



**DRUG TAKEBACK SOLUTIONS
FOUNDATION**

Variance Request for Additional Services and Events

Oregon Drug Take-Back Program

Submitted on: 10/14/2025

Contents

I. Request Overview	3
II. Addressing Factors Set Forth in OAR 340-098-0350	4
A. Good Faith Efforts to Solicit and Enter into Agreements with Potential Authorized Collectors	4
B. Conditions for Participation	7
C. Proposed Additional Services	8
D. Reasonably Convenient and Equitable Access for Additional Services and Events	14
E. Concurrence from Local Governments	19
F. Annual Solicitation of Potential Authorized Collectors	21
III. Adherence to Applicable Laws and Approved Plan	22
IV. Certifying Statement	22
V. Appendix A -Implementation, Logistics, and Timeline for Direct Mail Service	23
Appendix B - Collection Event Information Program Year 4	25
VI. Attachments	27

I. Request Overview

The Drug Takeback Solutions Foundation (“Foundation”) submits this Variance Request for Additional Services to the Oregon Department of Environmental Quality (“DEQ”) for approval to supplement its revised Updated Program Plan submitted October 14, 2025 (“Updated Program Plan”). This Variance Request incorporates guidance from the [Recommended Format for a Variance Request from Required Drop-off Sites, per ORS 459A.218\(3\)](#) (Recommended Format) that DEQ provided Program Operators and uses the definitions from ORS 459A.200 and Updated Program Plan.

- Name of program operator

Drug Takeback Solutions Foundation

- Name and contact information of authorized representative.

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Foundation Interim President



- Total number of Population Centers for which additional services and events are proposed.

Coverage by Tactic:

Kiosk/Drop-off Sites – 91 Population Centers

Existing Mail-back Distribution Sites – 47 Population Centers

Direct Mail – 52 Population Centers

Proximity/Local Concurrence – 4 Population Centers

Additionally, the Foundation proposes to organize Collection Events to cover 47 Population Centers as outlined further below.

- Total number of drop-off sites that the program operator is unable to establish or maintain.

150

- Program year of request, e.g., July 1, 2021 – June 30, 2022.

July 1, 2025 – June 30, 2026

II. Addressing Factors Set Forth in OAR 340-098-0350

A. Good Faith Efforts to Solicit and Enter into Agreements with Potential Authorized Collectors

OAR 340-098-0350(1): Good faith efforts to solicit and enter into agreements with potential authorized collectors in the affected county or Population Center...such as through outreach to identify, contact and engage with potential authorized collectors.

The Foundation remains committed to establishing Drop-off Sites as the preferred collection method for meeting convenience in Oregon and will continue to work toward meeting that goal until the minimum number of Drop-off Sites required by ORS 459A.209(2)(i) is achieved. The Foundation currently has agreements with 205 Authorized Collectors, resulting in per-se convenient service in 91 Population Centers. The Foundation has also established 8 Kiosks in cities that are not on the Population Center list. Please refer to the Updated Plan, for a description of the methods used in identifying and engaging with potential Authorized Collectors and ongoing efforts to secure Drop-off Sites.

Identification of Eligible Potential Authorized Collectors:

Pursuant to ORS 459A.215, Inmar Rx Solutions on behalf of the Foundation identified potential Authorized Collectors for outreach. The Foundation updates its list of Potential Authorized Collectors continuously throughout the year. Prior to conducting outreach, the Foundation eliminated Potential Authorized Collectors from the list that are already participating in a Drug Take-Back Program, were permanently closed, or do not meet DEQ requirements to host a Kiosk. Potential Authorized Collectors that are not eliminated because of the criteria outlined above are “eligible Potential Authorized Collectors”.

In Program Year 4, the Foundation focused its outreach efforts on five Counties (Curry, Grant, Morrow, Sherman, and Wheeler) where it has yet to establish a Kiosk as required by ORS 459A.209(2)(i)(A). Despite these efforts, the Foundation was unable to establish a Kiosk in these five counties. These are rural counties with small populations and few Population Centers. As explained in the table below, the number of Authorized Collectors is significantly reduced because many of these Authorized Collectors are not eligible because they either already participate with MED-Project, etc. The Foundation reached out to all eligible Authorized Collectors in these five counties between July 14th and August 13th. As noted in the table, most of the contacts declined to join the program.



County	Total #of Authorized Collector(s)	Total # of Eligible Authorized Collector(s)	Notes
Curry	21	12	Most contacts declined or already participate with MED-Project
Grant	24	12	Very limited LEA access; most declined or unavailable
Morrow	16	4	Some outreach succeeded, most already signed with MED-Project
Sherman	4	0	No available collectors or all available collectors participate with MED-Project
Wheeler	3	0	No available collectors or all available collectors participate with MED-Project

The limited number of eligible Authorized Collectors is not just an issue in the five counties. Even after updating its list of potential Authorized Collectors, of the 150 Population Centers where the Foundation has not established the required number of Drop-off Sites, only 21 Population Centers have eligible Potential Authorized Collectors available to place a Kiosk. Most of the potential Authorized Collectors identified by the Foundation were not eligible to participate in the program because they were already participating in a Drug Take-Back Program, were permanently closed, or did not meet DEQ/DEA requirements to host a Kiosk. For example, in 21 Population Centers where the Foundation needs to place a Kiosk in accordance with ORS 459A.209(2)(i), the other approved Program Operator has secured agreements with all the eligible Authorized Collectors. The Foundation is, therefore, unable to establish a Drop-off Site in those 21 Population Centers because the other Program Operator manages the only available DEA Authorized Collectors. Another example is the decreasing number of available Authorized Collectors as businesses shift away from brick-and-mortar pharmacies as customers increasingly rely on online and mail-order pharmacies.

