



**JOINT ADVISORY OPINION ISSUED BY THE SOUTH CAROLINA  
STATE BOARDS OF MEDICAL EXAMINERS, NURSING AND  
PHARMACY REGARDING THE PRESENCE OF A PHARMACIST IN A  
METHADONE CLINIC DURING DOSING HOURS<sup>1</sup>**

The Healthcare Collaborative Committee met on October 23, 2015, at which time a quorum of designated representatives from the South Carolina State Boards of Medical Examiners, Nursing and Pharmacy was present.

Representatives from the South Carolina Board of Pharmacy staff and the South Carolina Department of Health and Environmental Control's Bureau of Drug Control advised the Healthcare Collaborative Committee of multiple regulatory compliance concerns arising from inspections of methadone clinics around the state.

The compliance challenges identified include, but are not limited to, scope of practice issues for pharmacists and nurses working in the methadone clinic, potential disparities between applicable state and federal laws, verification of a patient's identity, verification and compliance with a valid prescription by a prescriber, concerns about labeling of non-patient specific doses for on-site administration, and the distinction between "administration" and "dispensing" of medication as defined by the South Carolina Pharmacy Practice Act. Testimony established that a pharmacist most often is not present during all dosing hours of a methadone clinic, but that a pharmacist's presence during all dosing hours would resolve most of the concerns identified.

The Healthcare Collaborative Committee recommended that the State Boards of Medical Examiners, Nursing, and Pharmacy adopt a joint advisory opinion clarifying that methadone clinics should have a pharmacist on site during all hours when methadone is dispensed for either administration on site or at home and that dispensing occurs any time product selection, which includes dosage selection, occurs. The State Board of Medical Examiners approved this recommendation at its meeting on November 2, 2015. The State Board of Pharmacy approved this recommendation at its meeting on November 18, 2015. The State Board of Nursing approved this recommendation at its meeting on November 2, 2015.

Accordingly, it is the joint opinion of the State Boards of Medical Examiners, Nursing and Pharmacy that a methadone clinic should have a pharmacist on site during all hours when methadone is dispensed for either administration on site or at home and that dispensing occurs any time product selection, which includes dosage selection, occurs. The administration or dispensing of methadone without a pharmacist present in the methadone clinic may result in disciplinary action against licensed professionals employed by the methadone clinic.

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<sup>1</sup> Approved by the South Carolina State Board of Medical Examiners on November 2, 2015.