

Protocol for Delegated Cosmetic S4 Injections

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The CPCA recognises that there are two main forms of delegated cosmetic injectable treatments. The first occurs when a cosmetic physician provides a face to face (FTF prescribing) consultation at their Practice and delegates the treatment to be performed to a suitably qualified registered nurse. The second occurs when the consultation is not face to face but performed as a Technology Based Consultation (remote prescribing) with the patient and the registered nurse.

The CPCA believes that **best practice** for delegated cosmetic S4 injections requires that suitably- trained registered nurses may administer S4 medicines for cosmetic purposes after a doctor has consulted in person, face-to-face with a patient and formulated a specific written treatment plan. Whilst the CPCA does not believe that Technology Based Consultations are best practice, and in fact carries additional risks to the prescribing doctor, the Medical Board of Australia has allowed the use of Technology Based Consultations for this purpose. In addition to the Protocol the CPCA has produced for FTF prescribing, a list of additional requirements catering for remote prescribing has been developed for our members.

Whether the consultation is performed face-to-face or via technology, the doctor assumes responsibility for the procedure and the patient must know the doctor's contact details including how to contact the doctor in case of issues arising after the treatment.

Face to Face Prescribing for Delegated S4 Injections

A written **Treatment Plan**, formulated after the doctor's consultation with the patient should:

1. Cover a time period no greater than 1 year
2. Stipulate the specific areas to be treated
3. Provide a specific **Written Order** as to which S4 injectable is to be used in each particular area including specific dosages
4. Set the maximum number of procedures

The **Treatment Plan** and **Written Order** should be reviewed by the doctor and discussed with the patient:

1. At the expiration of the set time period.
2. If an unexpected side effect or complication occurred.
3. If the patient or nurse were unhappy with the results of the treatment being performed.
4. If a new indication or area of treatment for the ordered medications was to be contemplated.
5. If any change to the specific Written Order was to be contemplated.
6. If the presentation of the patient has changed (eg pregnancy, breast feeding, illness, medications, allergy etc)

If any medications taken by the patient alter, the delegated nurse must check with the supervising doctor prior to the procedure occurring to ensure there are no contraindications to proceeding with the planned treatment.

The doctor should meet and have a professional relationship with the nurse and ensure that the nurse is fully competent and capable to carry out all injections that are delegated. The supervising doctor must be capable of performing these procedures themselves and should perform any procedures that fall outside the nurse's capabilities or expertise.

In the event of an emergency, the supervising doctor, or other suitably trained and competent doctor within the practice must be available to attend within 15 minutes.

It is **not lawful** for any individual to on sell S4 medications and devices. This includes a doctor selling S4 injectables to a delegated nurse.

Registered nurses performing such procedures must:

1. Have current national registration.
2. Be covered by the practice insurance policy, or in the case of an independent contractor, have his or her own policy.
3. Have had adequate training in the particular procedure/s they are performing.
4. Have been certified as competent where certification exists, or deemed competent by a trainer or supervising doctor within the practice.
5. Be approved by the supervising doctor.
6. Not perform procedures which have not been prescribed. i.e. that **are not** on the Treatment Plan or **are not** covered specifically by the Written Order.
7. Not perform procedures which are beyond their level of training and capability.

The CPCA does not endorse the use of injectors whose qualifications or experience is less than that stated above and is vehemently opposed to injections being given by non-paramedical persons such as beauty therapists.

All members should ensure there are no additional requirements relevant to the advertising, acquisition, storage, transport or administration of S4 medications pertinent to their own state or territory which must be fulfilled.

Remote Prescribing for Delegated S4 Injectables

The CPCA is committed to setting and promoting the standards in Cosmetic Medicine and believes that Remote Prescribing for Delegated S4 Injectable cosmetic treatments is **not Best Practice**.

It is important to recognise that as the prescribing doctor they are responsible for the outcome of any delegated procedure being performed by a non-medical practitioner and have a duty of care to the patient as if they had personally treated them.

If a member is providing remote prescribing services via a technology based consultation, they need to ensure that they comply with the following requirements **in addition to those for FTF prescribing**:

1. Ensure that all State & Federal Laws are complied with including those governing advertising, acquisition, storage and transport of S4 medications and devices.
2. Ensure that they have a good understanding of the various regulations and guidelines governing this area, including but not limited to; MBA Guidelines for technology based consultations, MBA Good Medical Practice and Code of Conduct for doctors in Australia, MBA Guidelines for registered medical practitioners who perform cosmetic medical and surgical procedures as well as an awareness of the various Nursing and Midwifery Board Guidelines.
3. Ensure they have adequate Professional Indemnity to provide Technology Based Consultations and remote delegation of S4 injectables.
4. Ensure the Technology Based Consultation fulfils MBA requirements including full past medical history including medications, allergies and pregnancy status, history of presenting concern, discussion of treatment options, explanation of proposed treatment, full informed consent and a specific written treatment plan.
5. Keep a contemporaneous record of the consultation and consent. The delegated nurse injector is also required to keep their own record of this.
6. Provide a specific written prescription to the registered nurse delegated to perform the procedure. It must include the patients name, the date, your contact details, the specific S4 to be used including the dose and which areas are to be treated and must be done prior to the procedure being performed. Many States will not accept an electronic signature.
7. Be able to provide adequate supervision and be able to respond to any side effects or complications, in person if medically required, and in a timely manner.
8. Ensure that the remote delegated injector is well trained in the management of acute complications including vascular occlusion and has at least five ampoules of hyaluronidase available for use.
9. The CPCA member should not provide Remote Prescribing services for more than five delegated nurse injectors.

The CPCA will require their members to certify that they comply with CPCA policy annually at the time their membership fees fall due.