



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Professions Licensure  
239 Causeway Street, Suite 500, Boston, MA 02114

Tel: 617-973-0800  
TTY : 617-973-0988  
[www.mass.gov/dph/boards](http://www.mass.gov/dph/boards)

**Board of Registration in Pharmacy  
Drug Control Program**

**Joint 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 emergency kit ("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 Joint Policy 2019-02: *Automated Dispensing Device Use*.

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 2018-05: *Requirements and Procedures for Reporting Theft or Loss 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