



May 2, 2025

Dear Members of the Emergency Medicine Practice Advisory Council and the EMTS Branch at CDPHE,

The National Association of EMS Physicians, Colorado Chapter (NAEMSP-CO) represents over 80 professionals including 45 practicing EMS physicians and 36 EMS providers serving as educators and administrators across Colorado.

NAEMSP-CO requests your attention to the proposed changes relating to the Chapter two rules regarding scope of practice for Paramedics holding the Community Paramedic (CP-C) endorsement. The current language in 6 CCR 1015-3, Section 18, Appendix G, item G.5 states: *“Assist with the inventory, compliance, and administration of, or may directly administer, specialized medications prescribed to the individual by a prescribing physician under a care plan. The route of administration must be within the provider’s scope as listed in Appendix A and this Appendix G.”*

NAEMSP-CO supports a change to this language as follows: *“perform any medical act, including; administer any medication or therapeutic, and perform any procedure, diagnostic test or medical intervention, which is part of a patient's written or verbal care plan, under the direction of the agency medical director and only after receiving appropriate training relative to the medical acts from the agency medical director or their designee”.*

This language change would replace the existing language under G.5. The proposed language change has been developed in coordination with the EMTS Branch of CDPHE, as well as multiple stakeholders and MIH programs within the state. These changes will allow Community Integrated Healthcare Services (CIHCS) agencies to more effectively serve their communities while upholding exceptional standards of clinical care. These proposed changes are supported by multiple medical directors, regional medical directors and three of the leading CIHCS agencies in the state.

Thank you for your consideration of these changes to promote Community Paramedicine in Colorado.

Submitted On Behalf Of The Board Of Directors Of NAEMSP-Colorado