

# Attachment A

PRC section 42032.2(a)(1)(F)(ii) requires a program operator to provide for a reasonable geographic spread of authorized collection sites and an explanation for the geographic spread. The Foundation’s approved Plan states that the Foundation will “ensure that at least 90% of Ultimate Users live within a 15-mile drive of an Authorized Collection Site or a Mail-Back Distribution Site in counties where an authorized Retail Pharmacy is not available.”

The Foundation proposes to amend the singular state-wide definition of “geographic spread to a multi-level definition of geographic spread, determined based upon the number of potential authorized collectors in each county and the population density. This amendment properly considers the differences between urban and rural counties and data gathered from operating the program over the last several years.

Rural residents have higher mobility levels and higher reliance on cars because residences and activity sites are more dispersed.<sup>1</sup> Thus, in counties with low population density and a low number of potential Authorized Collection Sites, Ultimate Users would expect to travel farther to reach an Authorized Collection Site.

The proposed Tiers are shown in the table below:

**Breakdown of Counties in Each Tier as of April 2025:**

<b>Tier</b>	<b>County</b>	<b>Driving Radius</b>	<b>Percent of Population</b>
1	Los Angeles	15 miles	90%
1	Orange	15 miles	90%
1	San Diego	15 miles	90%
1	Sacramento	15 miles	90%
1	Contra Costa	15 miles	90%
1	Riverside	15 miles	90%
1	Ventura	15 miles	90%
1	San Joaquin	15 miles	90%
1	San Bernardino	15 miles	90%
1	Solano	15 miles	90%
2	Stanislaus	30 miles	90%
2	Fresno	30 miles	90%
2	Sonoma	30 miles	90%
2	Placer	30 miles	90%
2	Kern	30 miles	90%
2	Monterey	30 miles	90%
2	Tulare	30 miles	90%
3	Yolo	45 miles	90%
3	Merced	45 miles	90%
3	Butte	45 miles	90%
3	Napa	45 miles	90%
3	El Dorado	45 miles	90%
3	Sutter	45 miles	90%

<sup>1</sup> Pucher, J., Renne, J.L. Rural mobility and mode choice: Evidence from the 2001 National Household Travel Survey. Transportation 32, 165–186 (2005). <https://doi.org/10.1007/s11116-004-5508-3>.

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3	Shasta	45 miles	90%
3	Kings	45 miles	90%
3	Nevada	45 miles	90%
3	Madera	45 miles	90%
3	Yuba	45 miles	90%
3	Humboldt	45 miles	90%
3	Imperial	45 miles	90%
4	Lake	60 miles	90%
4	Amador	60 miles	90%
4	Mendocino	60 miles	90%
4	San Benito	60 miles	90%
5	Calaveras	60 miles	75%
5	Tuolumne	60 miles	75%
5	Tehama	60 miles	75%
5	Del Norte	60 miles	75%
5	Glenn	60 miles	75%
5	Colusa	60 miles	75%
5	Plumas	60 miles	75%
5	Siskiyou	60 miles	75%
5	Lassen	60 miles	75%
5	Mariposa	60 miles	75%
5	Trinity	60 miles	75%
5	Inyo	60 miles	75%
5	Mono	60 miles	75%
5	Modoc	60 miles	75%
5	Sierra	60 miles	75%
5	Alpine	60 miles	75%

Accordingly, the Foundation proposes to amend its current Stewardship Plan for Covered Drugs, October 21, 2021, Version 4 (October 15, 2022), by replacing Paragraph 2 of Subsection B (Convenience Standard) of Section VII (Collection, Transport, and Disposal), located at the bottom of page 21 and the top of page 22, with the following language:

### Section VII. Collection, Transport, and Disposal

#### **B. Convenience Standard**

*14 CCR § 18973.2(g)(2)(A) How reasonable geographic spread is determined, including all factors applied to develop the determination. Population considerations shall use the most recent publicly available population calculations from the State of California Department of Finance.*

**Replace the current paragraph B. Convenience Standard, paragraph “2.” with the following:**

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2. The Foundation will use the California Board of Pharmacy license verification website to determine the number of licensed pharmacies located in each participating county. California Association of Public Hospitals and Health Systems, CDPH California Health Facility Information Database, Cal Health Find Database, and CAL HHS Licensed and Certified Healthcare Facility Listing will all be utilized to determine the hospitals and skilled nursing facilities in each participating county. State of California Law Enforcement Agencies website will be utilized to determine the law enforcement agencies in each participating county. The CA DHCS Narcotic Treatment Program Directory and SAMHSA (Substance Abuse and Mental Health Services Administration) website will be utilized to search for Opioid Treatment Programs in each participating county. All of these sources will be used collectively to determine the number of potential Authorized Collection Sites. Next, the Foundation will use the most recent E-1 population data to determine the population of each county participating in the California State Drug Take-Back Program. The Foundation will divide this number by the area of each county in square miles to calculate the county’s population density. The Foundation will then multiply the population density by the number of potential Authorized Collection Sites. The calculation result will reflect both population density and availability of potential Authorized Collection Sites. Based on the calculations, the Foundation will place counties into “tiers” according to Table 1 below.

Lastly, the Foundation will calculate the percentage of the county population that lives within a certain distance from a participating Authorized Collection Site or mail-back site as outlined in Table 1 below. The Foundation will conduct this data collection process on an annual basis, ensuring each county continues to be serviced per the parameters discussed above utilizing the most current E-1 population data, current participating Authorized Collection Sites and mail-back sites, California Board of Pharmacy licensing information, California Association of Public Hospitals and Health Systems, CDPH California Health Facility Information Database, Cal Health Find Database, CAL HHS Licensed and Certified Healthcare Facility Listing, State of California Law Enforcement Agencies website, CA DHCS Narcotic Treatment Program Directory, and SAMHSA website.

**Table 1: Tier Parameters**

Tier	Population Density x Number of Potential Authorized Collectors	Percentage of Population	Miles from Authorized Collection Site or Mail-Back Site
1	≥35,000	90%	15
2	9,000-34,999	90%	30
3	1,000-8,999	90%	45
4	400-999	90%	60
5	0-399	75%	60