



Agenda Item 6.0

BRN Future Priorities and Proposals for Review and Possible Action

BRN Board Meeting | March 26-27, 2026

BRN Future Priorities and Proposals
for Review and Possible Action
March 26, 2026

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Agenda Item 6.1

**Discussion and Possible Action:
Presentation on Action Plan to Provide Notice and
Address Issues Relating to Scope of Practice and
Supervision for Compounding Drugs**

BRN Board Meeting | March 26-27, 2026

BOARD OF REGISTERED NURSING
Agenda Item Summary

AGENDA ITEM: 6.1
DATE: March 26-27, 2026

ACTION REQUESTED: **Discussion and possible action:** Presentation on action plan to provide notice and address issues relating to scope of practice and supervision for compounding drugs

REQUESTED BY: Board

BACKGROUND:

The Board has received an increase in complaints regarding medspa and intravenous (IV) therapy clinics where registered nurses (RNs) and advance practice registered nurses (APRNs) are engaging in drug compounding. Compounding is not within the scope of practice for RNs or APRNs in California and may only be performed by a licensed physician or pharmacist.

Educational materials have been developed for publication on the Board of Registered Nursing (BRN) website and social media platforms, and for distribution to partner boards, academic institutions, and via the BRN's listserv.

Medication preparation and administration are core nursing responsibilities; however, California law draws a clear distinction between permissible medication preparation and prohibited compounding activities. Business and Professions Code section [BPC 2725.1 \(b\)](#) states: "No registered nurse shall compound drugs."

Compounding involves altering a medication from its original form which may include, but is not limited to:

- Using a different diluent than specified;
- Changing the concentration; or
- Mixing ingredients not described in the package insert.

Admixing refers to medication preparation that follows the manufacturer's instructions exactly, without deviation. This includes, but is not limited to:

- Reconstituting a powdered drug using the listed diluent;
- Preparing an IV medication according to the package insert; or
- Drawing up medication for immediate administration as recommended by the manufacturer.

RNs and APRNs may prepare medications exactly as labeled but are not permitted to mix IV solutions beyond manufacturer instructions or deviate from package labeling, such as using a different diluent or concentration and combining medications, vitamins or supplements. Additionally, they may not compound medications, even if directed to do so by a prescriber. More specific guidance and examples are provided in the specific outreach materials following this AIS.

NEXT STEP:

PERSON TO CONTACT: Loretta Melby
Executive Officer
California Board of Registered Nursing
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Subject: Reminder: Compounding is not within RN/APRN Scope in California

The Board has seen an increase in complaints involving medspa and intravenous (IV) therapy settings where registered nurses (RNs) and advanced practice registered nurses (APRNs) are engaging in medication compounding. Under California law, **compounding may only be performed by licensed physicians or pharmacists.** RNs and APRNs may not compound medications, even if directed by a prescriber.

Compounding vs. Admixing

- **Compounding (Not Allowed):** Any alteration of a medication's original form, including using a different diluent, changing concentration, or mixing ingredients not included in the package insert.
- **Admixing (Allowed):** Preparing medications exactly as specified in the manufacturer's instructions, without deviation.

RNs and APRNs May:

- Prepare medications exactly as labeled
- Reconstitute using the specified diluent
- Draw up single medications for immediate administration
- Prepare IV medications only when following the package insert

RNs and APRNs May Not:

- Compound medications in non-emergent situations
- Mix or prepare IV solutions beyond manufacturer instructions
- Use a different diluent or alter concentration
- Compound Medications even if directed by a prescriber

Quick Guide:

If you follow the package insert exactly → Allowed

If you change anything (including combining multiple medications and/or vitamins) → Considered Compounding → Not allowed for RNs/APRNs

Social Media messaging

Post 1:

Compounding and Admixing: What Nurses Must Know

Compounding: means altering a medication from its original form including using a different diluent, changing the concentration, or mixing ingredients not listed in the package insert.

Admixing: Preparing medications exactly according to the manufacturer's instructions, without deviation.

Post 2:

Compounding: Important Reminder for California RNs and APRNs

Compounding is not within the scope of practice for RNs or APRNs in California. Nurses may prepare medications only as described in the package insert. Any change, such as using a different diluent, altering concentration, or mixing additional ingredients, is compounding and is prohibited.

Post 3:

Compounding; What RNs and APRNs *May Do*:

- Prepare medications exactly as labeled
- Reconstitute with the specified diluent
- Draw up a single medication for immediate administration
- Prepare IV medications only when following the package insert

Post 4:

Compounding: What RNs and APRNs *May Not Do*:

- Compound medications in non-emergent
- Mix or prepare IV solutions beyond manufacturer instructions
- Use a different diluent than the one specified
- Alter a concentration or formulation
- Compound medications, even if directed by a prescriber

Post 5:

Compounding: Quick Decision Guide

- Follow the package insert exactly → allowed
- Change anything → compounding → not allowed

Post 6:

Compounding: An important message

The BRN has received an increase in complaints involving MedSpa and IV therapy settings where nurses are compounding. Under California law, compounding is not within the RN or APRN scope of practice. **Compounding may only be performed by physicians or pharmacists.**

Compounding and Admixing: Scope of Practice for California RNs and APRNs

What's the Difference?

Compounding (any deviation from manufacturer instructions)

- Preparing medications by combining, mixing, or altering ingredients to create a customized product.
- Involves any deviation from FDA-approved labeling (e.g., using a different diluent, creating a different concentration, combining medications).

Admixing (strictly following manufacturer instructions)

- Preparing medications by mixing or diluting them exactly as specified.
- Follows the manufacturer's label and package insert with no deviation.

What RNs and APRNs *May Do*

- Prepare medications according to United States Food and Drug Administration (FDA)-approved labeling.
- Reconstitute medications using the specified diluent.
- Draw up a single medication for immediate administration.
- Prepare IV medications only when following the label or package insert.

What RNs and APRNs *May Not Do*

- Compound medications in non-emergent, non life-threatening situations.
- Mix or prepare IV solutions beyond manufacturer instructions.
- Use a different diluent than the one specified.
- Alter a medication's concentration or formulation.
- Compound medications, even if delegated by a prescriber.

Why These Rules Exist

The FDA warns that compounded drugs may:

- Cause contamination
- Be an incorrect drug strength
- Result in serious injury or death

Compounding requires specialized training, equipment, and oversight.

Who *May* Compound

- Licensed pharmacists
- Physicians

Quick Decision Guide

If you follow the package insert exactly → Allowed

If you change anything (including combining multiple medications and/or vitamins) → Considered Compounding → Not allowed for RNs/APRNs

Examples

Situation	Allowed?	Why
Drawing up a single medication for immediate use	✓ Yes	Single medication
Reconstituting with the specified diluent	✓ Yes	Following labeling
Preparing an IV bag per package insert	✓ Yes	Admixing (no deviation)
Using a different diluent	✗ No	Changes the manufacturer's recommendation
Mixing or adding medications to IV solutions in non-emergent situations	✗ No	Considered compounding (combining/altering medications)