



Colorado Medical Society

"Advocating excellence in the profession of medicine"

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Division of Professions and Occupations
1560 Broadway, Suite 1350
Denver, Colorado 80202

Re: Proposed Rulemaking 3 Colo. Code Regs. Section 707-1, Rule 7C-
Supplemental Submission of Statement from Alan Aboaf, MD

The Colorado Board of Chiropractic Examiners has issued new proposed rule changes to the above referenced rule. The Colorado Medical Society hereby submits this supplemental submission and incorporates by reference CMS' original and supplemental submissions.

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 submit this letter in opposition to the new proposed rule. I am Board Certified in Internal Medicine and licensed to practice as a physician in the State of Colorado. I am very concerned about the patient safety risks associated with allowing chiropractors to inject nutritional remedial measures into patients.

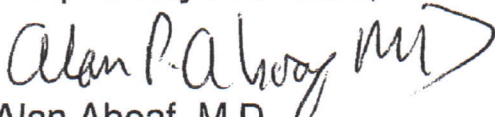
Injecting these substances into a patient may cause serious adverse outcomes associated with interactions with other drugs the patient may be taking for serious health conditions. It is imperative to the safety of patients that injections/drugs should not be given without understanding the interactions it could have with other medications

The patient could have a side effect or allergic reaction, including anaphylactic or anaphylactic-like reactions, both of which could be life-threatening. These types of reactions are emergent and need immediate medical management.

It is also imperative to understanding drug metabolism by the liver and kidney when giving drugs as they may be eliminated at variable rates and create situations for unanticipated toxicity.

In my opinion, chiropractors do not have sufficient training and education about medication administration, drug interactions, side effects, and the medical management of complications to inject patients safely.

Respectfully submitted,


Alan Aboaf, M.D.