1(j).
- Disapprove The Foundation's *Revised 2023 Annual Report*.

Signed by:

Zoe Heller
Director

Dated: December 23, 2024

Attachments:

Documents listed below are posted to CalRecycle's website.

1. [The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2023 Annual Report](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15991) (September 27, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15991>
 - a. [Attachment A – Service Providers and Weights](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15992)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15992>
 - b. [Attachment B – Participating Covered Entities and Covered Products](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15993)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15993>
 - c. [Attachment C – Mail-Back Unit Distribution by County](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15994)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15994>
 - d. [Attachment D – State Agency Determinations](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15995)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15995>
2. [Stewardship Plan for Home-Generated Sharps Waste](https://www2.calrecycle.ca.gov/Docs/Web/122409) (October 15, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/122409>
 - a. [Appendix A – Program Budget](https://www2.calrecycle.ca.gov/Docs/Web/122421) (October 15, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/122421>
 - b. [Appendix B – Participating Covered Entities](https://www2.calrecycle.ca.gov/Docs/Web/122418) (October 15, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/122418>
 - c. [Appendix C – Service Providers](https://www2.calrecycle.ca.gov/Docs/Web/122415) (October 15, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/122415>
 - d. [Appendix D – Sharps Sold or Offered for Sale in California by Participating Covered Entities](https://www2.calrecycle.ca.gov/Docs/Web/122412) (October 15, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/122412>
3. [The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2023 Annual Report](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15694) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15694>
 - a. [Attachment A – Service Providers and Weights](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15695)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15695>
 - b. [Attachment B – Participating Covered Entities and Covered Products](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15696)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15696>
 - c. [Attachment C – Mail-Back Unit Distribution by County](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15696)

<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15697>

d. [Attachment D – State Agency Determinations](#)

<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15698>

4. [Consideration of The Drug Takeback Solutions Foundation's 2023 Annual Report for Home-Generated Sharps Waste](#) (June 27, 2024)

<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15861>

5. [Notice Regarding Disapproval of The Drug Takeback Solutions Foundation's 2023 Annual Report for Home-Generated Sharps Waste](#) (July 29, 2024)

<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15882>