

# MedDrop™ Medication Collection Kiosk Site Requirements

Compliance with DEA regulations rests with the registrant

As your site is the DEA registered authorized collector, this document is meant to remind staff at your facility of the requirements from DEA for installing and maintaining collection receptacles (kiosks).

The DEA designed the physical security controls and other accountability measures (e.g., recordkeeping, two-person witness process, for collection receptacles) in an effort to minimize the risk of diversion.

## The following are reminders of your responsibilities

In the event an authorized collector knows or has reason to suspect diversion from collection receptacles is occurring, the authorized collector must take steps to prevent the diversion, including reporting to the appropriate authorities pursuant to §§ 1301.74 and 1301.76. Such action stems from the responsibility to provide effective controls and procedures to guard against theft and diversion as required by § 1301.71(a).

### KEY RETENTION

Access to the inner liner shall be restricted to employees of the collector: **The customer site must maintain the kiosk keys.** Only your employees may open the kiosk for the driver and must retain full possession of them throughout the process. Never hand the keys to the driver.

### EMPLOYEE WITNESS/SUPERVISION AND SIGNATURES

DEA regulations state that installation and removal of the inner liner of the collection receptacle shall be performed by or under the supervision of at least two employees of the authorized collector.

The installation and removal of the inner liner of the collection receptacle shall be performed by or under the supervision of at least two employees of your site. The inner liner shall be sealed by the driver under the supervision of two employees of the site immediately upon removal from the kiosk. Installation or removal of the inner liner will not occur unless two employees of the customer are present and are observing the driver at all times.

Finally, your two employees must sign the driver's handheld to indicate their witnessing of the process. The driver cannot sign on your behalf.

### LOGBOOK/RECORDKEEPING

DEA requires you to keep record of liner installation and removal. Stericycle has provided a logbook template, available on the customer portal, for you to use for this purpose. It is the responsibility of your employees to maintain the logbook and follow any additional state regulations for keeping such records.

**Installation Records:** Record the date of each inner liner when installed, the address of the location where each inner liner is installed, the unique identification number and size of each installed inner liner, the registration number of the collector, and the names and signatures of the two employees that witnessed each installation.

**Removal Records:** Record the date of each inner liner when removed and sealed, the address of the location from which each inner liner is removed, the unique identification number and size of each inner liner removed, the registration number of the collector (customer site), and the complete (first and last) names and full signatures of the two employees that witnessed each removal.

Record the date when each sealed inner liner is transferred to storage, the unique identification number and size of each sealed inner liner stored, and the names and signatures of the two employees that transferred each sealed inner liner to storage.

Record the date when each sealed inner liner is transferred for destruction, the address and registration number of the reverse distributor or distributor to whom each sealed inner liner was transferred, the unique identification number and the size of each sealed inner liner transferred, and the names and signatures of the two employees that transferred each sealed inner liner to the reverse distributor or distributor.

### BOX MAINTENANCE AND SHIPPING

Once the driver leaves the closed liner in your possession, you are required to store it in a securely locked room with controlled access. The driver labeled the liner and arranged for pickup by UPS at time of service. Do not arrange for your own UPS pickup or for another carrier to pick up. Do not add any additional labels to the liner.



Contact Stericycle's dedicated kiosk client services team at:

[RxTakeBack@stericycle.com](mailto:RxTakeBack@stericycle.com)



We protect what matters.