



To: Colorado EMS Medical Directors, EMS Education Programs, Emergency Medical Practice Advisory Council members, Regional Medical Directors and other interested parties

From: D. Randy Kuykendall, MLS; Division Director, Health Facilities & Emergency Medical Services Division 

Date: February 28, 2020

Re: 6 CCR 1015-3, EMS Chapter Two - Rules Pertaining to EMS Practice and Medical Director Oversight, Rule 14.2 and Tables A.6, B.12, D.4 and G.2 (Miscellaneous)

The Colorado Department of Public Health and Environment (Department) is aware that the local medical community is discussing anticipated responses to the potential coronavirus pandemic event in Colorado. One possible response may create a need for additional practitioners to perform nasal/oral swab testing for emergent infectious disease surveillance and mitigation. Under the current scope of practice regulations, only a very limited number of Paramedics, those with Community Paramedic endorsements, can perform nasal/oral swab testing. (See Appendix G, Table G.2). The current rule does not authorize nasal/oral swab testing for any other level of EMS Provider practice.

The Department has the immediate authority “. . . to investigate and control the causes of epidemic and communicable disease affecting the public health.” Section 25-1.5-102 (1)(a)(I), C.R.S. Pursuant to its authority, and in the best interests of the public health, safety, and welfare of the citizens of Colorado, the Department has determined, and by this memo provides notice, that Colorado medical directors may issue standing orders to enable all levels of EMS providers to perform nasal/oral swab testing. See 6 CCR 1015-3, Chapter Two, Section 14.2. EMS agencies authorizing the nasal/oral swab testing must establish protocols and ensure the proper training of their providers through completion of the coursework that is available in the Google training folder via this link:
<https://drive.google.com/drive/folders/1k6ut0mw4r1Gf3xr3f433xolmDwtkeqww>.

Once these steps are satisfied, agencies may move forward without requesting a waiver or other notification to the Department. Nasal/oral swab testing is henceforth an allowable act for all levels of EMS providers while the Department is moving forward to update the Chapter Two rules.

The Chapter Two rules are scheduled for revision in 2020. The Emergency Medical Practice Advisory Council (EMPAC) will be reviewing the rules at its May 11, 2020 quarterly meeting. In August 2020, after EMPAC has approved the proposed scope expansion, the Division will request the department’s Chief Medical Officer to conduct a rulemaking hearing regarding this requested scope of practice expansion.

If you have any questions or need for further information, please feel free to contact the Emergency Medical and Trauma Services Branch at 303-691-4932. Thank you for your service to the State of Colorado.

