



To: Members of the State Board of Health

From: D. Randy Kuykendall, Director, Health Facilities and Emergency Medical Services Division (DRK)

Date: December 15, 2021

Subject: Emergency Rulemaking Hearing concerning 6 CCR 1011-1, Chapter 2- General Licensure Standards and the COVID-19 Vaccine.

On August 17, 2021, Governor Polis sent a letter to the State Board of Health requesting the Board immediately consider rulemaking mandating the COVID-19 vaccination for all individuals “involved in health care and support staff who regularly come into contact and share spaces with vulnerable populations including patients seeking medical care in essential medical settings and in congregate senior living facilities.” In response to this request, the Department drafted regulations, which met the intent of the Governor’s request within the bounds of the Department’s statutory authority, which were adopted as Emergency Rules by the Board of Health on August 30, 2021. Since that date, the Department engaged with stakeholders to propose revisions to those emergency regulations that are better suited to our current healthcare facility landscape and will allow for flexibility as the COVID-19 situation inevitably changes in the coming months. The Department requests an additional emergency rulemaking to adopt the changes proposed within. These changes represent areas of significant stakeholder feedback that the Department agreed were important to make in order to facilitate a less burdensome implementation of this mandate. Additionally, these changes harmonize the state licensing mandate with the mandate announced by the Centers for Medicare and Medicaid Services on November 4, 2021, which applies to all federally certified facilities (facilities that receive payment from CMS).

The Department has authority to enact and enforce regulations over all licensed healthcare facilities and agencies: Acute Treatment Units, Ambulatory Surgical Centers, Assisted Living Residences, Behavioral Health Entities, Birth Centers, Community Clinics, Community Clinics with Emergency Centers, Community Mental Health Centers, Dialysis Treatment Clinics, Facilities for Individuals with Intellectual and Development Disabilities (Group Homes and Intermediate Care Facilities), Freestanding Emergency Departments, Home Care Agencies, Home Care Placement Agencies, Hospices, Hospitals (General, Rehabilitation, Psychiatric, and Hospital Units), and Nursing Homes. The Department does not have authority over individual healthcare practitioners or staff, nor does it have the statutory authority to oversee other settings where patients seek medical care including ground ambulance agencies, primary care offices, and urgent care locations. Nonetheless, the Department anticipates the proposed regulations will have an immediate, widespread, and positive impact on the health, safety, and welfare of Coloradans, as they will apply to many of the employees of the approximately 2400 licensed healthcare facilities and agencies regulated by the Department

Although there was some negative response to the emergency regulations, there are several important factors to consider when reviewing these proposed revisions. First, approximately 92% of the healthcare workforce in Colorado is fully vaccinated against COVID-19. Second, recent nationwide polling indicates that 63% of Americans support vaccine mandates for healthcare workers.¹ Third, since the Department began collecting data pursuant to the Emergency Rule, only 1.4% of total reported personnel have left their jobs due to the vaccine

¹ <https://news.gallup.com/poll/354983/majority-supports-biden-covid-vaccine-mandates.aspx>

mandate.² It is with this context in mind, the Department brings forth the following recommended revisions to 6 CCR 1011-1, Chapter 2 - General Licensure Standards.

A summary of the significant changes to the regulations since the adoption of the emergency rules is provided below:

Part 12.1 - Statutory Authority and Applicability

- Added Part 12.1.4 to create an exemption for live-in caregivers, defined in the regulations as an individual who is employed by a home care agency to provide care to one or more clients residing in the same household as the live-in caregiver. These individuals will not be subject to the requirements of the rule, and will not count “against” a home care agency for purposes of compliance. These individuals will be required to wear PPE when in contact with other employees, direct contractors, and staff of the agency. These individuals have been exempt from this regulation since October 18, 2021, when a waiver was issued to this effect.

Part 12.2 - General Provisions

- Part 12.2.1 has been revised to clarify that medical and religious exemptions will be treated in the same manner. Employees will apply for an exemption from their employer (facility), and the facility will determine if that application meets the requirements of the facility policy. The Department will calculate compliance with the 100% requirement as follows: $100\% = \# \text{ of vaccinated individuals} + \# \text{ of employees with medical exemptions} + \# \text{ of employees with religious exemptions}$.
- Part 12.2.2(C) regarding booster or subsequent doses has been removed and replaced with a policy and procedure requirement in 12.2.5, which requires facilities to specify their plan for encouraging their personnel to receive a booster dose when eligible.
- New Part 12.2.2(C) has been revised to clarify that individuals who were recently diagnosed with COVID-19 or received certain COVID-19 treatments should obtain a medical exemption from their licensed independent practitioner that indicates the timeframe during which the medical exemption is valid. These individuals are required to obtain full vaccination status after this timeframe expires.
- New Part 12.2.2(D) has been revised to clarify the expectation for employees, direct contractors, and support staff members hired after October 31, 2021. The revisions dictate that new hires must be fully vaccinated, receive a one-dose vaccination, or receive their first dose of a two-dose vaccination prior to assignment involving exposure to clients. These new hires may also apply for a religious or medical exemption from their facility/agency, in accordance with the facility's policy.
- Added Parts 12.2.3 and 12.2.4 to clarify which employees, direct contractors, and support staff are subject to the vaccine requirement. This language is the same as appears in the CMS mandate, and only exempts individuals who do not have any contact with the facility or other staff. The existing language was identified as confusing for stakeholders, and the Department hopes this new language provides greater clarity as well as eases compliance with the two mandates.
- Added Part 12.2.6, which sets forth mandatory protective measures that all facilities and agencies must institute for all unvaccinated individuals. These mandatory measures are:
 - Mandatory personal protective equipment (PPE), based on state and national guidelines and appropriate to the specific healthcare setting; and
 - Social distancing, when doing so does not interfere with or prevent completion of job duties.

² Not all licensed healthcare facilities have submitted data responsive to this request. This total is representative of the 661 unique facilities that reported data in this field. Additionally, due to limitations in the reporting system, this count is a cumulative count of all employees who have left employment and assumes that facilities did not report the same employees across multiple reporting periods.

