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BY: KC

CPS

Citizens for Patient Safety

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August 28, 2012

Nancy Werner
Program Specialist
Colorado Department of Regulatory Agencies
Division of Professions and Occupations
1560 Broadway, Suite 1350
Denver, Colorado 80202

Re: Proposed Rulemaking 3 Colo. Code Regs. Section 707-1, Rule 7C- Submission of Statement from Citizens for Patient Safety, Patty Skolnik, M.S.W.

The new proposed rule by the Colorado Board of Chiropractic Examiners seeks to expand Rule 7C by adding this additional language:

"Administer means by Oral Topical Inhalation and Injection.

All chiropractors that choose to administer homeopathic and botanical medicines, vitamins, and minerals, phytonutrients, antioxidants, enzymes and glandular extracts by means of injectable procedures shall be certified by the board. Applications for certification in Injectables shall be made in a manner approved by the Board. Certification in Injectables by the State Board of Chiropractic Examiners may be obtained by complying with the following:

1. Successfully complete a minimum of a combined total of 24 hours of theoretical study and supervised clinical instruction obtained from a college of chiropractic approved by the Council on Chiropractic Education (CCE) or the equivalent hours of study and clinical supervision obtained from an instructor recognized by the postgraduate faculty of a chiropractic institution or approved by CCE to teach this course and
2. Passing a nationally recognized Injectable certification examination recognized by a CCE accredited chiropractic college."

I am Patty Skolnik, M.S.W., of Citizens for Patient Safety (CPS). Our Mission at CPS is to educate ourselves and future generations to take action to protect our health and safety from medical errors. I am very concerned about the patient safety risks associated with allowing chiropractors to inject nutritional remedial measures into patients. I submit this letter in opposition to the new proposed rule.

I am very uncomfortable with allowing procedures, including injections, to be performed on any patient with someone who has not been trained in the procedures for giving injections including



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into a muscle, joint or spine. I have concerns that chiropractors are not trained in pharmacology including possible side effects, drug interactions, and how to recognize and treat these reactions. I also have concerns about using "nutritional remedial measures" which are compounds that have not been thoroughly researched, especially with patients that have chronic diseases and are taking multiple drugs. I am very concerned that the combination of the above will lead to an increase in adverse outcomes and medication errors in patients, including possible death and other harm. I respectfully request that the Colorado Board of Chiropractic Examiners not adopt the new proposed rule 7C.

Respectfully submitted,

A handwritten signature in black ink that reads 'Patty Skolnik'. The signature is fluid and cursive, with the first name 'Patty' being more prominent than the last name 'Skolnik'.

Patty Skolnik