



Summary of changes to MED-Project approved plan

Original approved plan dated 05-18-2020, was approved by the department in May of 2020.

[Current approved plan is dated 05-24-2023.](#) Note: all changes from 08-21-2020 through 05-24-2023 are also reflected in the current approved plan. This summary shows the most recent updates first.

Date	Description of Change	Notes
Requested 10-16-2024 Approved 10-21-2024	In Section III.F Table 3 Waste Disposal Facilities, removed exception from Curis Bay Energy, LP. This Waste Disposal Facility now accepts all covered drugs. Prior to this change this facility did not accept inhaler mailers.	
Requested 10-16-2023 Approved 11-01-2023	<p>Changed description of automatic resupply of inner liner kits for on-demand sites to allow a resupply of three inner liner kits for frequent return sites and a resupply of one inner liner kits for infrequent return sites. The fourth paragraph of section III.B.4 (collection sites) of the MED-Project plan dated 05-24-2023 is changed to read:</p> <p><i>Using a system that is designed to stock Authorized Collectors with spare inner liners and boxes prior to exhausting on-site supplies, Authorized Collectors participating via the On-Demand Collection Service method will receive replenishment inner liners and boxes automatically when two inner liners and boxes from previous kits of inner liners and boxes remain on-site.</i></p> <p><i>The automatic replenishment system for inner liners and boxes or the regularly scheduled service based on historical trends will limit situations in which an Authorized Collector must lock a Collection Receptacle that has become full before receiving a replenishment inner liner and box or regularly scheduled service.</i></p>	<p>RCW 69.48.060(2)(a) requires kiosks to accept covered drugs during the hours the authorized collection is open for business.</p> <p>RCW 69.48.060(2)(c) requires program operators to provide a service schedule that ensures kiosks are not locked due to being full.</p> <p>The department approved this change with the understanding that:</p> <ul style="list-style-type: none"> • New on-demand collection sites will have an initial supply of three inner liners. • When MED-Project identifies a collection site as an infrequent return site, that site will begin to receive an inner liner resupply package that contains one inner liner kit, rather than three. Other on-demand collection sites (frequent return sites) will continue to receive an inner liner supply package that contains three inner liner kits. MED-Project will monitor collection site returns and recategorize sites as infrequent or frequent return sites as needed. • MED-Project will ensure that each collection site always has at least two inner liner kits on site, one in the kiosk and one in storage. Except for the few days when a new inner liner package is in transit, all collection sites will have at least three inner liner kits on site, one in the kiosk and two in storage. Frequent return sites will often have four or more inner liner kits on site. • MED-Project monthly kiosk reports will identify which on-demand collection sites receive standard three inner liner/box kits and which receive new single inner liner/box kits.
	Deleted section VI.E (disclaimer) of the MED-Project plan dated 05-24-2023.	

For brevity, this document refers to secure collection receptacles as *kiosks and collection sites as kiosk hosts*.

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	MED-Project will no longer include a disclaimer on written or verbal education and outreach material.	
Requested 05-24-2023	Removed three waste disposal facilities and updated addresses and permit information for others in Table 3.	
Approved 06-01-2023	Updated names and addresses of vendors in Table 1.	
	<p>Deleted “rapid response” from definitions, deleted “rapid response” section (III-B-7 in 05-18-2020 plan), removed references to “rapid response” throughout plan, and removed reporting on requests for rapid response that were not provided.</p> <p>Clarified that kiosk hosts can request service in addition to regularly scheduled service by submitting a maintenance request (including a request for prompt service).</p>	<p>Statute requires program operators to make sure kiosks are managed in a way that keeps them available to the public on an on-going, year-round basis. This includes providing prompt service and a method for kiosk hosts to request prompt service.</p> <p>Plan includes description of how kiosk hosts can request prompt service and assurance that MED-Project will provide prompt service.</p>
	Increased time from order to receipt for inner liner/box kits from two-three business days to five business days.	Automatic replenishment of inner liner/box kits did not change—a new kit of three inner liners and boxes will be shipped when the first box of any prior kit is received.
	Reduced monitoring for kiosk host compliance from quarterly to semi-annually. Clarified that this monitoring is in addition to the inspection of kiosks for maintenance and cleaning needs performed each time an inner liner is packaged for transportation.	In a cover letter accompanying the plan revision, MED-Project noted that, for some sites, one of the twice-yearly inspections is conducted by authorized collector staff using a checklist and data collection system provided by MED-Project. MED-Project staff follow-up as appropriate, based on checklist responses and quality of collected data.
	Deleted description of typical staffing levels from Collection Event Procedure (section III-D).	Plan states staffing levels will comply with DEA requirements, meet collection event host requests, and comply with all applicable laws, regulations, and other legal requirements.
	Deleted list of sources used to identify facilities and people to receive annual outreach.	All outreach requirements of chapter 69.48 RCW and chapter 246-480 WAC must be met. None require specific sources.
	Reduced outreach campaign from one month three times per year to unspecified.	No change to goal of outreach viewed by 50% of the adult population of Washington.

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	<p>Removed projection that 90% of covered entities living within 15-minute drive of a kiosk.</p>	<p>Maintains statements that MED-Project will work to distribute kiosk hosts geographically and seek to establish the required number of kiosk hosts per population center and at each eligible potential authorized collector on islands and in areas outside population centers.</p> <p>Requirement for 90% of residents to be within 15-minute drive of a kiosk is not required by law.</p>
	<p>Deleted statement that, “MED-Project will continue to support the services existing at the time of the end of the grandfather period, including all Collection Sites in the existing drug take-back program according to their existing service methods.”</p>	<p>Program operators must meet all chapter 69.48 RCW requirements. Any retail pharmacy, hospital or clinic with on-site pharmacy or law enforcement agency that offers to participate must be included. Current participation is considered as offering and able to participate. Kiosk hosts may change their choice of collection method as provided by section III-B-4.</p>
	<p>Changed statement in section XII: Grandfathered Plans from, “After the end of the 12-month period, MED-Project will maintain a network of Collection Sites that provides equitable and reasonably convenient access to all residents as described in this Plan.” to, “... maintain a network of collection sites that meets the requirements established in RCW 69.48.060(3)(c).”</p>	<p>Program operators must meet all chapter 69.48 RCW requirements, including all related to number and location of collection sites.</p>
	<p>Added statement to Appendix E, page 100, noting that education, outreach, and promotional materials, including signage, will comply with RCW 69.48.040(4)(a).</p> <p>Replaced drop-slot signage, page 98, with image that complies with RCW 69.48.040(4)(a). (Deleted “medical devices” from Not Accepted list.)</p>	<p>RCW 69.48.040(4)(a) includes drugs in medical devices in the definition of covered drugs.</p>
<p>Department notified 12-13-2021</p>	<p>Stericycle Specialty Waste Solutions, Inc. changed name to Stericycle Inc.</p> <p>PureWay Compliance, Inc. changed location from Katy, TX to 16225 Park Ten Place Ste 830 Houston TX 77084</p> <p>Covanta Environmental Solutions dba Chesapeake Waste Solutions, LLC changed location from Milwaukee WI to 190 Shellyland Road Manheim PA</p>	
<p>Department notified 05-28-2021</p>	<p>Stericycle Specialty Waste Solutions, Inc. changed location from Blaine MN to 2355 Waukegan Road Bannockburn IL 60015</p>	
<p>Department notified 08-21-2020</p>	<p>Changed official point of contact from Jim Wilson to Victoria Travis.</p>	

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