Part 12.3 - Waiver Requests

- This section is proposed to be struck in its entirety. With the proposed change to Part 12.2.1, medical and religious exemptions will be handled through the same process. Because a facility will no longer be required to apply for a waiver if they grant one or more religious exemptions to an employee, this specific language is no longer necessary. However, should a facility believe they need to apply for a waiver of any other provision of Part 12, they may follow the existing waiver process outlined in 6 CCR 1011-1, Chapter 2, Part 5.

Part 12.4 - Reporting Requirements

- New 12.3.1 has been added to add clarity around when reports of vaccination status must be submitted to the Department. Under the existing regulation, facilities have been submitting in a number of ways, which did not meet the intent of the Department to capture two numbers over the progression of the month. The Department will continue to work with facilities, even should the Board adopt the new language, to obtain compliance and provide clarity on the regulatory expectations.
- Part 12.4.3 has been struck, which will allow the Department to respond to changing conditions and stakeholder feedback and modify requested data elements in order to collect meaningful data upon which the Department can make informed decisions.

The Department respectfully requests the Board adopt the following emergency regulations regarding COVID-19 vaccination for employees, direct contractors, and support staff at licensed healthcare facilities.

**STATEMENT OF BASIS AND PURPOSE
AND SPECIFIC STATUTORY AUTHORITY AND FINDINGS IN SUPPORT OF ADOPTION OF
EMERGENCY REVISIONS TO
6 CCR 1011-1, Standards for Hospitals and Health Facilities
Chapter 2 - General Licensure Standards**

Basis and Purpose.

Introduction

In response to COVID-19, Governor Polis verbally declared a disaster emergency on March 10, 2020, and issued the corresponding Executive Order D 2020 003 on March 11, 2020. Since that time, there have been 9,391 deaths due to COVID-19 in Colorado, 2,772 of which occurred in licensed long-term healthcare facilities³ (an increase of 147 since the August hearing). Studies show the rates of hospitalization and death due to COVID-19 infection is greatest in the unvaccinated, which constrains the resources of our healthcare system to respond to and treat both COVID-19 and non-COVID-19 cases alike. Colorado's data demonstrates that vaccine efficacy remains high and is one of our best methods of protection against the spread of COVID-19. Analysis of COVID-19 cases show that vaccinated individuals are 3.9 times less likely to contract COVID-19, 10 times less likely to be hospitalized for COVID-19, and 13.4 times less likely to die from COVID-19 than unvaccinated individuals.⁴ This level of protection is crucial at a time when the capacity of our healthcare system is strained to a level not previously experienced in Colorado, even during the 2020 height of the COVID-19 pandemic. As of November 26, 2021, 90% of the state's acute care hospital beds were in use, and 93% of the state's ICU beds were in use.⁵ That number has steadily increased from a low of 71% in December 2020 and is projected to continue rising. Keeping our healthcare workforce healthy, which in turn keeps healthcare consumers and patients healthy, is critical to decrease the burden on Colorado's hospitals and on our healthcare industry as a whole. Vaccination of the workforce is a vital tool to achieving this goal.

Like the patients they serve, the healthcare workforce is at higher risk of catching and transmitting COVID-19 if they are unvaccinated. The emergency rule adopted by the Board of Health on August 30, 2021, sought to mitigate these risks by requiring licensed health care facilities to ensure individuals involved in health care and support staff who regularly come into contact and share spaces with vulnerable populations have been fully vaccinated against COVID-19. This approach has been successful in increasing vaccination rates in these facilities. As of November 30, 2021, 92% of all personnel in licensed healthcare facilities are fully-vaccinated, 0.9% of personnel had a facility-granted medical exemption, and 4.3% of personnel had a facility-granted religious exemption. Prior to the August 30, 2021 Emergency Rules, the Department did not collect staff vaccination data from all facilities, so there is no reliable baseline from which to compare all facilities. However, the Department does have historical data on vaccination rates among long-term care facilities. Prior to the mandate taking effect, approximately 75% of these staff were vaccinated against COVID-19. As of November 30, 2021, 92.7% of personnel in these facilities were fully vaccinated, 1.0% of personnel had a facility-granted medical exemption, and 4.9% of personnel had a facility-granted religious exemption. This subset of data demonstrates the positive effect the

³ The facilities included in this category are Assisted Living Residences, Nursing Homes, and Group Homes/Intermediate Care Facilities. The Department does not have comprehensive data on this topic for all healthcare facilities.

⁴ <https://covid19.colorado.gov/vaccine-breakthrough>

⁵ <https://covid19.colorado.gov/data>

vaccination mandate had on increasing staff vaccination rates in Colorado's healthcare facilities.

The Department has authority to enact and enforce regulations over all licensed healthcare facilities and agencies: Acute Treatment Units, Ambulatory Surgical Centers, Assisted Living Residences, Behavioral Health Entities, Birth Centers, Community Clinics, Community Clinics with Emergency Centers, Community Mental Health Centers, Dialysis Treatment Clinics, Facilities for Individuals with Intellectual and Development Disabilities (Group Homes and Intermediate Care Facilities), Freestanding Emergency Departments, Home Care Agencies, Home Care Placement Agencies, Hospices, Hospitals (General, Rehabilitation, Psychiatric, and Hospital Units), and Nursing Homes. The Department does not have authority over individual healthcare practitioners or staff, nor does it have the statutory authority to oversee other settings where patients seek medical care, including primary care offices and urgent care locations.

