State of Idaho
Division of Occupational and Professional Licenses

BRAD LITTLE
Governor
RUSSELL BARRON
Administrator

11341 W Chinden Blvd.
P.O. Box 83720
Boise, ID 83720-0063
(208) 334-3233
dopl.idaho.gov

Guidance for Healthcare Professionals Offering Lifestyle Injectable Medications

Purpose

The purpose of this guidance document is to highlight considerations for licensed healthcare professionals offering lifestyle injectable medications. Depending on the practice setting medication selection, prescribing, preparation, compounding, and administration likely constitute the practice of medicine, nursing, pharmacy, or dentistry.

All individuals offering healthcare services are responsible for ensuring they possess the appropriate licensure, delegation from a supervising provider, or both prior to offering any of these services. In addition to this document, each licensee should familiarize themselves with the applicable practice act and board rules governing their profession.

Background

The Idaho Boards of Barbers and Cosmetology Services, Dentistry, Medicine, Nursing, and Pharmacy recognize the increasing prevalence of medical consumerism, particularly as it relates to lifestyle injectable medications. These services are frequently marketed directly to consumers and may include compounded or commercially manufactured products. Given the rapid influx of demand, there is a high degree of variability among individuals offering these services.

Lifestyle injectable medications include, but are not limited to:

- Peptides
- Fillers
- IV Hydration
- IV Ketamine
- Injectable Vitamins
- Platelet-Rich Fibrin (PRF)
- Platelet-Rich Plasma (PRP)
- Neurotoxins
- GLP-1s and other compounded weight loss products

Case reports have already emerged of severe adverse reactions tied to providers using counterfeit, adulterated, or improperly compounded drugs. Furthermore, there have been reports of patient harm when a provider fails to adequately assess the appropriateness of an injectable's use in a patient prior to treatment initiation.

The Boards reaffirm their commitment to protecting public health and safety. Licensees are expected to practice in a manner consistent with the acceptable standard of care and within the limits of their education, training, and experience.

Adoption Date: 3/13/2026

Enforcement Overview

As of July 1, 2025, Idaho Code § 67-9407 allows any board in Idaho under the authority of the Division of Occupational and Professional Licenses to pursue disciplinary action if a licensed professional fails to meet the standard of care provided by other similarly licensed professionals in the same or similar settings. Under this approach, when determining whether conduct falls outside the acceptable standard of care, the following questions should be considered:

- Is the act expressly prohibited by Idaho Code, Rule, or federal law?
- Is the act consistent with the licensee's education, training, and experience?
- Would a reasonable and prudent licensee with similar education, training, and experience, practicing in a similar setting, provide the same or similar care?

Medication Sourcing and Compounding Considerations

Licensees offering lifestyle injectable medications should evaluate the legality and safety of drug sourcing and preparation practices, including:

- Is the drug or active pharmaceutical ingredient (API) sourced from an FDA-registered facility?
- Was the medication obtained from a licensed Idaho wholesaler, pharmacy, or manufacturer?
- Does the distributor provide Certificates of Analysis for products purchased?
- If bulk API is obtained, is independent third-party testing performed to validate purity and potency?

Given the presence of a thriving gray market, sourcing medications from unverified suppliers may expose patients to safety risks from contaminants, sterility issues, or variability in potency.

With respect to compounding:

- Do you possess the necessary facilities, equipment, and competencies to compound in compliance with current applicable standards?
- Is an appropriate beyond-use date assigned based on compounding environment?
- Are quality control processes in place to ensure batch testing for sterility and purity?

Compounding performed outside an appropriate aseptic environment significantly increases the risk of contamination. When sterile compounding safeguards are not met, products may be limited to immediate use only.

Considerations for Prescribers

Prescribers bear responsibility for establishing and maintaining an appropriate prescriber-patient relationship and for ensuring that injectable medications are prescribed in alignment with each individual's medical history and treatment goals.

Prescribers should consider:

- Has a sufficient prescriber-patient relationship been established to justify the prescribing or administration of an injectable medication?
- Was an appropriate patient evaluation conducted to identify contraindications and assess necessity?
- Do you possess the education, training, and experience necessary to provide injectable lifestyle medications safely?
- Was informed consent obtained and documented appropriately?
- What monitoring parameters are in place during and after treatment?
- Are patients educated regarding potential adverse reactions and when to seek further care?

