

Guidance for Mobile Pharmacy MAT Units

Approved by Kansas State Board of Pharmacy: August 25, 2022

Last Updated: August 19, 2022

- I. Purpose
 - a. The purpose of this guidance is to provide clarification regarding the operation of a mobile component dispensary of a pharmacy for the provision of medication assisted treatment for substance use disorder.
- II. Statutory Authority
 - a. See K.S.A. 65-1629, 65-1635, 65-1636, 65-1637, 65-1642, 65-1643, 65-1645, and 65-1648.
 - b. See 21 C.F.R. Parts 1300, 1301, and 1304; see specifically 21 C.F.R. 1301.13(e)(4)
- III. Guidance
 - a. For purposes of this document, “pharmacy” means a Kansas-registered pharmacy.
 - b. A mobile MAT unit approved by and registered as a Narcotic Treatment Center with the Kansas Department on Aging and Disability Services, as well as the U.S. Drug Enforcement Agency may deploy from the pharmacy to a Board-approved location to increase patient access to assessment and treatment for substance use disorder using MAT.
 - c. Notifications
 - i. Prior to deployment, the pharmacy and unit shall notify the Board in writing.
 1. Notification shall include:
 - a. Name and Kansas pharmacy registration number;
 - b. Physical address(es) where unit will be located while deployed (approximate coordinates or landmarks if no specific address available);
 - c. Storage location for unit and drugs when not in use;
 - d. Anticipated dates/times unit will be operational at location and estimated duration of operation at location (i.e., days, hours);
 - e. Description of the methods of security, which shall include at minimum:
 - i. How drugs/devices will be secured and any extra security for controlled substances;
 - ii. How unit is secured from unauthorized entry; and
 - iii. Preventative measures to deter theft of entire unit if/when unattended (i.e., tire boot, etc.); and
 - f. Description of how the unit will maintain:
 - i. Adequate climate control;
 - ii. Water supplies for sanitation; and
 - iii. Communications.
 2. A new notification is required if the unit changes or adds locations.
 - ii. At least ten days prior to ceasing unit operations, the pharmacy shall notify the Board in writing of the anticipated end date. The pharmacy shall make reasonable efforts to notify patients of discontinuation of unit services at the location.
 - d. Inspections
 - i. Prior to operation, a Board Inspector shall conduct a physical inspection of the unit to assess compliance with laws and regulations and approve/deny.
 - ii. A Board Inspector may conduct a physical inspection of the unit at the storage location or any service location.

- e. The pharmacy shall:
 - i. Utilize licensed or registered individuals to staff the unit;
 - ii. Maintain KDADS and DEA approvals and registrations, and ensure compliance with all requirements for operation of the unit;
 - iii. Ensure that drugs are removed, inventoried, and stored whenever the unit is not in use;
 - iv. Establish and maintain policies and procedures for the operation and security of the unit;
 - v. Comply with all other relevant provisions of the Pharmacy Act of the State of Kansas; and
 - vi. Lock all C-II controlled substances in a cabinet secured to the unit.
- f. All drugs/devices stocked to the unit during deployment shall be the property of the pharmacy. All drugs/devices on the unit must remain secured inside the pharmacy's registered, permanent location when the unit is being stored.
- g. Units not deployed that are stationed and maintained in Kansas shall not be stocked with drugs/devices.