

**REVISED JOINT ADVISORY OPINION ISSUED BY THE SOUTH CAROLINA
BOARDS OF MEDICAL EXAMINERS, NURSING AND PHARMACY¹ REGARDING
OVER-THE-COUNTER MEDICATIONS AND HERBAL
SUPPLEMENTS IN SCHOOLS**

The Healthcare Collaborative Committee, comprised of representatives from the South Carolina Boards of Medical Examiners, Nursing and Pharmacy, convened on June 9, 2017, to consider a request for clarification on the Joint Advisory Opinion Regarding Over-the-Counter Medications in Schools issued in September 2013. The South Carolina Boards of Medical Examiners, Nursing and Pharmacy subsequently convened separately and hereby collectively approve and adopt the recommendations of the Healthcare Collaborative Committee to revise the previous joint advisory opinion, follows:

- (1) It is within the scope of practice for an RN or LPN to administer or allow-self-administration of over-the-counter medications or herbal supplements commercially available for retail sale in South Carolina in a school setting with parental consent, but without a medical order from an authorized licensed provider. However, if the over-the-counter medication is prescribed by an authorized licensed provider, then the over-the-counter medication must be treated like a prescription medication as set forth in S.C. Code Ann. § 40-43-86.
- (2) An authorized licensed prescriber may not write standing orders for over-the-counter medications for students with whom they do not have a physician-patient relationship as described in S.C. Code Ann. § 40-47-113.
- (3)
 - (a) In the case of a prescribed over-the-counter medication or herbal supplement commercially available for retail sale in South Carolina, the school may not accept the medication in the manufacturer's labeled container purchased off the shelf and attach a tag with the student's name. Prescribed over-the-counter medications must be treated in all respects as a prescription drug and all prescription drug labeling requirements shall apply as set forth in S.C. Code Ann. § 40-43-86.
 - (b) In the case of over-the-counter medication or herbal supplement commercially available for retail sale in South Carolina for which no prescription exists, nothing in the Medical Practice Act, Nurse Practice Act or Pharmacy Practice Act prevents a school and/or school nurse from accepting the over-the-counter medication or herbal supplement commercially available for retail sale in South Carolina in the manufacturer's original packaging with a tag bearing the student's name attached.
- (4) The school may maintain a stock supply of commonly prescribed over-the-counter medications to avoid having to store multiple students' medications.

¹The Board of Pharmacy approved this Revised Joint Advisory Opinion on June 14, 2017; the Board of Medical Examiners approved this Revised Joint Advisory Opinion on May 7, 2018; and the Board of Nursing approved this Revised Joint Advisory Opinion on May 17, 2018.