

Overview

In 2023, regulations creating a Health System Non-Dispensing Permit were passed by the General Assembly. Since the passage of the regulations, the South Carolina Board of Pharmacy has fielded many questions, and received input from a wide variety of stakeholders, as to how this permit classification could address the needs of health systems throughout the State. The Board provided clarification on the requirements for the Health System Non-Dispensing permit, and its relationship to a Non-Dispensing Drug Outlet Permit, at the March 2024 meeting.

Health System Non-Dispensing Permit

A hospital/health system may choose to have authority over their health-system owned clinics and practices in one of two ways.

Health System Non-Dispensing Permit (HSND)	Non-Dispensing Drug Outlet Permit (NDDO)
<p>Each HSND permit holder must be associated with a single inpatient or outpatient hospital Pharmacy permit; the health system can determine how many HSND clinics/practices/facilities are associated with each hospital Pharmacy permit held</p> <p>The Pharmacist-in-Charge (PIC) of the hospital Pharmacy is responsible for all clinics/practices/facilities issued an HSND permit associated with that hospital Pharmacy</p> <p>A Consultant Pharmacist is not required for each clinic/practice/facility</p> <p>The PIC of the hospital Pharmacy is responsible for determining who completes the monthly inspection (does not have to be a licensed pharmacist)</p> <p>Monthly inspections must be available at each permitted clinic/practice/facility and at the associated permitted pharmacy for review by the Board upon request</p>	<p>For any clinic/practice/facility that a health system chooses not to roll under an HSND; every clinic/practice/facility must have an individual NDDO permit</p> <p>Each clinic/practice/facility holding an NDDO must have a Consultant Pharmacist responsible for all statutory requirements of a consultant pharmacist</p> <p>Each clinic/practice/facility holding an NDDO must complete monthly inspections and have those available on-site for review by the Board upon request</p> <p>Do not fall under the hospital Pharmacy permit(s)</p> <p>The hospital Pharmacy PIC has no responsibility for the clinic/practice/facility holding the NDDO</p>