

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC HEALTH

DRUG STEWARDSHIP PROGRAM

PROPOSAL

Originally Submitted April 10, 2020

Revised June 26, 2020

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SUBMITTED BY:



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CONTENT

Cover Letter	01
I. Summary and Overview	02
II. Drug Collection Systems	04
A. Convenient and Ongoing Access	04
B. Mail-back Program	06
1) Mail-back Envelope Distribution Sites	06
2) Requesting Mail-back Packaging	06
3) Mail-back Packaging Tracking	07
C. Collection Kiosks	08
1) Kiosk Specifications and Design	08
2) Auto-replenishment of Kiosk Supplies	09
3) On-site Pick-up Service	10
4) Optional Self-service Returns	10
5) Pick-up and Disposal	10
D. Drop-off Day Events	13
III. Security & Safety Provisions	13
IV. Public Outreach & Education Plan	13
A. Educational & Outreach Material	13
B. Collector Marketing Supporting	14
C. Website	15
D. Toll-free Number	15
E. Traditional Media	16
F. Social Influencer Marketing	18
G. Targeted Media	19
H. Impact Measurements	19
I. Collection Kiosk Signage	19
V. Operational & Administrative Costs	20
VI. Attestation of Compliance	21
VII. Compliance with Applicable Laws	21
A. Policies and Procedures	22
B. Authorized for Collection	22
C. Unauthorized for Collection	22
D. Collection Specifications	22
E. Kiosk Specifications	23
F. Mail-back Program Specifications	23
G. Mail-back Envelope Distribution Sites	24
H. Requesting Return Envelopes	24
VIII. Participating Covered Manufacturers	24
IX. Reporting	25

CONTENT

A. Drug Collection Annual Reporting	25
B. Education and Outreach Initiatives	25
X. Program Goals	26
XI. Implementation Plan and Schedule	27
A. Implementation Plan and Schedule	27
B. Program Oversight	27
XII. Change Management.....	28
XIII. Patient Privacy	28
XIV. Proprietary Information	29
XV. Program Operator POC	29
Appendix	31
A. List of Kiosk Locations	32
B. Kiosk Signage.....	33
C. Training Material	35
D. Promotion Material	36
E. Applicable Permits and Licenses.....	43
F. Agreement Templates	44
G. Letters of Recommendation	45
H. Resumes.....	47
I. Inmar Rx Returns Kiosks Nationwide.....	51
J. Drop-off Day Materials.....	52
K. List of Producers' Benzodiazepines and/or Opioids.....	54

Cover Letter

April 10, 2020

The Commonwealth of Massachusetts
Department of Public Health
250 Washington St.
Boston, MA 02108

Inmar Rx Solutions, Inc. ("Inmar") hereby submits this proposed drug stewardship program pursuant to the Massachusetts Drug Stewardship Program, codified as M.G.L. c. 94H and under the guidance of Circular Letter DHCQ 17-1-666. As opioid and Rx diversion continues to threaten the health of Massachusetts' citizens and threaten local ecosystems, Inmar stands uniquely positioned to protect public safety. Inmar possesses the required legal, regulatory, and operational infrastructure to develop and operate a drug stewardship program in the Commonwealth of Massachusetts. Currently, Inmar services nearly 1,200 drug collection kiosks in 42 States and the District of Columbia, and has safely disposed of 59.5 tons of consumer-returned medication to date.

As the largest pharmaceutical reverse distributor in the United States, Inmar has relationships with 90% of all pharmaceutical manufacturers. Through conversations and meetings with these manufacturers, Inmar has discovered a high level of interest from them of Inmar operating the drug stewardship program on their behalf. Inmar is seeking to become an approved drug stewardship program operator for the Commonwealth of Massachusetts Department of Public Health. Once approved, Inmar will leverage its relationship in the manufacturer community to recruit them as participants in the program.

Inmar currently has over 500 Rx Returns client locations in the Commonwealth of Massachusetts, of which over 100 are retail pharmacy client locations. Inmar will engage these pharmacies to become authorized collection sites. Inmar will utilize hospitals with on-site pharmacies and law enforcement agencies as necessary to meet the goals of convenient and ongoing access for residents across the Commonwealth.

Inmar is open to speak further about our Drug Stewardship Program and welcomes the opportunity to do so. Please contact Domingo Isasi, VP of Consumer Drug Take-Back Solutions at domingo.isasi@inmar.com to arrange a meeting.

This Drug Stewardship Program will be fully financed by the Drug Manufacturers that elect to participate in Inmar's Drug Stewardship Program for the Commonwealth of Massachusetts.

Sincerely,



Domingo Isasi
Vice President, Consumer Drug Take-Back Solutions

I. Summary and Overview

Inmar provides a comprehensive drug stewardship program that includes compliant drug collection methods supported by outreach and education programs to increase consumer awareness and participation. The program complies with the legislation under statute M.G.L. c. 94H and guidance set forth in Circular Letter DHCQ 17-1-666. The drug stewardship program provides safe, secure, and convenient access on an ongoing basis for consumers across the Commonwealth and will be funded by participating covered manufacturers. The program also provides reporting on collection metrics and results of consumer education and outreach campaigns. Inmar will notify the applicable governing bodies fifteen (15) days prior to making any changes to the program that materially impact the operation of the program.

Citation (M.G.L. c. 94H)	Description of MA Law	Inmar Complies	Proposal Section/Page
Drug Collection System			
Section 3 (i)	A collection system to provide convenient, ongoing collection services to all persons seeking to dispose of unwanted drugs; provided, however, that the collection system may accept any covered drug and any other prescription drug in a pill formulation regardless of its schedule, brand or source of manufacture.	Current kiosk placements at authorized collector locations and centers of population for targeted kiosk placement	Section II.A Page 04
Drug Collection Methods			
Section 3 (i) (A)	A mail-back program that provides prepaid and preaddressed packaging for a pharmacy to distribute when filling a prescription for a covered drug or upon request by a consumer;	Available for distribution at select authorized collection sites or by request via a website or toll-free phone line	Section II.B Pages 06-07
Section 3 (i) (B)	Collection kiosks;	Turn-key program with DEA- and DOT-compliant processes and materials	Section II.C Pages 08-12
Section 3 (i) (C)	Drop-off day events at regional locations convenient to the public; or	Coordinated initiatives with local authorities to manage secure events at alternative locations in underserved communities	Section II.D Page 13

Section 3 (i) (D)	In-home disposal methods that render a product safe from misuse and that comply with applicable controlled substance regulations and environmental safety regulations.		N/A
Security			
Section 3 (ii)	Adequate provisions for the security of unwanted drugs throughout the collection process and the safety of any person involved in monitoring, staffing or servicing the stewardship program.	Safety and Security are covered in multiple section of this proposal	Section III Page 13 Appendix C Appendix E
Education and Outreach			
Section 3 (iii)	A plan for public outreach and education about the Drug Stewardship Program.	Strategic deployment of Inmar's media assets and expertise, as well as far-reaching retail pharmacy relationships, to drive program awareness and participation	Section IV Pages 13-19
Costs/Budget			
Section 3 (iv)	A plan for the manufacturer or stewardship organization that provides the operational and administrative costs associated with the program; provided, however, that no point-of-sale, point-of-collection, processing fees or other drug cost increases may be charged to individual consumers to recoup program costs.	Operational and Administrative Costs estimates are included along with Program Assumptions	Section V Pages 20-21
Compliance			
Section 3 (v)	An attestation that the program shall comply with all applicable state and federal requirements for the collection, security, transport and disposal of drug products, including any requirements established by rule or regulation of either the U.S. Drug Enforcement	Attestation of Compliance and explanation of compliance with applicable laws	Sections VI & VII Pages 21-24

	Administration or the U.S. Environmental Protection Agency.		
Participating Manufacturers			
Section 3 (vi)	<p>Any other requirements established by the department for the safe and effective administration of a drug stewardship program.</p> <p>A list of all manufacturers participating in the proposed plan and the amount each will contribute to the plan financing. Each manufacturer must also identify all covered drug products sold in the Commonwealth during calendar year 2016, and the number of units of each.</p>	Statement of Strategy to operate on behalf of Participating Manufacturers	Section VIII Page 24
Reporting			
Section 2 (c)	Each operator of a drug stewardship program shall file an annual written report to the department describing the program's activities for the prior year and the volume and type of unwanted drugs collected not later than March 1.	Insight into required collection and outreach metrics	Section IX Page 25

II. Drug Collection Systems

✓ Title XV Chapter 94H Section 3(i)

A. Convenient and Ongoing Access

We look forward to the opportunity to work alongside the Department of Public Health to ensure convenient access for every resident in the Commonwealth. The program will initiate immediately after the Department's approval of Inmar's drug stewardship program. Inmar will set up a collection system that provides convenient and ongoing access to residents across the Commonwealth.

By virtue of our experience, Inmar is estimating the need for approximately 250 kiosks strategically located throughout the Commonwealth. This number has been established based on a formula of one collection site in each population center and one additional collection site for every 50,000 residents of the city or town. Inmar commits to collaboration with the Department to ensure alignment in the proper number and location of kiosks.

Today, Inmar provides Rx Returns services to over 500 client locations in the Commonwealth of Massachusetts. Inmar will reach out to these pharmacies as potential collection sites. We believe in the utilization of retail pharmacies whenever possible as not only a convenient avenue for residents to return unwanted drugs but this also provides opportunities for incremental revenue as customers make purchases during their visits. Not only does this help the retail pharmacy that is allocating floor space to the drug stewardship program, but it provides a revenue boost for the Commonwealth as well.

Collection sites are searchable to residents in Google Maps, simply by typing “Drug Disposal,” or other similar phrases in the Google Maps applications.

Inmar will establish mail-back envelope distribution locations or drop-off day events for each missing collection site to supplement service in any underserved area of the Commonwealth pursuant to M.G.L. c. 94H.

Exhibit II.A-1 below shows the centers of population in which Inmar has existing kiosk locations, potential client locations to make the program accessible to consumers in accordance with the regulations, and centers of population with less than 50,000 residents that will require kiosks for accessibility for residents in those areas.

Appendix I also shows all Inmar kiosks nationwide.

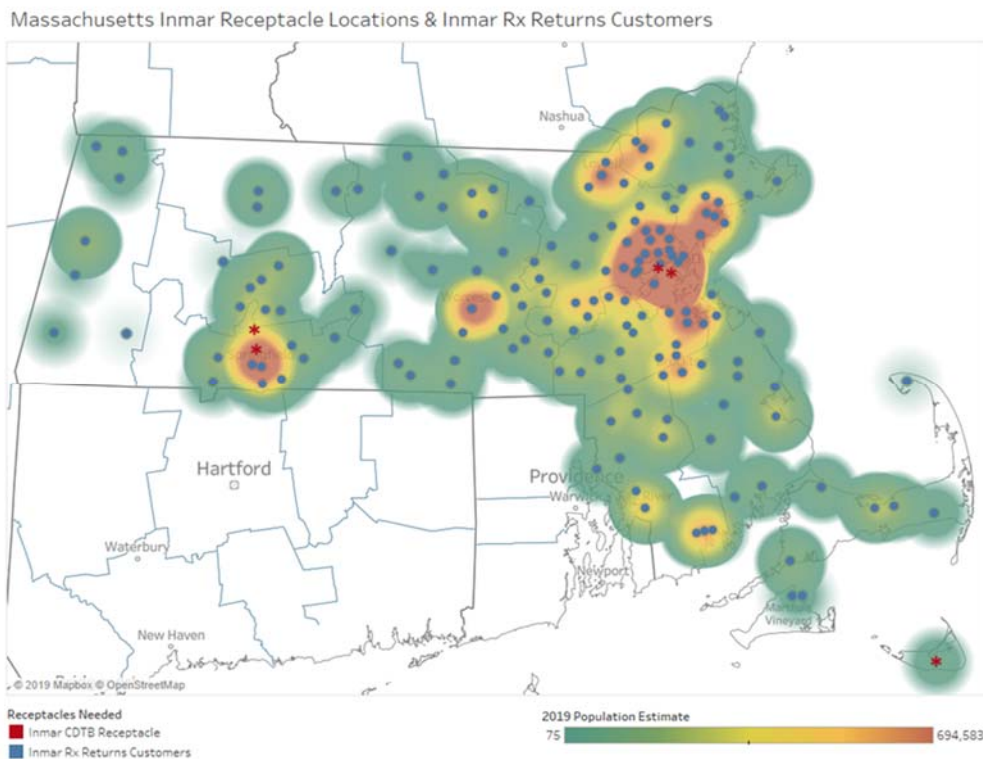


Exhibit II.A-1: Kiosk locations overlaid with population density

B. Mail-Back Program

Inmar will provide prepaid and pre-addressed packaging to consumers containing written instructions for returning unwanted drugs. Mail-back packaging will be provided at mail-back distribution location sites and will also be available directly from Inmar via the program website and toll-free number.

Inmar will also provide small information cards to pharmacy locations that are challenged with space or staffing. Inmar understands that not all locations are able to keep an inventory of serialized mail-back packaging. Instead, Inmar is prepared to provide smaller cards that can be included inside of prescription bags, stapled to the outside, or handed to a consumer who inquires at the pharmacy counter.

1) Mail-Back Packaging Distribution Sites

Mail-back packaging will be distributed at approved mail-back distribution sites. Consumers will be able to locate the mail-back distribution sites nearest to them on Inmar's LifeInCheck™ Consumer Drug Take-Back program website, <https://rxdisposal.lifeincheck.com/>.

Inmar will establish mail-back distribution locations to supplement service in any area underserved by collection sites. Inmar currently has over 500 Rx Returns client locations in the Commonwealth of Massachusetts. Of those 500 client locations, over 100 are retail pharmacies. Inmar will evaluate and contact these retail pharmacies as potential collection sites or mail-back distribution sites as needed. Inmar will utilize hospitals with on-site pharmacies and law enforcement agencies as necessary to meet the goals of equitable and reasonably convenient access for consumers across the Commonwealth. However, it is our expectation that the majority of authorized collection sites will be retail pharmacies.

Inmar will also work with the Department of Public Health, local law enforcement agencies and local communities to determine the appropriate number mail-back distribution sites and their specific locations.

2) Requesting Mail-Back Packaging

Consumers will be able to request mail-back packaging via Inmar's LifeInCheck™ Consumer Drug Take-Back program website (<https://rxdisposal.lifeincheck.com/>) or the Inmar LifeInCheck™ Consumer Drug Take-Back toll-free phone line.

Mail-back packaging will meet DEA requirements per DEA Rule § 1317.70(c):

- Preaddressed, postage paid
- Nondescript, and do 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 mailing the package, 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

A sample envelope is shown below in Exhibit II.B.2-1

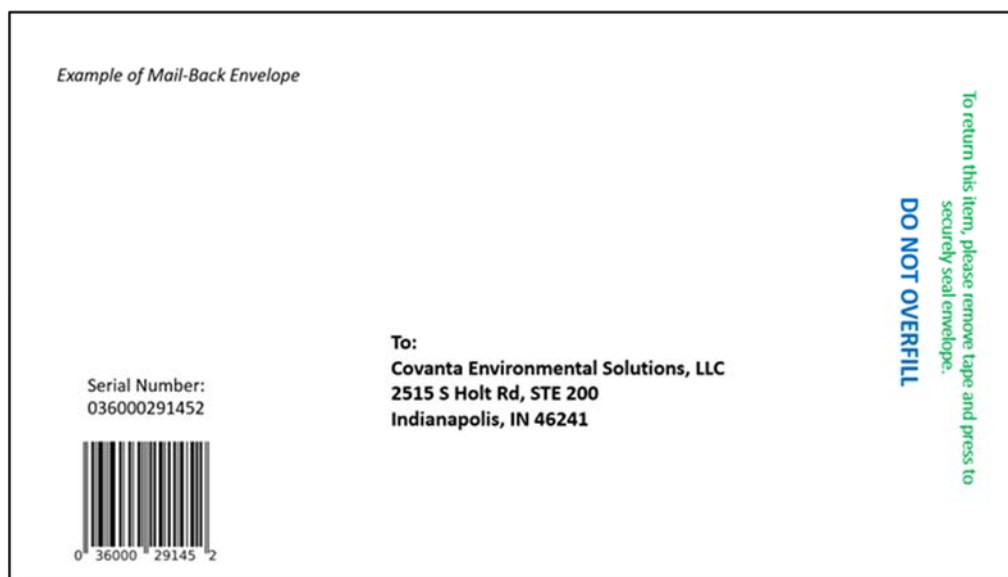


Exhibit II.B.2-1: Sample Envelope

3) Mail-Back Packaging Tracking

Mail-back packaging distributed by authorized mail-back distributors will be tracked in a method similar to the kiosk collection containers. Mail-back packaging will have a unique, serialized identification number. When mail-back packaging is distributed to consumers requesting them, the authorized collector employee will make note of this event on a serialization tracking sheet. Once the mail-back packaging arrives at the destruction facility, the serial number will be noted before final disposition.

Mail-back packaging distributed directly to consumers via the website or via toll-free phone number requests will be tracked by Inmar when sent to consumers and tracked at the destruction facility when they are returned.

This tracking process will allow Inmar to report the number of mail-back packaging distributed and returned in the annual reporting provided to the Massachusetts Department of Public Health, as required.