To further complicate these efforts, most of the 21 Population Centers with at least one eligible Drop-Off Site *only have one* eligible Authorized Collector. As outlined below, the Foundation conducted outreach to these eligible Authorized Collectors. A summary of the

Eligible Authorized Collectors in the 151 Population Centers where the Foundation is proposing additional services is provided below.

Summary of Eligible Authorized Collectors	#
Population Centers for Which Additional Services are Being Requested	150
Population Centers with No Eligible Drop-Off Site	132
Population Centers with At Least One Eligible Drop-Off Site	21
Total Eligible Drop-Off Sites Available Among the 21 Population Centers (Above)	24

Additionally, available data in three Population Centers (Boardman, Heppner, and Rockaway Beach) indicate that only one Drop-off Site is necessary to meet the Convenience Standard as provided in ORS 459A.209(2)(i). It was determined that the other Program Operator has established more than one Drop-off Site in these 3 Population Centers. In addition to there already being an excess number of Drop-off Sites than required by ORS 459A.209(2)(i), there are no other eligible Potential Authorized Collectors in these locations for the Foundation to establish to meet the Convenience Standard.

Contact and Engagement:

The Foundation contacted eligible Potential Authorized Collectors via direct mail campaign, phone, email, or in-person site visits. During the last Program Year The Foundation had representatives conducting in-person site visits and attending industry relevant conferences. These efforts and the results they yielded are described in more detail in section B below and in *Attachment A - Good Faith Efforts and Conditions for Participation*

In our attempt to establish Drop-off Sites, the Foundation has gone to great lengths to secure Drop-Off Sites in all Population Centers as outlined in prior years and *Attachment A - Good Faith Efforts and Condition of Participation Spreadsheet*, including those in Historically Underserved Communities. As noted above, Authorized Collectors have given myriad reasons for not establishing a Drop-off Site. When an eligible Authorized Collector explains that its site is not available for one of these reasons or asks not to be contacted about becoming an Authorized Collector again, the site becomes "Not Available."

When an eligible Authorized Collector indicates an interest in participating in the program, the Foundation has worked with them to come to agreement on participation in the Program. The Foundation's efforts last program year resulted in 28 Authorized Collectors joining our program.

This outreach doesn't stop when the Foundation reaches the convenience standard. Even in Population Centers that may have more than one eligible Potential Authorized Collector,

the Foundation will continue to work with the Potential Authorized Collectors even if the number of Drop-off Sites have been met. These efforts have resulted in 19 Population Centers that have more than the statutorily required number of Kiosks.

In addition to the previously described efforts, the Foundation also continues to evaluate the impact of placing Kiosks in Long-term Care Facilities across Oregon. While available only to facility residents, these Kiosks would serve a historically underserved population and increase the overall success of Program collection.

B. Conditions for Participation

OAR 340-098-0350(2): Why a drop-off site cannot be established or maintained in the affected county or Population Center, including an explanation of any conditions for participation on which the program operator or any potential authorized collector could not agree.

As outlined above, the Foundation reached out to every eligible Potential Authorized Collector in the 150 Population Centers for which this variance is being requested. In some cases, as further explained below, no potential Authorized Collector was eligible to establish a Kiosk in the Population Center.

Attachment A -Good Faith Efforts and Conditions for Participation and Attachment B - Means of Meeting Convenience are being provided with this Request to further support the Foundation's efforts around outreach to Potential Authorized Collectors and includes the following details:

- A list of eligible Potential Authorized Collectors identified per Population Center
- Identification of Population Centers that have no available Potential Authorized Collectors
- The explanation of conditions for participation on which the Program Operator or all Potential Authorized Collectors could not agree; or, the reason that a Potential Authorized Collector has chosen not to participate in the Program

Eligible Potential Authorized Collectors gave the Foundation a variety of responses for why they could not establish a Kiosk. Some of these included:

- Space constraints
- Already uses a Med-Project Kiosk
- Change of ownership
- Currently referring customers to Police Department or local hospital for medicine return and uninterested in changing process
- Not interested with no reason given
- Location determined to be out of business
- Unable to reach decision maker after multiple attempts
- Location going through remodel; renovations

- Have had a Kiosk in the past and not interested in having a Kiosk again
- Uses FedEx labels from DEA or other means for drug take-back services
- Location uses another nearby Kiosk and is not interested in having one in-house
- Police department lacks personnel resources to become a collector and instead directs the public to established pharmacy collectors
- Law enforcement substations unmanned and/or closed to the public

C. Proposed Additional Services

Mail-back Distribution Sites.

The Foundation will provide convenient service in 47 Population Centers by utilizing its existing network of Mail-back Distribution Sites during Program Year 5 (July 1, 2025 – June 30, 2026). The Foundation has established Mail-back Distribution Sites in 47 Population Centers where it does not currently have a Kiosk. These Mail-back Distribution sites are conveniently located at community centers, city halls, libraries, local businesses, and medical facilities, which makes them easily accessible for Covered Entities to access. Further, six of these Population Centers have several Mail-back Distribution Sites, making it more convenient for Covered Entities in those areas to access the Foundation's Covered Drug Mail-back Services.

