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Medi-spas: Head to Toe What you Need to Know

October 23, 2025

Public Health Ontario Rounds

Welcome and Land Acknowledgement

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Learning Objectives

By the end of this session participants will be able to:

1. Describe the provincial legislation applicable in personal service and other settings offering medical aesthetic services, and the role of regulatory colleges, including Controlled Acts and their delegation.
2. Recognize the complexities of the changing and expanding scope of practice among various regulated and non-regulated health professionals in personal service and other settings offering medical aesthetic services, and how they contribute towards IPAC lapses.
3. Outline known and potential adverse health outcomes in personal service and other settings offering medical aesthetic services, beyond transmission of bloodborne infections i.e. injuries and other infections.

Presenters

- Lara Segan, Ministry of Health
- Dr. Maureen Cividino, Public Health Ontario
- Zorica Vujnic, York Region Public Health

Disclosures

- Lara Segan does not have any conflicts of interest to disclose.
- Dr. Maureen Cividino does not have any conflicts of interest to disclose.
- Zorica Vujnic does not have any conflicts of interest to disclose.

Provincial Legislation Related to Personal Service Settings

An Overview

Ministry of Health

October 23, 2025

Ontario

Outline

- Legislative Overview
- Engagement with Regulatory Colleges – Ministry of Health and Public Health Units
- Role of Regulatory Colleges
- Role of the Public Health Unit
- Regulated Health Professionals in Personal Service Settings

Legislative Overview: HPPA and Related Protocols

Legislation

- **Health Protection and Promotion Act (HPPA)**
- Outlines the role, authority and powers of local medical officers of health (MOH), public helath inspectors (PHIs), the Chief Medical Officer of Health (CMOH) and Associate CMOH and the Minister of Health.
- Two key types of orders can be made by the HPPA by local MOHs and/or PHIs – Health Hazard Orders (section 13) or Communicable disease orders (section 22).

Regulation

- **Personal Service Settings Regulation**
  - Prescribes infection prevention and control (IPAC) requirements to ensure the risk of infections from procedures performed within a personal service setting (PSS) are minimized.
  - Enables swifter correction of deviations in IPAC best practices through ability of PHU to write tickets and issue fines.

Standards

- **Ontario Public Health Standards**
  - Infectious and Communicable Diseases Prevention and Control Standard
    - Identify the minimum expectations for public health programs and services to be delivered by Ontario's Boards of Health/Public Health Units (PHUs) to reduce burden of communicable diseases and other infectious diseases.

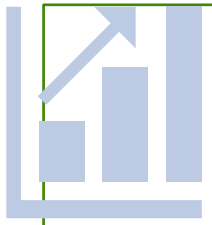
Protocols

- **Infection Prevention and Control Protocol**
  - PHUs must inspect certain named settings on an annual basis (i.e., childcare settings, personal service settings).
- **Infection Prevention and Control Complaint Protocol**
  - PHUs must respond to IPAC complaints in all settings, including medispa settings and conduct an IPAC investigation if warranted.
  - If IPAC lapse is found, PHU may provide education to the operator/staff and/or order corrective actions under HPPA or tickets under PSS Regulation.
- **Infection Prevention and Control Disclosure Protocol**
  - PHUs must publicly disclose a summary of the IPAC lapse on their website and determine if client/patient notification is necessary.

Regulatory College Engagement on Public Health Matters

Ministry of Health - OCMOH

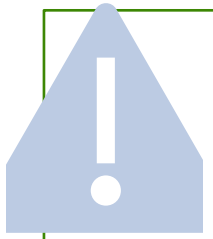
Chairs the quarterly IPAC Regulatory College Working Group to discuss shared priorities, new IPAC initiatives, and resources



Discuss any issues or concerning trends (e.g., lapses related to reprocessing in clinical settings)

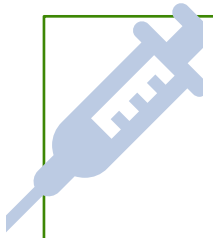
Information gathering activities (e.g., polls, surveys)

Public Health Units



Contacts the appropriate regulatory college when there are concerns with the IPAC practices of an RHP

Takes a collaborative approach with the regulatory college on IPAC investigations as warranted



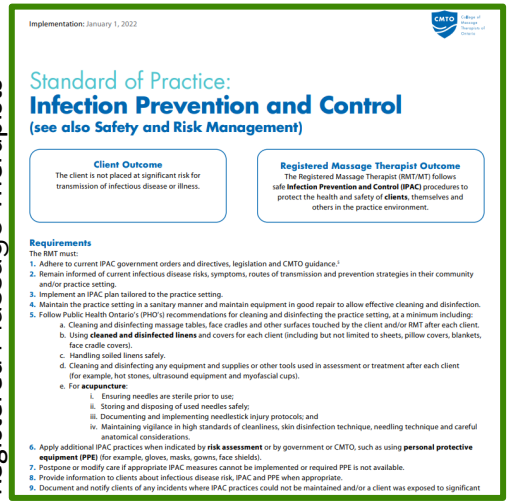
Contacts the appropriate regulatory college with questions surrounding the scope of practice of an RHP

Role of the Regulatory Colleges

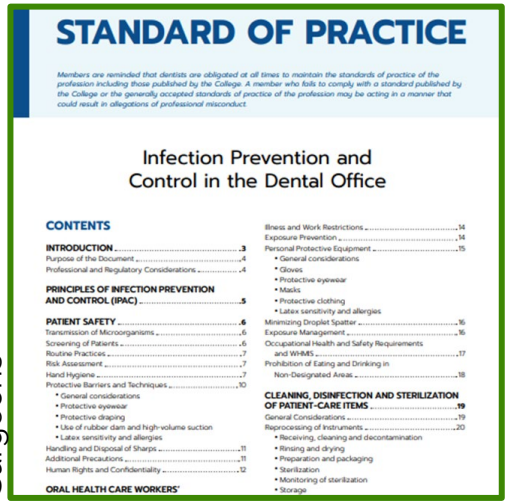
- Regulation of the professions in the public interest.
- Responsible for setting standards of practice for the profession, the oversight, registration, and assessment of their members.
- Investigate all formal complaints or reports regarding their members, including members' IPAC practices.
- Some colleges have the capacity to be involved in joint IPAC lapse investigations with PHUs, while others may not.
- May develop their own standards of IPAC for members, or include IPAC considerations as part of the standards, policies and/or guidelines.

Traditional Chinese Medicine Practitioners and Acupuncturists

Registered Massage Therapists



Royal College of Dental Surgeons



Ontario

Role of the Public Health Unit

Required

- Inspect PSS no less than once every 12 months for adherence to IPAC best practices and the PSS Regulation
- Receive IPAC complaints and determine the appropriate response
- Contact the appropriate regulatory college if the **practices of an RHP are of concern**
- Determine if a health hazard exists and if there is non-compliance with IPAC best practices
- Take action under the HPPA or PSS Regulation

Not Required*

- Verify the license and registration of an RHP
- Verify whether the RHP's license is expired/revoked
- Verify proof of ownership of the PSS
- To understand when a situation is in contravention of the Regulated Health Professions Act, 1991 (RHPA)
- Verify the authenticity of proof of delegation of a controlled act or whether the activity being performed is a controlled act under the RHPA

*PHUs may choose to complete these actions to support identification of a health hazard and enforcement activities (e.g., section 13 order, tickets)

Ontario

Personal Service Settings and Regulated Health Professionals

- Regardless of name, PHUs should assess the premises to determine if the premises meets the definition of personal service setting and are subject to the requirements of O. Reg 136/18 of the *HPPA*.
- An RHP is always subject to their applicable health profession Act and associated regulations. An RHP must always adhere to the standards of practice of the profession and is subject to the oversight of that person's regulatory college.
- The activities and procedures an RHP can perform is determined by:
    - Their health profession legislation and regulations (i.e., RHPA) and health profession Act and regulations (e.g., *Nursing Act*, 1991).
    - Practice setting legislation and regulations (e.g., *Public Hospitals Act*, 1990, the *Fixing Long-Term Care Homes Act*, 2007).
    - Procedure specific legislation and regulations (e.g., *Healing Arts Radiation Protection Act*, 1990).
    - Health regulatory college practice standards and guidelines.
    - Employer policies and procedures in the practice setting
    - Competency as decided by the health professionals themselves.

Controlled Acts

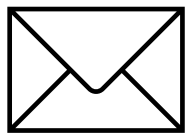
- Under the RHPA, controlled acts are health care procedures that can only be performed by authorized, regulated health professionals.
- There are 14 acts, examples include communicating a diagnosis or prescribing drugs.
- These acts may be performed by a professional who has direct legal authority or if the act is properly delegated to them by an authorized professional.