C. Collection Kiosks

1) Kiosk Specifications And Design

Inmar's kiosk is made in the USA and designed for excellence. Produced from 16-gauge cold-rolled steel, and with an easy-to-use, Americans with Disabilities (ADA)-compliant drop-box design, consumers can easily drop unused medications through the drop door and into the shippable container and inner liner inside. The container is a 275lb-rated box with a 6-mil, DEA-compliant liner. The kiosk is bright green in color, which intentionally draws attention to the unit.

There are several unique features that enhance the effectiveness and security of the Inmar kiosk. For example, the top of the kiosk is sloped, limiting the ability to stack items on top. In addition, the drop slot features an extended metal drop door that lowers into the container to detect when product capacity is reached. When the drop door encounters resistance within the kiosk, it is an indication that it is time to change the container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the kiosk to be in proximity to an electrical outlet. Lastly, the container access door is reversible to allow for convenient placement in any appropriate location in the pharmacy.

Per DEA requirements, the kiosk must be installed in the line of sight of the pharmacy or DEA registrant employees and bolted to the floor or a permanent fixture. The Inmar kiosk has pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

The Inmar kiosk will have signage that communicates what is and is not allowed to be placed inside. The signage will also feature a website and toll-free phone number (detailed further in Section IV) so users of the program can ask questions and find more information. Inmar will work with the Massachusetts Department of Public Health to design signage that meets the needs and requirements of the program. See Appendix B for examples of signage.

Inmar's kiosk is sent to the authorized collector along with enough supplies for 3 returns. Supplies include:

- Preaddressed, pre-paid serialized container
- Serialized inner liners to protect against puncture and provide a liquid barrier
- Easy-to-use zip ties to seal inner liner compliantly
- Absorbent pad for placement in the bottom of the inner liner bag



Exhibit II.C.1-1: Kiosk design features



Exhibit II.C.1-2: Kiosk components

2) Auto-Replenishment of Kiosk Supplies

Regardless of service option selected, the supplies used to collect and transport unwanted drugs are provided in automatically-replenished "kits" of three. Each kit includes: pre-labeled and pre-paid cardboard box containers, liquid barriers, and serialized, puncture-resistant inner liners. Upon receipt of the second return within the kit, Inmar automatically ships another kit with a set of three containers/supplies. Auto replenishment reduces the amount of inventory maintained at the collection site while maintaining sufficient supplies to keep the kiosk continuously operable.

3) On-Site Pick-Up Service

Per the guidelines of the Massachusetts Drug Stewardship Program, Inmar will offer on-site service for the collection, replacement, and shipping of full containers. This all-inclusive program removes the burden for the authorized collector and the pharmacy employees. Inmar will initiate standard service intervals for each collection site. Once a pattern of usage has been established, the service schedule will be adjusted with the agreement of the authorized collector to provide the best overall service with minimal interruption.

Inmar will provide two employees with DEA regulation training to specifically service kiosks. The service will include the following:

- Observation of the condition of the receptacle upon arrival
- Notification to the pharmacy employees of arrival
- Removal, packaging, and documentation of the container from the receptacle
- Replenishment of new supplies for renewed operation
- General clean-up and wipe-down of receptacle
- Notation of container's serial number removed, and serial number installed along with signatures by 2 Inmar employees (witnesses)
- Removal of full container to be taken directly to FedEx by Inmar employees
- Final signature from pharmacy employees upon completion of service.

4) Optional Self-Service Returns

Inmar will also train authorized collectors to service the containers on their own to allow for expedited servicing as desired. The steps to service a container are fast, efficient, and DEA-compliant. Inmar will provide authorized collectors with training materials including step-by-step instructions for tracking, sealing, shipping and replacing collection containers. See attached Steps to Start, FAQs, and Installation Instructions provided in Appendix C.

5) Pick-Up and Disposal

For the safe on-site removal of contents and servicing of kiosks, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each authorized collector to develop a collection program schedule that works specifically for their location - either an on-site or self-service option. Inmar will also be at the ready with service technicians should emergency service be required. For a pickup request outside of the normal schedule, the standard response time is 48 hours.

Inmar subcontracts with trusted partners for waste transportation and incineration.

Containers will be sent from the authorized collector directly to Covanta

Indianapolis, Inc. for destruction as Inmar's approved waste-to-energy incinerator. Covanta Indianapolis, Inc., located in Indianapolis, IN, will properly dispose of all collected containers. Covanta Indianapolis, Inc. is a permitted large municipal waste combustor facility that meets the requirements of 40 C.F.R. parts 60 and 62.

FedEx is our transporter from the pharmacy to the Covanta facility.

Inmar's DOT permit info:

- DOT Permit #: 050417 550 019Z
- DOT Special Permit #: 20255

Table II.C.5-1: Waste Destruction Partners

Name	Address	EPA ID	Type
Covanta Environmental Solutions, LLC	2515 S Holt Rd, STE 200 Indianapolis, IN 46241	N/A	Non-Hazardous
Indianapolis Resource Recovery Facility (Covanta)	2320 South Harding St Indianapolis, IN 46221	IND9848 82365	Non-Hazardous

Documentation and Tracking

Collection containers and inner liners will have a serialized identification number to enable tracking at all stages of the return process illustrated below.



Shipment
from Inmar



Receipt at
Collection Site



Storage and Use at
Collection Site



Sealing and
Shipment from
Collection Site



Arrival and
Destruction at
Destruction Facility

Exhibit II.C.5-1: Product return stages

Tracking is well-documented as evidenced by the Inmar serialization tracking form that is included in full as Appendix D and referenced below as Exhibit III.1.G-2. This form must be completed and witnessed by two authorized collection site employees, which assures compliance and safety across the program, and internally by both the stewardship organization and the collection site.

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

SERIAL NUMBERS	Date Received by (1 signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	<i>John Jones</i>	4/26/18 <i>John Jones</i> <i>Sally Smith</i>	5/26/18 <i>John Jones</i> <i>Sally Smith</i>	5/27/18 <i>John Jones</i> <i>Sally Smith</i>

Exhibit II.C.5-2: Partial Drug Disposal Serialization Tracking Sheet

The purpose of this form is to document the use of the serialized inner liner throughout the collection process and to help the authorized collector meet DEA and Board of Pharmacy record-keeping requirements. Inmar will require each authorized collector to understand and comply with all Federal, State, and local regulatory requirements pertaining to unwanted drugs applicable at the authorized collector's registered location.

The serial numbers, date received, and signatures of the authorized pharmacy employees must be completed upon receipt of the container and inner liner. As illustrated above, the date-in-use is to be completed with authorized pharmacy employee signatures upon installation of the collection kiosk. The date the container and inner liner are removed from the kiosk is also to be noted with signatures. Finally, the date the container and inner liner are shipped is noted with authorized signatures.

Authorized collectors must maintain a copy of the completed form, and other records as applicable, on file at the authorized collector's registered location for at least two years.

Once the container arrives at the destruction facility, the serial number will be noted before final disposition, which allows Inmar to report the number of

containers distributed and returned in the annual reporting provided to the Massachusetts Department of Public Health, as required.

D. Drop-Off Day Events

Inmar will provide kiosks at regional locations convenient to the public and will promote and conduct unwanted drug drop-off day events at least twice annually in conjunction with a local law enforcement agency.

For the convenience of consumers, Inmar will work with the Department of Public Health, local law enforcement agencies, and local communities to determine the appropriate number drop-off day events and their regional locations.

Inmar actively participates in the two national drug take-back days annually. The nearly 1,200 kiosks that Inmar has placed throughout the United States promote every day being drug take-back day. Examples of these activities are located in Appendix J.

III. Security and Safety Provisions

Inmar's collection kiosks are DEA- and ADA-compliant and provide environmental protection from unwanted drug residue. The units are equipped with a four-point locking system with hidden steel deadbolts that are activated when locked for strengthened security. They contain pre-drilled holes at the bottom of the unit for easy installation to securely bolt them to the floor in each approved collection site. The internal container and supplies protect against puncture and provide a liquid barrier to prevent seepage and/or spillage.

Inmar's drug stewardship program provides drug disposal serialization tracking sheets that requires validation by two collector employees. This assures compliance and safety across the program.

Inmar's training materials found in Appendix C, aid collection sites in proper kiosk installation, which helps optimize the security of the unit. The training materials also includes information on kiosk operation, inner container materials assembly and placement, regulated shipping instructions, program FAQs, and serialization tracking. All of these inclusions maximize the safety and security of any person involved in the stewardship program.

Inmar is an approved and permitted authorized shipper of hazardous materials with special authorization from the US Department of Transportation's Office of Pipeline and Hazardous Materials Safety Administration (DOT PHMSA). Inmar's Grantee Authorization can be found in Appendix E.

Inmar and its subcontractors are fully licensed and registered to meet the Federal and State Government requirements for transportation, distribution, destruction, security of materials, and security and safety of persons approved to participate in these programs.

I . Public Outreach and Education Plan

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness and maximize participation of the drug stewardship program. Inmar's strategy is designed to ensure that where and how to return covered drugs is widely understood by consumers, pharmacists, retail pharmacies, and health care facilities and providers.

In coordination with the Massachusetts Department of Environmental Protection, we will incorporate consistent information to the public including kiosk location, waiver requirements as well as key messaging available as included in any Fact Sheets provided by the Department.

A leader in the promotions space for nearly 40 years, Inmar has a unique set of core capabilities relative to other prospective program operators, specifically in consumer marketing and activation. Thus, in addition to traditional outreach methods (signage, written materials, etc.), Inmar is able to drive participation among consumers with modern, high-impact tactics such as influencer marketing and targeted media.

Across all tactics, key outreach messages will include, but not be limited to, the following:

- Encourage safe storage of drugs in the home (especially around children and teens)
- Dangers of drug misuse (i.e., not taking medicines as prescribed)
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Arrival of a safe drug take-back solution with instructions for how to locate and participate
- Drop-off day event promotion

If more than one drug stewardship program is approved by the Department, Inmar will seek to coordinate its promotional activities with other approved programs within 12 months after the other program is approved. Inmar's LifeInCheck™ Consumer Drug Take-Back website will ensure that all consumers can easily identify, understand, and access the collection services provided by Inmar and other program operators. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved programs.

A. Educational & Outreach Materials

Inmar will equip pharmacies, health care facilities, and other interested parties with easily-consumable educational and outreach materials for dissemination to consumers upon request and at no charge.

These materials will:

- Provide instruction on how to safely store covered drugs at home
- Inform of the risks of disposing of covered drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
- Outline how to participate in the drug take-back program for safe disposal of covered drugs.

All materials will be designed to be easily understandable by consumers with varying levels of English proficiency and will leverage explanatory graphics to aid in comprehension. Please see Appendix D for example materials.

B. Collector Marketing Support

To drive awareness and participation at a local level, Inmar will provide individual authorized collectors with a variety of marketing assets at no charge, including in-store signage, social media content kits, press release templates, a radio ad script, and scripts for pharmacy staff to let consumers know that they can safely dispose of their covered drugs at that location. Authorized collectors will be able to request additional marketing materials through the help desk. Please see Appendix D for example materials.

C. Website

Inmar will provide a mobile-optimized website, appropriately translated into specified languages, which will publicize collection options and educate consumers on proper disposal practices. Inmar will use enhanced search engine optimization to ensure easy location and access.

Specifically, the website will:

- Leverage Inmar's partnership with Google Maps to allow consumers to find the nearest collection site or mail-back distribution site via an interactive map. The list of locations will be updated monthly to ensure accuracy.
- Allow consumers to request prepaid return packaging.
- Clearly indicate what substances are and are not accepted. Graphics of unacceptable substances are provided for additional clarity on the website.
- Include educational materials on proper drug disposal available for view and download.
- Feature links to LifeInCheck™ Consumer Drug Take-Back social media pages for more useful content.

Retailers or pharmacies interested in participating in the drug stewardship program will be able to request more information through the website.

Please see Appendix D for images of the website interface and functionality.

D. Toll-Free Number

Inmar will operate a multi-lingual, toll-free call center that consumers can call to learn more about the drug stewardship program, drop-off day events, and drug disposal best practices. Consumers will also be able to request information about the nearest collection site or mail-back distribution site, or request that a prepaid return packaging be sent to them.

Callers with medical emergencies will be directed to call 911. Patients with medication-related questions will be directed to contact their healthcare provider(s).

Authorized collectors will also be able to call the toll-free number to request on-site kiosk maintenance and support.

E. Traditional Media

Inmar Intelligence has a system in place that allows us to efficiently deploy local media using traditional tactics for general awareness and programmatic media to sustain a presence throughout the year. Below are details broken out by medium that cover recommended placements. Inmar is committed to reaching all demographics including the elderly and underserved.

Massachusetts

- Population 6,892,503
 - White alone 81%
 - Asian 7%
 - Hispanic or Latino 12%
 - Black or African American 9%
- Households 2,601,914

Target Demos:

- General Public
- At risk populations including the elderly and homeless population
- Pharmacies
- Retailer of Unwanted Meds
- Health Care Providers & Patients
- Skilled Nursing and Long-term Care Facilities
- Veterinary Providers & Animal Lovers

Media Communication Methods

1. Press Release
 - Sent at Plan Approval
 - Local Media Outlets/Partners
 - National PR Wire
2. Direct Mail
 - PSA Announcement Postcard sent to local residents (5x7 Postcard)
 - General Public
 - Option #1: Entire State
 - Option #2: Entire County
 - Option #3: Select Zip Codes
 - Option #4: Select Neighborhoods/Streets
 - Option #5: New Resident Mailers (mail to those that move INTO the area)
 - Pharmacies
 - List Purchase by zip code
 - Health Care Providers
 - List Purchase by zip code

- Veterinary Providers
 - List Purchase by zip code
 - Public Health Facilities
 - List Purchase by zip code
- 3. Print Ads
 - Run ads in local papers for 3-4 weeks to announce PSA
- 4. Television
 - For a more targeted use of television dollars, purchase cable in only the zones with kiosks that make sense for the messaging (versus network)
 - Along with targeted zones, layer set box top data on the zones to build custom audiences
 - Use viewership data and combine it with third-party data to find in market audiences and deliver an efficient and effective campaign across all viewing screens (Streaming, OTT, Mobile, Television, On-Demand)
 - Whether by geography, content, audience, or addressability, target your audiences precisely. Age and or other demographic information can be used to guide targeting
 - Track campaign performance with transparent metrics and get recommendations on how to optimize your next one.
 - Channels may include ESPN, Fox News, HGTV, Lifetime, Comedy Central, Bravo, CNN, CNBC, ESPN Deportes, Food Network, Fox Sports, FS1, Golf, History in Espanol and many more
 - Would recommend Hispanic in-language PSA for channels like ESPN Deportes and History in Espanol, etc.
- 5. Radio
 - January 2020 PPM 6+ Mon-Sun, 6a-12mid
 - Run on top 8 stations in Massachusetts market based on highest ratings/reach and per demographic.
 - Would want to look at in-language PSA to reach large Hispanic market on those specific stations
- 6. Programmatic Media
 - Leverage Inmar Intelligence's network of transparent retail audiences, such as Walgreens, to serve behaviorally targeted display and/or video ads
 - Geo-Targeting: Inmar will upload physical locations of drug receptacles and target individuals within close proximity to build awareness and encourage usage
 - We recommend ads run across our brand safe site list of over 200K domains (sample site list will be provided)
 - Maintain always-on presence as to reinforce awareness built using traditional media tactics
- 7. Outdoor
 - Assess this need based on reach and as needed.

F. Social Influencer Marketing

Inmar has the ability to execute robust, data-driven social influencer marketing programs that activate shoppers and patients alike. On average, Inmar executes approximately 500 such programs annually.

Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling content that can drive awareness and inspire participation among consumers. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the consumers receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, Inmar's recommendation would be one, or a combination of, the following:

- Tips for safe storage of drugs in the home prior to disposal
- Education about the implications of improper drug disposal
- Promotion of the drug stewardship program, including directions on where and how to participate
- Encourage proper disposal through mail-back programs, collection kiosks, and drop-off day events.

Inmar will deploy one influencer program every four weeks and support the user-generated content with targeted media as outlined in the next section.

In partnership with Blue Cross Blue Shield of North Carolina and Mutual Drug pharmacies, fifteen local influencers wrote blog posts about their experience participating in the program. The posts encompassed topics such as why drug safety was important to them, where their followers could find a collection kiosk near them, and how drop-off worked. The campaign generated 11.4MM impressions, but, more importantly, the posts themselves were highly engaging. The average click-through-rate (CTR) was 4.5% (a historical CTR benchmark in this category is 1.5 - 2.0%) and users spent an average of one minute and eight seconds on each post. Both metrics suggest users found the content compelling and useful. Return on Investment (ROI) for social influencer marketing campaigns is measured in terms of return on Total Media Value (the combined value of earned and paid media for the campaign). In this case, TMV return was favorable at 2.1x.

Please see Appendix D for sample social influencer content. We also invite you to view some of the top performing posts linked below:

[Life in Check Consumer Drug Take-Back receptacle | National Prescription Drug Take-Back Day by Meagan Harrell](#)

[5 Easy Tips to Declutter Your Closet + Safe Medication Disposal by Valerie Clement](#)

[How to Dispose of Unused Medications Safely - Mom Always Knows by Elizabeth Hurt](#)

G. Targeted Media

Inmar's expert paid media team actively monitors social influencer content for the highest performers - looking beyond vanity metrics to focus on deeper measurements such as views and engagements. The most engaging content is promoted across social platforms as well as off-site media to amplify the message around drug take-back to a targeted cohort of consumers.

Beyond social influencer content, Inmar will also post about the program twice monthly on our LifeInCheck™ Consumer Drug Take-Back social media channels and promote the posts with amplified media.