During Program Year 4, the Foundation collected 926.68 pounds of Covered Drugs from its Mail-Back Distribution Sites. This was more than a 20 percent increase over Program Year 3, showing that mail-back continues to grow. On a per site basis, the Foundation's Mail-Back Distribution Sites collect around 3 pounds. While the Foundation has less overall Mail-Back Distribution Sites this year, it is tracking this per site number closely to better understand usage trends across different service areas. While return volumes may vary due to factors beyond the Foundation's control—such as resident behavior and local site engagement—these insights help inform ongoing outreach and education efforts.

Additional Outreach at Mail-Back Distribution Locations in the Five Counties.

The Foundation intends to continue its focus on additional outreach in five counties where it has yet to establish a Kiosk. This year, the Foundation will increase outreach efforts to promote mail-back services by placing mail-back display stands in new Mail-back Distribution Sites within the Five Counties to fulfill convenience.

- As always, residents in the Five Counties may request a Mail-back Envelope or container online (via medtakebackoregon.org) or by calling a dedicated toll-free line.
- Each Mail-back Kit comprises:
 - a. One DOT-approved sharps container suitable for pre-filled injector products, or Mail-back Envelope for other covered drugs, or inhaler envelope for

- inhaler administered medication;
 - b. A tamper-evident, pre-paid, pre-addressed return envelope;
 - c. Detailed, plain-language disposal and packaging instructions.
- ii. Request & Fulfillment Workflow.
- Request Capture: Resident submits name, address, and quantity requested.
 - Processing Time: Mail-back Kits ship via ground courier within a timely manner of the request; tracking information is emailed/texted to the resident.
 - Space & Safety Screening: Each sharps container meets 49 CFR § 173.197 for non-spillable sharps and 21 CFR § 1317.60 for minimized leakage risk.
- iii. Use & Return.
- Resident deposits covered drugs and pre-filled injectors directly into the sharps container or Mail-back Envelope, seals it per instructions, places it into the pre-paid and pre-addressed envelope and then follows the return instructions.
 - Mail-back Kits are traceable end-to-end via unique barcodes; residents may check return status online.
- iv. Receipt & Final Disposal.
- Returned envelopes are routed to the Reverse Distributor who:
 - a. Logs receipt and inspects each container for integrity;
 - b. Transfers contents under witness to an EPA-permitted incinerator (40 CFR Part 266, Subpart P) or medical-waste incinerator (40 CFR Part 62, Subpart HHH).
 - Final destruction certificates and chain-of-custody records are generated for every shipment.

Continuation of Direct Mail Services as Approved in DEQ's Letters Dated September 20, 2023 and November 30, 2023.

Per DEQ's approval letter dated September 20, 2023 and November 30, 2023 for program year 3 Variance Request for Additional Services, the Foundation will continue to provide convenient service through Direct Mail Services to 4 Population Centers needing additional services:

- Lonerock - Direct Mail
- Antelope - Direct Mail
- Shaniko - Direct Mail
- Greenhorn - Direct Mail

The Foundation will continue to provide convenient service through Direct Mail Services, seeking additional service approval for an expanded list of Population Centers with populations less than 1000, where Kiosk placement opportunities are limited. See

Attachment B – Means of Meeting Convenience. The Foundation will provide the Direct Mail Services outlined below and in Appendix A.

- i. Direct Mail Approach
 - All residential addresses in Lonerock, Antelope, Shaniko, or Greenhorn will be sent a Mail-back Envelope delivered directly to the address once every program year.
- ii. Kit Contents & Instruction Postcard.

Each Mail-back Kit will include:

 - A pre-paid, pre-addressed Standard Mail-back Envelope (sized and tested for up to 5 lbs of covered drugs) compliant with 49 CFR § 173.197 and 21 CFR § 1317.60;
 - A removable postcard insert featuring:
 - a. Step-by-step safe-disposal instructions;
 - b. A clear diagram of the Mail-back Envelope and sealing procedure;
 - c. Toll-free and web contacts for ordering additional Mailers when needed, including Inhaler Mail-Back Envelopes and Auto-Injector Mail-Back Packages;
 - A unique, serialized tracking number on both envelope and postcard for end-to-end traceability.
- iii. Fulfillment & Shipping.
 - Kits ship via ground courier within a timely manner of the request;
 - Tracking details are emailed or texted to the requester;
 - All packaging is nondescript and meets DEA Rule § 1317.70(c) requirements for anonymity and tamper evidence.
- iv. Use & Return Process.
 - Resident deposits covered drugs into the Mail-back Envelope, follows the sealing and return instructions
 - Barcoded/unique ID number ensures the Service Provider can monitor receipt at our reverse-distribution partner.
- v. Receipt, Destruction & Certification.
 - Returned envelopes go to the Reverse Distributor, where each is:
 - a. Logged and integrity-inspected;
 - b. Transferred under witness to an EPA-permitted incinerator (40 CFR Part 266, Subpart P) or medical/infectious incinerator (40 CFR Part 62, Subpart HHH);
 - c. Documented with a destruction certificate.

All Mailers provided to these rural locations will include information about safe medication disposal and information for requesting additional Mailers. Direct mail is an accessible and convenient service because it reaches residents directly in their homes, eliminating the need for internet access, travel, or proactive engagement with external platforms. It allows individuals to receive clear, tailored information in a format they can review on their own time and includes a simple return option that makes participation easy. For many, especially those in rural or underserved areas, where there could be significant drive to visit a Kiosk, Mail-Back Distribution Site, or Collection Event, direct mail ensures equitable access to program services, helping to bridge gaps that in-person services may leave behind. While return data from direct mail services is still limited, the Foundation views this method as an important equity-based solution to reach populations that may otherwise be excluded from the program's core infrastructure. The Foundation will continue to monitor and report on return activity as data becomes available.