When Does the RHPA Apply?

- The RHPA applies to all RHPs in Ontario.
- When health care services are being provided to an individual.
- No person shall perform a controlled act **in the course of providing health care services** to an individual unless:
  - The person is a member authorized by a health profession Act to perform the controlled act; or
  - The performance of the controlled act has been delegated to the person by a member of a regulated health profession who is so authorized to perform that controlled act

When Does the HPPA Apply?

- PSS where personal services are primarily provided by regulated health professionals who are engaged in the practice of their profession are not subject to the PSS Regulation, but a PHU may **take action under the HPPA** if a health hazard exists in these settings.



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Medi-spas: Head to Toe What you Need to Know

Maureen Cividino, MD, FCFP, DOHS, CCBOM, CIC

October 23, 2025

Public Health Ontario Rounds

Authors

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- Raymond Gullekson, IPAC Specialist
- David Ryding, IPAC Specialist

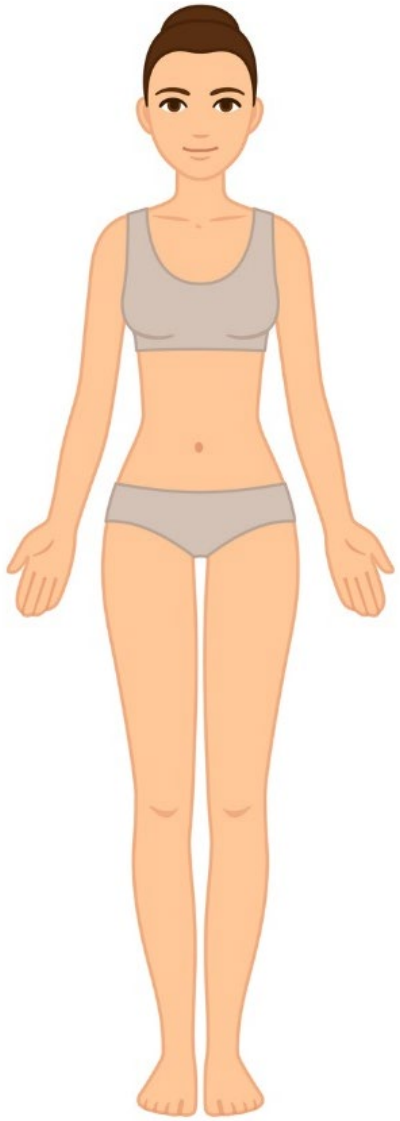
Learning Objectives

By the end of this session, participants will be able to:

- Describe a broad range of existing and emerging personal services and products provided by a variety of operators across multiple settings
- Identify IPAC and other potential health and safety risks/hazards associated with these services
- Recognize the need for an approach to challenges in a rapidly changing field and its increasingly complex lapse investigations

Outline

- Halo Head Spas
- Collagen Induction Therapies
- New Injectable and Topical Drugs
- Exosomes
- Energy Based Devices
- Alternative Health Therapies
- Foot Care and Pedicures



These procedures carry infection and injury risks

Outline

- **Halo Head Spas**
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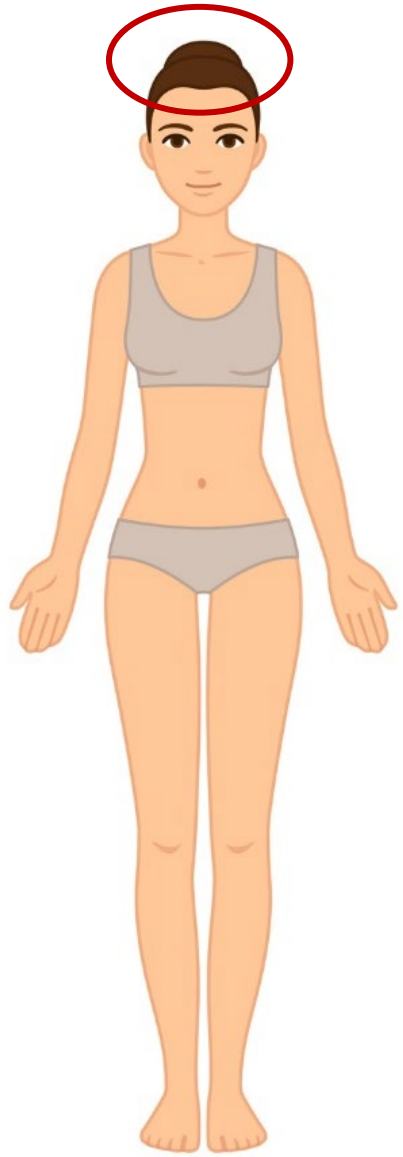


These procedures carry infection and injury risks

Halo Head Spas

Advertised as a treatment for scalp dryness, oiliness, dandruff, and for promoting relaxation, stress reduction and overall well-being

Design includes:

- Water delivery tube with several holes along it allowing cascading streams of water or
- Elongated waterfall spout forming a sheet of water
- Empties into a basin that often drains into a non-plumbed reservoir

Legionella Risk

A *Legionella* investigation in 2024 identified halo hair spa device within a personal service setting (PSS) as a possible source.

The halo hair spa had:

- A reservoir with recirculating water
- No processes in place for cleaning and disinfection of internal components
- No manufacturer's instructions for use (MIFU)

Similar services are widely in use across Ontario.

IPAC Considerations

- Use of halo hair spa equipment may create conditions in which *Legionella* and other pathogens proliferate
- Clients and staff exposed to a flow or droplets of contaminated water near the mucous membranes of the face and respiratory tract may be at risk of illness
- Hair spa services are:
  - To be plumbed and directly connected to a potable water source
  - Not to incorporate water recirculation holding tanks
  - Not to incorporate water recirculation from the hair wash basin, even for the same client
  - To have a MIFU
    - MIFUs are to indicate how to clean, disinfect and maintain the equipment
    - MIFUs are to be followed

Public Health Ontario. IPAC considerations for halo head spas [Internet]. Toronto, ON: King's Printer for Ontario; 2025 [cited 2025 Sep 23]. Available from: https://www.publichealthontario.ca/-/media/Documents/I/25/ipac-considerations-halo-head-spas.pdf

Collagen Induction Therapies

Microneedling

- Uses needles to create micro-injuries in the skin to stimulate healing resulting in collagen and elastin production

Radiofrequency (RF) Microneedling

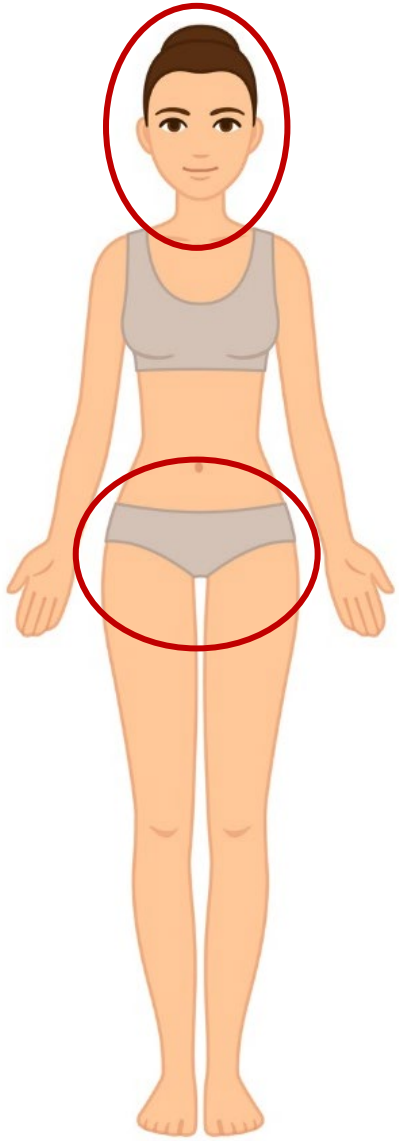
- Combines radiofrequency energy with microneedling to increase the effects of microneedling

Microchanneling

- Microneedling with shallower needles

Mesotherapy

- Uses needles to deliver a series of injections into the middle layer (mesoderm) of skin



IPAC Risks

- Microneedling devices pose a risk of infection if they are not properly reprocessed.
- The needle portion of microneedling devices is considered to be a critical item.
- The classification of the handpiece is dependent upon engineering controls that should be in place to prevent blood and fluid infiltration into the device.
- Non-intact skin is prone to infections from unclean hands, the environment, or the client’s skin.

