



The Honorable Governor Jared Polis  
State of Colorado  
November 17<sup>th</sup>, 2020

## **Interprofessional Recommendations for the Delivery of Essential Limited Healthcare Services in Colorado under COVID-19**

Governor J. Polis,

The undersigned, representing over 5000 health care practitioners in the State of Colorado, are submitting the following recommendations for the ongoing delivery of essential health care services, and for the utilization of personal protective equipment (PPE) during the continuing COVID-19 pandemic. This submission represents the considered opinions of Association Leadership in Colorado for Acupuncturists, Chiropractors, Massage Therapists, Occupational Therapists, Speech Therapists and Physical Therapists.

Our associations seek to continue to allow our practitioners to provide essential health care services, as we have provided for over eight months to date within the ongoing COVID-19 pandemic, including during the Stay at Home period in March/April 2020. We seek to optimize health; and provide patient choice within health care to maximize access to skilled health care services.

Following our associations inter-professional review of the current regulatory guidelines for Limited Healthcare Services (LHS), we have identified challenges related to the November 2<sup>nd</sup> Colorado Department of Public Health and the Environment (CDPHE) [Public Health Order 20-36](#) issued in response to your [Executive Order D 2020 235](#).

Our concern is that the current language in the COVID-Dial Framework (PHO 20-36), under the Stay at Home/Red category, splits LHS providers into two groups and prevents Coloradan's from receiving in-person services from providers not under direct Medical, Dental or Veterinary referral. This arbitrary demarcation in health care delivery removes the option for Coloradans to receive essential health care services from multiple providers recognized as critical businesses in Colorado, the practitioners of which are not required by their respective Colorado practice acts to only provide care to patients following a direct Medical, Dental or Veterinary referral. Requiring such referrals imposes a barrier to care that the Colorado Legislature did not include in these practice acts over a period of many years and should not be imposed now by executive action during the pandemic.



**The recommendation of our associations is that Limited Healthcare Services (LHS) continue to be considered as one group under all levels of the current and any future COVID-Dial, and that access to LHS be available to Coloradans and assured as an essential service.**

In support of this recommendation, as a representative group of LHS provider associations, we put forward the following:

- All patients receive screening for COVID-19, and providers have safeguards in place for social distancing, hand, personal, patient, and environmental hygiene
- Coloradans have received health care services without any reported super-spreader or similar events from our LHS. This has been provided since March of this year and the first promulgation of PHO's restricting business and service delivery due to COVID-19
- Our health care services provide a critical bulwark to individuals with primary neuromusculoskeletal impairments seeking care in hospital emergency departments, urgent care clinics or other medical facilities with a higher risk of exposure to COVID-19
- We provide clinic, walk-in and practice-based health care services which are recognized as essential business services
- Examples:
  - One primary reason for Coloradans seeking health care is low back pain. Many of our professions serve this patient population, providing open choice for individuals. Coloradans need to continue to have the choice to improve their back pain instead of self-medicating or attend to emergency departments, which divides the care of an already overburdened facility.
  - If a patient has just undergone surgery and a physical therapist, chiropractor, acupuncturist, occupational therapist or massage therapist is part of their individual management, under the current EO, this would not be allowed in person. It should be the provider and patient's decision whether face to face or telehealth is appropriate.
  - If a patient has chronic needs, such as limited mobility for self-care, under the current EO, they would be severely limited in their choices.
  - LHS services provide management in conjunction with other healthcare treatments such as cancer treatment, pain management, mental health and opioid addiction treatment
  - During the prior stay at home order when LHS were able to continue in the provision of healthcare, multiple secondary impairments were managed such as migraines, stress, headaches, anxiety and depression
  - Guidelines during the first stay at home order split the massage therapy profession into two categories, identifying some as in a limited healthcare setting and others as personal care services. Sole practitioners work on



individuals who are experiencing pain without a medical script and many work in conjunction with PT and chiropractic direction in their private settings. All massage therapists should be classified as LHS.

- Essential Speech Language Pathology services include habilitative and rehabilitative treatment for adults and children including communication, swallowing, respiration, and cognition treatment for which continuance of care is necessary for improvement and maintenance of skills.

We respectfully provide these recommendations seeking to benefit the health care of Colorado and to continue to seek the optimal balance between in person care and safety within the ongoing pandemic. Each association represented is in agreement with these current recommendations; but reserves the right to pursue alternate future approaches to address the ability of their professions to provide patient care in Colorado.

#### Signors and Associations

Dr Cameron W MacDonald PT DPT

President, American Physical Therapy Association – Colorado Chapter

Kacey Wardle, L.Ac.

President, Acupuncture Association of Colorado

Dr. Craig Pearson, DC,1 BSc. (Chem. Hons.)

President, Colorado Chiropractic Association

Laura Embleton

National Government Relations Director, Associated Bodywork & Massage Professionals

Tami Schumacher

Colorado Government Relations Coordinator, American Massage Therapy Association

Emilie S. McLeod

President, Colorado Speech-Language-Hearing Association

Bailey LeBoeuf Johnson, MS, OTR/L

Public Policy Chair, Occupational Therapy Association of Colorado

Cc:

Kasey Wulff

Elisabeth Aranales



Jill Ryan  
Patty Salazar