Lifestyle medications carry inherent risks. These services should be approached with the same clinical rigor as any other medical intervention, including appropriate diagnosis, documentation, shared decision-making, and development of a patient-specific treatment plan. The supervising provider remains responsible for the care provided under their delegation, regardless of the amount of patient interaction.

Delegation

Delegation must occur within the limits established by each profession's practice act and applicable board rules.[1]

Before delegating, providers should consider:

- Do I have legal authority under Idaho law to delegate this task?
- Does the delegate possess the knowledge, skill, and competency necessary to perform the task safely?

[1] Although the term "medical director" is commonly used to describe a healthcare provider who establishes protocols and delegates tasks to other licensed or unlicensed personnel, it is not recognized in the practice acts or board rules of the Idaho Boards of Barbers and Cosmetology Services, Dentistry, Medicine, Nursing, or Pharmacy. Instead, these laws refer generally to "supervising" providers.

- Has adequate training, supervision, and oversight been provided to the delegate?
- Am I aware of all services being provided under my delegation?
- Are safeguards in place to prevent the delegate from exceeding the scope of delegated tasks?
- Am I prepared to accept professional, legal, and financial responsibility for the acts of my delegate?

Delegation does not absolve the delegating provider of accountability; rather, it places additional responsibility on them to verify the delegate's competency and ensure that delegated tasks are performed in accordance with the same professional standards.

Considerations for Receiving Delegation

Individuals receiving delegated tasks should independently assess their ability to perform a task safely by considering the following:

- Does Idaho law prohibit or limit the interventions being delegated to me?
- Have I received adequate training?
- Are there clear parameters defining when consultation or escalation is required?
- Am I competent and confident to perform the delegated service safely?

Each profession's practice act contains unique requirements regarding supervision and delegation. The absence of an express prohibition does not automatically render a delegated act as appropriate. Professional judgment must be exercised to ensure patient safety and compliance with state law.

Facility and Operational Protocols

Facilities offering lifestyle injectable medications should consider implementing policies and procedures that support safe practice, including:

- If standing orders are utilized, are screening protocols adequate to ensure patient safety?
- Are patients clearly informed regarding who will be providing their care and the credentials of that provider?
- If the supervising provider is not onsite, are there established procedures for managing adverse events and emergencies?
- Are delegated tasks clearly defined and documented?

- Is there ongoing provider review of patient charts, prescribing patterns, and clinical outcomes?

The Boards remain committed to protecting the public by ensuring that lifestyle injectable services are provided in a manner consistent with Idaho law and within the acceptable standard of care. Idaho's licensing boards take a collaborative approach to enforce the law and seek disciplinary proceedings for any individual found to be in violation of any provision of the applicable practice act. Any unlicensed practice of barbers and cosmetology services, dentistry, medicine, nursing, or pharmacy is subject to civil action, criminal prosecution, or both. Furthermore, the federal government has oversight of the administration, distribution, and compounding of non-approved medications. Healthcare professionals should be aware of and in compliance with relevant federal provisions, in addition to state law.

Applicable Idaho Law

Barbers and Cosmetology Services Licensing Board:
Practice Act - https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH58/
Board Rule - https://adminrules.idaho.gov/rules/current/24/242801.pdf

Board of Dentistry:
Practice Act - https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH9/
Board Rule - https://adminrules.idaho.gov/rules/current/24/243101.pdf

Board of Medicine:
Practice Act - https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH18/
Medicine Board Rule - https://adminrules.idaho.gov/rules/current/24/243301.pdf
Physician Assistants Rule - https://adminrules.idaho.gov/rules/current/24/243302.pdf

Board of Nursing:
Practice Act - https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH14/
Board Rule - https://adminrules.idaho.gov/rules/current/24/243401.pdf

Board of Pharmacy:
Practice Act - https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH17/

Disclaimer:

The Idaho Division of Occupational and Professional Licenses (DOPL) is providing this guidance document as a public service. It is intended to provide general guidance and is non-binding. This document does not constitute legal advice, nor may DOPL, its officers, employees, or agents be held liable for actions taken or omissions made in reliance on any information contained herein. Guidance documents do not have the full force or effect of law. If there is any discrepancy between this publication and the law, the provisions of the law will prevail.