Inmar can leverage our partnership with PlacelQ (an independent data and technology company that helps businesses leverage location-based insights to connect with and understand audiences) to deliver proximity-based SMART ads to consumers. SMART ads allow ad units to be delivered to consumers that are physically near selected locations (e.g., near a collection kiosk). More specifically, any device that routinely passes through a three-mile radius of a collection kiosk location can be served ads promoting the program on commonly used mobile apps like CNN and The Weather Channel, even NFL Fantasy Football. With PlacelQ's addressable audience of 90MM households and 190MM devices across the US, content delivery can be easily scaled to drive program awareness and participation.

H. Impact Measurement

Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar's measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

All paid and organic activity is measured using the industry's most powerful analytics suite to capture true ROI. Reporting may include:

- Third-party-verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

I. Collection Kiosk Signage

The collection kiosks themselves will be readily recognizable. The standard color for the kiosks is bright green for easy identification, and each kiosk is adorned with clear graphical

instructions in both English and Spanish for proper use. Please see Appendix B for an image of the collection kiosk and disposal instructions.

V. Operational and Administrative Costs

Year 1
January 1 - December 31, 2020

Category 1: Administrative Costs

Category 2: Collection and Disposal Cost

Category 3: Communication Costs

Inmar's drug stewardship program will be fully financed by participating drug manufacturers. No point-of-sale, point-of-collection, processing fees or other drug cost increases will be charged to individual consumers to recoup program costs. All cost categories below will be borne by the manufacturers.

Category 1: Administrative costs. A total for all administrative costs includes, but is not limited to:

- (i) Contracted and employed personnel overhead costs
- (ii) Legal fees
- (iii) Local and state business licensing fees
- (iv) Local, state, and federal taxes
- (v) Property costs, including rentals
- (vi) Utilities, phone, and internet
- (vii) General equipment and supplies.

Category 2: Collection and disposal costs. A total for all collection and disposal costs include, but is not limited to:

- (i) Collection, transportation, and disposal of drugs
- (ii) Purchase, maintenance, and replacement of collection receptacles
- (iii) Compensation of authorized collectors, if separate from personnel costs in (a)(i) of this subsection
- (iv) Production, distribution, and postage of mailers.

Category 3: Communication costs. A total for all communication costs include, but is not limited to:

- (i) Advertising
- (ii) Marketing
- (iii) Web site creation and maintenance
- (iv) Operation of a toll-free phone number.

Inmar will be performing all the work in-house with the exception of transportation and disposal, which will be subcontracted. Inmar has long-standing agreements for these services, which Inmar

will leverage for performance of this program. Additional operational and administrative costs associated with the program include, but are not limited to:

- Program oversight to ensure seamless transition, implementation, and operation:
 - Recruitment and executing agreements with authorized collectors
 - Recruitment and executing agreements with manufacturers
 - Relationship management and support for grandfathered local drug stewardship programs
 - Regulatory oversight for compliance to applicable regulations
- Providing kiosks for each collection site
- Maintaining and replacing kiosks when necessary
- On-site support or pick-up service as needed
- Auto-replenishment of supplies:
 - Preaddressed, pre-paid serialized container
 - Serialized inner liners to protect against puncture and provide liquid barrier
 - Easy-to-use zip ties to seal inner liner compliantly
 - Absorbent pad for placement in the bottom of the inner liner bag
- Mail-back packaging and associated shipping
- Drop-off day event logistics and supplies
- Transportation of collected unwanted drugs to disposal site
- Disposal of unwanted drugs in accordance with all applicable regulations (i.e., DEA)
- Reporting
- Program promotion, education, and outreach
 - Toll Free Number
 - Website

VI. Attestation of Compliance

An attestation that the program shall comply with all applicable state and federal requirements for the collection, security, transport, and disposal of drug products, including any requirements established by rule or regulation of either the U.S. Drug Enforcement Administration or the U.S. Environmental Protection Agency will be made available upon approval at the Commonwealth's request.

VII. Compliance with Applicable Laws

Inmar operates collection kiosks across 44 States and the District of Columbia as part of its operations today and maintains compliance with all Federal and State rules and laws. Upon approval to act as an operator, Inmar will ensure that it acts in compliance with all applicable laws, rules, and regulations as specified by the program requirements and require by contract where applicable that vendors and collection sites are also compliant with all laws, regulations, and legal requirements.

Inmar will also ensure that municipalities and organizations wanting to host one-time collections or permanent kiosks apply for a Waste Medication Collection Waiver with the Massachusetts Department of Environmental Protection as required.

A. Policies and Procedures

Inmar, collections sites, and vendors will specifically be required to comply with The Controlled Substances Act, 21 USC SS 801-971 and 21 CFR SS 1317; United States Department of Transportation Hazardous Materials Regulation, 49 CFR parts 100-185, and all applicable Massachusetts State Rules and Regulations.

The DEA Rule defines authorized collectors as law enforcement agencies and additionally as retail pharmacies, reverse distributors, hospitals or clinics with onsite pharmacies, and certain other entities that are registered with DEA as an authorized collector.

Inmar has established standard operating procedures that require Collectors to adhere to these standards. Any collector agreements specifically require their compliance ensuring their commitment to compliant operation of the collection kiosk and shipping of contents in compliance with the DEA regulations. A refusal to sign the agreement or comply with the DEA regulations would be a reason why a collection site could be excluded from the Massachusetts drug stewardship program.

B. Authorized for Collection

Authorized collectors may collect any covered drugs, including legend (prescription) drugs and non-legend (over-the-counter) drugs, brand name and generic drugs. Collectors may collect DEA-controlled substances in classes CII-CV from an ultimate user who has lawfully obtained and who possesses the controlled substance for their own use or for the use of a member of their household or for an animal owned by them or a member of their household.

C. Unauthorized for Collection

Authorized collectors may not collect drugs intended for use solely in veterinary care; cosmetic products as defined in 21 U.S.C. § 301 et seq., the U.S. Food, Drug & Cosmetic Act; drugs compounded under a specialty license pursuant to M.G.L. c. 112, §§ 39G through 39J; hypodermic needles, lancets, or other sharps products subject to collection and disposal procedures established under M.G.L. c. 94C, § 27A through 39J; drugs approved and used primarily for medication-assisted substance use disorder treatment.

Access to the inner liner is restricted to collection site employees. Collectors may only allow ultimate users and other authorized non-registrant persons in lawful possession of a controlled substance in Schedule II, III, IV, or V to deposit such substances into the collection kiosk. Collectors may not permit an ultimate user to transfer such substance to any person for any reason. Once a substance has been deposited into a collection kiosk, the substance cannot be counted, sorted, inventoried, or otherwise individually handled.

D. Collection Specifications

Inmar's collection kiosk is designed to accept covered drug deposited through the drop slot while preventing access to the open liner container within. The drop slot also includes a lock that can be used by collector employees to prevent use when employees are not able to be present near the receptacle. When unlocked, an authorized person may pull the drop slot door down and place their covered drugs into the drop slot. Once they allow the drop slot door to close, the deposited drugs will fall into the inner liner.

The collectors' employees will be trained to administer replacement, tracking and storage of the containers, prepare the containers for shipment, and will be responsible for ensuring that adequate inventory of supplies is maintained at the collection site, all in accordance with the specific instructions that will be provided by Inmar.

Inmar will provide ongoing help desk support to the collectors' employees and will assist the collectors with set-up, administration, and operation of the drug stewardship program at the collection sites. If there is a major event at the collection site that damages the structure and security of the kiosks, the collection site can contact Inmar's help desk for a quick service response.

The inner liner shall be removed from the kiosk and immediately sealed by or under the supervision of at least two employees of the collector. The sealed inner liner shall not be opened, x-rayed, analyzed, or otherwise penetrated.

An Inmar representative or the collector will properly seal, store securely, and arrange for pickup of the container and its contents from the registered location in a manner consistent with DEA regulations. The container will include a preaddressed and prepaid shipping label. The common carrier representative will take possession of the container and deliver it to an approved destruction facility for witnessed incineration.

E. Kiosk Specifications

Kiosks are standard 46.56" x 14.5" x 17.25". Each kiosk is required to be inside the collector's DEA-registered location. It is to be securely bolted to the collector's floor and readily visible to collector employees (pharmacy), regularly monitored by employees (hospital/clinic/long term care facility), or a secure room with controlled access that does not contain controlled substances (narcotic treatment program). Each authorized collector is issued a key for the lock on the kiosk. A kit is provided to the collector that includes a numbered and pre-labeled collection/shipping cardboard box, serialized 34" x 40" opaque liner, black zip tie, absorption pad, and a detailed set of instructions on how to install, remove, and ship the kiosk container.

F. Mail-Back Program Specifications

Inmar will provide prepaid and preaddressed mail-back packaging to consumers containing written instructions for returning unwanted drugs.

Mail-back packaging will meet DEA requirements per DEA Rule § 1317.70(c):

- Preadressed, postage paid
- Nondescript, and do 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 mailing the package, 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

G. Mail-Back Packaging Distribution Sites

Mail-back packaging will also be distributed at various collection sites. Consumers will be able to locate the collection site with mail-back packaging nearest to them on

<https://rxdisposal.lifeincheck.com/>.

H. Requesting Mail-Back Packaging

Consumers will be able to request mail-back packaging via the Inmar LifeInCheck™

Consumer Drug Take-Back website (<https://rxdisposal.lifeincheck.com/>) or the Inmar

LifeInCheck™ Consumer Drug Take-Back toll-free phone line.

VIII. Participating Covered Manufacturers

Inmar has commercial relationships with 90% of all pharmaceutical manufacturers as result of our pharmaceutical reverse distribution business. We have received affirmative indications of interest from many of those manufactures for Inmar to service their pharmaceutical stewardship obligations once approved. Currently, we are representing Lannett & Unichem. Additionally, Inmar's Consumer Drug Take Back program is designed more efficiently and simply than traditional programs that require cost sharing amongst the constituent manufacturers due to our existing national pharmaceutical reverse distribution business.

Unichem Pharmaceuticals, USA

Sanjeev Parab

Director, Finance

1 Tower Center Boulevard, Suite 2200

East Brunswick, NJ 08816

Email: sparab@unichemusa.com | Phone: 732-253-5954

Lannett

Grant Brock

Vice President, Operations

1101C Avenue West

Seymour, IN 47274

Email: grant.brock@Lannett.com | Phone: 812-523-5475

Inmar has learned from manufacturers that the “share the expense” approach creates uncertainty for the manufacturer as to the cost (Inmar will charge one annual fee for service with no regard for how many manufacturers participate) and allows the operator to pass the full cost to the manufacturers, even if the operator already has a network in place that covers a portion of the cost. Inmar’s approach allows us to provide the maximum service to citizens of Massachusetts with minimal cost to the manufacturer, with the reliability and consistency of an almost 40-year-old company that has been disposing of pharmaceuticals for decades.

Once approved as a drug stewardship operator in the Commonwealth of Massachusetts, Inmar will actively recruit additional pharmaceutical manufacturers to participate in the program. Please refer to Appendix K for a list of Producers’ benzodiazepines and/or opioids. Once a manufacturer has entered into a stewardship agreement with Inmar, Inmar will provide the Commonwealth with that manufacturer’s financial contribution to the program. Furthermore, Inmar will supply the Commonwealth with a full list of all covered drug products sold in the Commonwealth during each calendar year, and the number of units each for every manufacturer who participates in Inmar’s drug stewardship program.

IX. Reporting

A. Drug Collection Annual Reporting

Inmar will submit an annual report in accordance with M.G.L. c. 94H that will include:

- List of participating manufacturers
- Volume and type of unwanted drugs collected
- List of collection sites with addresses
- Number of mail-back packaging returned
- Locations of mail-back distribution sites
- List of drop-off day events
- List of transporters and disposal facilities
- Review of program goals for collection amounts and public awareness versus results
- Communication of any safety or security problems that may have occurred during collection, transportation or disposal of drugs, and documentation of procedure and policy changes to address and prevent further problems.

B. Education and Outreach Initiatives

Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar’s measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

All paid and organic activity is measured using the industry’s most powerful analytics suite to capture true ROI. Reporting will include:

- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post)

X. Program Goals

Table 2: Program Collection Goals

6 Months	12 Months
<ul style="list-style-type: none"> • Initiate program operation • Increase authorized collection sites in population centers and areas outside of population centers 	<p>Inmar's goal is 250 kiosks placed across the Commonwealth to provide equitable and reasonably convenient access to residents. If this goal cannot be met, underserved areas will be targeted for mail-back distribution centers or drop-off day events.</p> <ul style="list-style-type: none"> • Establish mail-back distribution centers and/or drop-off day events in areas that are underserved by collection sites • Provide and communicate system for pharmacies to request mail-back packaging. • Based on our experience from our current customer base of nearly 1,200 kiosks in the market place, Inmar estimates collection of 20 lbs. per month per collection site on average for a total of 60,000 lbs. for 12 months once the Commonwealth has full coverage based on goal of 250 kiosks

Table 3: Program Promotion Goals

Complete	6 Months	12 Months	18 Months
<ul style="list-style-type: none"> • Website launch • Educational materials • Authorized collector marketing support materials 	<ul style="list-style-type: none"> • Phase 1 website functionality updates: <ul style="list-style-type: none"> ○ Mail-back packaging requests ○ Educational materials uploaded ○ Authorized collector kiosk maintenance resources and requests ○ Collection site and mail-back distribution site list updated (ongoing) • Multi-lingual, toll-free call center launch • Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take Back posts per month) 	<ul style="list-style-type: none"> • Phase 2 website functionality updates <ul style="list-style-type: none"> ○ Translation into specified languages ○ Collection site and mail-back distribution site list updated (ongoing) • Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take Back posts per month) 	<ul style="list-style-type: none"> • Phase 3 website functionality updates <ul style="list-style-type: none"> ○ Collection site and mail-back distribution site list updated (ongoing) • Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take Back posts per month)

XI. Implementation Plan and Schedule

Inmar will develop a plan for and begin the implementation process upon notification of acceptance of our plan by the Commonwealth.

Establishing a management plan to encompass all facets of the Massachusetts drug stewardship program is key to the success of the program and a lasting partnership between Inmar and the Commonwealth. We provide project management tools and processes to document, track, and report program information to the Commonwealth. The result is an open, transparent management approach that keeps the Commonwealth actively engaged and informed at every stage of the program. Please refer to the resumes in Appendix H for a sample of the qualifications of Inmar's oversight team.

A. Implementation Plan and Schedule

All high-level and detailed tasks, including milestones and deliverables will be included in this plan along with estimated time and expected start and finish dates. Scheduled completion dates for each task will be specifically included. The full implementation plan and schedule will include tasks for:

- Administration
- Kiosks
- Mail-Back Program
- Drop-Off Day Events
- Toll Free Number
- Website
- Promotion

B. Implementation Oversight

Additionally, Inmar provides an oversight team that acts as an internal point of escalation for program management. This oversight team empowers the project manager with the ability to acquire additional resources and program direction as necessary to meet the needs of the program. By providing this support, our management team will be made aware immediately if any aspect of the program requires additional action. The direct communication of program performance encourages an effective system of accountability, helping Inmar avoid any issues that could affect the on-time, on-budget delivery of services in compliance with contract requirements. We have provided the resumes of key individuals who will either participate in the operations or oversight of the Massachusetts drug stewardship program in Appendix H.

XII. Change Management

Inmar will notify the Department in writing at least 60 days prior to a substantial change to the program. Substantial changes include covered manufacturers, collection methods, service convenience goals, policies and procedures for handling covered drugs, education and promotion methods, and selection of disposal facilities.

Inmar will notify the Department at least 30 days before implementing changes to the program that do not substantially alter program operations. Inmar will not notify the Department of de minimis items such as minor revisions to branding, marketing materials, and other dynamic information updated on the website such as the collection site location finder.

Inmar will notify the Department of any changes to the official point of contact no later than 15 days following the change. We further agree to notify the Department of any changes in ownership or contact information for participating covered manufacturers no later than 90 days after such change.

XIII. Patient Privacy

Inmar provides significant training to our participating authorized collectors and strictly follows the DEA guidelines for the proper handling of collection kiosks and inner liners. This begins with the proper training of the authorized collector in the compliant operation of the kiosks and proper preparation, removal and packaging of the container. It also involves the training of Inmar employees that may come into contact with the full container to ensure proper handling.

According to the DEA, as provided in §§ 1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned mail-back packages shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a collection receptacle or mail-back package. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into a collection receptacle.

Inmar has a long history of serving both commercial and government clients subject to stringent requirements. For example, Inmar's pharmacy applications manage Protected Healthcare Information (PHI) and are HIPAA compliant. Additionally, as part of Inmar's Rx Returns (reverse distribution) business, we work very closely with regulators to implement compliant procedures covering the DEA, Boards of Pharmacy, EPA, and other tangential regulatory entities. Data protection, privacy, and adherence to applicable regulations are the foundation of Inmar service capabilities.



Inmar has a long history of serving both commercial and government clients with stringent compliance standards such as the protection of Protected Health Information (PHI) and HIPAA.

XIV. Proprietary Information

During the execution of the program, Inmar anticipates that financial commercial and proprietary information will be accessed by both Inmar and the Commonwealth and in such circumstances, Inmar will properly mark such information.

