

## THE VALUE AND NECESSITY OF COMPOUNDED MEDICATIONS FOR OFFICE USE

The patients seen by naturopathic doctors (NDs) derive tremendous benefit from having access to safely compounded medications made available or administered to them in the physician's office. Nutritional, herbal, and homeopathic remedies are compounded to meet unique patient needs, and are unavailable from large pharmaceutical manufacturers that do not have the skill to make small batches of these specialized products. These compounded medications, including injectables and IV solutions, have been used safely by NDs for decades.

Such medications provide unique benefit to patients and have an excellent track record of safety when properly produced and stored. Having a stock of safely compounded medications available for immediate in-office use helps patients receive the products their physicians recommend and reduce the medical and financial burden on both the patient and doctor that restrictions on office use would impose.

Unnecessary delay in the use of a medication can harm patients, especially those with acute or chronic conditions. The physician needs to have a variety of compounded medications on hand and in stock for immediate administration. Compounding pharmacies are most often not local, and can take anywhere from 2-7 days to produce and ship a product for a single prescription. If it is an injectable product, once the patient receives the package in the mail, she or he must return to the physician's office to have it administered. All of this creates unnecessary delay, which can harm the patient.

Furthermore, if it is an injectable product, patients may not maintain proper temperature or storage control when at home or during transport to the doctor's office.

The situation is much different for a mainstream drug, where the physician can write a prescription, the patient gets it filled right away at the local drugstore, and she or he can then start the prescribed medical treatment in a timely manner.

If the physician has the medication in stock for office use, none of these challenges is present that can interfere with good patient care.

For these reasons, AANP strongly encourages the FDA to recognize that Section 503A of the Food, Drug, and Cosmetic Act continues to allow the States to regulate office use. The manifest needs of patients, and the pragmatic needs of doctors, will be well served by this recognition.

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