No Additional Services as Approved in DEQ's Letter Dated July 21, 2023 Because the Population Centers are Adequately Served by Existing Kiosks.

As previously approved by DEQ on July 21, 2023, the Foundation does not propose additional services for four (4) additional Population Centers:

- Dunes City
- Johnson City
- King City
- Maywood Park

As described in the table below, the Foundation has Kiosks in neighboring Population Centers that are from the Population Center above. Given the close proximity and the general size of these Population Centers, these Population Centers are adequately served by the nearby Kiosk.

Population Center Needing Additional Services	Population of Population Center Needing Additional Services	Nearest Population Center with a Kiosk	Distance from Kiosk to Population Center Needing Additional Services
Dunes City	1,450	Florence	6.7 Miles and ~11 min drive
Johnson City	527	Gladstone	2.4 miles and ~7 min drive
King City	5,181	Tigard	0.9 miles and ~3 min Drive
Maywood Park	829	Portland	1.9 Miles and ~6 Min Drive

Collection Events.

The Foundation has made major efforts towards conducting Collection Events across Oregon, as we continue to conduct outreach to law enforcement agencies (LEA's), solid waste facilities, local community leaders, and potential event location sites. These efforts to plan and execute events resulted in 14 completed events in Program Year 4. Details about these Collection Events are described in Appendix B. In advance of each event, the Foundation conducted additional promotion by sending direct mail postcards to the residents of Population Centers being covered by an event as well as offering and providing educational and event materials to Law Enforcement and local community leaders. These materials were handed out, displayed, and shared physically and digitally to community members of counties and Population Centers where historically underserved community members reside.

The Foundation received feedback from LEA's and community leaders about potential Collection Events. LEA's were generally willing to participate but often did not have appropriate staffing to be able to attend Collection Events, as required per 21 CFR §1317.65(b). The most common feedback community leaders provided was in reference to hosting events during certain months to avoid major weather issues. This feedback resulted in the majority of the events falling into spring of 2025.

County	Explanation
Curry	LEAs have limited staffing; substations are unmanned or inaccessible to the public
Grant	One event was coordinated in John Day; other Population Centers did not have accessible LEAs or expressed scheduling limitations
Morrow	Multiple LEAs referred back to existing MED-Project services or declined due to personnel limitations; some contacts unresponsive
Sherman	Only one LEA exists, and it is not publicly accessible or responsive; no other viable stakeholders to host events
Wheeler	LEA staffing constraints; rural geography and sparse population make it difficult to secure event locations or community participation

To maximize the effectiveness and equitable reach of our Collection Events in Program Year 5, the Foundation will deploy a tiered, data-informed strategy that focuses on counties with underserved Population Centers—specifically, those without an established Kiosk or Mail-back Distribution Site. We began with a list of 150 Population Centers that do not currently have a Kiosk. From this list, we excluded four Population Centers where DEQ

has previously approved Direct Mail Services: Lonerock, Antelope, Shaniko, and Greenhorn. We also excluded the four Population Centers where local governments provided written concurrence that nearby Kiosks in adjacent cities provide adequate service: Dunes City, Johnson City, King City, and Maywood Park. The 52 Population Centers where the Foundation is seeking additional Services approval on direct mail have been subtracted. This results in a refined group of 47 Population Centers, which are then categorized by the population density of their respective counties:

1. **Priority for Counties with the Lowest-Density Underserved Population Centers:** For counties containing the lowest population densities among the 47 Population Centers, the Foundation will work with local/county law enforcement to assess the feasibility of an event. If local/county law enforcement are willing to participate, the Foundation will work with local community leaders to schedule a Collection Event in that county. The Foundation's outreach efforts will prioritize the Population Centers within each County that have the lowest population densities among this group. These rural areas are less likely to support permanent collection infrastructure due to smaller populations and greater geographic barriers, making event-based service delivery the most feasible and equitable option.
2. **Simultaneous Outreach in the other Oregon Counties with Service Gaps:** For the remaining counties among the original 47 Population Centers—those with underserved Population Centers and higher relative population densities— the Foundation will focus on aggressive outreach to potential Collectors to establish new Drop-off Sites or Mail-back Distribution Sites. Outreach will include a minimum of 4 documented contact attempts per entity, using a mix of direct mail, phone, email, or in-person visits. Outreach will continue unless the entity is deemed ineligible, declines to participate, or successfully enters into a service agreement. The Foundation will also make good-faith efforts to schedule at least one Collection Event in each of the Population Centers without access to a Drop-off Site or Mail-back Distribution Site, including in the five rural counties. The Foundation's good-faith efforts shall consist of no fewer than two (2) documented outreach attempts per Program Year to local law-enforcement agencies, solid-waste officials, and other key stakeholders in each Population Center. Outreach shall cease early if an event is confirmed on the first contact, if the stakeholder explicitly declines to participate, or if a Drop-Off Site is established in that county. Each attempt shall be recorded with the date, method, and outcome of outreach attempts.

The Foundation will provide DEQ the following information at least 60 days prior to the proposed date for a scheduled event:

- Date of scheduled event
- Contact information of local solid waste management officials with which program operator will coordinate event

- Contact information of local law enforcement that will oversee the event
- Vendor to be used at the event.

