

The Commonwealth of Massachusetts

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Board of Registration in Pharmacy Drug Control Program

Policy 2019-06: Compounded Emergency Medications for Veterinarian Use

The Massachusetts Board of Registration in Pharmacy ("Board") and the Drug Control Program ("DCP") adopt this policy regarding the provision of emergency medication kits ("e-kits") containing compounded medications for use in veterinary office practices.

This policy only applies to compounded drugs intended for animal use by a licensed veterinarian and allows the veterinarian to address immediate medical needs, pain, and suffering in a timely manner when FDA-approved products are not available or appropriate for veterinary administration or there is not time to have a patient specific prescription filled by a compounding pharmacy.

In accordance with applicable state and federal laws and regulations, a pharmacy may provide an e-kit containing limited quantities of compounded medications to a licensed veterinarian for the purpose of direct administration or dispensing in emergency situations, providing the following conditions are satisfied:

- 1. The veterinarian must hold a valid Massachusetts Controlled Substances Registration ("MCSR").
- 2. The pharmacy must maintain a written agreement with the veterinary office that identifies the specific medications (formulary) to be contained in the e-kit. The agreement and formulary must be reviewed and renewed at least annually.
- 3. The e-kit may only contain compounded Schedule VI controlled substances.
- 4. The medications contained in the e-kit remain the pharmacy's responsibility and part of the pharmacy's inventory until such time as the veterinarian provides a patient specific prescription to the pharmacy.
- 5. The pharmacy must ensure the e-kit is properly stored and secured. An Automated Dispensing Device ("ADD") may be used to secure medications in accordance with Policy 2019-02: *Automated Dispensing Device Use*.

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- 6. The pharmacy must obtain a patient-specific prescription for each medication removed from the e-kit within 7 days of the medication's removal.
- 7. Compounded emergency medications must be prepared to meet the unique medical needs of an animal (e.g., xylitol-free, increased concentration, etc.).
- 8. The veterinarian may dispense up to a 120-hour emergency supply from the e-kit only if timely access to a compounding pharmacy is not possible.
- 9. At least once every 10 days, the pharmacist must inspect, restock, and reconcile prescriptions for any medications dispensed from the e-kit.
- 10. The pharmacy must report any drug loss in accordance with Board Policy 2022-01: Loss or Theft of Controlled Substances.

Pharmacists are responsible for the proper labeling of each medication in an e-kit. The label of each compounded product must contain the following elements:

- 1. Generic name and strength
- 2. Quantity
- 3. Date of preparation
- 4. Lot number
- 5. Beyond-use-date ("BUD")
- 6. Storage, handling, and any other cautionary information
- 7. Name, address, and telephone number of the pharmacy
- 8. A statement indicating that the product is a sterile or non-sterile compounded drug preparation

Please direct any questions to: Pharmacy.Admin@mass.gov

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