

# Respiratory Therapists Working in Medical Spas

## POSITION STATEMENT

Please note that as of **March 1, 2026**, RTs must ensure they receive delegation for all controlled acts they perform in any out-of-hospital medical spa setting (e.g., medspa, aesthetic, cosmetic, wellness clinic, etc.), including controlled acts authorized to RTs under the [Respiratory Therapy Act](#) (RTA, s. 4), such as **administering a substance by injection or inhalation**.

RTs are only authorized to perform the controlled acts listed in the Respiratory Therapy Act, 1991, while engaging in the practice of respiratory therapy. As such, in order for an RT to perform a controlled act outside of the practice of respiratory therapy (such as in a medical spa where aesthetic procedures are being carried out), an RT must have the controlled act delegated to them by a health professional who is authorized to carry out such procedures (such as a physician or nurse in the extended class).

### Background

Over the past five years, Ontario has experienced significant growth in the medical spa sector. Beginning with botulinum toxin (Botox) injections, the sector has rapidly expanded to include a wide array of non-surgical aesthetics and medical cosmetic treatments, such as injectable neuromodulators, dermal fillers, microneedling, laser and light-based therapies, chemical peels, and body-contouring devices. **These procedures are outside the RT scope of practice** as defined in the [RTA \(s. 3\)](#).

There are also an increasing number of services provided in these out-of-hospital facilities that fall under controlled acts in the [Regulated Health Professions Act \(RHPA\)](#), including:

- Communicating a diagnosis
- Performing a procedure below the dermis, or below the surface of a mucous membrane
- Administering a substance by injection or inhalation
- Putting an instrument, hand or finger beyond certain body openings
- Applying or ordering the application of a form of energy.

Unfortunately, despite the increasing prevalence of medical spas, there is limited and inconsistent oversight of facilities, and a reported lack of adherence to proper delegation standards. This has heightened safety concerns for clients and significant liability risks for RTs working in these settings.



## Professional Standards of Practice

RTs can provide services in a medical spa setting, but there are three (3) essential considerations for RTs working in a medical spa facility:

### 1. Receiving Appropriate Delegation

The procedures performed in a medical spa are outside the scope of practice of Respiratory Therapy. Therefore, RTs can only perform controlled acts (such as administering Botox injections) in these environments under formal, clearly documented delegation from an authorized delegator. They must also clearly communicate to the client that they are practising outside the scope of practice of the profession and are performing controlled acts under delegation. They should also maintain a permanent record of their education and training in carrying out such procedures. For more information on the requirements of delegation, please refer to the CRTO's [Delegation of Controlled Acts Professional Practice Guideline](#).

### 2. Use of Title

When an RT is performing a cosmetic procedure outside the scope of practice of the profession, they must ensure that any use of their professional title or designation (e.g., Respiratory Therapist, Registered Respiratory Therapist, RRT, Graduate Respiratory Therapist, GRT) is not misleading and that the client understands that they are practising outside of the scope of their profession and doing so under delegation.

### 3. Adhering to the Standards of Practice of the Profession

Members of the CRTO are professionally accountable to practise in accordance with the standards of practice of their profession. This includes, but is not limited to, the following:

- Adhering to ethical, fair, and transparent advertising, marketing, fees and billing practices. ([STD 1 – Business Practices](#))
- Possessing the competence pertinent to their roles and responsibilities and refraining from performing activities/procedures for which they are not competent. ([STD 4 – Competence/Ongoing Competence](#))
- Confirming that voluntary informed consent has been obtained from clients in accordance with all relevant legislative and regulatory requirements. ([STD 6 – Consent](#))
- Assessing the impact of their clinical interventions on client care and making adjustments accordingly. ([STD 8 – Evidence-Informed Practice](#))
- Adhering to all current, applicable practice guidelines and policies for infection prevention and control. ([STD 9 – Infection Prevention and Control](#))

For more information, please refer to the CRTO's [Standards of Practice](#) document.

## Questions

If you have any questions regarding this matter, please contact us at [professionalpractice@crtto.on.ca](mailto:professionalpractice@crtto.on.ca).



The **College of Respiratory Therapists of Ontario (CRTO)**, through its administration of the ***Regulated Health Professions Act*** and the ***Respiratory Therapy Act***, is dedicated to ensuring that respiratory care services provided to the public by its Members are delivered in a safe and ethical manner. The CRTO has developed this Position Statement on Respiratory Therapists (RTs) Working in Medical Spas and believes that the position outlined, and the guidance provided, serve both the interest of the public and the Members of the CRTO. The Position Statement is outlined in accordance with the legislation, regulations, policies and guidelines that govern their practice.

#### **Contact Information**

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