D. Reasonably Convenient and Equitable Access for Additional Services and Events

OAR 340-098-0350(3): How the proposed services and, as applicable, collection events will provide reasonably convenient and equitable access to all residents in the affected county or Population Center, and engagement with minority, lower-income, rural and other historically underserved communities to help this.

A. Collection Relative to Drop-Off Sites

Since initiating services in Oregon, the Foundation has destroyed 98,752.87 pounds of Covered Drugs through its program. The Foundation collected and destroyed 93,730.23 pounds through its Secured Kiosks, 2552.94 pounds through its Mailers (including Mailers requested by a Covered Entity, Mail-back Distribution Site, and Direct Mail Service), and 2469.7 pounds through Collection Events. Mailers represent 2.59% and events represent 2.50% of total collections since project inception. From Program Year 3 to Program Year 4, there was a 34.32% increase in the number of Mailers returned overall which resulted in a 26.92% increase in total mail-back weight returned Program-wide. Each year the Foundation has increased the total number of Kiosks and increased collection weight through additional services needed to meet the Convenience standard. In Program Year 2, the Foundation's additional services accounted for 2.87% of total collections, with 583.73 collected pounds from Mailers. In Program Year 3, the Foundation's additional services accounted for 4.03% of total collections, with 646.26 pounds collected through Mailers and 540 pounds through event collection to date. Between Year 2 and Year 3, collections from additional services increased from 2.8% to 4.03%. Mail-Back Distribution Sites and Direct Mail Services continue to provide an important and growing role in the overall delivery of convenient take-back services to those that cannot easily access a Kiosk.

Additionally, the Foundation is building on our past efforts during the initial Program years to increase outreach, as described in the Outreach section below, with the goal of increasing total collections. These efforts are ongoing, and the Foundation will continue to utilize all available data to support outreach.

The Foundation conducted biennial surveys during Program Years 1 and 3, and the results summarized in the respective annual reports is used to adjust awareness and outreach tactics. For Program Year 5 (July 1, 2025 – June 30, 2026), the Foundation significantly increased its outreach efforts. This includes running eight print ads annually in local newspapers (The Bulletin, East Oregonian), four radio spots per year on three stations (targeting underserved areas), including direct engagement with all known

Oregon-based, DEA-listed organizers, and providing support for event awareness, collection, logistics, destruction, and educational materials. With continued focus on the Historically Underserved Communities throughout Oregon, the Foundation believes that non-digital forms of advertising and awareness play a big part in staying inclusive to as many community members as possible.

The Foundation will continue to prioritize establishing and sustaining Kiosks to meet the requirements of ORS 459A.209(2)(i) where Potential Authorized Collectors are available. However, the Foundation expects that Mail-back Distribution Sites, Direct Mail Services, and Collection Events will continue to be an important part of the program, especially in ensuring that rural communities have access to a drug take-back service. Mail-back Distribution Sites provide Covered Entities opportunities to pick up Mail-back Packages at locations that are convenient to them in their communities. All Covered Entities can order Mail-back Packages through the Foundation's website or call center. The website and phone number coupled with Direct Mail Services and Collection Events in certain Population Centers is especially important in rural areas and Historically Underserved Communities who may not be able to travel to a Kiosk or Mail-back Distribution Site.

B. How Additional Services will Achieve Collection Goals

Since initiating services in Oregon, the Foundation has collected over 98,752.87 pounds in Covered Drugs. As reported in the Foundation's Program Year 3 Annual Report and what has been collected to date in year 4, the Foundation experienced a 29.32% increase in weight of collected drugs from Year 3. Given the percentage increase in collections in Program Year 4, the Foundation is confident continuing to provide additional services outlined in this request will allow the Foundation to meet its Program Year 5 collection goals of increasing its collection weight by 43,230 lbs.

C. The Proposed Additional Services Will Provide Reasonably Convenient and Equitable Access

1. Ease of Access

The Foundation proposes that collection through additional services of Mail-back Distribution Sites, Direct Mail Services, and Collection Events provides reasonably convenient and equitable access for all Covered Entities. For one, all Covered Entities can dispose of their Covered Drugs 24 hours a day, 365 days per year, without even leaving their home by requesting mail-back services through the Foundation's website or the toll-free telephone number. In the residential areas of Oregon, Historically Underserved Communities, or residents who are homebound likely find the Foundation's provision of these services to be especially important.

If Covered Entities prefer, they can pick up Mailers at one of the Foundations 234 Mail-back Distribution Sites. Forty of these Population Centers have more than one Mail-back

Distribution Site, making it more convenient for Covered Entities in those areas to access the Foundation's Covered Drug Mail-back Services. Finally, the Foundation proposes to make good-faith efforts to plan Collection Events. These rural areas are especially important in smaller Population Centers and more rural-counties, where regular infrastructure is not feasible.

2. Commitment to Reporting

The Foundation is committed to reporting on the usage rates of additional services used in Program Year 5 in variance requests for subsequent program years. Pursuant to this requirement, the Foundation provided information regarding usage rates for Program Years 1 through 4 above in Section (D)(A).

3. Increased and Additional Public Awareness and Outreach

Based upon previous survey results and the increases in total weight and mail-back weight collected year over year, the Foundation recognizes the need to continue its increased outreach efforts. Below are the increased outreach efforts that will be included in Program Year 5.