Ontario Agency for Health Protection and Promotion (Public Health Ontario). Guide to infection prevention and control in personal service settings. 3rd ed, 1 st revision. Toronto, ON: Queen's Printer for Ontario; 2019 . Available from: https://www.publichealthontario.ca/-/media/documents/G/2019/guide-ipac-personal-servicesettings.pdf
Ontario Agency for Health Protection and Promotion (Public Health Ontario). Reprocessing risks for tattoo cartridge grips. Toronto, ON: King's Printer for Ontario; 2024. Available from: https://www.publichealthontario.ca/-/media/Documents/T/24/tattoo-cartridge-grips-reprocessing-risks.pdf

Complications and Safety Risks

Common complications include:

- Erythema
- Pain
- Edema
- Temporary skin irritation

Rare but serious complications include:

- Burns
- Nerve damage

Gowda A, Healey B, Ezaldein H, Merati M. A Systematic Review Examining the Potential Adverse Effects of Microneedling. *J Clin Aesthet Dermatol*. 2021;14(1):45-54. Available from: https://pmc.ncbi.nlm.nih.gov/articles/PMC7869810/

New Injectable and Topical Drugs

Platelet Rich Plasma (PRP)

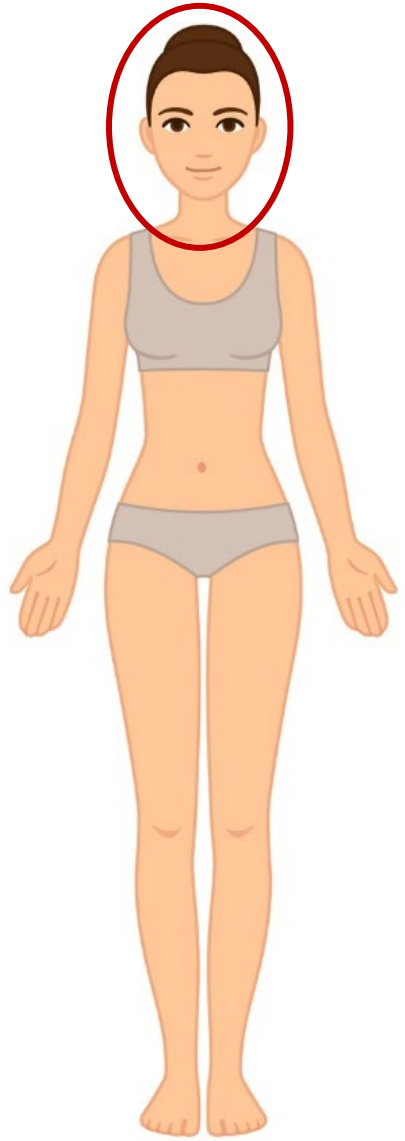
- A treatment that uses a patient's own blood that has been centrifuged to concentrate plasma protein

Exosomes and Stem Cell Derived Products

- Cells and cellular products derived from human, animal, plant, or artificial sources

Chemical Peels

- Chemical solution to exfoliate and remove the top layers of skin



IPAC Risks

Contaminated Product

When drugs are not manufactured in accordance with best practice, they can become contaminated with pathogens. Particularly when components of the drug are human or animal in origin.

Aseptic Technique

Poor aseptic technique can result in the contamination of medication as well as transmitting infection to the client/patient.

2018 IPAC Lapse and Outbreak

In 2018, the New Mexico Department of Health investigated a case of human immunodeficiency virus (HIV) with no known risk factors who had received a PRP microneedling facial at a spa.

Four other spa clients, and one sexual partner of a spa client, were also diagnosed with HIV.

An inspection revealed multiple unsafe infection control practices including:

- The centrifuge and unlabeled tubes of blood were stored on a kitchen counter.
- Tubes of blood and medical injectables were stored in the kitchen refrigerator alongside food.
- Single use disposable electric desiccator tips were cleaned by alcohol immersion and reused.

Stadelman-Behar AM, Gehre MN, Atallah L, et al. Investigation of Presumptive HIV Transmission Associated with Receipt of Platelet-Rich Plasma Microneedling Facials at a Spa Among Former Spa Clients — New Mexico, 2018–2023. MMWR Morb Mortal Wkly Rep 2024;73:372–376. Available from: http://dx.doi.org/10.15585/mmwr.mm7316a3

Exosomes

- A form of extracellular vesicle, secreted by all cell types
- Very small (i.e., nano-sized) vesicles
- Can be of human, animal or plant origin
- Involved in cell-to-cell communication by transporting complex cargo, such as proteins, lipids and nucleic acids (DNA and RNA) genetic material (e.g., microRNAs)
- The cargo is selectively taken up by local and distant recipient cells and influences various biological processes (e.g., gene expression, cell-to-cell signaling, immune response, tissue repair)

Tienda-Vázquez, MA, Hanel, JM, Márquez-Arteaga, EM, Salgado-Álvarez, AP, Scheckhuber, CQ, Alanis-Gómez, JR., Espinoza-Silva, JI, Ramos-Kuri, M, Hernández-Rosas, F, Melchor-Martínez, EM, Parra-Saldívar, R. Exosomes: A Promising Strategy for Repair, Regeneration and Treatment of Skin Disorders. Cells. 2023 June; 12(12), 1625. Available from: https://doi.org/10.3390/cells12121625
Perocheau D, Touramanidou L, Gurung S, Gissen P, Baruteau J. Clinical applications for exosomes: Are we there yet? Br J Pharmacol. 2021; 178: 2375–2392. Available from: https://doi.org/10.1111/bph.15432

Exosome Sources

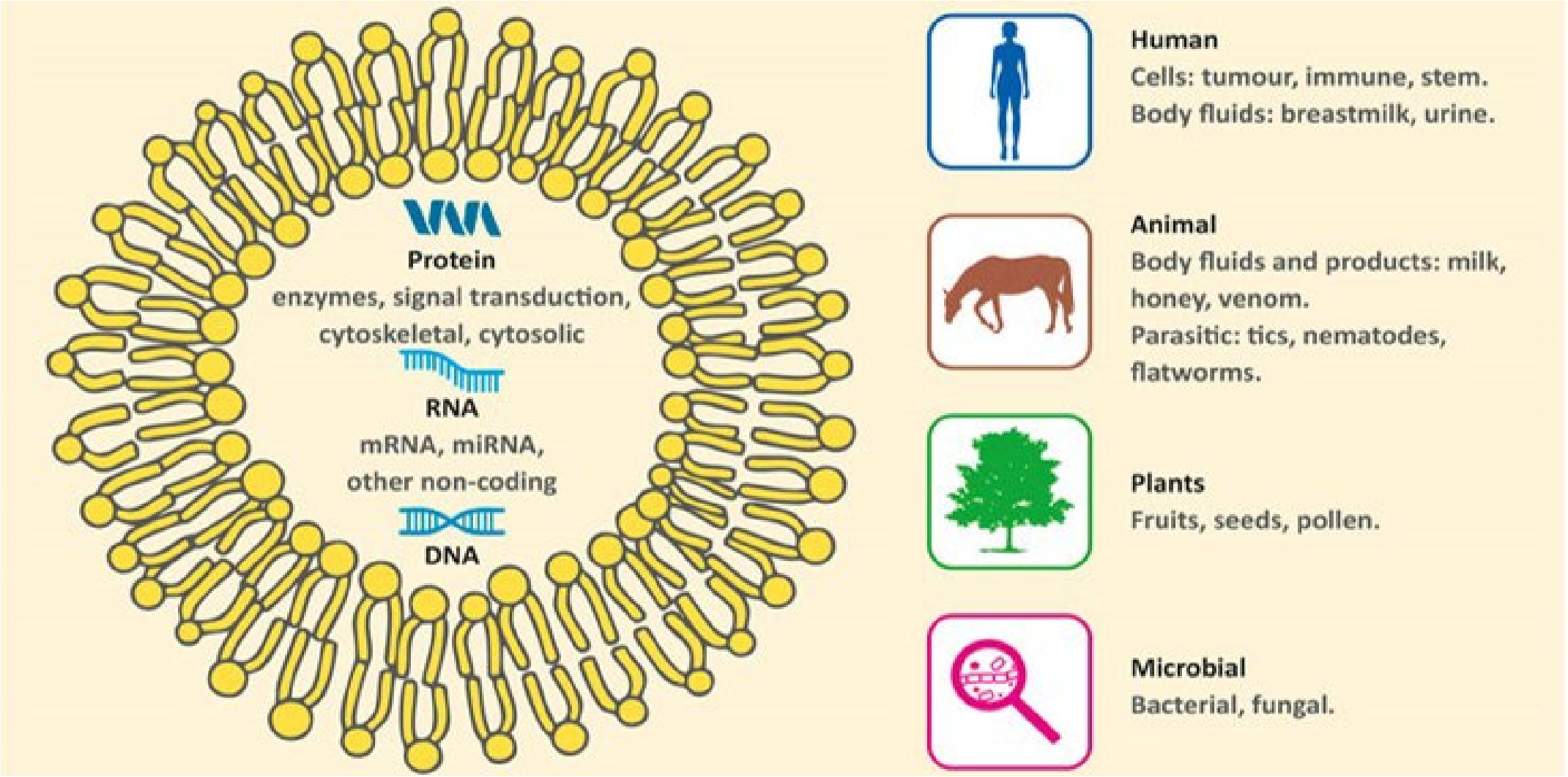


Image source: Janouskova O, Herma R, Semeradtova A, Poustka D, Liegertova M, Malinska HA and Maly J. Conventional and Nonconventional Sources of Exosomes–Isolation Methods and Influence on Their Downstream Biomedical Application. Front. Mol. Biosci. 2022 May; 9:846650. Available from: https://doi.org/10.3389/fmolb.2022.846650

