

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).

EMPLOYEE WITNESS/SUPERVISION AND SIGNATURES

Access of inner liner shall be restricted to employees of the collector. 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, at least one employee must have completed the special permit training.

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 under the supervision of two employees of the site immediately upon removal from the kiosk. Installation or removal of the inner liner should only occur when two employees are present throughout the process.

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 liner and box have been packaged per the *Packaging Guidelines* (found on the customer portal) by an employee trained on the conditions of DOT Special Permit 21489, move the box to a securely locked room with controlled access for storage to await UPS pick-up.



Contact Stericycle's dedicated kiosk client services team at:

RxTakeBack@stericycle.com



We protect what matters.