Timeline of Relevant Events

- August 17, 2021
 - Governor Polis sent a letter to the State Board of Health requesting that the Board immediately consider rulemaking mandating the COVID-19 vaccination for all individuals “involved in health care and support staff who regularly come into contact and share spaces with vulnerable populations including patients seeking medical care in essential medical settings and in congregate senior living facilities.”
- August 23, 2021
 - The U.S. Food and Drug Administration (FDA) announced that it had granted full approval to the Pfizer/BioNTech COVID-19 vaccine (now known as Comirnaty) for individuals age 16 and older. Prior to this announcement, Colorado (and many other states) saw some businesses enact mandatory vaccination requirements for their staff.
- August 30, 2021
 - The Board of Health adopted emergency rules imposing a requirement for all facilities to obtain 100% vaccination against COVID-19 among their employees, direct contractors, and support staff who have potential for exposure to clients and/or infectious materials.
 - This rule will expire on December 28, 2021.
- September 9, 2021
 - President Biden announced that the Occupational Safety and Health Administration (OSHA) will issue a vaccine mandate for all employers with 100+ employees and that Centers for Medicare & Medicaid Services (CMS) would mandate vaccinations for employees in all federally certified facilities.
- September 14, 2021
 - The Health Facilities and Emergency Medical Services (Division) held a stakeholder meeting open to all stakeholders and interested parties to present changes to the draft regulation and gather public feedback. This meeting was attended by 455 individuals.
- September 20, 2021
 - The Division held a second stakeholder meeting open to all stakeholders and interested parties to present changes to the draft regulation and gather public feedback. This meeting was attended by 349 individuals.
- September 24, 2021

- The Division held a third stakeholder meeting, specifically targeted toward licensed Hospitals, but open to all stakeholders and interested parties, to present changes to the draft regulation and gather public feedback. This meeting was attended by 165 individuals.
- October 1, 2021
 - Licensed facilities began reporting their vaccination data to the Department on a twice-monthly basis, as required by the August 30, 2021 emergency rule. As of November 14, 2021, 66% of licensed facilities were reporting the requested data. The Department believes the proposed revisions will decrease confusion and ultimately increase reporting rates amongst facilities.
- November 4, 2021
 - The federal healthcare worker vaccine mandate was released by the Centers for Medicare and Medicaid Services (CMS). This mandate is explained below.
 - As of November 30, 2021, the CMS mandate was subject to a preliminary injunction in two federal courts, which temporarily blocks the implementation of this mandate in all 50 states. The Department will monitor these lawsuits, but notes that this is an issue of federal law, which has no impact on the validity of the state licensing regulations or state statutory authority under which they are promulgated.
 - The Occupational Safety and Health Administration (OSHA) vaccine mandate for employers with 100 or more employees was released. This mandate is explained below.
- November 26, 2021
 - The World Health Organization (WHO) designated the variant B.1.1.529 (Omicron) a variant of concern.

Federal and State Vaccine Mandates

On November 4, 2021, the Centers for Medicare and Medicaid Services (CMS) announced its vaccine mandate for healthcare workers.⁶ This mandate covers staff at healthcare facilities that participate in Medicare and Medicaid programs (receive reimbursement from CMS for services provided to covered patients/clients). The regulation requires facilities to establish a policy ensuring all eligible staff received their first dose of the vaccine, or a one-dose vaccine, by December 6, 2021, and receive their second shot by January 4, 2022. The regulation allows for medical and religious exemptions, in accordance with facility-designed policies. CMS intends to ensure compliance with these regulations through existing survey processes, including the use of all enforcement actions available to the agency.

Also issued on November 4, 2021, the Occupational Safety and Health Administration (OSHA) issued an Emergency Temporary Standard (ETS) that requires large employers (those with 100 or more employees) to develop, implement, and enforce a mandatory COVID-19 vaccination policy.⁷ The OSHA standard notably differs from the CMS mandate, in that it does allow an employer to enact a policy that requires either vaccination or weekly testing along with mandatory mask wearing. While there are some licensed healthcare facilities that fall under the OSHA mandate based on their size, it is important to note that the more-stringent CMS requirement applies to all federally certified facilities. Therefore, these facilities cannot create a vaccination or testing policy, as this would be contrary to the CMS mandate (and state licensing regulation).

⁶ <https://www.cms.gov/newsroom/press-releases/biden-harris-administration-issues-emergency-regulation-requiring-covid-19-vaccination-health-care>

⁷ <https://www.osha.gov/sites/default/files/publications/OSHA4161.pdf>

In addition to the CMS and OSHA vaccine mandates, numerous Federal entities have mandated employee vaccination. These federal mandates provide for limited exemptions as required by federal law, but do not allow a testing option for unvaccinated employees. The mandates include:

- The Department of Health & Human Services requires all 25,000+ health care workers to be vaccinated, including the Indian Health Service and National Institute of Health;
- The US Surgeon General requires US Public Health Service Commissioned Corps members to be vaccinated;
- The Veterans Health Administration requires all employees, volunteers, and contractors who come into contact with VA patients or health care workers to be vaccinated;
- All federal employees must be vaccinated per Executive Order 14043; and
- The Department of Defense requires all military service members be vaccinated.

On a state level, there have been a number of other full vaccination mandates issued for state employees or health care workers. On August 5, 2021, the Oregon Health Authority implemented emergency rules requiring health care providers and health care staff to be fully vaccinated and prohibited health care employers from employing or hiring unvaccinated health care providers and staff. On August 12, 2021, the Maine Center for Disease Control & Prevention adopted emergency rules requiring employees of health care facilities, EMS organizations, and dental practices, to provide proof of full vaccination. On September 10, 2021, the Nevada Board of Health approved emergency regulations requiring state staff working with vulnerable populations (health care and corrections) be fully vaccinated. The Massachusetts Public Health Council has approved numerous vaccine mandates applicable to various classes of health care workers requiring COVID vaccination. These regulatory vaccine mandates are in addition to numerous vaccination mandates or “vaccine or test” mandates implemented via Executive and Public Health Orders. In total, there are over 20 states with a version of a full-vaccination or “vaccine or test” mandate.