Exosomes: Potential Therapeutic and Cosmetic Applications

- Therapeutic potential
  - Drug delivery
  - Vaccination
  - Immunomodulation
  - Gene therapy
- Disease diagnosis
  - Biomarkers
  - Disease progression
- Cosmetic application
  - Skin rejuvenation
    - Wrinkles
    - Photoaging
    - Scars
  - Wound healing
  - Hair growth

Health Canada is currently reviewing if topical products containing human-derived exosomes are inherent drugs

Kalluri R, LeBleu VS. The biology, function, and biomedical applications of exosomes. Science. 2020 Feb 7;367(6478):eaau6977. Available from: https://doi.org/10.1126/science.aau6977
Yousefian F, Espinoza L, Yadlapati S, Lorenc ZP, Gold M. A comprehensive review of the medical and cosmetic applications of exosomes in dermatology. J Cosmet Dermatol. 2024 Apr;23(4):1224-1228. Available from: https://doi.org/10.1111/jocd.16149
Harsha Sreeraj, R. AnuKiruthika, K.S. Tamilselvi, D. Subha, Exosomes for skin treatment: Therapeutic and cosmetic applications, Nano TransMed. 2024; (3) 100048. Available from: https://doi.org/10.1016/j.ntm.2024.100048.

Cosmetic Delivery of Exosomes

- Topically without disruption to skin barrier
  - Face mask, serums, combined with creams and rubbed in
- Topically with disruption to skin barrier
  - Microneedling
  - Radio Frequency (RF) microneedling
  - Laser/RF skin resurfacing
  - Chemical peels
  - Mesotherapy
  - Dermabrasion
- Intradermal, subcutaneous or intravenous routes

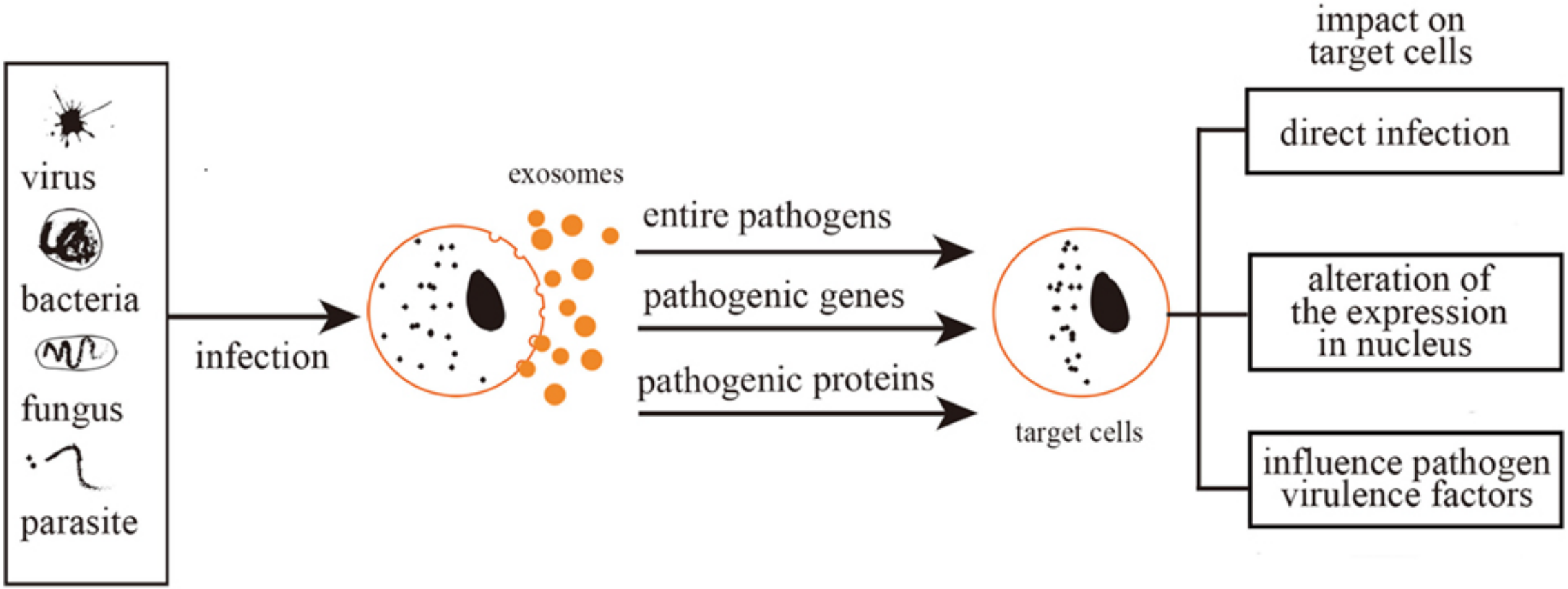
Zhang Y, Bi J, Huang J, Tang Y, Du S, Li P. Exosome: A Review of Its Classification, Isolation Techniques, Storage, Diagnostic and Targeted Therapy Applications. Int J Nanomedicine. 2020 Sep 22;15:6917-6934 Available from: https://doi.org/10.2147/ijn.s264498

Exosomes and Health and Safety Risks

- May promote infection or play an anti-infective role
  - Exosomes can either accelerate or inhibit the process of infection.
  - In both cases, exosomes make possible connections between host cells or between pathogens and host cells.
- Participating in the immune escape of pathogens
  - Some pathogens can escape the host immune system with the help of exosomes and this favours their spread.
- Manufacturing process issues; handling and administration errors
  - May also be implicated in infection transmission

Zhang W, Jiang X, Bao J, Wang Y, Liu H, Tang L. Exosomes in Pathogen Infections: A Bridge to Deliver Molecules and Link Functions. Front Immunol. 2018 Feb 12;9:90. Available from: https://doi.org/10.3389/fimmu.2018.00090

Role of Exosomes in Pathogen Infections



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Health and Safety Challenges With Producing Exosomes

- Exosome source influences the types of pathogens that may be present in products (human pathogens from human; potential zoonoses from animals).
- Thorough screening of exosome donors is essential for human and animal sources including testing for HBV, HCV and HIV.
- Manufacturing techniques must ensure sterility and properly filter out potential pathogens.
- Quality control measures must be in place to ensure purity of the product, such as testing the final product.

