



Colorado Medical Society

“Advocating excellence in the profession of medicine”

**Testimony before the Committee on Legal Services
Regarding Chiropractic Board Rule 7c, Injections
By Jan Kief, MD, President,
Colorado Medical Society
January 8, 2013**

Mr. Chairman and members of the committee, my name is Jan Kief. I am a physician in Metro Denver and President of the Colorado Medical Society. I appear before you today representing Colorado Medical Society and thank you for the opportunity to make comments on Rule 7c of the Board of Chiropractic Examiners and ask you to deny this rule.

CMS, acting on behalf of its more than 7,800 member physicians, residents and medical students along with twelve co-plaintiffs filed a lawsuit on December 28, 2012 in District Court to halt the implementation of Chiropractic Board of Examiners Rule 7c. This rule would improperly authorize chiropractors to inject non-FDA approved compounds.

CMS and our co-plaintiffs are quite busy with healthcare reform and do not file lawsuits without extremely careful consideration. It is our opinion that Rule 7c is not only illegal, but bad public policy and potentially dangerous. This is a matter of patient safety.

In December, three members of the Chiropractic Board approved a rule that Chiropractors after a 24 hour course can perform injections of these non-FDA approved substances as well as administer them through inhalation and topically. The rule does not restrict the medical conditions to be treated or where in the human body the injections can be administered. This leaves open to individual interpretation the disease to be treated, the substance they want to inject and the site they want to inject it into. I want to briefly touch on each of these components of the rule.

First: Pharmacology and injection therapy are areas that cannot be learned in 24 hours. Physicians study and practice this over years to know drug interactions, liver and kidney metabolism, how the entire body will respond to substances, etc. For example, I would never be able to do spine manipulation. The chiropractors are very skilled at this and it takes years and I refer my patients to them for this treatment.

Second, with regard to injection sites: Sites include under the skin, into soft tissues, muscles, into veins, arteries, into spinal fluid spaces and more. Deaths and complications have occurred even in trained hands in injections. Some drugs are

deadly when injected into veins instead of muscles or other spaces. You can puncture a lung, tear a blood vessel, infect the spine and more.

Inhalation of drugs can cause spasm of the airways (like asthma), permanent scarring or reaction of the lungs and chemical burns to these tissues.

Third: nutritional remedies like vitamins taken by mouth can be non-prescription, but anything injected that is pharmaceutical grade has to be by prescription (a legend drug), and since chiropractors cannot prescribe, they would be injecting non-FDA approved compounds. Unknown compounding and manufacturing processes, the multiple chemicals that are found in botanicals and glandulars that they propose to inject can cause severe reactions and are a true concern for patient safety.

Fourth, it is so important to note that broad rulings like this can be hazardous. Just five months ago, the Chiropractic Board affirmed that they could diagnose and treat the endocrine system. The endocrine system is a complex set of organs and glands in the body responsible for metabolism and hormonal regulation of most processes in the body. Diseases like diabetes, thyroid, hypertension, cholesterol metabolism, menopause, osteoporosis and a host of other diseases fall under this category. Endocrinologists are physicians specially trained to diagnose and treat the endocrine system and encompasses internal medicine, pediatric, and obstetric and gynecologic training and takes over 10 years.

Thus if Rule 7c goes into effect, chiropractors in Colorado will be authorized to diagnose and treat endocrine disease and perform injections.

These diseases and treatments are quite complex and we would urge the Chiropractic Board to take a step back, re-examine the issues and what their profession wants to treat. My themes as President of CMS are collaboration, relationships and evolution in health care. We believe in health teams and would be happy to collaborate with the chiropractic community about these issues.

Personally, as a physician, I know what I know and I know what I don't know. I do what I have been trained to do with excellence. Health professionals should each be proud of what we do, but first do no harm and keep patient safety as a central tenant. Isn't that what you would want of your healthcare provider?

For now, I would ask this committee to deny Chiropractic Board Rule 7c.

Thank you.

Jan Kief MD