XV. Program Operator POC

Inmar Rx Returns, Inc.
4332 Empire Road
Forth Worth, TX 76155
Phone: (636) 734-3559

Contact:

Ashley Schmidt
Director, Regulatory and Compliance
635 Vine Street
Winston Salem, NC 27101
Email: Ashley.Schmidt@inmar.com
Phone: 336-631-2883

Inmar Overview

Inmar is the leading provider of pharmaceutical reverse supply chain services in the nation. More than 90% of pharmaceutical manufacturers use our services, as well as 50,000+ retail pharmacies and 5,000+ hospital pharmacies. More than 80% of all returned Rx products (more than 98 million pieces) pass through Inmar's facilities each year for secure and fully compliant processing and disposal. Inmar maintains over 50 licenses related to Rx returns and participates in regulatory agency inspections including Drug Enforcement Administration (DEA) and State agencies. In addition, Inmar has nearly 40 years of experience and handles 2.1 billion promotion transactions annually in the consumer promotions space. This experience can be leveraged to drive consumer education and participation in the Massachusetts Drug Stewardship Program.

For the past three years, Inmar has been deploying our full set of capabilities and deep retail pharmacy relationships to help State governments protect against drug diversion and negative environmental impacts by removing unused, expired, and surplus pharmaceutical products from communities.

We already have the required legal, regulatory, and operational infrastructure in place, service nearly 1,200 kiosks in 42 States and the District of Columbia and have safely disposed of more than 59.5 tons of consumer returned medication to date.

Key advantages for a multi-year review / renewal process

- Annual review requires Commonwealth money and resources every year to be applied to the process of review, with little value received
- Annual review will require the service provider to focus on ensuring an orderly shutdown every year (a multi-month process) rather than focusing on flawless execution
- Lack of a multi-year approach restricts the level of investment and innovation that can be applied to this service as a longer payback period supports a larger investment - For example
 - Kiosk location and placement
 - Mail-Back Program - (generally a 2-month turnaround)

- Special Drop-Off Day Events - (requiring 6-month planning)
- Publicity and Education - (effectiveness relies on compounding effect)
- Reporting - (adapting to measured effectiveness in all areas)
- As a benchmark, no other jurisdiction we are aware of has an annual review. The great majority of jurisdictions have provisions that provide for an out if the service provider fails to adequately perform the service and couples that with a 3-to-5 year review.

Experience With Medication Disposal Programs

Inmar has experience servicing large medication disposal programs in the public and private sectors. This experience enables us not only to understand and comply with regulations, but to manage large, long-term project implementations with skilled program managers.

Additionally, Inmar provides an oversight team who acts as an internal point of escalation for program management. This oversight team empowers the project manager with the ability to acquire additional resources and program direction as necessary to meet the needs of the program. By providing this support, our management team will be made aware immediately if any aspect of the program requires additional action. The direct communication of program performance encourages an effective system of accountability, helping Inmar avoid any issues that could affect the on-time, on-budget delivery of services in compliance with contract requirements. We have provided the resumes of key individuals who will either participate in the operations or oversight of the Massachusetts Drug Stewardship Program in Appendix H.

To further demonstrate the types of implementations and operations that Inmar has recently performed successfully, below is a brief description of projects of similar size and scope:

1. *Department of Defense (DoD) – Defense Logistics Agency (DLA)*

Inmar handles and properly disposes of pharmaceutical and medical supplies dispensed by the pharmacy and any related waste materials that may arise out of nonreturnable pharmaceuticals. We also assist recipients in achieving maximum return credit and in processing any related waste that may arise out of nonreturnable pharmaceuticals. This service agreement includes all Continental United States locations for the Army, Navy, Air Force, and Coast Guard.

2. *Center for Disease Control (CDC) Strategic National Stockpile, a division of the Office of the Assistant Secretary for Preparedness and Response*

Inmar handles and properly disposes of medical material waste. On a monthly basis, Inmar disposes of hazardous and non-hazardous medical material and equipment and provides all applicable forms, labels, and placards required to ship designated products to a processing facility. This contract services all the work orders related to the Division Strategic National Stockpile (DSNS).

3. *Partnership with Blue Cross Blue Shield of North Carolina and Mutual Drug*

In 2018, Blue Cross Blue Shield of North Carolina (Blue Cross NC) collaborated with the Mutual Drug Company to place 85 Inmar LifeInCheck™ Consumer Drug Take-Back kiosks in 75 North Carolina counties. Inmar facilitated the implementation and logistics of the program including contracting with each participating location, kiosk placement, and collection of medication. Inmar further supported this program by providing marketing materials that helped generate considerable publicity. Letters of recommendation from Blue Cross NC and Mutual Drug are included in this proposal, confirming the success of this partnership.

APPENDIX

A. List of Kiosk Locations	32
B. Kiosk Signage	33
C. Training Material	35
D. Promotion Material	36
E. Applicable Permits and Licenses	43
F. Agreement Templates	44
G. Letters of Recommendation	45
H. Resumes	47
I. Inmar Rx Returns Kiosks Nationwide.....	51
J. Drop-off Day Materials	52
K. List of Producers' Benzodiazepines and/or Opioids.....	54

Appendix A: List of Kiosk Locations

- A. Holyoke Health Center Pharmacy
230 Maple Street
Holyoke, MA 01040
- B. Chicopee Health Center Pharmacy
505 Front Street
Chicopee, MA 01013
- C. Sullivan's Pharmacy
1 Corinth Street
Roslindale, MA 02131
- D. Harvard University Health Services
75 Mount Auburn Street
Cambridge, MA 02138
- E. Nantucket Cottage Hospital
57 Prospect Street
Nantucket, MA 02554

Inmar Intelligence currently operates a network of drug collection kiosks across the entire country which are placed in various types of establishments. Because of Inmar's distinct and unique ability to leverage its relationships with more than 90% of retailers across the country, we are able to quickly and effectively place a network of boxes over a large geographical area faster and easier than any other potential new entrant in this space.

Because Inmar Intelligence is a tech-enabled data driven company, we use data to drive our decision making when placing our network of drug collection kiosks. We track each time a drug collection kiosk is opened, an inner liner is removed, and sent for destruction. We continue this tracking through the entire life cycle of the kiosk, and, we are able to tie each serviceable event to a particular type of location such as a retail location or independent pharmacy location.

Our analysis shows that of all of the serviceable events tracked across our network, roughly 70% of all serviceable events happened at retail or grocery locations combined. Because of this, Inmar stands uniquely positioned to leverage our relationships with our retail and grocery partners to place kiosks which are easily identifiable, readily accessible, and have already proven to deliver results (number of times a kiosk is serviced).

Appendix B: Kiosk Signage



DRUG DISPOSAL PROGRAM (PROGRAMA DE ELIMINACIÓN DE DROGAS)

See Directions on Top of Box (Instrucciones arriba de la caja)
For more information, visit rxdisposal.lifeincheck.com or call **1-800-123-4567**



We are proud to work with this location in support of the Consumer Drug Take-Back

Discreet, safe and responsible drug disposal is critical in the fight against the opioid crisis.

DID YOU KNOW?

197

Americans die every day from a **drug overdose**

*National Center for Health Statistics

Each day, more than

1,000

people are treated in **emergency departments** for not using prescription opioids as directed

*Centers for Disease Control and Prevention

77%

of **opioid prescription medications** taken by new users are obtained from a friend or relative

*U.S. Department of Health and Human Services

62%

of **teens** who admit taking medication for non-medical reasons say they get drugs from **medicine cabinets in their homes**

*National Survey on Drug Use and Health, SAMHSA

TOGETHER, WE CAN MAKE A DIFFERENCE!

Tell your friends and relatives about this safe drug disposal location.

For more information on safe drug storage and disposal, as well as information on additional collection options, visit rxdisposal.lifeincheck.com or call 1-800-123-4567

Appendix C: Training Material

Training material provided to authorize collectors include:

1. FAQs
2. Container Instructions
3. Steps to Start Document
4. Installation Reference Guide
5. Serialization Tracker

All of the aforementioned documents are provided on the following pages.



Frequently Asked Questions

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



Consumer Drug Take-Back

Frequently Asked Questions

Installation / Removal

Question	Answer
1 How is the receptacle installed?	The receptacle must be affixed to a wall or bolted to the floor for compliance with the Responsible Disposal Act. Inmar provides a printed guide for easy installation.
2 Where are the keys located for the receptacle?	The keys are located in the top bin of the receptacle. Please note there are two sets of keys provided for each lock. We suggest these duplicates be immediately separated and each set stored in a safe place.
3 If I need replacement keys, where is the lock number located?	Each lock has a lock number printed on the outside of the lock. When ordering replacement keys, you will need to reference the receptacle PC number which is located on the inside left of the drop-door.
4 When should I ship the collection container to Inmar?	Full containers should be shipped immediately after the inner liners are sealed and packaged for shipping. The container is sent to you already prepared with a prepaid FedEx shipping label.
5 How will I know when the collection container is full?	The drop-door has an extended tongue that lowers down into the container when the drop-door is closed. When the product builds to a certain height, the door will have some resistance in operation. This will indicate it is time to change the container.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



Consumer Drug Take-Back

Frequently Asked Questions

Installation / Removal (Continued)

Question	Answer
6 Are the zip ties the only way the liners are serialized? Is the serial number located anywhere else?	The red locking zip tie is serialized, the inner liner is serialized and the outside of the cardboard shipping container is serialized. These serial numbers all match and are packaged as a kit. Therefore, it is critical that the pieces of the kit stay together throughout usage and return shipping.
7 Do I need to wait until the shipping company is on-site for pickup before I change the container?	As the pickup is standard FedEx, most of our customers change the container and then call FedEx. Please be aware that the DEA requires that the sealed container be held in the controlled substances area during the time between liner removal and pickup.
8 When ordering multiple receptacles, is it required that each receptacle be shipped to the location where they will be installed or can they be shipped to a central location and then transported?	The metal receptacles can be shipped to whatever location you choose. The supplies are shipped separately from our facility in Fort Worth, TX. It will be important to notify your staff to be on the lookout for these supplies so they are not inadvertently discarded.
9 How do I order more collection containers?	Upon receipt of your second returned container, Inmar will automatically send you a supply kit for your next three returns. If you need additional supplies, please contact Inmar via the email address or phone number listed below.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



Consumer Drug Take-Back

Frequently Asked Questions

Compliance / Regulatory

Question	Answer
10 Is there a statement from the DEA allowing for video monitoring of the receptacle?	There is no statement allowing video surveillance. However, the regulations state that regular monitoring by employees is required. This is the exact text from the Regulation Part 1317 Subpart B (1317.75 2(i)): "(i) At a hospital/clinic: A collection receptacle shall be located in an area regularly monitored by employees, and shall not be located in the proximity of any area where emergency or urgent care is provided." VIDEO MONITORING IS NOT ALLOWED IN CALIFORNIA (not part of DEA regulation).
11 Are the items collected considered medical waste?	Household pharmaceuticals collected by take-back programs are not considered medical waste and, therefore, not subject to EPA RCRA rules. The items collected are considered household waste as long as the take-back program rules are followed. That is, no sharps, non-pharmaceuticals, etc. allowed in the receptacles.
12 What should the pharmacist do if they see someone put a "not allowed" substance or item in the receptacle?	Those responsible for monitoring the receptacle should do their best to keep this from occurring. However, the DEA specifies opening the inner liner is not allowed.
13 Can non-controlled medications and controlled substances be placed in the LifeInCheck Consumer Drug Take-Back receptacle?	Yes. Comingling of controlled and non-controlled substances is allowed in the take-back receptacle.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



Consumer Drug Take-Back

Frequently Asked Questions

Compliance / Regulatory (Continued)

Question	Answer
14 If a patient asks the pharmacist to place their medications in the receptacle, can they do so?	With an exception for personnel in a long term care facility, the drug owner or a member of his/her household are the only persons allowed to place items in the take-back receptacle.
15 Where can I find information on DEA regulations?	You can access links for DEA registrants, LTCFs and more here: https://www.deadiversion.usdoj.gov/drug_disposal/index.html .
16 Are there any regulations limiting the number of keys I can replicate for these units?	The DEA does not specify anything regarding the keys, only that the receptacle is secure, monitored and that two staff members are present when it is opened.

Marketing/Promotion

Question	Answer
17 Can the pharmacy add a logo to, or brand, the receptacle?	If sponsored subscription has been purchased, then the magnet provided by Inmar must be placed on the front door of the receptacle. The sides can be used for your logo/brand. If the full-price subscription was purchased, then the pharmacy can place a logo/brand on the sides or front.
18 Are there marketing materials available to help me promote my take-back program?	Please contact Inmar for the latest marketing materials. These include signage, social media copy and images as well as language for press releases and ads.

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Questions: Contact Consumer Drug Take-Back Client Service Team

take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST



LIFE **IN** CHECK™
CONSUMER DRUG TAKE-BACK

COLLECTION CONTAINER VISUAL INSTRUCTIONS

CONSTRUCTION, INSTALLATION, REMOVAL AND SHIPPING OF COLLECTION CONTAINER

Questions: Contact Consumer Drug Take-Back Client Service Team
take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

KIT CONTENTS

Each shipment contains 3 individually packaged kits with unique components to each kit.

DO NOT rearrange contents between kits.

THE KIT:

- 1 The kit will arrive in a package similar to this.
- 2 The kit will include three numbered and pre-labeled boxes.



Each kit contains one of each of the following items:

- 1 Zip Tie
- 2 Absorption pad
- 3 Inner liner
- 4 Numbered and pre-labeled box



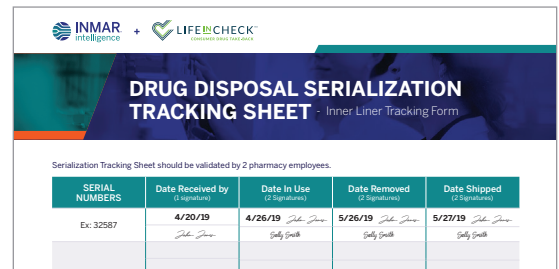
IMPORTANT:

For every shipment – serial number on inner liner & serial number on cardboard container **MUST MATCH**.

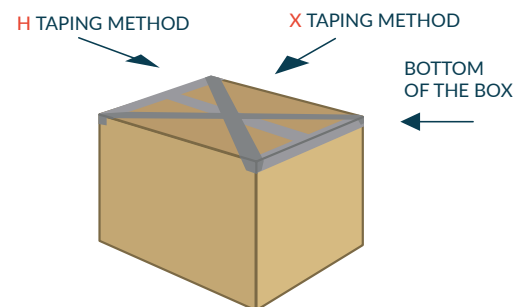
NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

- 1 Document the serial number and receipt of each inner liner on the Drug Disposal Serialization Tracking Sheet.
- 2 Close and tape the box bottom. Seal the middle seam and both outside seams. Leave no un-taped spaces along the seams. We recommend 1 strip of tape across the bottom seam, 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.



SERIAL NUMBERS	Date Received by (2 Signatures)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	4/20/19 <i>John Jones</i>	4/26/19 <i>John Jones</i>	5/26/19 <i>John Jones</i>	5/27/19 <i>John Jones</i>
	<i>Sally Smith</i>	<i>Sally Smith</i>	<i>Sally Smith</i>	<i>Sally Smith</i>



- 3 Place Inner Liner into the box and fold excess material at top over box flaps.



KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

- 4** Tape the zip tie to the inside of the door for later use.



- 5** Place absorbent pad into the installed Inner Liner.




- 6** Install the lined box (now the “Container”) into the Collection Receptacle.



KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

7 Immediately document installation of Container on the Drug Disposal Serialization Tracking Sheet.



Serialization Tracking Sheet should be validated by 2 pharmacy employees.

SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	4/20/19 <i>Judy Smith</i>	4/26/19 <i>Judy Smith</i>	5/26/19 <i>Judy Smith</i>	5/27/19 <i>Judy Smith</i>


8 Lock the bottom door and unlock the drop door at the top of the receptacle to begin drug disposal collection.



9 Store remaining spare kits securely for future use.



10 Use the Drug Disposal Serialization Tracking Sheet to document all "Inner Liner events."



Serialization Tracking Sheet should be validated by 2 pharmacy employees.

SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	4/20/19 <i>Judy Smith</i>	4/26/19 <i>Judy Smith</i>	5/26/19 <i>Judy Smith</i>	5/27/19 <i>Judy Smith</i>

NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

Note: The total weight of the Container ready for shipping may not exceed 66 pounds in weight.

1 Unlock and open bottom door.



2 Remove full Container from Collection Receptacle. **DO NOT** sort, count or inventory pharmaceuticals or touch contents of Inner Liner prior to sealing.



KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

- 3** Immediately seal the Inner Liner by gathering the top of the Liner.
- 4** Bend the gathered portion at the halfway point and fold the top half alongside the bottom half.
- 5** Repeat Step 4 - Again bend the gathered portion at the halfway point and fold the top half alongside the bottom half.

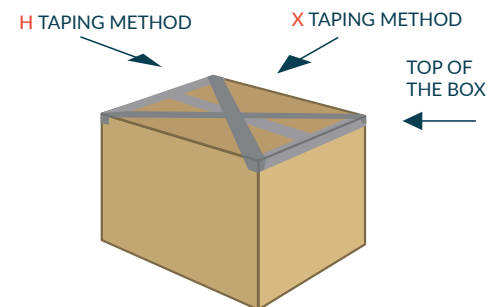


KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

- 6** Cinch and fully tighten the provided Zip Tie around both halves of the gathered portion of the Liner to secure the top.