Ahn SH, Ryu SW, Choi H, You S, Park J, Choi C. Manufacturing Therapeutic Exosomes: from Bench to Industry. *Mol Cells*. 2022;45(5):284-290. Available from: https://doi.org/10.14348/molcells.2022.2033

Food and Drug Administration (FDA) Warning Letters

- Since 2020, the US FDA has issued several warning letters related to the manufacture and distribution of exosomes.
- This includes the results of 4 inspections conducted at 3 facilities that were manufacturing exosomes without regulatory approval.
- They identified a total of 50 infractions across 25 different offences.
- Types of offences included:
  - Poor quality control
  - Poor aseptic technique
  - A failure to screen donors

The U.S. Food and Drug Administration. Warning Letter: Invitrix Therapeutics Inc. Silver Spring, MD: FDA: 2020. Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/invitrx-therapeutics-inc-581182-03162020
The U.S. Food and Drug Administration. Warning Letter: EUCYT Laboratories LLC. Silver Spring, MD: FDA: 2020, Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/eucyt-laboratories-llc-607182-06042020.
The U.S. Food and Drug Administration. Warning Letter: Invitrix Therapeutics Inc. Silver Spring, MD: FDA: 2022 Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/invitrx-therapeutics-inc-630712-11092022
The U.S. Food and Drug Administration. Warning Letter: Kimera Labs Inc. Silver Spring, MD: FDA: 2024 Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/kimera-labs-inc-649343-09012023

Pathogens noted in FDA Warning Letters

- Gram positive cocci
- Gram negative rods
- *Acidovorax temperans*
- *Clostridium perfringens*
- *Enterococcus faecalis*
- *Escherichia coli*
- *Klebsiella pneumoniae*
- *Kocuria varians*
- *Streptococcus spp*
- Hepatitis B virus

The U.S. Food and Drug Administration. Warning Letter: Invitrix Therapeutics Inc. Silver Spring, MD: FDA: 2020. Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/invitrx-therapeutics-inc-581182-03162020
The U.S. Food and Drug Administration. Warning Letter: EUCYT Laboratories LLC. Silver Spring, MD: FDA: 2020, Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/eucyt-laboratories-llc-607182-06042020.
The U.S. Food and Drug Administration. Warning Letter: Invitrix Therapeutics Inc. Silver Spring, MD: FDA: 2022 Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/invitrx-therapeutics-inc-630712-11092022
The U.S. Food and Drug Administration. Warning Letter: Kimera Labs Inc. Silver Spring, MD: FDA: 2024 Available from: https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/kimera-labs-inc-649343-09012023

2019 Nebraska *E. coli* Outbreak Following Exosome Treatment

- Following intravenous (IV) administration, five *E.coli* sepsis cases occurred within hours of receiving exosome treatment.
- The exosomes were sourced from harvested human placentas.
- The product was unregulated, not FDA approved and not associated with any clinical trials.
- The company relied on internal protocols for safe production.
- Bacterial isolates from contaminated product matched the clinical specimens.
- Resulted in state-wide health alert and FDA notice

Salehi, Susanne. Congratulations to Dr. Maureen Tierney, 2020 Inaugural McKnight Prize for Healthcare Outbreak Heroes Recipient [Internet]. CDC Foundation. 2020. [Cited Feb 24, 2025] Available from: https://www.cdcfoundation.org/blog/dr-maureen-tierney-receives-mcknight-prize-healthcare-outbreak-heroes-award

Other Case Reports

- Papules and nodules
  - Eight individuals developed erythematous indurated papules or nodules at the site of exosome injections.
  - Onset ranged from two weeks to three months post treatment
- Foreign body granuloma
  - A 50-year-old woman developed papules and nodules seven weeks after receiving exosome injections with a product that had not been officially released.
  - Patient was diagnosed with foreign body granuloma.
- Skin necrosis
  - A 36-year-old man received intradermal injections of an exosome product that was mixed on site.
  - Three days later he presented with skin necrosis

Nahm, W.J.; Thunga, S.; Yoo, J. Complications After Exosome Treatment for Aesthetic Skin Rejuvenation. Dermatol. Rev. 2024, 5, e242. Available from: https://doi.org/10.1002/der2.242
Hoon Choi, Jun Ho Kwak, Bong Seok Shin, Chan Ho Na, Min Sung Kim, Foreign body granuloma caused by an injection of exosomes, JAAD Case Reports, April 2024, Available from: https://doi.org/10.1016/j.jdcr.2024.03.026
Tawanwongsri W, Vachiramon V. Skin necrosis after intradermal injection of lyophilized exosome: A case report and a review of the literature. J. 2024 May;23(5):1597-603. Available from: https://dx.doi.org/10.1111/jocd.16206

Risk at Point of Administration

- On site mixing
  - Can affect the integrity, stability, function or therapeutic effect
- Dosing
  - Can be difficult to determine
  - Impacted by short half-life and zeta potential
- Improper handling and storage
  - Medication administration errors and contamination
  - Aggregation occurring prior to or after delivery

E. Tzng, N. Bayardo, P.C. Yang, Current challenges surrounding exosome treatments, Extracell. 2023 Dec; 100023. Available from: https://doi.org/10.1016/j.vesic.2023.100023

Energy Based Medical Devices

Lasers

- Use intense light to heat or remove tissue

Radiofrequency

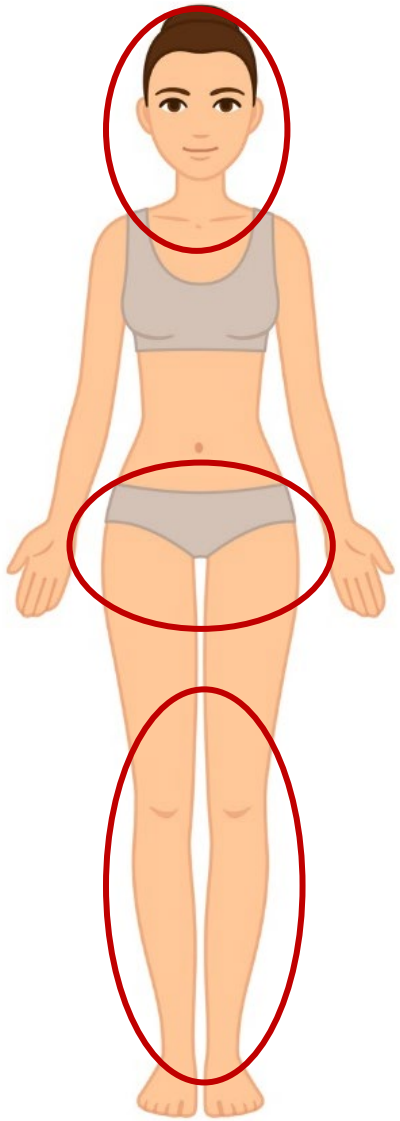
- Energy is applied to heat up specific areas of the patient's skin

Cryolipolysis

- Uses extreme cold to freeze and kill fat cells

Intense Pulsed Light (IPL)

- Uses a broad spectrum of light pulses to treat various skin conditions



Light Amplification by the Stimulated Emission of Radiation (Laser)

Hazard Classification

- Classified from Class 1 to 4
- Class 1 and Class 2 are generally considered safe
- Class 3B and Class 4 are common in medi-spas
- They pose a risk of immediate eye and skin damage

Mechanism of Action

- Non-ablative lasers heat up the underlying tissue, leaving the skin intact
- Ablative lasers vaporize tissue
- Fractional lasers target small areas of skin, leaving the surrounding skin untouched
- Non-fractional target the whole skin surface

Spaulding's Classification

- Non-critical
  - Contact with intact skin
- Semi-critical
  - Contact non-intact skin or intact mucous membranes
- Critical
  - Enters sterile tissue or disrupts mucous membranes

Preissig J, Hamilton K, Markus R. Current Laser Resurfacing Technologies: A Review that Delves Beneath the Surface. *Semin Plast Surg*. 2012;26(3):109-116. Available from: https://doi.org/10.1055/s-0032-1329413

Vaginal Lasers

The laser is inserted beyond the labia majora, making it a controlled act in Ontario under *RHPA.*

Marketed by manufacturers to treat genitourinary syndrome of menopause – only indication for treatment

Marketed by clinics to premenopausal women for “vaginal rejuvenation”

Creates reprocessing challenges for the laser handpiece

Kaunitz AM, Pinkerton JV, Manson JE. Women harmed by vaginal laser for treatment of GSM-the latest casualties of fear and confusion surrounding hormone therapy. *Menopause*. 2019;26(4):338-340. Available from: https://doi.org/10.1097/GME.0000000000001313
Regulated Health Professions Act, RSO 1991 c H.18. Available from: https://www.ontario.ca/laws/statute/91r18

IPAC Risks

- Ablative lasers create a plume of surgical smoke which can carry viruses.
- Lasers contacting skin or mucous membrane carry risk of spreading infections, based on their use, if not properly reprocessed.
- Transmission risks include contaminated personal protective equipment, such as glasses and eye shields.
- Non-intact skin is prone to infection from unclean hands, the environment, or the client's skin.
- Contamination of the environment with human papillomavirus (HPV) and reactivation of herpes simplex virus have been reported

Mahdood, B., Merajikhah, A., Mirzaiee, M. *et al.* Virus and viral components transmitted through surgical smoke; a silent danger in operating room: a systematic review. *BMC Surg* **24**, 227 (2024). Available from: https://doi.org/10.1186/s12893-024-02514-z

Health and Safety Risks of Administration

- Bleeding, edema, and crusting of the skin are common side effects of some laser treatments.
- Systemic reactions, while rare, are also possible.
- Burns and eye damage
- Fires

Facilities with lasers should have a designated laser safety officer

Alternative Health Therapies

Yoni Steaming (Vaginal Steaming)