- **Direct Mail**

- Four annual direct mail postcard campaigns each consisting of 40,000 postcards targeting both statewide and underserved communities for a total of 160,000 postcards mailed in a program year.
- The Foundation will continue to utilize its Mail-back specific information postcard that:
 - displays images of a mailback distribution kit
 - directs ultimate users to locate their nearest Mail-back Distribution Location by visiting <https://medtakebackoregon.org/>
 - educates ultimate users on how safe and simple Mail-back Service is for disposing of unused medication, as Oregon resident survey data indicated Oregonians perceive Mail-back programs as less safe
- The Foundation will continue to print ads eight (8) times a year in regional newspapers for each print campaign. While Oregon resident survey data indicated that the preference for learning about disposal methods via the newspaper was low (Question 14 in the 2022 survey), the data indicated that newspaper was the second highest medium for learning about the program (Question 11 in the 2022 survey). Ads have run in the same newspapers as were used in the first four program years because these newspapers specifically target the underserved communities and consistency is helping to establish trust and brand recognition. Cumulatively, the newspapers cover the below counties:



Newspaper	County
The Bulletin	Deschutes, Crook, and Jefferson
The Redmond Spokesman	Deschutes
East Oregonian	Wallowa, Union, Baker, Umatilla, Grant
Seaside Signal	Clatsop, Tillamook
Chinook Observer	Clatsop
The Astorian	Clatsop, Columbia
Rogue Valley Times	Jackson, Josephine, Curry
GO East Oregonian	Wallowa, Union, Baker, Umatilla, Grant
Wilsonville Spokesman	Clackamas
West Linn Tidings West Linn	Clackamas
Canby Herald	Clackamas
The Outlook Gresham	Multnomah
Lake Oswego Review	Clackamas
Beaverton Valley Times	Washington

- In Program Year 5, the Foundation will continue running local radio ads. The radio ads will run across three different radio stations for a full month 4x throughout the program year. Radio as a public awareness tactic will be assessed after completion to determine if radio is an effective option of awareness and outreach for subsequent Program years.
 - In Program Year 5, the Foundation will be targeting the following Population Centers with local radio ads: John Day, Canyon City, Prairie City, Seneca, Mount Vernon, Dayville, Long Creek, Monument, Adrian, Jordan Valley, Vale, Fossil, Mitchell, Spray, Arlington, Condon, Lonerock, Grass valley, Moro, Rufus, Wasco, Fossil, Mitchell, Spray, Boardman, Heppner, Lone, Irrigon, Lexington.
- The Foundation will continue its efforts in public service announcements to public radio broadcasting for its public awareness and outreach tactics. The Foundation will enter an ad for consideration to run throughout the year, as time and space is available as determined by the radio stations. Its effectiveness will be assessed after completion to determine if public service announcements via public radio broadcasting is a viable option of awareness and outreach in subsequent program years. The Foundation will continue its efforts in public service announcements on local television networks regionally available to Oregon Residents. The Foundation will enter an ad for consideration to run throughout the year as time and space is

available determined by the television networks. Its effectiveness will be assessed after completion to determine if television is a viable option of promotion of awareness and outreach in subsequent program years.

In conjunction with the above expanded outreach tactics, the Foundation will monitor collection weights after an outreach campaign has launched to determine whether the tactic had the desired effect in the targeted geographic region. With that information, the Foundation can change or edit the tactic used in that geographic region if needed. It is important to note that various factors may influence the collection trends after an outreach campaign has been completed.

The Foundation's increased outreach efforts will target the underserved Population Centers, including the historically underserved, but are part of an overall outreach strategy for the Program as a whole which aims to increase program participation and achieve higher collection weights throughout the various methods of collection.

Outreach to Equitable Access for Historically Underserved Communities

The Foundation continues to employ the below methods of outreach to Historically Underserved Communities as a way to provide for equitable access to Program services.

- Educational and Awareness campaigns are being targeted to the underserved communities throughout Oregon, for example, some direct mail campaigns will target communities with no available Drop-off Site and will more specifically address the safety and practicality of Mail-back Service for the return of unwanted medicine.
- Continued efforts of outreach to all nine federally recognized tribal nations via email and telephone.

The Foundation has learned that areas which are more populated and have broader access to safe medication disposal are more likely to understand why those services exist and how to access them. By continuing to target underserved communities via the methods that have been deployed and will be improved for more effective targeting in the Program Year 5, awareness will increase.

According to our conducted outreach and survey results in 2022, 34% of the survey respondents for the resident survey reported an annual household income of less than \$50,000.00 per year, which means that a large portion of our respondents are living at or below the poverty line per household in Oregon and are therefore considered underserved. Based on these same survey results, most of these Population Centers were previously serviced by Mail-back Service and 36% of the responses to the question of "how convenient are these services" rated using a Mailer as "Very Convenient" and 33% of the responses to that question listed it as "Somewhat Convenient". The Foundation is therefore able to conclude that Mail-back Service coupled with Collection Events will be effective in providing equitable access to Historically Underserved Communities.

E. Concurrence from Local Governments

OAR 340-098-0350(4): Concurrence by the appropriate local governments in the affected Population Center or county with the proposed services and, as applicable, collection events, or an explanation of why the program operator could not obtain such concurrence despite good faith efforts.

In Program Year 4, the Foundation worked to obtain concurrence from local government, community leaders and Law Enforcement Agencies across the state to understand the needs of the communities and ultimately what could help meet the Convenience Standard. By way of phone, email, and in person communication, these outreaches cultivated good information about local communities and ultimately resulted in the coordinating and planning of 14 medication take-back events run across the state. During Program Year 4, these events have yielded over 1,290 lbs of unused and unwanted medication.