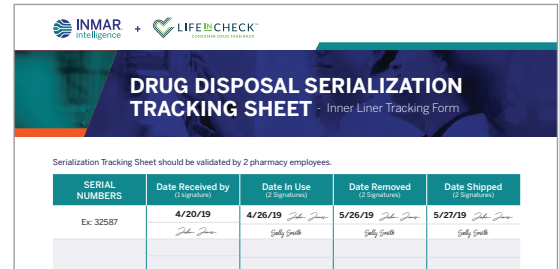
- 7** Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams. We recommend 1 strip of tape across the top seam, 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally. See illustration to right.



KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

8 Document removal of Container on the Drug Disposal Serialization Tracking Sheet.

9 Store the sealed Container in a secure location until shipped. The container is pre-labeled for shipping. Document the shipping of the Container on the Drug Disposal Serialization Tracking Sheet.




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CONSUMER DRUG TAKE-BACK

DRUG DISPOSAL SERIALIZATION TRACKING SHEET - Inner Liner Tracking Form

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	4/20/19 <i>Sally Smith</i>	4/26/19 <i>Sally Smith</i>	5/26/19 <i>Sally Smith</i>	5/27/19 <i>Sally Smith</i>



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CONSUMER DRUG TAKE-BACK

DRUG DISPOSAL SERIALIZATION TRACKING SHEET - Inner Liner Tracking Form

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

SERIAL NUMBERS	Date Received by (1 Signature)	Date In Use (2 Signatures)	Date Removed (2 Signatures)	Date Shipped (2 Signatures)
Ex: 32587	4/20/19 <i>Sally Smith</i>	4/26/19 <i>Sally Smith</i>	5/26/19 <i>Sally Smith</i>	5/27/19 <i>Sally Smith</i>

PLEASE NOTE:

Your cardboard container is pre-labeled for shipping. This label is pre-paid with FedEx and must not be copied.

Additional charges may apply for non-compliance.

Questions: Contact Consumer Drug Take-Back Client Service Team
take-back@inmar.com

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

GETTING STARTED

RECEPTACLE

You will receive your LifeInCheck Consumer Drug Take-Back receptacle and your supplies in separate shipments. After unpacking the receptacle, it must be installed according to the “Responsible Disposal Act” Rule which means it must be connected to a wall or the floor ensuring the receptacle is secure. Your receptacle will come pre-drilled in the bottom to make installation easier. Please see the installation instructions included in this email.

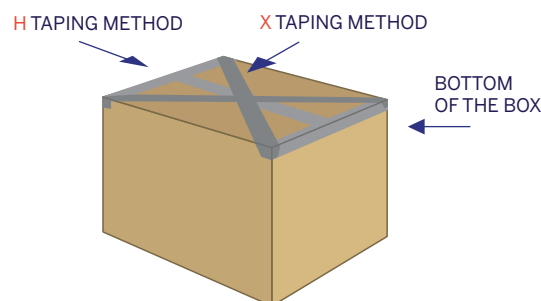
Your usage of the LifeInCheck Consumer Drug Take-Back Program indicates your agreement to accept responsibility for following the Federal Guidelines: DEA’s Final Rule, which implements the Secure and Responsible Drug Disposal Act of 2010 (“the Disposal Act”).

SUPPLIES

After completing proper installation of your LifeInCheck Consumer Drug Take-Back receptacle you should unpack your supplies. Included are supplies to operate your program for 3 returns. Upon receipt of your second container (return) shipment to Inmar, we will automatically send your next 3 return supply package so you will always have the necessary supplies on hand. Staged shipping of your supplies alleviates your need to store large supply quantities. It is important for you to document receipt of the **red serialized zip ties** on your tracking form. To assist, Inmar has provided the LifeInCheck Consumer Drug Take-Back Serialization Tracking sheet.

CONSTRUCTING YOUR INNER CONTAINER

Construct 1 cardboard container applying an appropriate amount of tape to the bottom to ensure safe transportation. We recommend 1 strip of tape across the bottom seam and 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.



PREPARING YOUR CONTAINER FOR USAGE

1. Set the container upright, fold down the flaps on the exterior of the container and insert the clear plastic liquid-barrier bag pushing down into container and folding the top of the bag to overlap the container edges.
2. Document the serial number from the **red serialized zip tie** on your Serialization Tracking sheet.
3. Insert the opaque inner liner bag in the same manner as above. (Use caution to keep the serialized red zip tie affixed to the inner liner as when it was received).
4. Place a single absorbent pad (provided) in the bottom of the inner liner bag.

Your container is now ready to be placed into the receptacle.
Additional supplies can be placed in the receptacle to the side of the current container.

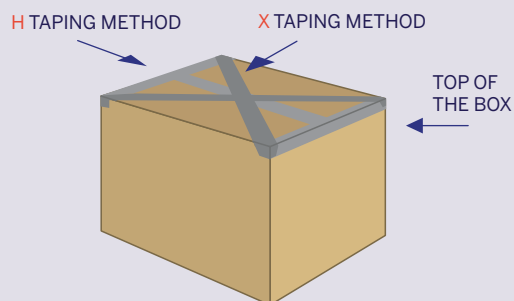
SHIPPING INSTRUCTIONS

1. Unlock and open the door of your drug disposal receptacle and remove the container that has product inside.
2. Gather the top of the opaque inner liner bag, close and secure using the red serialized zip tie that is taped to the inner liner.
3. Document and update the status of the serial number from the red serialized zip tie on your LifeInCheck Consumer Drug Take-Back Serialization Tracking sheet.
4. Gather the top of the clear plastic liquid barrier bag, close and secure using a plain black zip tie.
5. Close the container by folding the cardboard flaps and use the same method of taping as you did for the bottom.

NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back container should be performed by two pharmacy personnel.

PREPARING YOUR CONTAINER FOR SHIPPING

- Complete the closure of your cardboard container applying an appropriate amount of tape to the top for safe transportation.
- We recommend 1 strip of tape across the top seam and 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally.



SHIPPING

Your container comes pre-labeled for shipping to Inmar.



REPORTING

Inmar will maintain your modified Form 41 noting destruction date and time on file and will provide it to you upon request.

QUICK STEPS

TO START

- 01** Install LifeInCheck Consumer Drug Take-Back Receptacle per DEA guidelines.
- 02** Properly tape container at bottom.
- 03** Place plastic clear liner inside with top folded over container flaps.
- 04** Place opaque inner liner inside with top folded over container flaps.
- 05** Place absorbent pad in bottom of inner liner.
- 06** Install container inside receptacle.
- 07** Lock bottom door and unlock top door to begin collection.

TO CLOSE

- 01** Open bottom door.
- 02** Remove full container.
- 03** Use red serialized zip tie to secure inner liner bag top.
- 04** Use black zip tie to secure clear plastic bag top.
- 05** Properly tape container at top.
- 06** Container is pre-labeled for shipping to Inmar.



VISIT **INMAR.COM** OR CALL US AT
(866) 440-6917 FOR MORE INFORMATION



INSTALLATION INSTRUCTIONS

McMASTER-CARR.
Flanged Hex Head Screws for Wood
Hot-Dipped Galvanized Steel, 1/4" Size, 2" Long

In stock \$10.09 per pack of 50
955261100

Material	Hot-Dipped Galvanized Steel
Screw Size	1/4"
Screw Size Decimal Equivalent	0.2500"
Length	2"
Head	6.375"
Height	0.28"
Flange Diameter	0.50"
Drive Style	External Hex
Approximate Threads per inch	10
Thread Direction	Right Hand
Threading	Partially Threaded
Minimum Thread Length	1"
Tagging Method	Thread Forming
Head Type	Hex
Hex Head Profile	Standard
Tip Type	Pointed
Shank Cross Section	Round
System of Measurement	Inch
Screw Features	Flanged
For Use In	Wood
Specifications Met	ASTM A193
RoHS	Compliant

These steel screws are hot-dipped galvanized to resist corrosion in wet environments and are a good choice for ACO-treated (arsenic-free) lumber. The flange reduces the risk of cracking material and the hex head provides a secure grip with a wrench. They press threads into material for a tight, secure hold. To prevent splitting, drill a pilot hole slightly smaller than the screw. Head height includes the flange. Length is measured from under the head.

McMASTER-CARR. Part Number **91578A104**
Shed Anchor for Concrete

ANCHOR FOR CONCRETE FLOOR

SCREW FOR WOOD FLOOR

DATE	SYM	REVISIONS RECORD	AUTH	DR	CK
07/18/2017	A	RELEASED FOR PRODUCTION	WM	KQ	

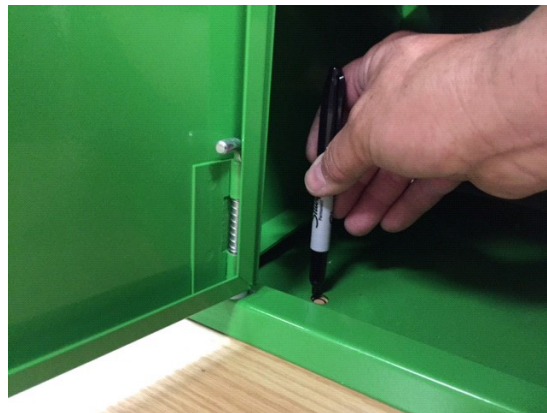
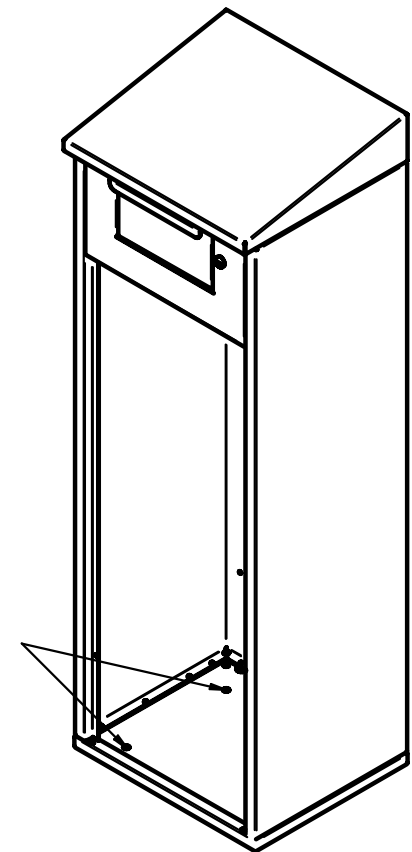


FIGURE 1

INSTALLATION

- STEP 1: PLACE CABINET IN PERMANENT LOCATION**
- STEP 2: USING THE CABINET BASE AS A TEMPLATE, MARK FLOOR USING CLEARANCE HOLES AS SHOWN IN FIGURE 1**
- STEP 3: DRILL HOLES FOR FLOOR SUBSTRATE**

Use four clearance holes in bottom for securing cabinet to floor.

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

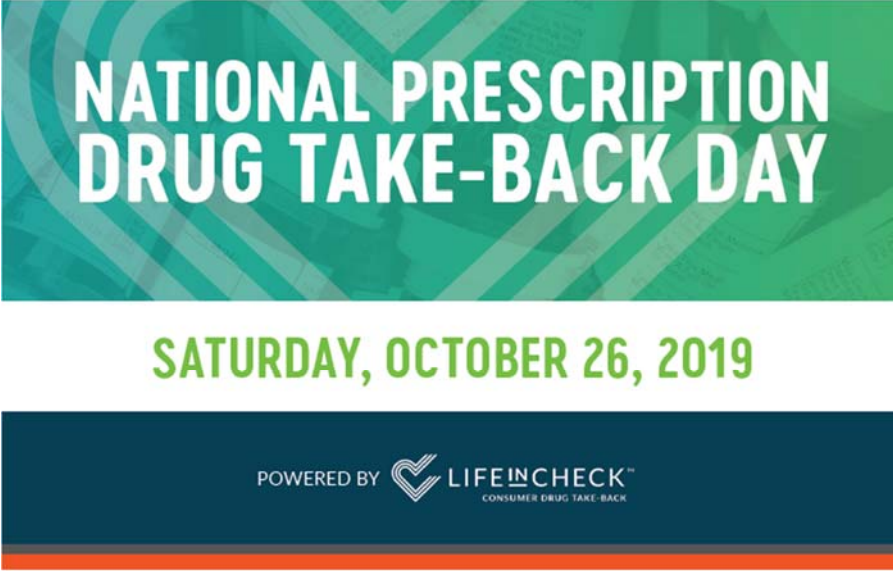
[illegible]

Instructions: Each Inner Liner will bear a permanent, unique identification number to enable tracking on the Inner Liner form. Columns 1 and 2 are to be completed upon receipt of Inner Liner. Column 3 is to be completed upon installation of the container into the collection receptacle. Column 4 is to be completed upon removal of the container from the collection receptacle. Column 5 is to be completed when the Inner Liner is shipped to Med-Turn. Maintain a copy of the completed "Inner Liner form" and other records, as applicable, on file at the collector's registered location for at least 2 years.

The purpose of this form is to document the use of the Inner Liner throughout a collection event. Although proper use of this form is intended to help the collector meet record keeping requirements, requirements may vary based on the registrant location. It is the responsibility of each registered collector to understand and comply with all federal, state and local regulatory requirements pertaining to take-back pharmaceuticals applicable at the collector's registered location. The Inner Liner form is not a DEA Form 41.


Appendix D: Promotion Material

1. Sample Education Materials



**NATIONAL PRESCRIPTION
DRUG TAKE-BACK DAY**

SATURDAY, OCTOBER 26, 2019

POWERED BY  **LIFE IN CHECK™**
CONSUMER DRUG TAKE-BACK

**NATIONAL PRESCRIPTION
DRUG TAKE-BACK DAY**

- Unused or expired prescription medications are a public safety issue, leading to accidental poisoning, overdose, and abuse.
- Pharmaceutical drugs can be just as dangerous as street drugs when taken without a prescription or a doctor's supervision.
- The non-medical use of prescription drugs ranks second only to marijuana as the most common form of drug abuse in America.
- The majority of teenagers abusing prescription drugs get them from family and friends and the home medicine cabinet.
- Unused prescription drugs thrown in the trash can be retrieved and abused or illegally sold. Unused drugs that are flushed contaminate the water supply. Proper disposal of unused drugs saves lives and protects the environment.


**TAKE-BACK PROGRAMS ARE THE BEST
WAY TO DISPOSE OF OLD DRUGS.**

But if a program is not available:

- Take the meds out of their bottles;
- Mix the medicines (do not crush tablets or capsules) with an unpalatable substance such as dirt, kitty litter, or used coffee grounds. This prevents thievery or diversion of medicines from the trash.
- Place the mixture in a container such as a zip-lock or sealable plastic bag, and throw the container away in your household trash.

**FOR MORE INFORMATION ON
PRESCRIPTION DRUG ABUSE, GO TO:**

www.dea.gov
www.getsmartaboutdrugs.com
www.justthinktwice.com


 **LIFE IN CHECK™**
CONSUMER DRUG TAKE-BACK



**EVERY DAY IS CONSUMER
DRUG TAKE-BACK DAY**

Working together to protect our
families, communities and environment.

GO TO
RXDISPOSAL.LIFEINCHECK.COM
TO FIND A RECEPTACLE NEAR YOU



HOW IT WORKS

- 1** Pull to open drawer
Hale para abrir el cajón
- 2** Place medications inside
Coloque las medicinas adentro
- 3** Close the drawer
Cierre el cajón



**SAFELY DISPOSE OF
YOUR UNUSED OR
EXPIRED MEDICATIONS!**

DID YOU KNOW?

192 AMERICANS
die every day from
a drug overdose.
*fda.gov

46 MILLION
people at minimum, in 24 major
American metropolitan areas
are exposed to pharmaceutical
contaminated drinking water.

83% OF PEOPLE
who misuse prescription pain
relievers including opioids get them
from a friend, relative or others.
*samhsa.gov

2. Sample Collector Marketing Support



STOP BY TO SAFELY
DISPOSE OF YOUR
UNUSED OR EXPIRED MEDS

83% OF PEOPLE WHO MISUSE PRESCRIPTION
PAIN RELIEVERS INCLUDING OPIOIDS GET THEM
FROM A FRIEND, RELATIVE OR OTHERS.

(WWW.SAMHSA.GOV)

46 MILLION AMERICANS ARE EXPOSED TO
TRACE AMOUNTS OF MEDICATIONS IN THEIR
DRINKING WATER.

(KANSAS CENTER PRESS)

**SAFELY DISPOSE OF YOUR UNUSED
OR EXPIRED MEDICATIONS HERE**

For more information on safe drug storage and disposal, as well
as information on additional collection options,
visit rxdisposal.lifeincheck.com or call 1-800-123-4567

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SOCIAL MEDIA

Twitter: Crafting the Perfect Tweet

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1084 x 512 pixels*.

Facebook: Appealing to Your Audience

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn't always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 100 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.

SAMPLE POSTS

Copy and paste the following social media posts into your Facebook or Twitter to spread the word about the importance of properly managing leftover pharmaceuticals and drive people to your location. You can also combine them with some of the facts below to drive awareness of the importance of consumer drug take-back programs. Be sure to add one of the accompanying images and to fill in your location's name.

Announcing our new Consumer Drug Take-Back program to safely dispose of unused medications at OUR LOCATION.

OUR LOCATION wants to help you protect your loved ones, the community and the environment! Now you can dispose of unused meds here.

OUR LOCATION wants to help you protect your loved ones, the community and the environment by offering free unused meds disposal.

Got leftover meds? Drop them off at OUR LOCATION – free and easy.

Visit OUR LOCATION to drop off your leftover meds for free – no questions asked.