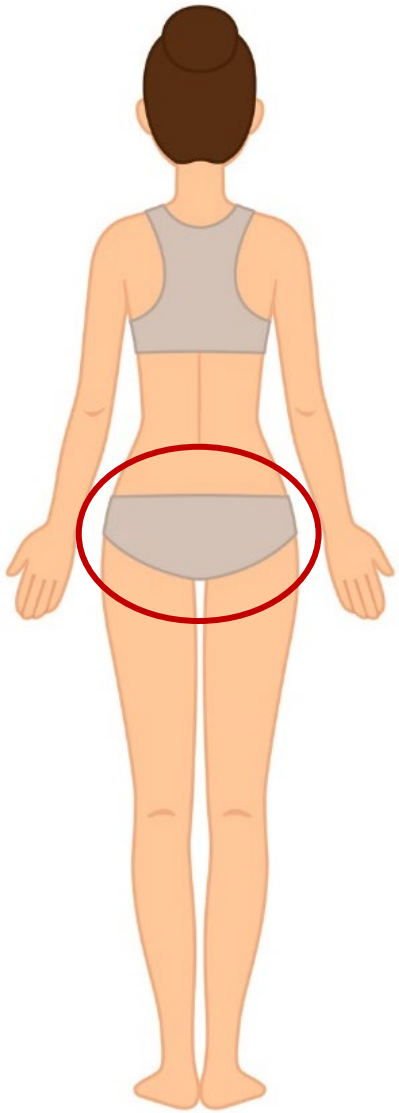
- Involves allowing herb infused steam to enter the vagina.

Kambo Therapy

- Involves the use of a hot stick or strike brand to create burns on the skin; the toxin from a giant leaf frog is then applied to the burn. The body then undergoes a ‘purge’ through vomiting and diarrhea.

Colonic Irrigation

- A procedure that flushes out the colon with water or other liquids.
- Also referred to as hydrocolonics.



Colonic Irrigation

A tube, which is part of a colonic irrigation kit, is inserted into the patient's rectum and warm water is introduced into the colon.

Open System

- The water is gravity fed.
- Waste will flow down the drain in the base of the bed.

Closed System

- The water is under pressure.
- The waste is evacuated into the sewage system.

Image © 2018, Used with permission.

Eykelbosh A, Weins M. Adverse effects after medical, commercial, or self-administered colon cleansing procedures [Internet]. Vancouver, BC: National Collaborating Centre for Environmental Health; 2018 [cited 2024 Feb 26]. Available from: https://ncceh.ca/sites/default/files/Adverse_effects_after_colon_cleansing_procedures-Jan_2018.pdf

Two Types of Systems

Closed system

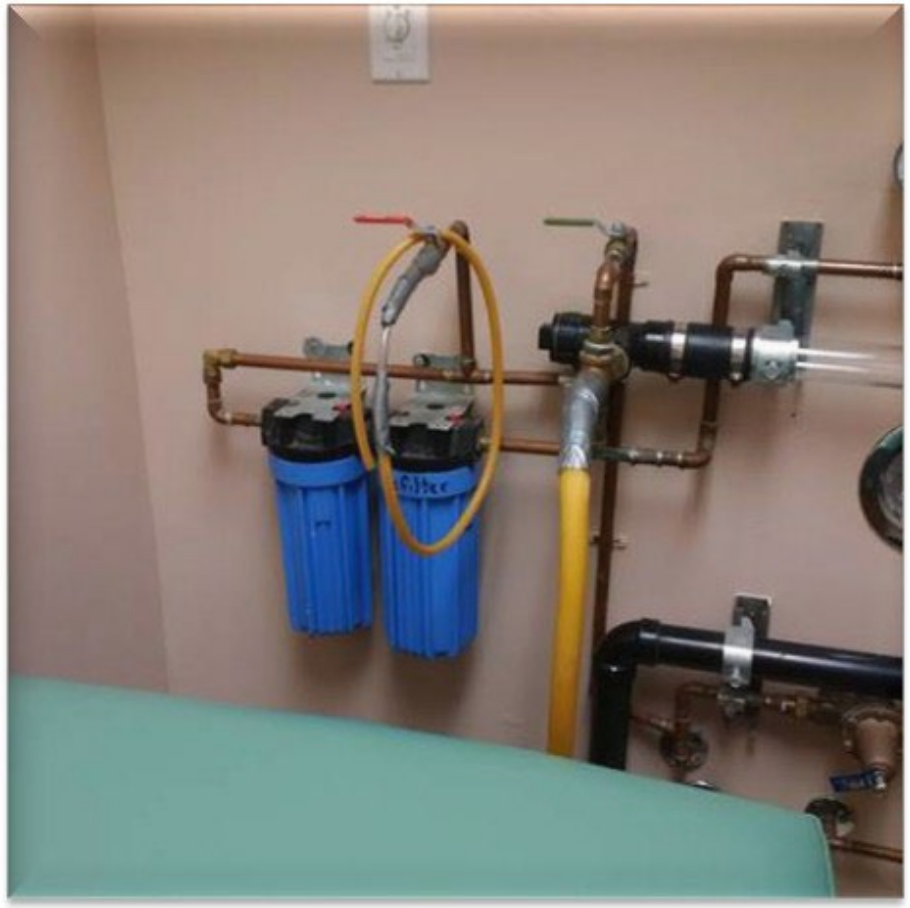


Image © 2018, Used with permission.

Open system

Image © Niagara Region Public Health, 2024. Used with permission.

Risk at Point of Administration

- Tubing is difficult to clean and should ideally be single use.
- Between 1978 and 1980 an outbreak of at least 36 cases of amebiasis was linked to a colonic irrigation facility that was reusing colonic irrigation kits.
- Additional infections have been linked to translocation of bacteria from the patients own gut into the blood or extra-intestinal sites due to bowel perforation.

Image © 2018, Used with permission.

Istre GR, Kreiss K, Hopkins RS, Healy GR, Benziger M, Canfield TM, et al. An outbreak of amebiasis spread by colonic irrigation at a chiropractic clinic. N Engl J Med. 1982 Aug 5;307(6):339-42. Available from: http://www.ncbi.nlm.nih.gov/pubmed/6283354

Safety Risks

- Bowel perforation is a documented risk with closed systems and can lead to septicemia and death.
- Burns have been caused by hot water and hot coffee enemas.
- Electrolyte imbalance

Eykelbosh A, Weins M. Adverse effects after medical, commercial, or self-administered colon cleansing procedures [Internet]. Vancouver, BC: National Collaborating Centre for Environmental Health; 2018 [cited 2024 Feb 26]. Available from: https://ncceh.ca/sites/default/files/Adverse_effects_after_colon_cleansing_procedures-Jan_2018.pdf

Foot Care

Nail Cutting and Filing

- Involves trimming of nails followed by smoothing out rough edges and shaping the nail

Treatment of Ingrown Toenails

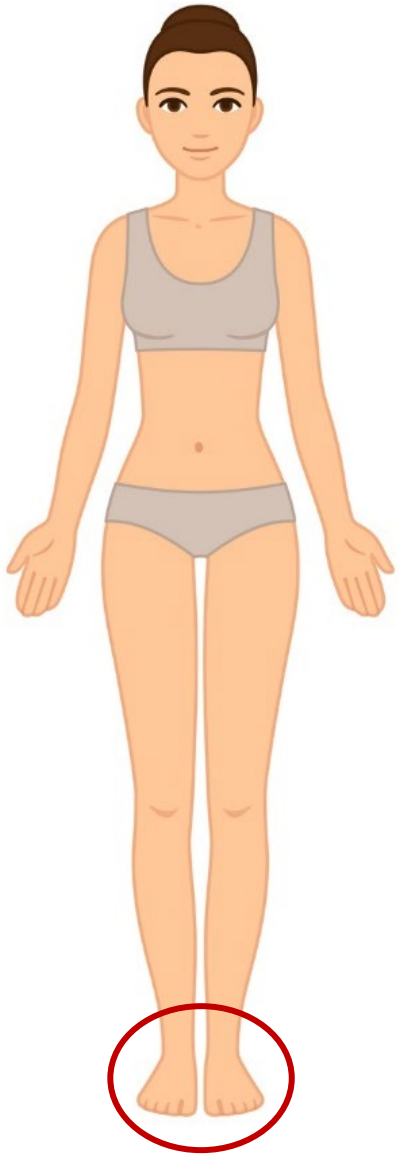
- Can include surgical procedures to remove ingrown nails

Callus Removal

- Procedures that remove thickened skin from the foot

Cuticle Care

- Procedures that soften, push back, and trim the cuticle



Difference Between Pedicures and Foot care

	Pedicure	Foot care
Intent of Procedure	Cosmetic procedure	Medical procedure
Population	General population	Vulnerable population
Service Provider	Nail technician	Regulated health professional
Invasive	Unlikely to become invasive	More likely to become invasive
Level of Reprocessing	Sterilization preferred, high level disinfection required	Sterilization required

Ingrown Toenail Treatment

Ingrown toenails are common and make up approximately 20% of foot problems in primary care.

