

Comprehensive Secure and Responsible Drug Disposal Program *Frequently Asked Questions*

Below are questions and associated answers related to the Comprehensive Secure and Responsible Drug Disposal Program solicitation. The solicitation and additional information are accessible at https://www.cossapresources.org/Content/Documents/Funding/Drug_Disposal_Grant_Solicitation_2022.pdf. Please note: The closing date for the funding opportunity is May 20, 2022.

Q: I understood that nonprofit organizations cannot apply. We are a nonprofit organization that works with the local police/sheriff to conduct drug take-back events. Is it the local police/sheriff who should apply?

A: Correct, nonprofit organizations are not eligible to apply for funding. The program [solicitation](#) indicates that only a unit of government—such as a state agency or department, a unit of local government, or a federally recognized Indian tribal entity, as determined by the U.S. Secretary of the Interior—may apply as a lead agency.

However, a government agency, such as a police or sheriff's office that applies as the lead partner in the project, may partner with community stakeholders (e.g., nonprofit organizations) in their proposed projects, and indeed, such partnerships are encouraged by the program.

Q: Does the funding also support disposal services for drug take-back kiosks, such as mail-back kits for waste disposal?

A: The entirety of program funding awarded to grantees must be used to purchase or rent equipment for drug take-back or disposal activities. By that definition, mail-back kits are among several innovative options that qualify as an allowable purchase, as would other materials that support mailing drugs to disposal facilities. (See pages 4 to 5 of the [Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs](#) from the U.S. Environmental Protection Agency [EPA].)

Q: Do I understand correctly that federally qualified health centers (FQHCs) would not be eligible to apply for this grant?

A: Only units of government—state agencies and departments, units of local government, and federally recognized Indian tribal entities, as determined by the U.S. Secretary of the Interior—may apply. FQHCs, which are community-based organizations that provide primary care and preventive care, are not eligible to apply. They may, however, serve as project partners for a government unit that applies.

Q: It has to be a local government unit that applies, collaborating heavily with law enforcement, correct?

A: State and tribal government units are eligible to apply, as well as local government units. Within the project structure, applicants are expected to designate a law enforcement agency as the lead project partner authorized to oversee the collection and disposal of prescription medications and controlled substances, in accordance with the U.S. Drug Enforcement Administration (DEA) and the U.S. Food and Drug Administration (FDA) guidelines.

Q: Is there a page limit for the statement of the problem and project plan or any other formatting requirements (e.g., 12-point font, single-spaced)?

A: No, there are no page limits for the statement of the problem or project plan sections of the application. Applications should follow standard formatting conventions, employing 12-point fonts and single spacing.

Q: Is there a required match?

A: No, this program does not require a match.

Q: My agency is in a rural area. We are collaborating with three municipalities from three counties. Can we apply for one award application? Or will we need to apply separately for each law enforcement municipality?

A: Given the modest size of the program, combining three municipalities into a single application is recommended. It is not necessary for each municipality to apply separately.

Q: Can public health be a lead agency?

A: The solicitation stipulates that applicants are expected to designate a law enforcement agency as the lead project partner authorized to oversee the collection and disposal of prescription medications and controlled substances in accordance with DEA and FDA guidelines. Given that requirement, a public health organization may not serve as a *lead* project partner, although it may certainly serve as a project partner.

Q: Can the local law enforcement organization designate someone in another organization as the project coordinator?

A: While it is required that a law enforcement organization or first responder serve as the lead partner in the project, the program encourages partnerships with other stakeholder organizations. Accordingly, the lead organization may designate someone in another organization to serve as the project coordinator.

Q: Would disposal services be considered equipment?

A: The entirety of program funding awarded to grantees must be used to purchase or rent equipment for drug take-back or disposal activities. By that definition, materials that support the mailing of prescription medications or controlled substances to disposal facilities are allowable purchases under this solicitation. (See [*Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Program*](#) from the EPA, pages 4 to 5.)

Q: Is there a limit on the amount used for the purchase of a single piece of equipment versus rental?

A: No, there is no such limit on the purchase of equipment.

Q: What supplies that might be helpful during a take-back event are allowable for purchase or rental under this solicitation?

A: Equipment that directly supports the safe collection of pharmaceuticals at a drug take-back event (for example, gloves) are allowable expenses under this solicitation. While marketing, awareness, and/or education campaigns might be helpful complementary activities, they should not be supported with program funds.

Q: Can customers use this funding to cover the disposal of the drugs, in addition to collection kiosks, since the kiosks cannot dispose of the drugs without disposal services included?

A: While program funds may not be used to pay for disposal services, they may be used to purchase materials, such as collection kiosks or other materials involved in the mailing of drugs to disposal facilities. Such purchases would be considered equipment under the solicitation. (See [*Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs*](#) from the EPA, pages 4 to 5.)

Q: Are medication lock boxes an approved purchase?

A: Yes, medication lock boxes qualify as equipment and are therefore allowable purchases under the program.

Q: Can part of the funds be used for marketing?

A: No, program funds may not be used for marketing services. The entirety of program funding must be used to purchase or rent equipment for drug take-back or disposal activities.

Q: We sell disposal kits, which are boxes, DEA-compliant liners, and shipping labels that would include disposal. Are these items considered equipment?

A: Yes, these items qualify as equipment and are therefore allowable purchases under the program.

Q: Will funds cover both collection and disposal?

A: While program funds may not be used to pay for collection or disposal services, they may be used to purchase materials, such as receptacle liners, outer packaging systems, or mail-back envelopes, involved in the mailing of drugs to disposal facilities. Such purchases would be considered equipment under the solicitation. (See [*Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs*](#) from the EPA, pages 4 to 5.)

Q: What is the minimum to the maximum amount of the grant?

A: It is expected that each grantee under the program will receive up to \$100,000 in funding.

Q: How many awards do you anticipate funding?

A: It is anticipated that up to eight grantees will receive funding.

Q: This program is only for drop boxes, correct, not disposal pouches?

A: No, in addition to disposal pouches, allowable purchases under this program include equipment, such as drug-disposal drop boxes or kiosks; equipment to support drug mail-back programs, such as labels or stickers; and equipment to support community collection events conducted in accordance with DEA guidelines.

Q: Would state department of public health district offices/health departments be considered authorized applicants for this program since they are state/local government agencies?

A: Yes, state, local, or tribal government agencies are eligible to apply for funding under this program. As noted above, applications are expected to designate a state/local/tribal law enforcement agency authorized to serve as the *lead* partner in their proposed projects.

Q: Does the equipment remain in the community once the project period ends?

A: Yes, the program does not require that equipment purchased under the program be returned following the conclusion of the project period. It should continue to be used to support drug take-back activities.

Q: If our hope is to obtain a drop box, where can we find the requirements for that?

A: The [Drug Disposal Information](#) web page on the DEA website provides information detailing federal requirements related to drug disposal boxes, including links to Section [1317.75](#) of Title 21 of the Code of Federal Regulations (CFR), entitled "Collection Receptacles," and to [21 CFR Parts 1300, 1301, 1304, et al.](#), entitled "Disposal of Controlled Substances; Final Rule."

If you have further questions, please contact the Institute for Intergovernmental Research at COSSAP@iir.com with the subject heading "Take Back Award."