Efforts to obtain concurrence are ongoing and will continue into the new program year. The below information is similar to previous years as the strategy to obtain concurrence has remained largely unchanged. As the Foundation moves into Program Year 5, we will evolve this strategy by researching potential new contacts for each Population Center that has not provided a response for concurrence to date. If the Foundation identifies a new contact, a new round of email or phone calls will be initiated to further establish concurrence where it has not been previously achieved. The below summarizes the Foundation's efforts to obtain concurrence during the Program to date.

As Mail-back Distribution Sites or Collection Events are established, the Foundation reaches out to the local contacts, including local government contacts in those Population Centers seeking their concurrence with the collection method. The following details are provided to demonstrate the Foundation's efforts to obtain these concurrences. The information is broken down by 1) the efforts undertaken to date 2) summary of concurrence received to date 3) ongoing efforts to obtain concurrence.

1. Concurrence Efforts Undertaken to Date

Over the past program year email, phone, and in-person outreach was conducted, to date, with the below results:

- Over 112 phone calls, emails, and in-person meetings were made throughout the state of Oregon
- The below is a breakout of outreaches by contact type:
 - County Level LEA – 60
 - City Level LEA – 29
 - Solid Waste Facility – 16
 - Other – 7



2. Summary of Concurrences Obtained to Date

To date, the Foundation has a Kiosk or has obtained concurrence in 146 Population Centers. The 146 Population Centers are listed below:

Adams	Elkton	Lincoln City
Adrian	Enterprise	Lostine
Albany	Estacada	Madras
Amity	Eugene	Maupin
Arlington	Falls City	Maywood Park
Astoria	Florence	McMinnville
Athena	Forest Grove	Medford
Aumsville	Fossil	Milton-Freewater
Baker City	Gates	Milwaukie
Bandon	Gervais	Molalla
Banks	Gladstone	Monmouth
Bay City	Gold Beach	Monument
Beaverton	Grants Pass	Mt. Angel
Bend	Greenhorn	Myrtle Point
Bonanza	Gresham	Newberg
Burns	Halfway	Newport
Canby	Happy Valley	North Bend
Cannon Beach	Harrisburg	Nyssa
Canyonville	Helix	Oakridge
Carlton	Hermiston	Ontario
Cascade Locks	Hillsboro	Oregon City
Cave Junction	Hines	Pendleton
Central Point	Hood River	Philomath
Clatskanie	Independence	Pilot Rock
Columbia City	Jefferson	Portland
Coos Bay	John Day	Powers
Coquille	Johnson City	Prairie City
Cornelius	Junction City	Prineville
Corvallis	Keizer	Rainier
Cottage Grove	King City	Redmond
Creswell	Klamath Falls	Reedsport
Dallas	La Grande	Rivergrove
Dayton	Lafayette	Rogue River
Depoe Bay	Lake Oswego	Roseburg
Dunes City	Lakeside	Salem
Durham	Lakeview	Sandy
Echo	Lebanon	Scappoose



Scio	Talent	Waldport
Seaside	The Dalles	West Linn
Sheridan	Tigard	Weston
Sherwood	Tillamook	Willamina
Siletz	Toledo	Wilsonville
Silverton	Troutdale	Winston
Sisters	Tualatin	Wood Village
Springfield	Turner	Woodburn
Stanfield	Umatilla	Yachats
Stayton	Unity	Yamhill
Summerville	Vale	Yoncalla
Sweet Home	Veneta	

3. Adapting to Community Feedback and Non-concurrences

As demonstrated by the data from this outreach, the Foundation has received information indicating how and where the local governments prefer to have service in their community. The Foundation has not received any communication indicating that there was an instance of non-concurrence.

The Foundation's adaptation to feedback from the local community spans across all the possible facets of the Program including collection method, service delivery and location, and will continue to evolve as additional feedback is received.

4. Engagement and Outreach Strategy Evolution

As previously stated, it is the Foundation's intention to evolve the current strategy for concurrence going into Program Year 5. We will accomplish this by researching and identifying new contacts at the county level for the Population Centers that have not provided a response for concurrence to date. After the new contact info is obtained, a new round of email or phone calls will be initiated to further establish concurrence where it has not been previously achieved.

F. Annual Solicitation of Potential Authorized Collectors

OAR 340-098-0350(5): Commitment to solicit potential authorized collectors for the affected county or Population Centers on at least an annual basis.

The Foundation will continue to solicit potential Authorized Collectors annually and evaluate the need for additional Drop-off Sites based on population growth and access to underserved communities. Population numbers by city have not changed drastically enough nor have we received feedback from community leaders needing additional Drop-off or Mail-back Distribution Sites.

Methods of solicitation include targeted in-person site visits, phone, email, c-level discussions with large corporate chains and health systems, direct mail, and social

media tactics. The Foundation continues to build strong relationships with Law Enforcement Agencies across the state. These relationships have led to the placement of Kiosks, spreading of program awareness, as well as the running of more than 45 take-back events.

