



Colorado Medical Society

"Advocating excellence in the profession of medicine"

P.O. Box 17550 • Denver, CO 80217-0550 • 720-859-1001 or 800-654-5653 • fax 720-859-7509 • www.cms.org

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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-
Supplemental Submission of Statement from Cinthia Bateman, 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 facility 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

Cardiology 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.

As a cardiologist, I get asked many times from anesthesiologists, orthopedics and dentists about whether or not spinal, joint or gum injections are safe for our cardiac patients; and this is with the use of FDA approved medications. The doctors asking me these questions understand the effects of these medications because the effects have been well studied and documented. In addition, these physicians have been trained through medical school and residency on how to perform procedures and understand what to do if a side effect occurs.

I am very uncomfortable with allowing procedures to be performed on any patient with someone who has not been trained, and with compounds that have not been well studied, especially with cardiac patients.

I worry about possible effects on the heart including potential of arrhythmias. Many drugs can cause prolongation of the qt interval causing increased susceptibility to ventricular arrhythmias; combining certain medications or herbal compounds can be potentially dangerous. Other possible effects could be spasm of the coronary arteries, myocardial infarction, congestive heart failure. We don't have a complete understanding of homeopathic or herbal compounds; we do not always know how they will interact with other medications. I would tell my cardiac patients to avoid any Injections performed using substances, like remedial nutritional measures, that have not been through the research to ensure both safety and efficacy.

Respectfully submitted,



Cinthia Bateman, M.D.