Medical treatment for ingrown toenails can include:

- Lifting the nail
- Placing a splint underneath the nail
- Partially removing the nail
- Removing portions of the nail bed

Mayeaux EJ Jr, Carter C, Murphy TE. Ingrown Toenail Management. Am Fam Physician. 2019;100(3):158-164. Available from: https://www.aafp.org/pubs/afp/issues/2019/0801/p158.html

IPAC Risks

Viral, bacterial, mycobacterial, and fungal infections have all been reported.

Potential sources of infection are:

- Contaminated and/or improperly reprocessed equipment
- Contaminated environment
- Client’s own bacteria on the skin
- Unclean hands touching the treatment area

Ontario Agency for Health Protection and Promotion (Public Health Ontario). Guide to infection prevention and control in personal service settings. 3rd ed, 1 st revision. Toronto, ON: Queen's Printer for Ontario; 2019 . Available from: https://www.publichealthontario.ca/-/media/documents/G/2019/guide-ipac-personal-servicesettings.pdf

Other Hazards

Microbial Dust

Nail dust may aerosolize, along with fungus and body fluid particles, when using a rotary tool during nail care.

Chemical Hazards

Polishes, strengtheners, removers, disinfectants, and artificial nail liquids

Sharps Injuries

Credo blades, lancets, scalpels, needles and other sharps

Occupational Safety and Health Administration (OSHA). Stay Healthy and Safe While Giving Manicures and Pedicures A Guide for Nail Salon Workers 3542-05 2012 [Internet]. Washington, DC: OSHA; 2012 [cited 12 March, 2025]. Available from: https://www.osha.gov/sites/default/files/publications/3542nail-salon-workers-guide.pdf

Summary

- There is an ever-changing and expanding scope of practice among various regulated and non-regulated health professionals and operators in PSS/Medi-spa settings, at times without clear delegation of authority.
- From head to toe, there are multiple products and practices that can result in serious harm to clients and occasionally operators, including injuries and infections.
- Exosomes offer exciting promise in disease research, as a vehicle for drug delivery and cosmetic applications, however, there have been serious reported adverse outcomes.
- At this time PHO is unaware of Health Canada approval for any type of exosomes by any route of administration.
  - However, exosomes are widely in use in aesthetics in Ontario.

CHALLENGES FROM THE FIELD

October 23, 2025

Zorica Vujnic MHA, CIC

Infection Prevention and Control Specialist

York Region

Key Topics

Legislation and Guidelines

Provision of Services that are Considered Controlled Acts

Equipment, Devices and Instruments used in the Industry

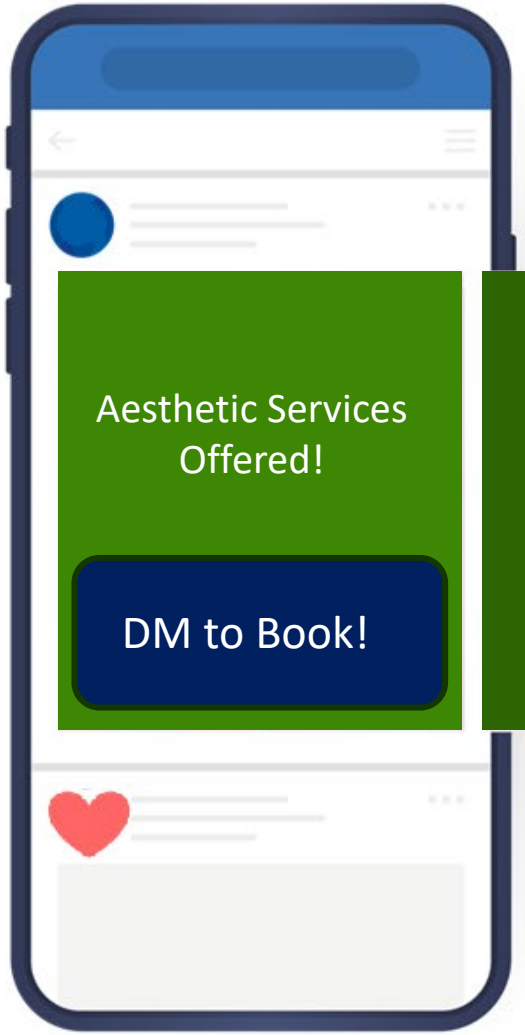
Cosmetics and Prescription Medication

LEGISLATION AND GUIDELINES

Legislation and Guidelines

- Regulatory limitations concerning applicability of Personal Service Settings (PSS) Regulation in environments outside conventional PSS

Legislation and Guidelines



Regulatory Limitations

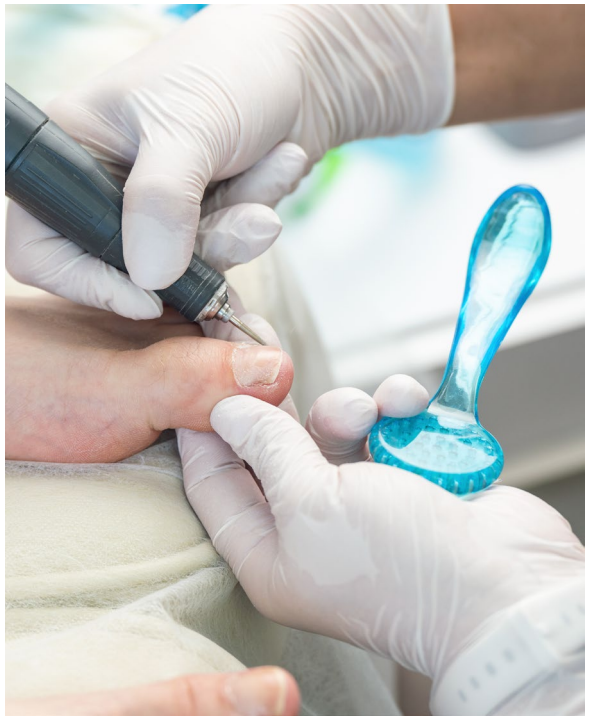
Personal Service Settings without a store front.

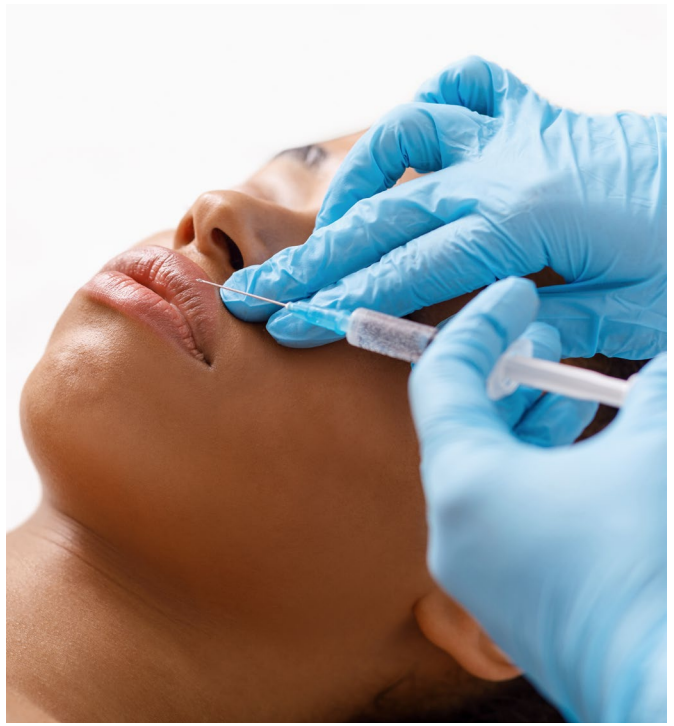
Services Permitted within Personal Service Settings

Operator Training

Legislation and Guidelines

- Limitations of Personal Service Settings (PSS) Regulation on the operation of PSS within clinical facilities