Leaving leftover drugs in the home can pose health and environmental dangers. Safely dispose of them today at OUR LOCATION!

Drop off your unwanted prescription and OTC meds in the green box at OUR LOCATION.

Rid your home of dangerous, leftover meds today. Bring them to OUR LOCATION to dispose of them safely – no questions asked!

Do you have leftover drugs in your medicine cabinet? Now you can dispose of them easily and safely at OUR LOCATION.

Safe prescription drug disposal is easy. Just find the green box in OUR LOCATION.

Do the right thing: don't flush your meds. Return leftover drugs to a safe take-back location like our green box at OUR LOCATION.

Do the right thing: don't flush your meds. Bring them to OUR LOCATION for proper disposal.

Protect your community – bring your leftover meds to a safe drug take-back program like ours at OUR LOCATION.

Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.

DID YOU KNOW?

192 AMERICANS

die every day from a drug overdose.*

AT

**EVERYDAY IS CONSUMER DRUG
TAKE-BACK DAY**

Go to rxdisposal.Lifeincheck.com
to find a receptacle near you

*cdc.gov



LIFE IN CHECK™

**SAFELY DISPOSE OF
YOUR UNUSED OR
EXPIRED MEDICATIONS!**

WE ARE PARTICIPATING!

**NATIONAL PRESCRIPTION
DRUG TAKE-BACK DAY**

SATURDAY, OCTOBER 26, 2019

SPONSORED BY  LIFE IN CHECK™
CONSUMER DRUG TAKE-BACK

SAMPLE PRESS-RELEASE

Use the template included in the press release folder or copy and paste the below to customize your press release and send out to media outlets in your area.

FOR IMMEDIATE RELEASE

CONTACT:

[Insert contact name here]

[Insert contact's title here]

[Phone number]

[Contact or program email address]

[Web site url if you have a web site](#)

**[Insert pharmacy name] announces convenient drug takeback
program for leftover household medications**

[CITY, STATE, TODAY'S DATE] -- [PHARMACY NAME] announced today it has established a convenient medication takeback program for easy disposal of leftover, unused and out-of-date prescription and over-the-counter medications.

It is an effort to help reduce the risk of drugs in the home that can potentially harm children, teens or adults. [PHARMACY NAME] has set up a secure, safe drop-off location in its pharmacy at [ADDRESS] in [CITY NAME].

Unused medications in the home are a source of drug abuse in millions of homes, with the opioid crisis in the United States fueled in part by that availability. More than 83 percent of opioid prescription medications taken by new users are obtained from a friend, relative or others. Overall, 192 Americans die every day from a drug overdose.

"We want to provide the folks in our community with the safe, secure opportunity to clean out their medicine cabinets and make their homes and communities safer," said [NAME OF PHARMACY MANAGER OR OWNER], of [PHARMACY NAME]. "We want to remind people that they should not flush drugs down the toilet. Traces of drugs can appear in community drinking water. Our drug disposal unit, which is easily accessible in the pharmacy, is a great answer to that problem and it's simple to do. All they do is just come in, look for the big green receptacle and take it from there. Drugs can be dropped off with no questions asked."

[PHARMACY MANAGER/OWNER'S LAST NAME] said there are some things that can't be taken in the receptacle, such as inhalers and needles, but pharmacy staff will be on hand to help determine what to do. The collection receptacle will be available in the pharmacy at [ADDRESS], [DAYS AND HOURS].

[PHARMACY NAME] partnered with Inmar to manage this drug take back program. The company has a long history as the industry leader in handling prescription and over-the-counter drug returns safely, securely and discreetly for major and regional chain drug stores as well as independent pharmacies and hospitals across the U.S.

3. Website Interface and Functionality



CONSUMER DRUG TAKE-BACK PROGRAM

FIND YOUR NEAREST DRUG DISPOSAL LOCATION



Every day in America 1,000+ people are treated in emergency rooms for prescription drug abuse and 192 die from drug overdoses. According to the National Institute on Drug Abuse 18 million people in the U.S. over the age of 12 have misused medications at least once in the past year. The opioid epidemic is impacting communities and families across the US - from rural farm towns to highly populated urban areas and across every demographic.

JOIN US AND HELP FIGHT THE OPIOID EPIDEMIC

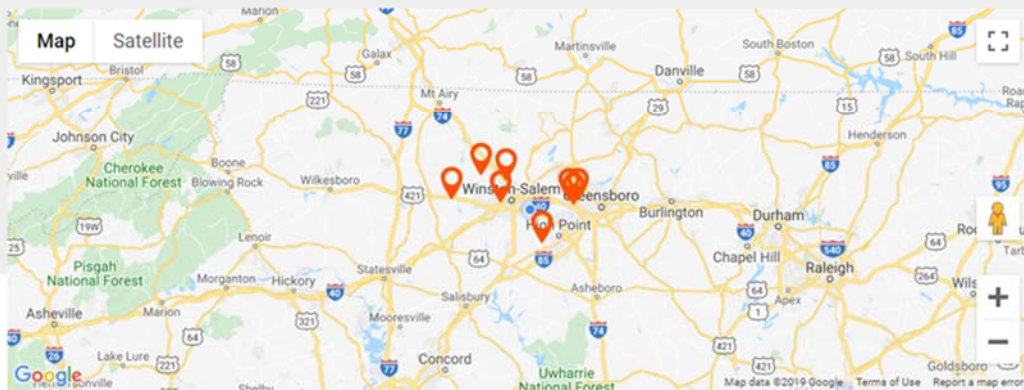
LifelnCheck Consumer Drug Take-Back is working to help educate Americans on the dangers of leaving prescription drugs unattended in the home. From diminishing the risk of drug abuse to helping protect the environment, disposing of your medications properly makes your community a healthier, safer place. **Simply enter your city and state or zip code and search radius and we will provide a list of safe drug disposal locations in your area.**

LOCATIONS

Location:

Distance:

FIND!



YOUR SEARCH RESULTS:

Southside Discount Pharmacy
3085 Waughtown Street
Winston-Salem, NC 27107
[Get Directions](#)

Walkertown Family Pharmacy
2905 DARROW RD
WALKERTOWN, NC 27051
[Get Directions](#)

SHOW ALL RESULTS



4. Social Influencer Process Overview & Content

Inmar Intelligence is the class leader when it comes to data-driven social influencer activations. Each influencer campaign progresses through four stages: Plan, Discover, Activate, and Measure.

Plan

In the Plan stage, we leverage our prescriptiveIQ™ insights engine to inform content themes and targeting parameters. prescriptiveIQ™ pulls data across 36MM social engagements to lend insight into trending topics, ideal campaign timing, and key audience demographics. For example, prescriptiveIQ™ may illustrate that conversations around National Consumer Drug Take-Back Day spike three weeks prior to the event in certain regions, especially among females ages 18-35. With this knowledge in hand, Inmar Intelligence works with our clients and influencers to curate and distribute content related to National Consumer Drug Take-Back Day and distribute it to female consumers between 18 and 35 who live in those key regions in the three weeks leading up to the event.

Discover

The Discovery stage is where the best influencers are matched to the campaign. Inmar Intelligence has a private, invite-only community of influencers consisting of over 12K members, each individually vetted for content quality, historical performance and audience quality (fake/bot follower detection included).

Clients have two options when it comes to influencer selection: They may browse and request their own influencers using the online Discovery tool or Inmar Intelligence can create a custom list of candidates for clients to choose from based on the clients' predefined parameters. The latter process is accomplished with the FitScore™ algorithm.

FitScore™ takes influencers who apply to be part of your campaign and weighs them against multiple factors including their price, historical performance, quality of content, and fit. The end result is a ranked list of influencers for the client to choose from.

In a test-and-control study, campaigns staffed with FitScore™ influencers observed 3.4x more content views, 36 percent more engagements, and 1.45 percent more earned media.

Activate

Once the influencers have been selected, it is time to start creating and distributing content. Clients provide influencers with a brief that outlines their key message, desired outcomes, and any parameters or restrictions. Outside of the brief, influencers are given creative liberty to ensure that the content still feels authentic and will resonate with their followers. **Importantly, clients have the ability to approve content to ensure it meets their requirements before it is published.**

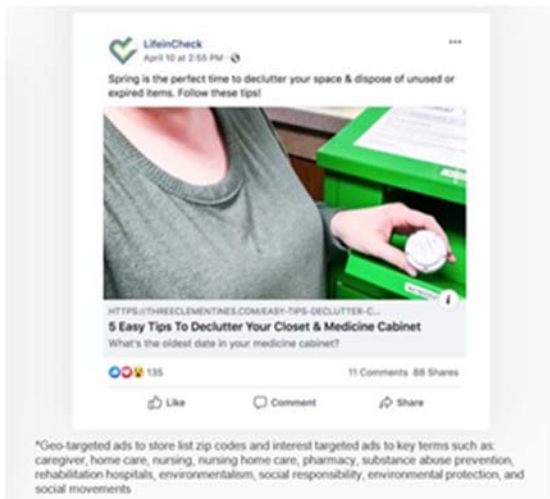
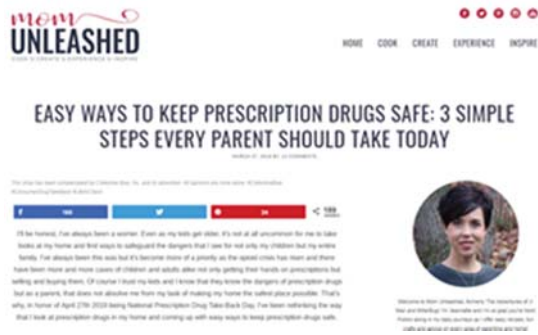
Upon distribution, influencers organically reach thousands of engaged followers and subscribers on their respective social platforms. Inmar Intelligence's Media Operations team closely monitors the performance of each individual post and compares it to benchmark data. Inmar Intelligence places particular weight on metrics like engagements, clicks, and shares (as opposed to views and impressions) because the former metrics suggest action and deep engagement rather than a passive (or even unconscious) glance at the content.

High performing pieces of content are leveraged for paid media ads and are promoted within social platforms as well as on off-site media properties. These ads drive back to the original content and are targeted to users based on client-defined criteria and/or to lookalike audiences.

Measure

For the entirety of the campaign, clients have access to an online dashboard which enables them to continuously monitor campaign performance. All metrics reported within the dashboard are third-party verified by Moat. These include:

- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post)



Appendix E: Applicable Permits and Licenses

The following permits have been provided on the following pages:

1. DEA
2. Wholesale Drug Distributor
3. Controlled Substance Registration
4. Department of Transportation Permit



Indiana Professional Licensing Agency
Indiana Board of Pharmacy
402 W. Washington Street, W072
Indianapolis, IN 46204

Wholesale Drug Distributor

License Number	Expire Date
48002376A	09/30/2020

Covanta Environmental Solutions, LLC

Eric J. Holcomb
Governor
State of Indiana

Deborah J. Frye
Executive Director
Indiana Professional Licensing Agency



Indiana Professional Licensing Agency
402 W. Washington Street, W072
Indianapolis, IN 46204

Wholesale Drug Distributor

License Number	Expire Date
48002376A	09/30/2020

**Covanta Environmental Solutions,
LLC**

Signature

DEA Registration Validation Result:

DEA Number: RC0561628

This DEA Number is ACTIVE

Name (Last, First): COVANTA ENVIRONMENTAL SOLUTIONS, LLC ,

Business Activity: REVERSE DISTRIB

Business Address 1: 2515 S HOLT RD STE 200

Business Address 2:

Business Address 3:

City: INDIANAPOLIS

State: IN

Zip: 462415354

Schedules: Schedule I, Schedule II Narcotic, Schedule II Non Narcotic, Schedule III Narcotic, Schedule III Non Narcotic, Schedule IV, Schedule V

Fee Status: Paid

Drug Codes: 9840 9843 9845 9847 9850 1233 1235 1237 1238 1246 1248 1249 1258 1475 1480 1503
1585 1590 2010 2012 2565 2572 6250 7008 7010 7011 7012 7014 7019 7020 7021 7023 7024 7025 7031
7032 7034 7035 7036 7033 7041 7042 7044 7047 7048 7049 7081 7083 7085 9825 9826 9827 9830 9831
9832 9833 9834 9835 9836 9837 9609 9611 9612 9613 9615 9616 9617 9618 9619 9621 9622 9623 9624
9625 9626 9627 9628 9629 9631 9632 9633 9634 9635 9636 9637 9638 9641 9642 9643 9644 9645 9646
9647 9649 9661 9663 9750 9811 9812 9813 9814 9815 9816 9821 9822 9823 9824 7089 7104 7118 7122
7144 7173 7200 7201 7203 7221 7222 7225 7249 7260 7297 7298 7315 7348 7350 7360 7370 7374 7381
7385 7390 7391 7392 7395 7396 7398 7399 7400 7401 7402 7404 7405 7411 7415 7431 7432 7433 7434
7435 7437 7438 7439 7455 7458 7470 7473 7482 7484 7493 7498 7508 7509 7517 7518 7519 7521 7524
7532 7535 7536 7537 7538 7540 7541 7542 7543 7545 7546 7694 9051 9052 9053 9054 9055 9056 9070
9145 9168 9200 9301 9302 9304 9305 9306 9307 9308 9309 9312 9313 9314 9315 9319 9335 9547 9551
9560 9601 9602 9603 9604 9605 9606 9607 9608

Bulk Drug Codes:

Expire Date: 08-31-2020

The U.S. Department of Justice, Drug Enforcement Administration, Diversion Control Division maintains registrant data and is considered the primary source of information on DEA registrants. The website <https://www.deadiversion.usdoj.gov> is the official location for real time online verification.



U.S. Department
of Transportation

East Building, PHH-30
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

**Pipeline and Hazardous
Materials Safety Administration**

SPECIAL PERMIT AUTHORIZATION

DOT-SP 20255

EXPIRATION DATE: 2021-07-31

GRANTEE: INMAR RX SOLUTIONS, INC.
FORT WORTH, TX

In response to your August 12, 2019 application for party status to DOT-SP 20255 and additional information dated August 22, 2019, INMAR RX SOLUTIONS, INC. is hereby granted party status to DOT-SP 20255 as a shipper only in accordance with 49 CFR 107.107.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at <http://www.phmsa.dot.gov/hazmat/regs/sp-a/special-permits/search>. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, Approvals and Permits Division at (202)366-4535.

Issued in Washington D.C. on **September 04, 2019.**

for William Schoonover
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2019085496 DUNS Number on file: 613608574

Appendix F: Agreement Templates

Inmar has provided templates on the following pages of the proposed agreement between Inmar and the authorized collectors, transporters, and disposal sites used as a part of the collection, handling, and disposal of unwanted drugs.



CONSUMER DRUG TAKE-BACK PROGRAM PURCHASE AGREEMENT

This Consumer Drug Take-Back Program Purchase Agreement ("Agreement") is made and is effective as of XX (the "Effective Date"), by and between **Inmar Rx Solutions, Inc.**, a Texas corporation, with offices at 4332 Empire Road, Ft. Worth, Texas 76155 ("Inmar"), and **XX**, with offices at XX ("Client").

Recitals:

This Agreement governs the use of all Consumer Drug Take-Back ("CDTB") containers and supplies and CDTB disposal services (collectively, the "Services"), including, without limitation, every order by Client of CDTB containers, supplies and all Services for Client's pharmacy Location(s) as defined in Section 1. Client agrees to the terms and conditions of this Agreement. All Services are governed by the terms and conditions in this Agreement, and objects to any other additional or different terms in any other purchase order, order form, or acceptance document. The individual signing this Agreement represents that he or she has the authority to bind Client to these terms and conditions. If such individual does not have such authority, or if such individual does not agree with these terms and conditions, such individual must not accept this Agreement, and Client may not use the Services.

Agreement:

In consideration of the foregoing recitals incorporated by reference and the covenants herein, the parties agree to be bound as follows:

1. Definitions.

- 1.1 Receptacles: The metal exterior box provided to Client by Inmar
- 1.2 Program Receptacles: Receptacles provided to client as part of the Washington State Medication Return Program.
- 1.3 Containers: The inner cardboard box and the liner provided to Client by Inmar
- 1.4 Destruction Services: Services provided by Inmar that destroy the contents of the Container
- 1.5 Location(s): Client's pharmacy location(s), a list of which Client provided in the applicable Order Form or in writing to Inmar (email to suffice) shall be considered to be attached hereto as the Location Exhibit and incorporated herein by reference
- 1.6 Washington State Drug Take-Back Program: The program authorized by RCW 69.48 which was implemented by the state of Washington in 2018 which "finds that it is in the interest of public health to establish a single, uniform, statewide system of regulation for safe and secure collection and disposal of medicines through a uniform drug "take-back" program operated and funded by drug manufacturers." RCW §69.48.10.

- 2. **Term.** The initial term of this Agreement shall be for three (3) years beginning on the Effective Date (the "Initial Term"). At the end of the Initial Term, this Agreement shall be renewed automatically for one (1) year periods (each one (1) year period shall be defined as a "Renewal Term"). The monthly fee assessed in any Renewal Term will be at the lower fee of \$XX per month (for twelve (12) Containers per Term year). The Initial Term and all Renewal Terms, if any, are collectively referred to as the "Term" of this Agreement. Upon expiration or earlier cancellation of this Agreement pursuant to Section 6 below, Client will take ownership of the CDTB Receptacle.

