



September 24, 2025

Raquel Rivera, MPH, CMBI
Executive Director
Arizona Medical Board
1740 W. Adams St, Suite 4000
Phoenix, AZ 85007
Delivered electronically

Dear Ms. Rivera:

On behalf of the undersigned physician organizations, we appreciate the opportunity to provide comments in support of allowing medical assistants (MAs) with the proper training to administer local anesthetic injections under the direct, on-site supervision of a board certified dermatologist.

Local anesthetic infiltration in office-based dermatologic procedures is considered safe and adverse events from medications delivered in this manner are rarely reportedⁱ. If a medical assistant has the proper training and is only performing the task under direct physician supervision, MAs have the ability to safely and effectively administer local anesthetics. However, the injections should be limited to intradermal and subcutaneous injections, not nerve blocks or tumescent anesthesia.

It is the responsible physician's obligation to ensure that a non-physician possesses knowledge of cutaneous medicine, documented training in the procedure, the indications for the procedure, and the pre- and post-operative care involved. To ensure patient safety, a physician should make the initial assessment of a patient, and the supervising physician shall be physically present on-site, immediately available, and able to respond promptly to any question or problems that may occur while the procedure is being performed. The patient should also be informed through clear and transparent communication about who will be providing care.

Our organizations believe that with proper education and training, direct on-site physician supervision, and patient consent, MAs should be allowed to perform local anesthetic infiltration that is restricted to intradermal and subcutaneous injections. We urge the Arizona Medical Board to work with the newly created task force in the best interest of Arizona patients. Should you have any questions please contact Kristin Hellquist, Senior Chief Advocacy Officer for the American Society for Dermatologic Surgery Association, at khellquist@asdsonline.org.

Sincerely,

American Academy of Dermatology Association
American Society for Dermatologic Surgery Association

ⁱ Kouba, D. J., et al. (2016). Guidelines for the use of local anesthesia in office-based dermatologic surgery. *Journal of the American Academy of Dermatology*, 74(6), 1201–1219. doi:10.1016/j.jaad.2016.01.022