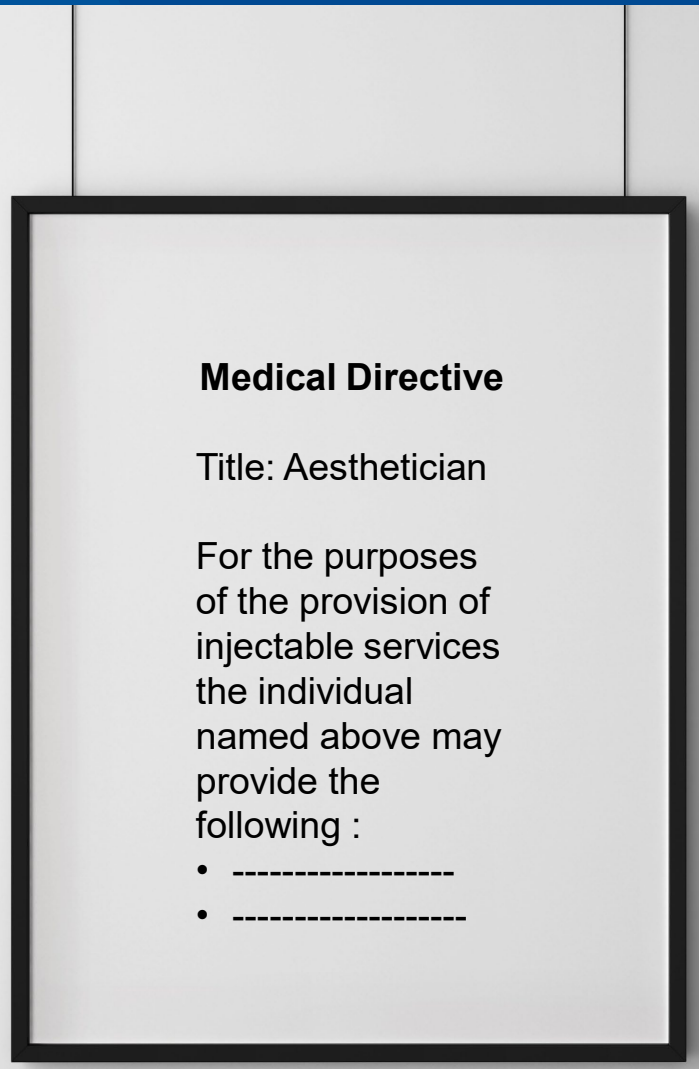




Legislation and Guidelines

Limitations of the Personal Service Settings Guideline:

- Delegation of Controlled Acts to Unregulated Care Providers (UCPs)
- Establishing Scope of Practice for Regulated Health Professionals (RHPs)



PROVISION OF CONTROLLED ACTS SERVICES

Provision of Controlled Acts Services

- Determination of services that are considered “Controlled Acts”
- Provision of “Controlled Acts” services by Unregulated Care Providers (UCPs) with or without delegation from a Regulated Health Professional (RHP)
- Follow up process where delegation from RHP has not been obtained

EQUIPMENT, DEVICES AND INSTRUMENTS

Equipment, Devices and Instruments

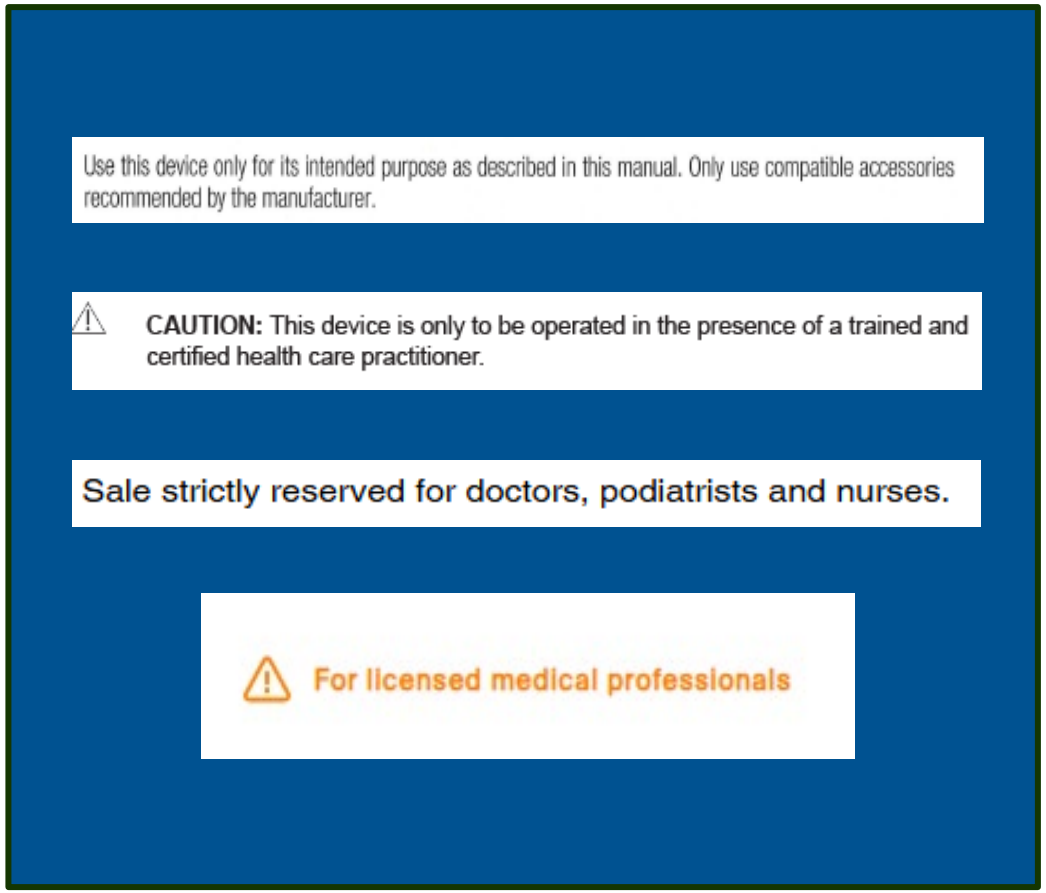
Authorized Medical Devices

Unauthorized Devices

Equipment, Devices and Instruments

Manufacturer's Instructions for Use:

- Qualifications of individuals using devices, including medical devices
- Indications for use
- Settings where devices can be used



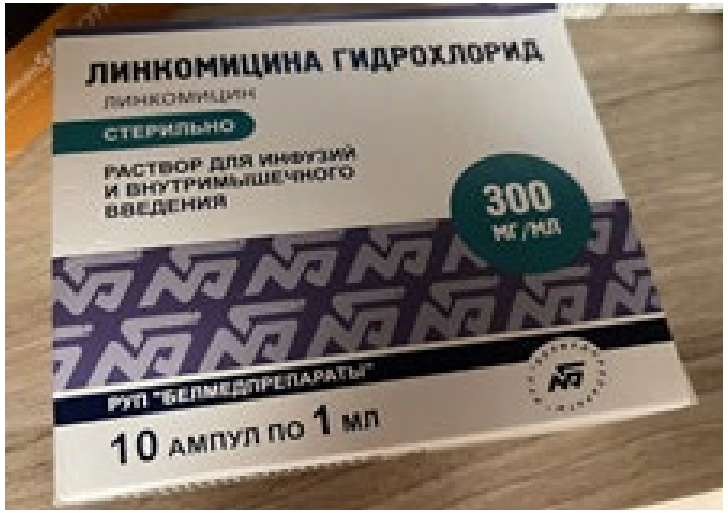
Equipment, Devices and Instruments

- Alignment with best practices in Infection Prevention and Control (IPAC)

COSMETICS AND PRESCRIPTION MEDICATION

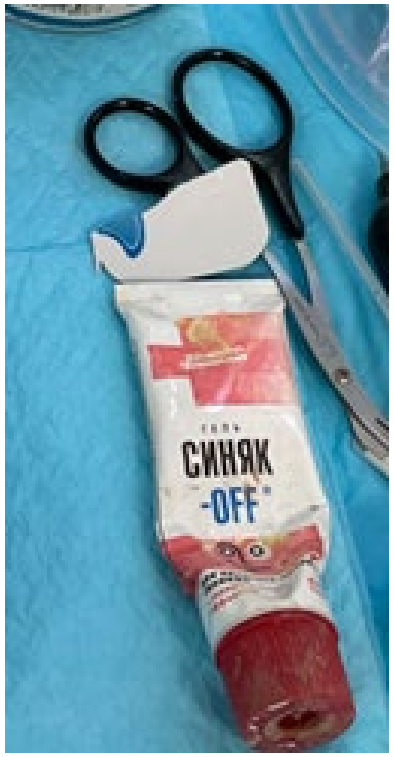
Cosmetics and Prescriptions

- Unlicensed products
- Prescription medication without DIN
- Prescription medication in other languages



Cosmetics and Prescriptions

- Cosmetics in other languages
- Compounded solutions



Thank You

For More Information About This Presentation Contact:

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