Staffing Concerns

Prior to the adoption of the August 30, 2021 emergency rule and during the stakeholder engagement process, the Department heard concerns that enacting a vaccine mandate in healthcare facilities would exacerbate the already difficult staffing situation in Colorado, causing a healthcare crisis across the state. It was based on this concern that the Department sought to collect data on staff attrition related to the vaccine mandate. The Department began collecting this data on October 1, 2021, and facilities are expected to report the number of employees, direct contractors, or support staff who have left employment due to the vaccine mandate. As of November 30, 2021, the Department received data responsive to this question from 661 licensed facilities. Across these facilities, there are 337,170 total reported personnel, and of those individuals only 4,781 or 1.4% have been reported as leaving employment due to the vaccine mandate. The Department recognizes this is an incomplete picture across all licensed facilities, but does feel the data demonstrate the vaccine mandate has not exacerbated nor created a staffing crisis.

While the Department recognizes staffing remains a major concern amongst licensed facilities, it maintains the position that these regulations will have a positive impact on the workforce, by lessening the strain felt by the entire system when personnel become infected with COVID-19. While the Department has identified only 17 total deaths (an increase of 1 death since the August hearing) among long-term care facility staff there have been 14,618

total COVID-19 cases among these facility staff (an increase of 1,556 cases since the August hearing). Because the Department only has historical data for long-term care facilities, it is likely these numbers are actually higher across all licensed facilities. Each time a staff member tests positive, there is an impact to that individual's coworkers in increased workload and acute staffing shortages as more staff get sick and/or have to quarantine. Increasing the overall staff vaccination rate should decrease the amount of positive cases amongst staff, in addition to patients and clients. Furthermore, decreasing the number of COVID-19 cases statewide will begin to alleviate the immense strain responding to this pandemic has placed on Colorado's healthcare workers. This will increase staff morale and retention rates statewide.

Conclusion and Summary of Changes

Based on the information above, the Department requests an additional emergency rulemaking to adopt the changes proposed within. The changes summarized below represent areas of significant stakeholder feedback that the Department agreed were important to make expediently in order to facilitate a less burdensome implementation of this mandate and to create consistency between the state regulations and the CMS mandate. The Department anticipates these regulations will have an immediate, widespread, and positive impact on the health, safety, and welfare of Coloradans, as they will apply to most of the employees of the approximately 2400 licensed healthcare facilities and agencies regulated by the Department. Accordingly, the Department requests the Board adopt the following regulations, via emergency rulemaking, requiring all licensed healthcare facilities to ensure their eligible employees, direct contractors, and support staff are fully vaccinated against COVID-19.

A summary of the significant changes to the regulations since the adoption of the August 30th emergency rules is provided below:

Part 12.1 - Statutory Authority and Applicability

- Added Part 12.1.4 to create an exemption for live-in caregivers, defined in the regulations as an individual who is employed by a home care agency to provide care to one or more clients residing in the same household as the live-in caregiver. These individuals will not be subject to the requirements of the rule, and will not count "against" a home care agency for purposes of compliance. These individuals will be required to wear PPE when in contact with other employees, direct contractors, and staff of the agency. These individuals have been exempt from this regulation since October 18, 2021, when a waiver was issued to this effect.

Part 12.2 - General Provisions

- Part 12.2.1 has been revised to clarify that medical and religious exemptions will be treated in the same manner. Employees will apply for an exemption from their employer (facility), and the facility will determine if that application meets the requirements of the facility policy. The Department will calculate compliance with the 100% requirement as follows: $100\% = \frac{\# \text{ of vaccinated individuals} + \# \text{ of employees with medical exemptions} + \# \text{ of employees with religious exemptions}}{\# \text{ of employees}}$
- Part 12.2.2(C) regarding booster or subsequent doses has been removed and replaced with a policy and procedure requirement in 12.2.5, which requires facilities to specify their plan for encouraging their personnel to receive a booster dose when eligible.
- New Part 12.2.2(C) has been revised to clarify that individuals who were recently diagnosed with COVID-19 or received certain COVID-19 treatments should obtain a medical exemption from their licensed independent practitioner that indicates the

timeframe during which the medical exemption is valid. These individuals are required to obtain full vaccination status after this timeframe expires.

- New Part 12.2.2(D) has been revised to clarify the expectation for employees, direct contractors, and support staff members hired after October 31, 2021. The revisions dictate that new hires must be fully vaccinated, receive a one-dose vaccination, or receive their first dose of a two-dose vaccination prior to assignment involving exposure to clients. These new hires may also apply for a religious or medical exemption from their facility/agency, in accordance with the facility's policy.
- Added Parts 12.2.3 and 12.2.4 to clarify which employees, direct contractors, and support staff are subject to the vaccine requirement. This language is the same as appears in the CMS mandate, and only exempts individuals who do not have any contact with the facility or other staff. The existing language was identified as confusing for stakeholders, and the Department hopes this new language provides greater clarity as well as eases compliance with the two mandates.
- Added Part 12.2.6, which sets forth mandatory protective measures that all facilities and agencies must institute for all unvaccinated individuals. These mandatory measures are:
 - Mandatory personal protective equipment (PPE), based on state and national guidelines and appropriate to the specific healthcare setting; and
 - Social distancing, when doing so does not interfere with or prevent completion of job duties.

Part 12.3 - Waiver Requests

- This section is proposed to be struck in its entirety. With the proposed change to Part 12.2.1, medical and religious exemptions will be handled through the same process. Because a facility will no longer be required to apply for a waiver if they grant one or more religious exemptions to an employee, this specific language is no longer necessary. However, should a facility believe they need to apply for a waiver of any other provision of Part 12, they may follow the existing waiver process outlined in 6 CCR 1011-1, Chapter 2, Part 5.

Part 12.4 - Reporting Requirements

- New 12.3.1 has been added to add clarity around when reports of vaccination status must be submitted to the Department. Under the existing regulation, facilities have been submitting in a number of ways, which did not meet the intent of the Department to capture two numbers over the progression of the month. The Department will continue to work with facilities, even should the Board adopt the new language, to obtain compliance and provide clarity on the regulatory expectations.
- Part 12.4.3 has been struck, which will allow the Department to respond to changing conditions and stakeholder feedback and modify requested data elements in order to collect meaningful data upon which the Department can make informed decisions.

