

# FACT SHEET



FS No. 98-009-1221

## CONUS DISPOSAL GUIDANCE FOR OTC COVID-19 SELF-TEST KITS USED FOR SCREENING UNVACCINATED PERSONNEL RETURNING TO THE WORKPLACE

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### Description:

This fact sheet addresses recommendations for disposal when over-the-counter (OTC) self-test kits are used for conducting screening of non-vaccinated personnel on the continental U.S. (CONUS) installations when they return to the workplace, either at medical treatment facilities (MTF)/medical research facilities or at other formal workplace locations (e.g., administrative buildings). The guidance below is for CONUS and U.S. Territory locations only. All outside the continental U.S. facilities will need to consult with their host installation environmental office and/or local environmental health or infection control office for additional information and local guidance pertaining to their host country.

The U.S. Food and Drug Administration authorized kits to be utilized for testing asymptomatic non-vaccinated personnel are non-prescription OTC self-test kits, which are not clinical diagnostic tests. If personnel being tested have any of the common Coronavirus Disease 2019 (COVID-19) symptoms, they should not be tested and not allowed access to the facility. When used by personnel at home, the kits should be disposed of in the regular trash per manufacturers' directions (assuming there are no prohibitions on disposal from their local, county, state regulators or their solid waste trash hauler). Note that the MTF is only responsible for this non-clinical screening of their own unvaccinated staff. It is the responsibility of each unit/activity, who conducts the screening tests of their unvaccinated personnel, to dispose of their own waste properly unless otherwise coordinated with another entity.

### All Self-Test Kits (Regardless of Testing Location):

- **Disposal Guidance:** All equipment and waste should be discarded according to applicable Federal, State, and local laws and policies. Where those policies differ from the guidance provided below, the more stringent requirements will be followed. Consult with your local environmental health or infection control office for additional information and local guidance.
- **Hazardous Waste Consideration:** Prior to disposal, determine if any of the components of the self-test kit are an U.S. Environmental Protection Agency/State regulated hazardous waste (HW). As listed in Fragmentary Order (FRAGO) 10 to Headquarters, Department of the Army (HQDA) Executive Order (EXORD) 225-21, *COVID-19 Steady State Operations, ANNEX TTT General Instructions For All Screening Tests Of Unvaccinated Personnel*, the three OTC self-test kits (QuickVue™ At-Home OTC COVID-19 Test, Orasure IntelliSwab™ COVID-19 Rapid Test, and Abbot BinaxNOW™ COVID-19 Antigen Self Test), have been evaluated to not have HW components and can be disposed as described below. If a self-test kit other than the three listed above is utilized, the facility conducting the testing will need to make an HW determination. Any wastes determined to be an HW will need to be managed and turned in for disposal as such based on their facility's HW generator status and HW management procedures. Consult with your facility's HW manager or host installation's environmental office for assistance with the HW determination.

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U.S. Army Public Health Center, Environmental Health Sciences Division  
8252 Blackhawk Road, Aberdeen Proving Ground, MD 21010  
410-436-3651 or DSN 584-3651

[usarmy.apg.medcom-aphc.mbx.hmwp@mail.mil](mailto:usarmy.apg.medcom-aphc.mbx.hmwp@mail.mil)  
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- **Packaging, Wrapping, Empty Containers, and Package Inserts:** Any empty packaging or wrapping (e.g., wrapping of self-test kit components, such as swabs, test cards, plastic vials, test strips), shipping box/container, and package inserts (i.e., containing information such as instructions for use or fact sheets), can be disposed of as regular trash or paper and cardboard may be recycled if possible. Empty containers of extraction reagent (dropper bottles) can also be disposed of as solid waste.

#### **Self-Test Kits Administered in an MTF/Medical Research Facility:**

Used testing materials that came in contact with the sample specimen (e.g., used swabs/test devices, used test cards, used test strips, used sample vials containing reagent) should be managed per the MTFs/Medical Research Facility's procedures and policies as though they could transmit disease and be disposed of as regulated medical waste (RMW). This guidance is recommended due to—

- The perception of where the waste is being generated (in an MTF/Medical Research Facility);
- The facility's readily available access to RMW disposal;
- Labeling information on the used test material (e.g., the word "COVID" usually appears, as well as an indication of positive or negative test results); and
- The manufacturer's recommendations for when healthcare professionals conduct the test instead of personnel performing the testing at home.

If any Personal Identifiable Information (PII) is on the test kit material, it should be removed or blackened out prior to disposal.

#### **Self-Test Kits Administered in Other Formal Workplaces:**

Used testing materials that came in contact with the sample specimen (e.g., used swabs/test devices, used test cards, used test strips, used sample vials containing reagent) should be managed per the manufacturer's instructions for home use and disposed of in the facility's regular trash, unless prohibited by the host installation or their solid waste trash hauler. The wastes should be enclosed in a non-transparent bag or container prior to disposal in the facility trash. This additional "bagging" guidance is recommended due to—

- Potential negative perception issues of the waste when picked up by housekeeping/janitorial personnel (e.g., labeling information, such as the appearance of the word "COVID" or an indication of positive or negative test results on the used test material); and
- The perceived safety of the housekeeping/janitorial staff when transporting the trash in the facility.

If any PII is on the test kit material, it should be removed or blackened out prior to disposal.