For Veterinarians: Prescribing Animal Drugs Compounded from Bulk Drug Substances

As a veterinarian, you may sometimes prescribe compounded drugs for your patient.

FDA regulates animal drugs, including compounded drugs, under the Federal Food, Drug and Cosmetic Act (FD&C Act). Here is what you need to know about the FD&C Act and FDA policies when you prescribe compounded drugs for your patient.

There are two ways to compound animal drugs, based on the source of the active ingredient. One way uses FDA-approved finished animal or human drugs as the source of the active ingredient. Compounding with FDA-approved drug products is a legal extralabel use under the FD&C Act if the conditions of FDA's extralabel use regulations are met. See 21 CFR Part 530.

The other way to compound animal drugs uses bulk drug substances (BDS), also known as active pharmaceutical ingredients (APIs), as the source of the active ingredient. Compounding animal drugs from BDS creates drugs that violate the FD&C Act because they do not meet the law's requirements for approval, manufacturing under current good manufacturing practices (CGMPs), and adequate directions for use. Because compounded animal drugs are not FDA-approved, they do not have these same assurances of safety, efficacy, and quality as FDA-approved and indexed products.

FDA's *Guidance for Industry # 256, Compounding Animal Drugs from Bulk Drug Substances* (GFI #256 or "the guidance"), describes the circumstances under which, at this time, FDA does not generally intend to take enforcement action against drugs compounded from BDS for violations of the FD&C Act's requirements for approval, adequate directions for use, and CGMPs. FDA recognizes that veterinarians sometimes prescribe drugs compounded from BDS when the patient cannot be treated with an approved or indexed drug. This checklist is intended to summarize the circumstances in GFI #256.

General Recommendations When Prescribing Compounded Animal Drugs from BDS

Under the guidance, whenever you prescribe or administer a drug compounded from BDS you should:

- ☐ **Have a valid veterinary-client-patient relationship (VCPR)**
- ☐ **Consider other FDA-approved options first.**
  - Consider whether an FDA approved (animal or human) drug or indexed drug can be used as labeled or in an extralabel manner, including compounding with the approved or indexed product, to treat the patient. If so, the approved or indexed drug should be used, instead of a drug compounded from BDS.
- ☐ **Distribute appropriately.**
  - Distribute compounded drugs to the patient's owner or caretaker or another veterinarian in your practice at the same location
- ☐ **Report adverse events.**
  - Report adverse events and product defects associated with the compounded drug to the compounder and to FDA on Form FDA 1932a.

Prescribing drugs for specific animal patients that are to be compounded from BDS by a pharmacy

When you prescribe a compounded drug for a particular patient or group of patients you should also:

- ☐ **Confirm the patient(s) is not a food-producing animal.**
  - ➢ See below for limited circumstances for compounding from BDS for food-producing animals
- ☐ **Identify patient(s).**
  - ➢ Write a prescription that identifies the patient or group of patients at same location.
- ☐ **Determine if you are prescribing a copy.**
  - ➢ Determine if there is an approved product with the same active ingredient, that can be given via the same route of administration. If so, you should have a medical rationale in your records noting why the compounded copy will make a clinical difference for the patient.
- ☐ **Provide rationale if copy is needed.**
  - ➢ Provide the pharmacist compounding the drug with the rationale for making a copy, either by writing it on the prescription or verbally when the pharmacist contacts you to obtain it. The statement of the rationale can be brief; see GFI #256 for examples. Note: If the compounded drug is not a copy of an approved product, the guidance does not ask you to provide a rationale.[1]

Obtaining office stock (i.e., drugs ordered without a prescription to be kept on-hand in inventory) compounded from BDS by a pharmacy

For some conditions treatment is urgently needed, and the time needed to compound a drug in response to an individual patient prescription may result in animal suffering or death. Under GFI #256 FDA reviews BDS nominated for use in compounding drugs as office stock for these circumstances and lists them on the List of Bulk Drug Substances for Compounding Office Stock Drugs for Use in Nonfood-Producing Animals. When you prescribe a compounded drug for office stock, you should also:

- ☐ **Confirm the patient(s) is not a food-producing animal.**
  - ➢ See below for limited circumstances for compounding from BDS for food-producing animals
- ☐ **Confirm that the BDS is on the List of Bulk Drug Substances for Compounding Office Stock Drugs for Use in Nonfood-Producing Animals or the list of Bulk Drug Substances Currently Under Review**
- ☐ **Use the compounded office stock to treat the species of animals under the conditions identified for the BDS on the list.**

Note: If you would like FDA to consider adding other drugs to the list, you can nominate a BDS at any time by following the directions in the Appendix of the GFI #256. Or, see Nominating a Bulk Drug Substance (BDS) to a List: A Quick Reference.

Prescribing drugs for food-producing animals and free-ranging wildlife species to be compounded from BDS by a pharmacy

Drugs compounded from BDS for food-producing animals are a high priority for enforcement action because of the potential for harmful residues in food from treated animals. However, because of their critical role in veterinary medicine, FDA generally does not intend to take action when animal drugs are

[1] Certain recommendations constitute collections of information that are subject to review by the Office of Management and Budget under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3521). These recommendations are under OMB review and are not for current implementation. See PRA statement in section IV. *Paperwork Reduction Act of 1995* of this guidance for more information.

compounded from certain BDS as antidotes for food-producing animals or sedatives or anesthetics for free-ranging wildlife as long as additional measures are taken to protect the human and animal food supply. When you prescribe a compounded drug for food-producing animals or wildlife (for use in specific patients or as office stock), you should also**:**

- ☐ **Confirm that the BDS is on the List of Bulk Drug Substances for Compounding Drugs for Use in Food-Producing Animals or Free-Ranging Wildlife Species or the list of Bulk Drug Substances Currently Under Review**
- ☐ **Establish withdrawal time.**
  - ➢ Establish a scientifically based withdrawal time that ensures that residues of the antidote, sedative, or anesthetic are not present in the animal at the time of slaughter or harvest
- ☐ **Ensure withdrawal time is observed.**
  - ➢ Take steps to ensure that the treated animals do not enter the food supply before the end of the withdrawal time or do not enter the food supply at all.

Note: If you would like FDA to consider adding other drugs to the list, you can nominate a BDS at any time by following the directions in the Appendix of the GFI #256. Or, see Nominating a Bulk Drug Substance (BDS) to a List: A Quick Reference.