Findings Pursuant to Section 24-4-103(6), C.R.S.

In response to COVID-19, Governor Polis verbally declared a disaster emergency on March 10, 2020, and issued the corresponding Executive Order D 2020 003 on March 11, 2020. Since that time there have been 9,391 deaths due to COVID-19 in Colorado, 2,772 of which occurred in licensed long-term healthcare facilities (an increase of 147 since the August hearing). With the rise in the Delta variant and emergence of the Omicron variant, ensuring that all workers in licensed healthcare facilities are vaccinated is one of the most effective means the state can take to protect the public health, safety, and welfare of all Coloradans and bring about a quicker end this ongoing pandemic.

With Colorado hospitals nearing capacity and the emergence of the Omicron variant, it is imperative the Department takes all available measures to increase vaccination rates to keep as many Coloradans as healthy as possible in order to reduce the burden on the already overstretched healthcare system and workforce. Although the Board adopted emergency rules on August 30, 2021, the Department received significant stakeholder feedback necessitating modifications to these regulations to ensure healthcare facilities can enact these requirements and maintain compliance with these regulations. Additionally, CMS released its vaccine mandate on November 4, 2021, which created the need for changes in the state regulations. Therefore, the Board finds that immediate adoption of these revisions is imperative to preserve the public health, safety and welfare, and that compliance with the normal rulemaking requirements of Section 24-4-103, C.R.S. would be contrary to the public interest.

Specific Statutory Authority.

Statutes that require or authorize rulemaking:

Section 24-4-103(6), C.R.S.

Section 25-1.5-102, C.R.S.

Section 25-1.5-103, C.R.S.

Section 25-3-103, C.R.S.

Is this rulemaking due to a change in state statute?

Yes, the bill number is _____. Rules are authorized required.
 No

Does this rulemaking include proposed rule language that incorporate materials by reference?

Yes URL
 No

Does this rulemaking include proposed rule language to create or modify fines or fees?

Yes
 No

Does the proposed rule language create (or increase) a state mandate on local government?

No.

- The proposed rule does not require a local government to perform or increase a specific activity for which the local government will not be reimbursed;
- The proposed rule requires a local government to perform or increase a specific activity because the local government has opted to perform an activity, or;
- The proposed rule reduces or eliminates a state mandate on local government.

**REGULATORY ANALYSIS
FOR EMERGENCY REVISIONS TO
6 CCR 1011-1, Standards for Hospitals and Health Facilities
Chapter 2 - General Licensure Standards**

1. A description of the classes of persons affected by the proposed rule, including the classes that will bear the costs and the classes that will benefit from the proposed rule.

Group of persons/entities Affected by the Proposed Rule	Size of the Group	Relationship to the Proposed Rule Select category: C/S/B
All licensed healthcare facilities and agencies (as listed below)	-2400	C
Acute Treatment Units	6	
Ambulatory Surgical Centers	137	
Assisted Living Residences	689	
Behavioral Health Entities (most currently licensed in other categories below)	1	
Birth Centers	7	
Community Mental Health Centers	25	
Community Clinics	58	
Crisis Stabilization Units	5	
Dialysis Treatment Clinics	85	
Facilities for Individuals with Intellectual and Developmental Disabilities	129	
Freestanding Emergency Departments (most currently licensed as Community Clinics)	2	
Home Care Agencies	790	
Home Care Placement Agencies	7	
Hospices	103	
Hospitals	118	
Nursing Homes	226	
Patients/clients receiving care and services from a licensed healthcare facility or agency	Over 63,000 (based on the number of licensed beds across all facility types. Some agency/facility types do not have licensed beds but serve many clients)	B
Employees, direct contractors, and support staff of licensed healthcare facilities and agencies.	Over 330,000 (based on the total number of personnel reported by facilities. The Department has not received data from all licensed facilities)	B

While all are stakeholders, groups of persons/entities connect to the rule and the problem being solved by the rule in different ways. To better understand those different relationships, please use this relationship categorization key:

- C = individuals/entities that implement or apply the rule.
- S = individuals/entities that do not implement or apply the rule but are interested in others applying the rule.

B = the individuals that are ultimately served, including the customers of our customers. These individuals may benefit, be harmed by or be at-risk because of the standard communicated in the rule or the manner in which the rule is implemented.

More than one category may be appropriate for some stakeholders.

2. To the extent practicable, a description of the probable quantitative and qualitative impact of the proposed rule, economic or otherwise, upon affected classes of persons.

C: The potential impact upon the healthcare facilities and agencies that implement this requirement include:

- A decreased number of positive COVID-19 cases, outbreaks, and deaths experienced in licensed healthcare facilities;
- Decreased costs incurred as a result of staff and client illness, and increased positive outcomes for patients and clients;
- Decreased number of staffing shortages related to COVID-19 illness or exposure;
- A potential decrease in the overall healthcare workforce if healthcare providers and support staff choose to leave the profession because of this requirement;
- Increased administrative workload for facilities and agencies to track and report vaccination status.

B: The impact upon clients, patients, and residents served in and by licensed healthcare facilities and agencies includes a decrease in exposure to COVID-19, lessening the chance of experiencing illness or death as a result. The impact upon employees of licensed healthcare facilities and agencies includes a decreased risk of exposure in the workplace. However, some of these individuals may choose to leave employment in this field due to these requirements.

3. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.

- A. Anticipated CDPHE personal services, operating costs or other expenditures:

The proposed amendments are cost neutral.

Anticipated CDPHE Revenues:

The proposed amendments are revenue neutral.

- B. Anticipated personal services, operating costs or other expenditures by another state agency:

N/A

Anticipated Revenues for another state agency:

N/A

4. A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction.

Along with the costs and benefits discussed above, the proposed revisions:

- Comply with a statutory mandate to promulgate rules.
- Comply with federal or state statutory mandates, federal or state regulations, and department funding obligations.
- Maintain alignment with other states or national standards.
- Implement a Regulatory Efficiency Review (rule review) result
- Improve public and environmental health practice.
- Implement stakeholder feedback.

