

July 31, 2019

RE: Surgical Implant of Hormone Pellets

Dear :

During its June 2019 meeting, the Louisiana State Board of Medical Examiners considered your inquiry requesting the Board's advice as to whether or not the scope of practice of a physician assistant ("PA") would permit you to surgically implant hormone pellets in patients of the dermatology clinic where you practice. As we appreciate from your communication, your supervising physician ("SP"), a dermatologist, wishes to delegate to you the task of eliciting patient consults and surgically inserting hormone pellets - estradiol and/or testosterone - both Schedule III controlled dangerous substances, in the office setting. You would be utilizing a local anesthetic agent, making a surgical incision, determining the appropriate depth for the medication, implanting the CDS with a trocar, and closing the incision site.

As provided by law,¹ a PA may perform such services as are within the scope of his or her education, training and experience, which are delegated by the SP and performed under his/her direction and supervision.² While the level and method of supervision to be provided is at the SP and PA level, the law does not authorize a PA to perform a surgical procedure independently of the SP.

Rather, consistent with the controlling law, a PA may *assist* a SP in surgery.³ Stated differently, PAs are not authorized to perform any portion of a surgical procedure, under the circumstances you describe, without the SP in attendance. To the extent that a PA is called upon to assist his or her SP with surgery, such supervision would require the immediate physical presence of the SP in the suite or room where the procedure is being performed.

While we understand that the above advice is not that for which you had hoped, we nevertheless trust that it is responsive to your inquiry. If not, please let us know.

Very truly yours,

¹La. Rev. Stat. §§37:1360.21-1360.38.

²La. Rev. Stat. §§37:1360.31.B; 1360.22(8).

³La. Rev. Stat. Ann. §37:1361.31(A).

Very truly yours,

**LOUISIANA STATE BOARD OF
MEDICAL EXAMINERS**

By: 

Vincent A. Culotta, Jr., M.D.
Executive Director

In compliance with Act 2018-655, the Board gives notice to its licensees and applicants of their opportunity to file a complaint about board actions and board procedures. You may submit such complaints to one or more of the following organizations:

1. Louisiana State Board of Medical Examiners; 630 Camp Street, New Orleans, LA 70130; (504) 568-6820; lsbme@lsbme.la.gov.
2. Committee on House & Governmental Affairs; La. House of Representatives; PO Box 44486, Baton Rouge, LA 70804; (225) 342-2403; h&ga@legis.la.gov
3. Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183, Baton Rouge, LA 70804; (225) 342-9845; s&g@legis.la.gov