

Prescriptions and Licensing FAQ from Iowa Board of Pharmacy

The answers to these questions have been provided from the Iowa Board of Pharmacy and applies to Iowa Pharmacy Practice Act for veterinarians and distributors in the state of Iowa.

Wholesale Questions:

1. Do we need a pharmacist on site for a producer customer to come in and pick up product?

If a producer comes in to pick up prescription product or the site mails, delivers, ships a prescription to the producer customer, the site must be licensed as a pharmacy.

2. Is a script on file adequate for a client to pick up product as long as the quantity or time hasn't expired without a pharmacist?

If the wholesaler is a licensed pharmacy.

3. Is it going to be legal to have prescription product on inventory without a pharmacy on site for producer sales or veterinarian sales?

If the wholesaler is not a licensed pharmacy, they will be able to sell the product to the veterinarian (prescriber), but not to the end user (producer). A licensed wholesaler can maintain stock for sale to the prescriber or a pharmacy.

4. Is a bill to the veterinarian ship to the customer a legal transaction without a prescription at my warehouse or any distributor location ? (shipped or picked up)

NO. Only a pharmacy can dispense a prescription product to the customer (end user).

5. Can I hire a local pharmacist to go over product to go out 2 -3 time a day to make sure we are compliant and the veterinarian is in compliance to service the producer that same day?

Yes, the wholesaler would need to obtain a pharmacy license and the pharmacist would have to verify every single order prior to it being shipped out or picked up.

6. We send meds through a "drop ship" method to producers/caretakers.

Only a wholesaler with a pharmacy license may drop ship prescription medication to an end user, be it a producer or caretaker

Veterinarian Questions:

7. Is a veterinarian on site with a (VCPR) adequate to make a sale with no pharmacist involved?

Yes, the prescriber can dispense medication directly to the end user without having a pharmacist involved.

Key Points:

Wholesale License

Ship prescriptions products to the prescriber or a pharmacy. Both types of sales are done through an order/invoice--not a script.

Pharmacy License

Dispense prescription products with a script to: Animal Site/ producer/end user/caretakers/ owners/ or any other term used to indicate anyone other than the prescriber.

For more information, please contact:
Dr. Chris Rademacher
Swine Extension Veterinarian
Ph: 515-294-8792
cjrsvm@iastate.edu

Iowa Pork Industry Center
www.ipic.iastate.edu

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8. Dispensing products from clinic or off our trucks

Yes, the prescriber can dispense medication directly to the end user either from their clinic or from their vehicle.

9. Do we need a script on the spot? Can it be written/signed within “X” time later?

If the prescriber is dispensing, then a prescription is not necessary, the prescriber must maintain records of medication dispensing.

10. Can multiple drugs be put on one script form?

Yes, the prescriber is allowed to put multiple products on a single prescription form.

11. How long to keep oral/injectable scripts

The prescriber/pharmacy must retain any prescription for a period of 2 years from the date on the prescription form.

12. Does a script need to go to the owner of the pigs each time or can be held at the clinic?

If the prescriber is dispensing, then they have to be at the clinic when the owner comes to pick the medication up. No prescription needed. A pharmacy is the only entity that can dispense a prescription.

13. Can a veterinarian that is employed by a producer bring animal health products into a central warehouse? What are the prescription and labeling requirements for moving that product out from the main warehouse to satellite warehouses prior to dispensing it to the animal site?

There are no labeling requirements just transfer records. The product must be labeled by the prescriber prior to dispensing to the animal site.

14. If a product has a prescription label on a product for one site and the veterinarian wants to move it to another site (same client – same animal ownership), what would need to change on the label in order to move this product?

The address would need to change.

15. What is the requirement for putting labels on unopened containers of medication (that container multiple individual packets) compared to having to label all the individual packets/bottles?

An unopened package containing smaller packages can be labeled on the outer package.

Helpful Links

Iowa Pork Industry Center
www.ipic.iastate.edu

State of Iowa Pharmacy Code
<https://www.legis.iowa.gov/DOCS/ACO/IC/LINC/Chapter.155a.pdf>