3. Client Obligations.

- 3.1 Client agrees to engage Inmar to provide the CDTB Receptacles and Containers and Destruction Services only when doing so will not violate any applicable federal, state or local laws or regulations. In order to receive the Services, Client agrees to register as a collector with the DEA, and Client shall provide proof of such registration for each Location to Inmar. Client will ship the Container only as provided by Inmar (and not in other packaging), and otherwise packaged as shown in the packing instructions provided by Inmar. Client understands and acknowledges that Inmar has received a special permit from the Department of Transportation (DOT), allowing less stringent shipping requirements for CDTB returns managed in compliance with Drug Enforcement Administration (DEA) regulations. The Special Permit ("[Special Permit](#)"), available [here](#), allows Client to ship CDTB returns in accordance with the reduced regulatory requirements provided in the Special Permit. Client warrants that its Locations shall manage the CDTB returns under the terms specified in the Special Permit and

that its Locations shall comply with all federal, state and local regulatory requirements, including but not limited to, WAC 246-869- 130, WAC 173-303 DEA, DOT, and Environmental Protection Agency (EPA) regulations.

- 3.2 Client agrees to pay Inmar the fees set forth on the applicable order form or enrollment form attached hereto and incorporated herein ("Order Form") on an annual basis within thirty (30) days of the Effective Date and each anniversary of the Effective Date at the beginning of each year of the Term unless otherwise agreed upon on the Order Form. Client will not be responsible for fees for Program Receptacles or service provided for Washington Drug Take-Back Program Receptacles.
4. **Services and Process.** Inmar will supply Client with the Receptacles as indicated on the Order Form. Each Receptacle will be assigned a specific account number. Each Container will contain a serialized inner liner. Inmar will supply Client with three (3) Containers per Receptacle with the initial order (a ninety (90) day supply). When each Container is full, or on a predetermined frequency, Client will ship the Container to the Inmar facility at 4332 Empire Road, Ft. Worth, Texas 76155 (the "Facility"). When the second Container of the set of three (3) arrives at the Facility, Inmar will ship up to a next three (3) month supply of Containers automatically to Client. If the number of Containers shipped to Client exceeds twelve (12) containers for a given Receptacle in a Term year, an additional charge of \$XX per additional Container will be assessed. Inmar will arrange for disposal of the Containers by a third-party waste destruction provider in accordance with applicable laws and regulations (the "Destruction Services").
5. **Disclaimer of Warranties.** EXCEPT AS OTHERWISE EXPRESSLY PROVIDED IN THIS AGREEMENT, INMAR DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, REGARDING THE PRODUCTS PROVIDED BY IT, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTY AGAINST INFRINGEMENT, THAT SUCH PRODUCTS WILL BE UNINTERRUPTED OR ERROR FREE AND ANY WARRANTY ARISING FROM A COURSE OF DEALING, USAGE, OR TRADE PRACTICE. EXCEPT AS OTHERWISE PROVIDED IN THIS AGREEMENT, THE PRODUCTS PROVIDED BY INMAR ARE PROVIDED "AS IS" WITHOUT WARRANTY OF ANY KIND. IN NO EVENT WILL INMAR BE LIABLE TO CLIENT FOR ANY SPECIAL, EXEMPLARY, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES, LOSSES, OR COSTS (INCLUDING LEGAL FEES AND EXPENSES), OR LOST TIME, SAVINGS, PROPERTY, PROFITS, OR GOODWILL, WHICH MAY ARISE IN CONNECTION WITH THE PRODUCTS PROVIDED BY INMAR, REGARDLESS OF THE FORM OF CLAIM OR ACTION, EVEN IF INMAR HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, LOSSES, OR COSTS.
6. **Cancellation.**
- 6.1 Either party may cancel an order for Services, with or without cause, upon thirty (30) days written notice to the other party. Upon receipt of notice/confirmation of notice of cancellation of Services, Inmar shall discontinue its performance of such cancelled order for Services. If cancellation is partial, Inmar shall continue the performance of the remaining portion of the canceled order for Services, as well as all other orders for Services which were not canceled.
- 6.2 If Client cancels all or part of the Services, such partial cancellation of Services to be based upon the cancellation of a specific Receptacle's account number, Client agrees to pay Inmar for all Services performed prior to the effective date of cancellation, at the agreed upon rates, plus Inmar's costs incurred to the effective date of cancellation which shall include but not be limited to: (1) if Client cancels the Services before second annual payment for Services is due, Client agrees to pay Inmar \$XX per Receptacle, or (2) if Client cancels the Services before third annual payment for Services is due, Client agrees to pay Inmar \$XX per Receptacle.
7. **Confidentiality.** Each party agrees to not disclose to any third party any information disclosed by the other party which (i) the disclosing party has classified in writing as confidential, or (ii) under the circumstances surrounding the disclosure, a reasonable person should know to be confidential. Each party agrees to use such information only for the purpose of this Agreement. Confidential information includes, but is not limited to, all pricing, operations, processes, software systems, methods of doing business, and other materials and information of a confidential nature.
8. **Limitation.** Unless otherwise limited herein, the liability of Inmar to Client under this Agreement or otherwise, regardless of the form of claim or action, will not exceed the amounts actually paid by Client to Inmar for Services provided by Inmar under this Agreement in the prior twelve (12) month period. No action arising out of this Agreement may be brought by either party more than one (1) year after the date on which the cause of action has accrued.
9. **Indemnification of the Parties.** Except as otherwise limited herein, each party (the "Indemnitor") agrees to defend, indemnify, and hold harmless the other party (the "Indemnitee") and its officers, directors, and employees from and against any and all damages, losses, fines, costs and expenses (including reasonable attorneys' fees), judgments, and liabilities (collectively, "Expenses") that (i) are made against or incurred by the Indemnitee in connection with a third party claim and (ii) arise out of or relate to acts or omissions of the Indemnitor in the performance of this

Agreement that constitute negligence or willful misconduct on the part of the Indemnitor, so long as such Expenses are not primarily caused by the Indemnitee, its officers, directors, or employees.

10. **Applicable Law.** This Agreement shall be governed by the laws of the State of New York, without regard to conflict of law provisions.
11. **Signatures.** Any order form, return authorization form or other document that incorporates the terms and conditions of this Agreement by reference, may be executed (i) in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same agreement, and (ii) using a manual signature, or a photocopy or other electronic reproduction of a manual signature, any of which shall have the same binding effect as an executed original.

This Agreement has been executed and delivered by a duly authorized representative of each party hereto as of the date corresponding to such party's signature.

Inmar	Client
Inmar Rx Solutions, Inc.	XX
_____	_____
(Signature)	(Signature)
_____	_____
(Printed Name)	(Printed Name)
_____	_____
(Title)	(Title)
_____	_____
(Date)	(Date)
Inmar Legal Approval: _____	

COVANTA

**Environmental
Solutions**

CES-Scottsdale

*7326 E. Evans Rd, Suite B
Scottsdale, AZ 85260
Tel: 480-659-9611
Fax: 480-659-2353*

21 June 2018

[REDACTED]
4332 EMPIRE RD
FORT WORTH, TX 76155

Re: Post Consumer Inner Liner Material (SCOL10)

[REDACTED]
Covanta Environmental Solutions, Scottsdale is pleased to provide this approval for energy-from-waste disposal of the above-referenced material at CES Scottsdale. This approval letter will remain in effect until another approval letter is issued for this waste stream superseding this document.

Please contact Rory Buske (rbuske@covanta.com or 480-271-3995) to schedule delivery into our facility located at 7326 E. Evans Rd., Suite B, Scottsdale, AZ 85260. All shipments must be shrink-wrapped and palletized. Failure to comply with these requirements will result in unnecessary delays and possible rejection of your materials and/or added costs.

A Certificate of Disposal will be issued for each load. Covanta Environmental Solutions will provide additional labor, when required, to manage your materials at the Covanta disposal facility. The price per ton is as listed on the proposal. Delivery and disposal of waste under this approval is subject to the terms and conditions of your contract.

Thank you for this opportunity to assist you with your non-hazardous waste disposal needs.

Sincerely,



Chris Ellis
Director of Operations
(480) 659-9611
cellis@covanta.com

cc: Zach Camarra

Zach Camarra
Business Development - Healthcare Solutions
Covanta Environmental Solutions

445 South Street
Morristown, NJ 07960
P 774-249-5032
ZCamarra@Covanta.com



June 20, 2018

[REDACTED]

Inmar
635 Vine Street
Winston-Salem, NC 27101

RE: Disposal services for Post-Consumer Liner Material

[REDACTED]

Covanta Environmental Solutions is pleased to provide Inmar with this proposal for the secure disposal and generation of clean renewable energy utilizing your Post Consumer Liner Material within our Energy from Waste (EfW) network. We appreciate this opportunity to offer your company the following disposal pricing and related services:

Renewable Energy Highlights

- **Annually, Covanta's EfW facilities convert more than 15 million tons of waste materials into clean renewable energy.**
- **Covanta's EfW operations are net reducers of greenhouse gases — annually offsetting approximately 15 million tons of carbon dioxide equivalents from being generated.**

Disposal Rates

Waste Description	Covanta DEA Facility	Covanta Destruction Facility	Disposal Price/Liner
DEA Controlled Liners	CES Scottsdale	Covanta Tulsa	[REDACTED] each for first 15 gallons* plus \$1 for each additional gallon
DEA Controlled Liners	CES Manheim	Covanta Lancaster	[REDACTED] each for first 15 gallons* plus \$1 for each additional gallon

**Denotes a liner gallon*

Please Note: All controlled substances shipments must be in compliance with DEA requirements. All shipment documents must be submitted to Covanta for review prior to a delivery confirmation being granted by Covanta.

Delivery volumes will be reviewed at the end of each calendar year.

Pricing Caveats

- There is a [REDACTED] Certificate of Destruction fee.
- All pricing is in U.S. dollars and annually prices will be adjusted to reflect a positive U.S. city Average Consumer Price Index for Urban Consumers (CPI-U).
- Pricing will include a 9.5% environmental security and insurance fee. (effective January 1, 2018)
- Additional City/State/Federal Taxes may apply.
- When requested, Covanta Environmental Solutions will provide special handling services at our EfW facilities.
 - Labor will be billed at the prevailing rate; currently \$75 per man hour.
 - Equipment will be billed at the prevailing rate; currently \$80 per hour.
 - Materials will be billed [REDACTED]
- There is a [REDACTED] surcharge per load pursuant to the following:
 - Unlabeled drums that contain powders
 - Drums not segregated that contain powders
- All DEA Controlled Liner Material can only be sent to a Pharmaceutical Service Center (PSC) and not direct to an EfW facility.

Value Added Services

- Material Characterization Form ("Profile" or "MCF") management including:
 - Assistance in the completion of the MCF form
 - Review of attachments for completeness
- Shipment Preparation:
 - Manifests provided if Covanta provides transportation.
 - Preprinted labels provided if Covanta provides transportation.
 - Pre-shipment form provided for each shipment
 - Non-hazardous certification form provided for each shipment
- Services Provided, upon request:
 - Coordination of onsite Covanta Environmental Solutions, LLC. subcontracted security
 - Certificate of Disposal for single shipping location

Service Terms

This offer of service will become effective immediately upon completion of the Material Characterization Form (MCF) and where necessary the execution of the service agreement accessible with this proposal and references the above noted waste streams. Future waste streams generated by this account may be added (pricing may vary based on material type) upon technical review and approval by Covanta. This offer is valid for 60 days from the date of this proposal.

Covanta's Environmental Solutions appreciates this opportunity to manage your company's secure disposal needs. Please direct any questions as well as completed approval forms to me.

Sincerely,

Zach Camarra
Business Development - Healthcare Solutions
Covanta Environmental Solutions

Appendix G: Letters of Recommendation



BlueCross BlueShield of North Carolina

In 2018, Blue Cross and Blue Shield of North Carolina (Blue Cross NC) announced a [commitment of \\$10 million and key policy changes](http://mediacenter.bcbsnc.com/news/blue-cross-nc-to-invest-50-million-in-community-health-initiatives) (<http://mediacenter.bcbsnc.com/news/blue-cross-nc-to-invest-50-million-in-community-health-initiatives>) to address the opioid epidemic. Our focus on prevention is the foundation of our community investments. Our collaboration with Mutual Drug member pharmacies and Inmar to provide new drop-off facilities across the state of North Carolina for the safe disposal of unused or unwanted prescription medications is huge step providing North Carolinians an easy and safe way to dispose of drugs.

While Take Back Day normally occurs only twice a year, Blue Cross NC's investment funded approximately 85 new medication drop-off sites in North Carolina that will be accessible to consumers year-round. Mutual Drug coordinated with their independent pharmacies across North Carolina to place the Take Back Day drop boxes in locations across the state. The new box locations will allow residents in 75 North Carolina counties to safely dispose of excess medications. By partnering with smaller independent pharmacies for box placement, the drop off locations will reach parts of the state that may not have easy access to medication disposal resources.

Blue Cross NC has been impressed with the ease of on-boarding and roll-out of the program. Inmar has been an excellent partner facilitating the logistics of the returns including contracting with each location, placement of the boxes and overseeing the entire project start to finish. Our reasons for choosing Inmar include the DEA and ADA compliant receptacle designed to be easy to use and having a small foot-print, the all-inclusive supplies for regular returns and the marketing materials available to support the program.

I have personally enjoyed working with Inmar and have found them to be a valued organization for this investment.

Thanks

Cheryl Parquet
Director, Community and Diversity Engagement
Cheyl.parquet@bcbsnc.com
919-765-4197



April 16, 2019

In April 2018, Mutual Drug met with Blue Cross Blue Shield of North Carolina to develop a partnership where BCBSNC would place Medication Take Back Boxes in Mutual Drug stores. However, to make this alliance successful, we needed a partner who would facilitate the logistics of the returns including the contracting, placement of the boxes, and oversight of the process. Having previous experience with Inmar and understanding of their Take Back Box Program, we invited them to join us on the project. Inmar worked with us on every step of the project and helped to provide insight and direction in a very complementary manner. We began the rollout in early 2019 and the initial reaction from our member stores was terrific. This project received considerable publicity in North Carolina as the effort encompasses 85 stores in 75 counties. Inmar has been receptive to our every request and has worked as our partner to make this project successful.

We are excited about our partnership with Inmar and highly recommend their services.

Gray Stewart, RPh | Director of Pharmacy Professional Services
direct: 919.598.4971 | gstewart@mutualdrug.com

Appendix H: Resumes



Domingo Isasi

Vice President & General Manager, Consumer Drug Take Back Solutions

Domingo Isasi, the Vice President and General Manager of Consumer Drug Take Back Solutions at Inmar has more than 20 years of global business leadership experience in Pharma, Reverse Logistics, Technology, Financial Services and the Aerospace and Defense industries.

Domingo's roles at Inmar include leading Inmar's Process Excellence, Mergers & Acquisitions, and Digital Operations divisions. Domingo began his career with 8 years in Law Enforcement, first as a Police Officer then as a Special Agent with the North Carolina State Bureau of Investigations.

Domingo's professional development and training lead to his certification as a Master Black Belt in Six Sigma, Lean Master, and a Project Management Professional, including training in Japan with Toyota and the Shingo Institute.

Domingo has successfully lead business units in driving long term value across the globe including as Chief Operating Officer with assignments in Canada, Mexico, Brazil, Australia, New Zealand, China, Japan, and the United Kingdom.

Domingo received his Bachelor's Degree in Behavioral and Social Sciences from the University of Maryland College Park and his Master of Business Administration in International Business from Wake Forest University.



Ashley Schmidt

Director, Regulatory and Compliance

Experience

5+ Years of Client Account Management Experience

5+ Years of Supporting Client Services for New Product Growth

Director, Regulatory and Compliance

- Develops and directs a strong team of 20+ regulatory compliance analysts on activities related to pharmaceutical reverse distribution and consumer drug returns
- Oversees company compliance activities related to DEA, State Boards of Pharmacy, FDA, EPA, Safety and Security for company facilities
- Provide guidance and direction to operations teams on matters regarding regulatory compliance
- Directs implementation and execution of regulatory compliance policies
- Ensures a comprehensive understanding of existing requirements and ongoing monitoring of new requirements.
- Performs in-depth review and inspection of all compliance policies and procedures to ensure minimal risk for facilities while still allowing the warehouses to effectively conduct business and serve their clients.
- Advocates for regulatory matters affecting the supply chain

Director, Healthcare Client Accounts - Inmar (November 2016 – present)

- Lead a team tasked with managing retail enterprise clients and expanding services to ensure that Inmar is delivering value and aligning with strategic client initiatives
- Manage large strategic retail and wholesale accounts
- Manage client renewal strategies and contract negotiations
- Prioritize needs of multiple accounts and direct client account teams accordingly
- Effectively assess at risk clients and create tactical plans for maintaining and growing business
- Develop and lead Account Management team training
- Lead and manage new client implementations
- Analyze and utilize reporting to provide customer business insights
- Provide analytical results for support of client business needs including but not limited to quarterly Business Reviews
- Provide client services support and insight on company-wide projects, including new product growth

Account Manager - Inmar (January 2012 – April 2014)

- Develop and maintain relationships with strategic clients at all levels to ensure that Inmar is delivering value and exceeding service expectations
- Manage large strategic retail and wholesale accounts
- Position and execute client renewal strategies and negotiations
- Prioritize needs of multiple accounts and direct client account teams accordingly

- Effectively assess at risk clients and create tactical plans for maintaining and growing business
- Develop and lead Account Management team training
- Manage new client implementations
- Analyze and utilize reporting to provide customer business insights
- Provide key Web-tool change management training during on-boarding as determined by the client's business goals
- Provide analytical results for support of client business needs including but not limited to quarterly Business Reviews
- Provide client services support and insight on company-wide projects, including new product growth

Business Development Manager – Inmar (April 2008 – January 2011)

- Closed and realized new and renewal revenue in Pharmacy Financial Management market segments meeting or exceeding goals each year
- 2010 Sales Achievement Award Winner
- Developed and maintained relationships with executive level contacts industry-wide and within assigned client base
- Demonstrated on-going value of services offered to customers
- Successfully renegotiated 3-year contract renewal and managed client relationship with largest PRISM client (annual revenue of \$1.6 million)
- Maintained a high level of knowledge regarding industry competitors and trends in the marketplace
- Led the 2010 launch and conversion rollout of a new product to largest PRISM client generating additional revenue more than doubling Inmar revenue from client
- Provided training and on-going support of PRISM's Web tool, Spectrum to new and existing clients
- Contributed to editing and writing of client communication with regard to products, services and training documents
- Demonstrated ownership, above average work ethic and high level of professionalism and teamwork with co-workers
- Provided Quarterly Business Reviews ensuring customers had clear results of third-party receivable metrics and comparables to industry peers

Certifications

- HIPAA – Fraud Waste and Abuse Certification

Education

Masters of Studies in Law, Wake Forest University
B.S., Psychology, Appalachian State University



Kirk Herweck

**Director Product & Strategy
Rx Returns and Workplace Solutions**

Experience

10+ years – Product Strategy

Director Product & Strategy Rx Returns & Workplace Solutions (November 2014 – present)

- Responsible for overall market strategy for Rx Returns working with hospital, retail and manufacturers services.
- Lead the team by focusing the product strategy team's creative spirit on solving market problems by leveraging organization's distinctive competencies to create new products at the inception stage.
- Lead team and ensure that all departments are prepared for new product releases and all items are completed to launch the product externally.
- Directing key areas within the product lifecycle for products, including market research, product definition focus, business planning, planning and development, programs, launch readiness and sales support.
- Lead a team of product managers, marketing managers, product intelligence analysts within the product lifecycle.

