

Dear Responsible Pharmacist,

In accordance with federal law, the US Food and Drug Administration (FDA) has developed a standard memorandum of understanding (MOU) with the states that addresses interstate distribution of compounded drugs.

Under the MOU, pharmacy compounders that distribute more than 50% of their compounded human drug products interstate will be identified by the states. States will be required to report certain information about these compounders to the FDA.

The 50% threshold merely triggers the information-sharing requirements; it does not limit the quantity of compounded drugs for humans that an individual compounding pharmacy may distribute outside its home state.

If a state does not enter into the MOU with FDA, a pharmacist, pharmacy, or physician in that state cannot sell more than 5% of its total compounding prescription orders across state lines.

For more information about the MOU, please see the following resources:

- Presentation given at the March 2021 Board Meeting
- FDA MOU Full Text

To assess licensee interest in signing the MOU, the Board asks that you complete the 2-minute survey linked below on behalf of your pharmacy by 5 p.m. on April 5, 2021.

IMPORTANT: You do not need to complete the survey if your pharmacy does not engage or plan to engage in drug compounding.

**Click to Access Survey**