



**MECKLENBURG COUNTY  
Health Department**

**Peter E. Safir, Director**

**(704) 336-4700**

November 13, 2001

To: Alan Honeycutt  
Regional Environmental Health Specialist

From: Emily Gray, RS  
Environmental Health Specialist

Re: Child Day Care Rule Clarification

Recently I have been posed a question concerning the storage of epinephrine pins. According to our County child care nurses these needles are used to immediately administer a dose of epinephrine due to an allergic response to a particular item. Our County child care nurses they feel this medication should be made readily accessible to children. The nurse's feel this is a "life or death" situation therefore the medication should be kept accessible to children without being under lock and key.

In accordance with 15A NCAC 18A .2820(d) all medications shall be kept under lock and key. Could an exception be made for epinephrine pins when they are prescribed from a physician, if they are kept out of reach of children and made readily accessible to a caregiver?

Additionally a memo dated August 20, 1999 addressed an exception for asthma inhalers in regards to school age children only. Does this also apply to pre-school age children if the asthma inhaler is kept in the caregivers possession? Thank you for addressing this matter.

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**700 N. Tryon Street, Suite 208, Charlotte, NC 28202**

**North Carolina Department of  
Environment And Natural Resources**

**Division of Environmental Health**

Michael F. Easley, Governor  
William G. Ross, Jr, Secretary  
Linda C. Sewall, Director  
Michael U. Rhodes, Section Chief



December 10, 2001

**MEMORANDUM**

**TO:** Emily Gray, R.S.  
Environmental Health Specialist

**FROM:** Alan Huneycutt, R.S., Environmental Specialist  
Children's Environmental Health Branch

**THROUGH:** Ed Norman, Program Supervisor  
Children's Environmental Health Branch

**SUBJECT:** Epinephrine Auto-Injector Pens and Asthma Inhalers

This memo is in response to your letter dated November 13, 2001 in which you asked about the storage of epinephrine pens in child care centers. You asked whether or not physician prescribed epinephrine pens may be kept accessible to a caregiver so long as they are kept out of the reach of children. Although the child care sanitation rules do not make a specific exception in 15 NCAC 18A .2820(d) for epinephrine pens, keeping these devices accessible to caregivers while out of reach of children is preferred to storage in a locked container given the immediate life threatening nature of anaphylactic shock. Written permission from a parent or physician should also be obtained and a written protocol for the staff at the child care center should be made available.

You also asked whether or not preschool age children may keep asthma inhalers in their possession. "Rescue" inhalers are relatively uncommon among preschoolers and they should not be kept in the child's possession. However, they may be kept accessible to caregivers (with written permission and a written protocol) rather than stored in a locked container. The urgency of their availability is somewhat less than for the epinephrine pens. A memo from the Children's Environmental Health Branch dated August 20, 1999 indicated that school age children may keep asthma inhalers in their possession with written permission from a physician or parent. Please contact me at (704) 895-2737 if you have further questions.