Vice President, Business Development – EXP Pharmaceutical Services (June 2003 – November 2014)

- Led the development of business plans by performing an objective analysis of a potential market opportunity. Worked with finance team to develop the financial model. Provided oversight for team implementation including migrating to Agile methodology
- Led the definition of the product by describing the product by its ability to solve market problems including features and capabilities of what it delivers
- Worked directly with senior leadership to cut operational costs and increase performance

Education

B.A., Behavioral Science, Missouri Baptist University

Appendix I: All Inmar Rx Returns Kiosks Nationwide

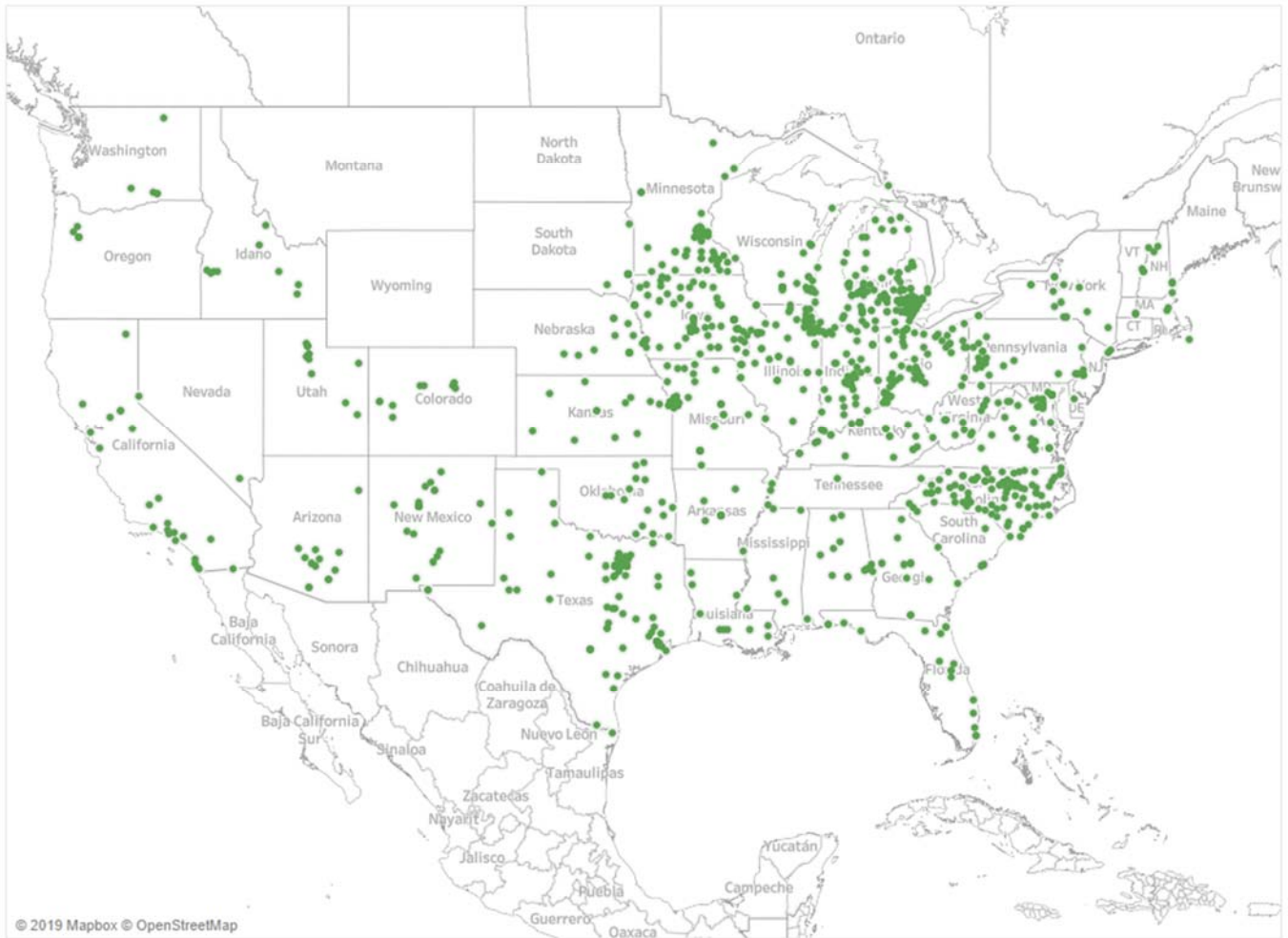
Consumer Drug Take Back Locations

1,151
Sites

608
Counties

861
Cities

43
States



Appendix J: Drop-Off Day Material

Meijer LifeInCheck Consumer Drug Take-Back Press Release Feb 2019

<http://newsroom.meijer.com/news/meijer-launches-consumer-drug-take-back-program-in-all-stores>

Meijer Launches Consumer Drug Take-Back Program in All Stores

Retailer installs secure, in-store kiosks for customers to safely dispose of unused or expired medications



February 19, 2019

Contact: Jennifer Rook, 616-791-2794

Jennifer.Rook@meijer.com

Click the link to view a multimedia version of this

announcement: <https://www.multivu.com/players/English/8497051-meijer-consumer-drug-take-back-program/>

GRAND RAPIDS, Mich. – Meijer announced today it is launching its new Consumer Drug Take-Back Program by installing secure in-store kiosks designed to help customers safely and properly dispose of unused or expired prescription drugs at no cost. Customers can find the easily identifiable kiosks in the pharmacy area in all 241 Meijer supercenters across the Midwest.

“Meijer is thrilled to be one of the first in our industry to provide a secure and convenient prescription drug take-back program at all stores in the communities we serve,” said Jason Beauch, Vice President of Meijer Pharmacy. “The Meijer Drug Take-Back Program allows our customers to remove the risk of an unforeseen accident occurring with expired or unused medications, while enabling them to properly dispose prescription drugs and reducing the possibility of creating a public health hazard.”

Customers can use the kiosks during pharmacy hours to dispose any unused, unwanted or expired medications – including opioids, controlled substances, and over-the-counter medications. Meijer pharmacists work in partnership with Inmar Rx Returns to properly document, transport and dispose of medications on a regular

basis. The Meijer Drug Take-Back Program complies with the rules and safety guidelines established by the U.S. Drug Enforcement Administration (DEA) and HIPAA privacy laws.

The Meijer Consumer Drug Take-Back Program supports a growing community need to have access to a safe method for disposing unused medications. According to the DEA's 2016 National Survey on Drug Use and Health, 6.2 million Americans misused controlled prescription drugs. The study shows that most abused prescription drugs were obtained from family and friends, often from the home medicine cabinet.

About Meijer:

Meijer is a Grand Rapids, Mich.-based retailer that operates 241 supercenters throughout Michigan, Ohio, Indiana, Illinois, Kentucky and Wisconsin. A privately-owned and family-operated company since 1934, Meijer pioneered the "one-stop shopping" concept and has evolved through the years to include expanded fresh produce and meat departments, as well as pharmacies, comprehensive apparel departments, pet departments, garden centers, toys and electronics. For additional information on Meijer, please visit www.meijer.com. Follow Meijer on Twitter [@twitter.com/Meijer](https://twitter.com/Meijer) and [@twitter.com/MeijerPR](https://twitter.com/MeijerPR) or become a fan at www.facebook.com/meijer.

#



#ConsumerDrugTakeBack Post Analysis

LifeInCheck Consumer Drug Take-Back | June 2019

Inmar's LifeInCheck™ Consumer Drug Take-Back Influencer and Social Media Ad April 2019 Campaign Results

June 2019

Objectives & Tactics

Objective

- Generate engagement and awareness of the LifeInCheck Consumer Drug Take-Back Program, how to locate and use the receptacles, and to drive traffic to the LifeInCheck Consumer Drug Take-Back locator site

Tactics

- 15 Long-form Blog Posts
 - 15 Tutorials
 - 60 Social Shares
- Targeted Social Content Ads
 - 10K Clicks to Blog Posts (Standard Targeting)
 - 2.5K Clicks to Blog Post (Retargeting)
 - 2K Clicks to LifeInCheck Locator Page



Influencer Blog Posts Results

Timing: 3/27/19-4/27/19

Content Live – Analytics Reporting

27K

Blog Post Views
Achieved: 1.8K per post

1:14min. 11.4MM

Avg. Time on
Content

Impressions
Guaranteed: 947.9K

6.2%

Click Through Rate
Benchmark: 1-2%

3.1K

Engagements
Achieved: 207 per post

2.5K

Instagram Views

250
Tweets

781
Engagements

217
Pins

1.8k
Engagements

18
Blog Comments

Social Content Ad Results

SCAs to Blog Post (Standard Targeting)

270K

Impressions

10.6K

Post Clicks
Guaranteed: 10K

3.9%

CTR
CB Benchmark: 1.6%-3%

624

Engagements

SCAs to Blog Post (Retargeting Targeting)

71K

Impressions

2.5K

Post Clicks
Guaranteed: 2.5K

3.5%

CTR

157

Engagements

SCAs to LifeInCheck Locator Site

87K

Impressions

2K

Post Clicks
Guaranteed: 2K

2.3%

CTR

162

Engagements

Content Highlights



Meg For It

"When I worked in the ER, I saw the effects and consequences of drug addiction, first hand. It affects the patient, the family, and the community. The patients I've seen seem to be held captive by their addictions. It controls them. The families are worried and fear the worst. Every near overdose devastates them. The community is burdened with the care and cost of this terrible vicious cycle. So here we are. What can we do about it?"

1.2K Total Engagements

Three Clementines

"For discreet, safe, and responsible drug disposal, check out the LifelnCheck Consumer Drug Take-Back Program which provides secure LifelnCheck Consumer Drug Take-Back receptacles across the U.S. Simply walk-in, pull open the drawer, place medications inside, and close the drawer. It's that easy to make a difference and help protect your family and community."



432 Total Engagements

Reader Comments

"I recently went through my medication basket and was shocked to see so many expired medications – prescription and non-prescription. I've been guilty of disposing of pills the wrong way so I'm glad you showed me a safe way to do it." - Alli

"I have not heard of the LifelnCheck Consumer Drug Take-Back Program, but it sounds like a wonderful service. I will check to see if it's available in our area. Normally, we take unused scripts back to the pharmacy we got them from, but I'd like to try this if I can." - Brianne

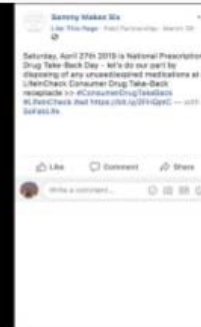
"This is such a great post and I will look through all my prescriptions today. I will look for a pharmacy near me that will take these old medications that have expired." - Melissa

"I'll go through our medications this weekend. I know we have some old ones that need to be disposed of. They are always put away to be safe!" - Amber

Social Syndication Examples



Facebook Syndication



Instagram Syndication



Appendix K: List of Producer's benzodiazepines and/or opioids

Manufacturer Name	Brand Name	Drug Label	GPI Description	Drug Group Description	Drug Class Description	Drug Subclass Description
LANNETT	BUTALBITAL COMPOUND-CODEINE	BUT/ASA/CAF/ CAP COD 30MG	Butalbital-Aspirin- Caff w/ Codeine Cap 50-325-40- 30 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Codeine Combinations***
LANNETT	CLOBAZAM	CLOBAZAM TAB 10MG	Clobazam Tab 10 MG	*ANTICONVULSA NTS*	*Anticonvulsants - Benzodiazepines* *	*Anticonvulsants - Benzodiazepines** *
LANNETT	CLOBAZAM	CLOBAZAM TAB 20MG	Clobazam Tab 20 MG	*ANTICONVULSA NTS*	*Anticonvulsants - Benzodiazepines* *	*Anticonvulsants - Benzodiazepines** *
LANNETT	CODEINE SULFATE	CODEINE SULF TAB 15MG	Codeine Sulfate Tab 15 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	CODEINE SULFATE	CODEINE SULF TAB 30MG	Codeine Sulfate Tab 30 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	CODEINE SULFATE	CODEINE SULF TAB 60MG	Codeine Sulfate Tab 60 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	DIAZEPAM	DIAZEPAM CON 5MG/ML	Diazepam Conc 5 MG/ML	*ANTIANKXIETY AGENTS*	*Benzodiazepines **	*Benzodiazepines* **

LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 10- 300MG	Hydrocodone- Acetaminophen Tab 10-300 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 10- 325MG	Hydrocodone- Acetaminophen Tab 10-325 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 5- 300MG	Hydrocodone- Acetaminophen Tab 5-300 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 5- 325MG	Hydrocodone- Acetaminophen Tab 5-325 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 7.5- 300	Hydrocodone- Acetaminophen Tab 7.5-300 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROCODONE- ACETAMINOPHEN	HYDROCO/AP AP TAB 7.5- 325	Hydrocodone- Acetaminophen Tab 7.5-325 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Hydrocodone Combinations***
LANNETT	HYDROMORPHONE HCL	HYDROMORPHONE HON TAB 2MG	Hydromorphone HCl Tab 2 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	HYDROMORPHONE HCL	HYDROMORPHONE HON TAB 4MG	Hydromorphone HCl Tab 4 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	HYDROMORPHONE HCL	HYDROMORPHONE HON TAB 8MG	Hydromorphone HCl Tab 8 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***

LANNETT	MORPHINE SULFATE	MORPHINE SUL SOL 100/5ML	Morphine Sulfate Oral Soln 100 MG/5ML (20 MG/ML)	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	OXYCODONE HCL	OXYCODONE CAP 5MG	Oxycodone HCl Cap 5 MG	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	OXYCODONE HCL	OXYCODONE CON 100/5ML	Oxycodone HCl Conc 100 MG/5ML (20 MG/ML)	*ANALGESICS - OPIOID*	*Opioid Agonists**	*Opioid Agonists***
LANNETT	OXYCODONE-ACETAMINOPHEN	OXYCOD/APA P TAB 10-325MG	Oxycodone w/ Acetaminophen Tab 10-325 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Opioid Combinations***
LANNETT	OXYCODONE-ACETAMINOPHEN	OXYCOD/APA P TAB 5-325MG	Oxycodone w/ Acetaminophen Tab 5-325 MG	*ANALGESICS - OPIOID*	*Opioid Combinations**	*Opioid Combinations***

ACKNOWLEDGMENT AND ATTESTATION

Date: 12/16/2019

Inmar Rx Solutions, Inc ("Inmar") certifies that it has read and understands the requirements of the Massachusetts Drug Stewardship Program codified as M.G. L.c. 94H ("Program"), and should Inmar be selected as program operator under said Program, Inmar will in the performance of such Program comply with all applicable state and federal requirements for the collection, security, transport and disposal of drug products, including any requirements established by rule or regulations of either the U.S. Drug Enforcement Administration or the U.S. Environmental Protection Agency.

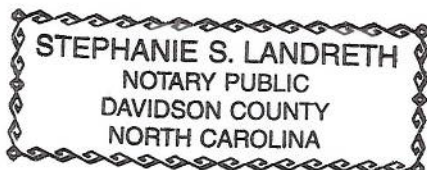
Inmar hereby certifies and declares that the foregoing is true and correct.

Subscribed on December 16, 2019 at Winston-Salem
Date City
Forsyth, State of North Carolina
State

Typed Name: Domingo Issa

Notary: Stephanie Landreth 12-16-19
Date

Commission Expires: 1-21-22





THANK YOU.

INMAR.COM

[linkedin.com/company/inmar/](https://www.linkedin.com/company/inmar/)

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