Advance the following CDPHE Strategic Plan priorities (select all that apply):

<p>Reduce Greenhouse Gas (GHG) emissions economy-wide from 125.716 million metric tons of CO₂e (carbon dioxide equivalent) per year to 119.430 million metric tons of CO₂e per year by June 30, 2020 and to 113.144 million metric tons of CO₂e by June 30, 2023.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Contributes to the blueprint for pollution reduction <input type="checkbox"/> Reduces carbon dioxide from transportation <input type="checkbox"/> Reduces methane emissions from oil and gas industry <input type="checkbox"/> Reduces carbon dioxide emissions from electricity sector
<p>Reduce ozone from 83 parts per billion (ppb) to 80 ppb by June 30, 2020 and 75 ppb by June 30, 2023.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reduces volatile organic compounds (VOC) and oxides of nitrogen (NO_x) from the oil and gas industry. <input type="checkbox"/> Supports local agencies and COGCC in oil and gas regulations. <input type="checkbox"/> Reduces VOC and NO_x emissions from non-oil and gas contributors
<p>Decrease the number of Colorado adults who have obesity by 2,838 by June 30, 2020 and by 12,207 by June 30, 2023.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Increases the consumption of healthy food and beverages through education, policy, practice and environmental changes. <input type="checkbox"/> Increases physical activity by promoting local and state policies to improve active transportation and access to recreation. <input type="checkbox"/> Increases the reach of the National Diabetes Prevention Program and Diabetes Self-Management Education and Support by collaborating with the Department of Health Care Policy and Financing.
<p>Decrease the number of Colorado children (age 2-4 years) who participate in the WIC Program and have obesity from 2120 to 2115 by June 30, 2020 and to 2100 by June 30, 2023.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ensures access to breastfeeding-friendly environments.
<p>Reverse the downward trend and increase the percent of kindergartners protected against measles, mumps and rubella (MMR) from 87.4% to 90% (1,669 more kids) by June 30, 2020 and increase to 95% by June 30, 2023.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reverses the downward trend and increase the percent of kindergartners protected

<p>against measles, mumps and rubella (MMR) from 87.4% to 90% (1,669 more kids) by June 30, 2020 and increase to 95% by June 30, 2023.</p> <ul style="list-style-type: none"> ___ Performs targeted programming to increase immunization rates. ___ Supports legislation and policies that promote complete immunization and exemption data in the Colorado Immunization Information System (CIIS).
<p>Colorado will reduce the suicide death rate by 5% by June 30, 2020 and 15% by June 30, 2023.</p> <ul style="list-style-type: none"> ___ Creates a roadmap to address suicide in Colorado. ___ Improves youth connections to school, positive peers and caring adults, and promotes healthy behaviors and positive school climate. ___ Decreases stigma associated with mental health and suicide, and increases help-seeking behaviors among working-age males, particularly within high-risk industries. ___ Saves health care costs by reducing reliance on emergency departments and connects to responsive community-based resources.
<p>The Office of Emergency Preparedness and Response (OEPR) will identify 100% of jurisdictional gaps to inform the required work of the Operational Readiness Review by June 30, 2020.</p> <ul style="list-style-type: none"> ___ Conducts a gap assessment. ___ Updates existing plans to address identified gaps. ___ Develops and conducts various exercises to close gaps.
<p>For each identified threat, increase the competency rating from 0% to 54% for outbreak/incident investigation steps by June 30, 2020 and increase to 92% competency rating by June 30, 2023.</p> <ul style="list-style-type: none"> ___ Uses an assessment tool to measure competency for CDPHE's response to an outbreak or environmental incident. ___ Works cross-departmentally to update and draft plans to address identified gaps noted in the assessment. ___ Conducts exercises to measure and increase performance related to identified gaps in the outbreak or incident response plan.
<p>100% of new technology applications will be virtually available to customers, anytime and anywhere, by June 20, 2020 and 90 of the existing applications by June 30, 2023.</p> <ul style="list-style-type: none"> ___ Implements the CDPHE Digital Transformation Plan. ___ Optimizes processes prior to digitizing them. ___ Improves data dissemination and interoperability methods and timeliness.
<p>10. Reduce CDPHE's Scope 1 & 2 Greenhouse Gas emissions (GHG) from 6,561 metric tons (in FY2015) to 5,249 metric tons (20% reduction) by June 30, 2020 and 4,593 tons (30% reduction) by June 30, 2023.</p> <ul style="list-style-type: none"> ___ Reduces emissions from employee commuting ___ Reduces emissions from CDPHE operations
<p>11. Fully implement the roadmap to create and pilot using a budget equity assessment by June 30, 2020 and increase the percent of selected budgets using the equity assessment from 0% to 50% by June 30, 2023.</p>

___ Used a budget equity assessment

___ Advance CDPHE Division-level strategic priorities.

The costs and benefits of the proposed rule will not be incurred if inaction was chosen. Costs and benefits of inaction not previously discussed include:

Inaction has neither monetary cost nor benefit; however, inaction will result in the further spread of COVID-19 across the state of Colorado. This will result in increased burden on an already overtaxed healthcare system, including the healthcare workforce, economic burdens as individuals are unable to work due to illness or quarantine requirements, disruptions in learning for students in K-12 and higher education settings, and increased deaths across all sectors of our population. Furthermore, because these standards were adopted as an Emergency Regulation on August 30, 2021, they are set to expire on December 28, 2021. If the Board does not adopt these revised changes, there will cease to be a vaccination requirement for healthcare workers in Colorado's licensed healthcare facilities.

5. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.

The less costly or less intrusive methods available in this scenario are for employees, direct contractors, and support staff to voluntarily receive the COVID-19 vaccination and/or for employers to enact vaccination requirements on an individual basis. While that approach has led to a majority of the healthcare workforce receiving the COVID-19 vaccine, at the time the vaccine mandate went into effect approximately 30% of the healthcare workforce remained unvaccinated. Additionally, there are concerns that without a universal mandate the settings/facilities/agencies that choose to enact a mandate will see staff members leave their sector for opportunities in facilities/agencies without a vaccine mandate. As such, this regulation is the next step to ensure vulnerable Coloradans are protected from the spread of COVID-19 and that facilities who choose to ensure vaccination amongst their staff are not penalized in the form of staffing shortages.