Outreach in the Five Counties: The Foundation will make additional good faith efforts to establish at least one Drop-Off Site in each of the five rural counties, Curry, Grant, Morrow, Sherman, Wheeler (the "Five Counties") by:

- Conducting a minimum of four (4) documented outreach attempts per potential authorized collector during the Program Year via direct mail, email, or in-person contact;
- Ceasing outreach to any prospect if: (a) DEA eligibility is not met; (b) the entity confirms participation with another operator, declines participation, or requests no further contact; (c) the entity elects to serve only as a Mail-back Distribution Site; or (d) the prospect converts to an executed Kiosk agreement (in which case follow-up shifts to the contracting cadence).
- Recording each attempt with the date, method, and outcome of outreach.

III. Adherence to Applicable Laws and Approved Plan

The Foundation will establish and conduct any approved additional services or events in accordance with all applicable laws and the Foundation's approved drug take-back program plan.

IV. Certifying Statement

I, Wanda Voigt, hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that the above information and all of the statements, documents and attachments submitted with this claim are true and correct to the best of my knowledge based on reasonable inquiry.



Wanda Voigt, M.Jur, R.N., B.S.N.
Foundation Interim President

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V. Appendix A –Implementation, Logistics, and Timeline for Direct Mail Service

The Foundation will be targeting households in Greenhorn, Shaniko, Lonerock and Antelope by utilizing USPS (logistics and delivery) and a local fulfillment company (fulfillment) that Inmar has a long-standing relationship with. This helps guarantee that each residential address receives a Mailer. Educational materials around Mail-back Services and how to order more Mailers will be included in the Mail-back Envelopes. The number of Mailers per Population Center will depend on the number of households in each individual Population Center. The Foundation's goal is to reach all residential addresses in Lonerock, Greenhorn, Shaniko, and Antelope with a Mail-back Envelope.

Once the address list is obtained from USPS and our fulfillment partner, the Foundation will move to fulfillment. Each Mailer will be inserted into an outer mailing envelope with the educational materials. After fulfillment is complete the mailing envelopes will be sent via USPS directly to every residential address in Lonerock, Greenhorn, Shaniko, and Antelope.

The Mailers being distributed to Covered Entities directly are the same Mailers used for Mail-back Distribution Sites and Mail-back Service that is requested via the Program Website or Toll-free Phone Number. Details are provided below:

The Standard Mail-back Envelopes will meet DEA Rule requirements under § 1317.70(c), specifically:

- Preaddressed, postage paid
- Nondescript and does not indicate what may be inside
- Waterproof, tamper-evident, tear-resistant, and sealable
- Contain a unique ID number that allows for tracking
- Include instructions for the user that indicate the process for returning the Mailer, substances that can be sent, notice that packages can only be mailed in the US customs territory and notice that the only packages provided by the Authorized Collector will be accepted
- No Personally Identifiable Information will be required

Information Insert

The Foundation developed a new informational insert that was included with Direct Mail envelopes during Program Year 3. Below is the Mail-back information postcard that:

- displays an image of a mailback envelope
- educates the ultimate user on how safe and simple Mail-back Service is for disposing of unused medication

Pursuant to ORS 459A.230(1)(c) and (i), the Foundation will include in the Annual Report the following information:

- The amount, by weight, of drugs collected by each Mail-back Service including Mail-back Distribution Sites, Mailers requested via the website or toll-free phone number and Mailers sent directly to Covered Entities
- The total amount, by weight, of drugs disposed of by all Mail-back Service including by Covered Entities who were directly provided a Mailer under this alternative method.
 - The direct-mail service's results will be able to be broken out separately from the traditional Mail-back Distribution Sites returned Mailers and returned Mailers requested from the website or toll-free phone number.

Appendix B – Collection Event Information Program Year 4

City of Event	County	Event Date	LEA Agency	Solid Waste Agency	Pounds Collected
Medford	Jackson	3/13/25	Oregon State Police Department	Jackson County Waste and Recycling	100
Reedsport	Douglas	4/23/2025	Reedsport Police Department	Douglas County Solid Waste Department Manager	47
Newport	Lincoln	4/24/2025	Newport Police Department	Lincoln County District Manager	20
Corvallis	Benton	4/26/25	Benton County Sheriff's Department	Corvallis Municipal Offices	321
Happy Valley	Clackamas	4/26/25	Happy Valley Police Department	Clackamas County Garbage & Recycling	341.1
Shady Cove/Eagle Point	Jackson	5/14/2025	Jackson County Sheriff's Department	Jackson County Waste and Recycling	35
Medford/Phoenix	Jackson	5/15/2025	Jackson County Sheriff's Department	Jackson County Waste and Recycling	94.5
Sublimity	Marion	5/28/2025	Marion County Sheriff's Department	HHW Facility at the Salem-Keizer Transfer Station	128

Woodburn	Marion	5/29/2025	Marion County Sheriff's Department	HHW Facility at the Salem-Keizer Transfer Station	35
McMinnaville	Yamhill	5/30/2025	Yamhill County Sheriff's Department	Yamhill County Solid Waste	111
Fossil	Wheeler	6/12/2025	Wheeler County Sheriff's Department	Fossil Transfer Station	6
Bend	Deschutes	6/13/2025	Oregon State Police Department	Deschutes County Solid Waste	17
Roseburg	Douglas	6/26/2025	Douglas County Sheriff's Department	Douglas County Solid Waste Department Manager	18
Irrigon	Morrow	6/26/2025	Morrow County Sheriff's Department	Morrow County Public Works	18

*These weights are estimates. The final weights of these events will be presented in the annual report.

VI. Attachments

Attachment A – Good Faith Efforts and Conditions of Participation Spreadsheet

Attachment B – Means of Meeting Convenience Spreadsheet