Changing Scope of Practice to Include Non-Surgical Cosmetic Procedures

Physicians wishing to perform non-surgical cosmetic procedures must abide by the College’s Ensuring Competence: Changing Scope of Practice and/or Re-entering Practice policy. The purpose of this document is to outline the College’s expectations for physicians who wish to add non-surgical cosmetic procedures to their practice, to outline training requirements, and to provide you with a tool to help you document any training you have undertaken.

Scope of Practice – What are the requirements?

In accordance with the College’s registration regulation, a physician must only practice in the areas of medicine in which she or he is educated and experienced. When any physician wants to practise in a new area, or in an area in which they have not practised in more than two years, the College must ensure that she or he has the education and experience necessary to do so. A “needs assessment” is conducted, based on information regarding a physician’s training and qualifications, as well as his or her current and proposed scopes of practice. In some cases, physicians are required to go through a formal changing scope of practice process which includes training, supervision, and an assessment. In other cases, where the addition of procedures is not a significant change from the current practice, and the physician has undertaken appropriate training, there may be no further requirements under the policy.

Our foremost concern is to ensure patient safety. While many non-surgical cosmetic procedures are of minimal risk to patients, there are others that have the potential for greater risk. We also recognize that some patients may be dissatisfied with the outcome of procedures, even though harm may not be permanent. The risk of both permanent and temporary harm may be increased in the absence of adequate training and experience.

High risk, non-surgical procedures include the injection or insertion of a non-absorbable product, an injection that promotes a physiologic response by the host, and procedures that include the use of ablative, non-fractionated lasers. If you intend to perform any of these procedures as part of your non-surgical cosmetics practice, you can expect that you will be required to participate in a changing scope of practice process.
However, if you intend only to perform low risk, non-surgical cosmetic procedures, and you have completed specific training in these procedures as described below, you need not necessarily go through a College-directed assessment of your practice. This is not to suggest that one can start incorporating non-surgical cosmetics into one’s practice with minimal training. For example, a simple demonstration of injecting a temporary filler by an industry representative would not constitute adequate training.

**Training Requirements**

With respect to procedural skills training, there are two main components: Pre-Patient Training and Training in the Clinical Setting. Pre-Patient Training involves acquiring basic knowledge about the procedure, its indications, contraindications, and management of potential complications. It also includes the acquisition of skills and then performance of the skills in a simulated, non-patient environment.

Training in the clinical setting involves a stepwise approach to skill acquisition, with observation of a skilled medical practitioner performing the procedure on a live patient, followed by guided performance with assistance and, ultimately, independent performance of the skill in a supervised capacity. Throughout this process feedback and guidance from the skilled medical practitioner is crucial.

**Documentation and Application**

To assist you in ensuring that you have adequate training as described above to perform these procedures, the College has developed a [Personal Record of Training in Non-Surgical Cosmetic Procedures](#). You are encouraged to complete this form and save it for your records. You do not need to submit these records to the College. Should the need arise to assess your practice in the future, you may be asked to submit evidence of your training. These simple records will make it easy for you to do so.

We trust that this information will be helpful to you as your practice evolves. Should you wish to incorporate non-surgical cosmetic procedures into your practice please complete and return the [Application Form for Physicians Proposing to Change Their Scope of Practice to Include Cosmetic Procedures](#). Please contact the Inquiries Section in the Applications and Credentials Department of the College for further guidance, at 416-967-2617 or by email at inquiries@cpsso.on.ca.