6. Alternative Rules or Alternatives to Rulemaking Considered and Why Rejected.

There were no alternatives to rulemaking considered except inaction. For the reasons set forth above, inaction will result in the further spread of COVID-19 across the state of Colorado, including in our licensed healthcare facilities.

During the stakeholder engagement process, there were many areas of modification requested by stakeholders. While the Department has made revisions to accommodate many of those requests, some changes the Department was unable to accommodate. Each of these areas are discussed in detail below.

- A) Testing in lieu of vaccination

Some stakeholders requested that the Department adopt a "vaccinate or test" regulation. While this is the approach that has been taken by other states, and even the Colorado Department of Personnel Administration, the Department did not feel

this was an appropriate position to take for the healthcare system. Primarily, there was a great deal of stakeholder concern about the availability and cost of COVID-19 testing supplies. The State is unable to provide the resources or funding to subsidize a testing scheme across all 2400 licensed healthcare facilities, and as such, felt this would be overly burdensome on healthcare facilities. Additionally, because the state cannot provide these resources there is a concern of equity among healthcare facilities where well-funded providers who can afford testing supplies could attract staff looking to utilize the testing opt-out, whereas less-funded providers would lose staff based on their inability to provide the opt-out option.

B) Signed releases from clients in lieu of vaccination requirement

There was a request from some stakeholder to enact a regulatory scheme where the facility or agency could inform the client that their provider was unvaccinated and have the client sign an acknowledgement or waiver to indicate their approval of that situation. However, there are many instances in healthcare facilities and agencies where the client may not have a choice in their provider, and would be forced to choose between demanding a vaccinated provider or receiving no healthcare. This is especially true in an Emergency setting where there is often little time to obtain a signature, but can also be true in rural areas of the state where there are few providers for even routine healthcare. The Department did not feel this was a fair or appropriate situation in which to place consumers, and as such did not adopt this approach.

C) Rescinding the state mandate in lieu of the federal CMS requirement

After President Biden announced that the CMS would issue a vaccine mandate for all healthcare facilities that receive federal dollars (which are those that are certified), some stakeholders approached the Department with a request to rescind the state mandate. While it is true that a large number of licensed facilities and agencies are certified by CMS and subject to this mandate, many facilities/agencies are not covered by the mandate. The numbers and types of these facilities are set forth in the table below. In order to ensure parity across facility types, and funding sources, the Department must maintain a state licensure mandate. However, the Department recognizes the need to align the state and federal requirements where possible and has done so in these proposed emergency regulations.

Facility Type	Number of Non-Certified Facilities	Total Number of Facilities	% of Total Facilities Non-Certified
Acute Treatment Units	6	6	100%
Ambulatory Surgical Centers	13	137	9.5%
Assisted Living Residences	378	689	54.9%
Behavioral Health Entities (most currently licensed as other facility types)	1	1	100%
Birth Centers	7	7	100%
Community Clinics	58	58	100%
Community Mental Health Centers	0	25	0%
Crisis Stabilization Units	5	5	100%
Dialysis Centers	2	85	2.3%

Facilities for Individuals with Developmental Disabilities	0	129	0%
Freestanding Emergency Departments	2	2	100%
Home Care Agencies (Class A Agency)	113	323	34.9%
Home Care Agencies (Class B Agency)	154	467	32.9%
Home Care Placement Agencies	7	7	100%
Hospices	30	103	29.1%
Hospitals	9	118	7.6%
Nursing Homes	5	226	2.2%
TOTAL FACILITIES:	812	2410	33.7%

D) Considerations for alternative treatments and/or naturally acquired immunity.

There were a considerable number of requests from facilities and individuals for the Department to write consideration into the regulations for alternative treatments (e.g. Vitamin C and Ivermectin) and naturally acquired immunity. However, the Department did not accommodate these concepts in the proposed regulations because research has indicated that the efficacy of natural immunity is lower than vaccination. According to the Centers for Disease Control (CDC), up to 34% of individuals contracting COVID-19 do not develop antibodies. (See Liu). Additionally, the CDC has found that after infection, unvaccinated individuals are 2.34 times more likely to become re-infected than vaccinated individuals. (See Cavanaugh).

Due to the uncertainty of the strength and length of this immunity compared to that of vaccinated individuals exempting these individuals from vaccination was not supported by the data available to the Department. Furthermore, tracking the immunity of those previously infected with COVID-19 would have required reliance on standards that do not now exist for reliably measuring the declining levels of antibodies over time. This would be an added expense for facilities at a time when budgets and staffing are under strain.

However, the Department does recognize that there are extenuating circumstances to consider for individuals recently diagnosed with COVID-19, or who received certain treatments such as monoclonal antibodies, determining when vaccination is appropriate. As such, there are considerations for these individuals in the regulations.

Liu W, Russell RM, Bibollet-Ruche F, Skelly AN, Sherrill-Mix S, Freeman DA, et al. Predictors of Nonseroconversion after SARS-CoV-2 Infection. *Emerg Infect Dis.* 2021;27(9):2454-2458. <https://doi.org/10.3201/eid2709.211042>

Cavanaugh AM, Spicer KB, Thoroughman D, Glick C, Winter K. Reduced Risk of Reinfection with SARS-CoV-2 After COVID-19 Vaccination – Kentucky, May-June 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1081-1083. DOI: <http://dx.doi.org/10.15585/mmwr.mm7032e1external icon>

E) Mandatory testing for all unvaccinated individuals

Stakeholders, especially those who work in residential care settings, expressed discomfort with the fact that testing would not be required for all unvaccinated individuals. Based on concerns related to the cost and logistics of testing, especially in decentralized settings such as Home Care Agencies, the Department ultimately determined that this was the best course forward. Additionally, CMS' mandate does not mandate testing of vaccinated or unvaccinated individuals. However, facilities and agencies are encouraged to exercise business discretion and institute policies that exceed the minimum regulatory requirements if they feel that doing so is in the best interest of their clients, employees, and business.

