



South Carolina
Department of Labor, Licensing and Regulation



Board of Medical Examiners

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Notice Concerning the Prescribing of Non-FDA Approved (Research-Grade) Peptides

The Board has been made aware that peptides (including semaglutide) are being advertised to physician offices and the public for purchase from innumerable sources, some of which are not permitted by the South Carolina Board of Pharmacy. Additionally, many of these peptides are not prescription quality.

Research-grade peptides are not approved by the FDA and have not been tested, reviewed, or determined to be safe or effective for human use. These substances are not subject to regulation or oversight by the FDA regarding safety, efficacy, or manufacturing standards and consistency. As a result, neither the provider nor the patient can fully assess, quantify, or understand the potential risks associated with their use. Nor can they verify the contents of any vials.¹

All drugs administered or dispensed to a patient must be prescription quality; therefore, under no circumstances is it permissible for a physician to compound, administer, or dispense a non-FDA approved or research grade peptide to a patient. A physician may not circumvent his or her duty of care to patients by permitting or delegating the purchase, administration, or dispensing of these drugs to Advanced Practice Registered Nurses (APRNs) or Physician Assistants (PAs). This prohibition includes advising, recommending, supplying, prescribing, or administering.

A medical professional cannot require or permit a patient to "waive" the provider's duty of care to the patient and the professional's personal obligation to follow the law. Patient consent forms purporting to identify a product as "research-grade" are ineffective and do not mitigate or eliminate the health care provider's professional or legal liability. In circumstances where a patient independently acquires and self-administers such substances, the associated risk rests solely with the patient. However, any involvement by a medical professional in recommending, supplying, prescribing, or administering these substances constitutes the practice of medicine and is prohibited.

Finally, under South Carolina law, it is unlawful for any facilities located within or outside of South Carolina to manufacture, produce, sell, distribute or dispense drugs without being permitted by the South Carolina Board of Pharmacy.² Practitioners must purchase all prescription products, drugs, and prescription ingredients from an entity permitted by the South

¹ Regarding semaglutide, many facilities are selling semaglutide salt forms and research grade powder. These salt forms and research grade powders are not approved by the FDA nor are they evaluated for safety. As such, the only powder that should be used in compounding is the prescription quality powder.

² See S.C. Code §§ 40-43-83, -89.

Carolina Board of Pharmacy. This includes any component of a compounded drug. A licensed practitioner compounding medications must verify that the drugs or their components are being bought from a permitted facility. This can be confirmed through the South Carolina Board of Pharmacy through either the licensee lookup function³ or by contacting the Board of Pharmacy directly. A licensed practitioner purchasing, distributing, or dispensing drugs or its components from an unpermitted facility is aiding and abetting unlicensed practice, is violating a state law involving drugs, and may be disciplined for unprofessional conduct.⁴

³ <https://verify.llronline.com/LicLookup/Pharmacy/Pharmacy.aspx?div=24&AspxAutoDetectCookieSupport=1>

⁴ See S.C. Code 40-47-110(B)(3) (misconduct to violate a federal, state, or local law involving drugs; S.C. Code 40-47-110(B)(7) (misconduct to knowingly perform an act that in any way assists an unlicensed person to practice); S.C. Code 40-47-110(B)(9) (misconduct to engage in dishonorable, unethical, or unprofessional conduct that is likely either to deceive, defraud, or harm the public).