7. To the extent practicable, a quantification of the data used in the analysis; the analysis must take into account both short-term and long-term consequences.

The Department utilized data collected from various sources by different programs across the Department. This includes information from the Outbreak team on deaths, flu data from the immunization branch, and reported vaccination rates from EMResource. Much of this data is publicly available on the Department website. Flu vaccination information is found at: <https://cdphe.colorado.gov/immunization-rates-reports-and-data>. COVID-19 data is found at: <https://covid19.colorado.gov/data>.

The Department also reviewed recent literature and studies regarding the COVID-19 vaccine, its efficacy and the disease including:

Benenson S, et al. BNT162b2 mRNA Covid-19 Vaccine Effectiveness Among Health Care Workers. *N Engl J Med* 2021;384:1775-1777. DOI: <http://dx.doi.org/10.1056/NEJMc2101951>

Bergwerk, M. et al. Covid-19 Breakthrough Infections in Vaccinated Health Care Workers, *N. Engl. J. Med.* 2021 DOI: <https://doi.org/10.1056/NEJMoa2109072>

Cavanaugh AM, Spicer KB, Thoroughman D, Glick C, Winter K. Reduced Risk of Reinfection with SARS-CoV-2 After COVID-19 Vaccination – Kentucky, May-June 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1081-1083. DOI: <http://dx.doi.org/10.15585/mmwr.mm7032e1external icon>

Griffin JB, Haddix M, Danza P, et al. SARS-CoV-2 Infections and Hospitalizations Among Persons Aged ≥16 Years, by Vaccination Status – Los Angeles County, California, May 1-July 25, 2021. *MMWR Morb Mortal Wkly Rep.* ePub: 24 August 2021. DOI: <http://dx.doi.org/10.15585/mmwr.mm7034e5external icon>.

Hall VJ, et al. COVID-19 vaccine coverage in health-care workers in England and effectiveness of BNT162b2 mRNA vaccine against infection (SIREN): a prospective, multicentre, cohort study. *Lancet.* 2021 May 8;397(10286):1725-1735. DOI: [https://doi.org/10.1016/S0140-6736\(21\)00790-X](https://doi.org/10.1016/S0140-6736(21)00790-X)

Herlihy R, Bamberg W, Burakoff A, et al. Rapid Increase in Circulation of the SARS-CoV-2 B.1.617.2 (Delta) Variant – Mesa County, Colorado, April-June 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1084-1087. DOI: <http://dx.doi.org/10.15585/mmwr.mm7032e2>

Lee JT, Althomsons SP, Wu H, et al. Disparities in COVID-19 Vaccination Coverage Among Health Care Personnel Working in Long-Term Care Facilities, by Job Category, National Healthcare Safety Network – United States, March 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1036-1039. DOI: <http://dx.doi.org/10.15585/mmwr.mm7030a2>

Liu W, Russell RM, Bibollet-Ruche F, Skelly AN, Sherrill-Mix S, Freeman DA, et al. Predictors of Nonseroconversion after SARS-CoV-2 Infection. *Emerg Infect Dis.* 2021;27(9):2454-2458. <https://doi.org/10.3201/eid2709.211042>

Moline HL, Whitaker M, Deng L, et al. Effectiveness of COVID-19 Vaccines in Preventing Hospitalization Among Adults Aged 65 Years – COVID-NET, 13 States, February-April 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1088-1093. DOI: <http://dx.doi.org/10.15585/mmwr.mm7032e3>

Nanduri S, Pilishvili T, Derado G, et al. Effectiveness of Pfizer-BioNTech and Moderna Vaccines in Preventing SARS-CoV-2 Infection Among Nursing Home Residents Before and During Widespread Circulation of the SARS-CoV-2 B.1.617.2 (Delta) Variant – National Healthcare Safety Network, March 1-August 1, 2021. *MMWR Morb Mortal Wkly Rep.* ePub: 18 August 2021. DOI: <http://dx.doi.org/10.15585/mmwr.mm7034e3>

Pilishvili T, Fleming-Dutra KE, Farrar JL, et al. Interim Estimates of Vaccine Effectiveness of Pfizer-BioNTech and Moderna COVID-19 Vaccines Among Health Care Personnel – 33 U.S. Sites, January-March 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:753-758. DOI: <http://dx.doi.org/10.15585/mmwr.mm7020e2>

Rosenberg ES, Holtgrave DR, Dorabawila V, et al. New COVID-19 Cases and Hospitalizations Among Adults, by Vaccination Status – New York, May 3-July 25, 2021. *MMWR Morb Mortal Wkly Rep.* ePub: 18 August 2021. DOI: <http://dx.doi.org/10.15585/mmwr.mm7034e1>

Self WH, Tenforde MW, Stubblefield WB, et al. Decline in SARS-CoV-2 Antibodies After Mild Infection Among Frontline Health Care Personnel in a Multistate Hospital Network – 12 States, April-August 2020. *MMWR Morb Mortal Wkly Rep* 2020;69:1762-1766. DOI: <http://dx.doi.org/10.15585/mmwr.mm6947a2external icon>

**STAKEHOLDER ENGAGEMENT
FOR EMERGENCY REVISIONS TO
6 CCR 1011-1, Standards for Hospitals and Health Facilities
Chapter 2 - General Licensure Standards**

State law requires agencies to establish a representative group of participants when considering to adopt or modify new and existing rules. This is commonly referred to as a stakeholder group.

Early Stakeholder Engagement:

The following individuals and/or entities were invited to provide input and included in the development of these proposed rules:

Despite the short stakeholder engagement period, the Department held multiple stakeholder meetings with wide participation from the regulated community. Two open-format stakeholder meetings were held on September 14, 2021, and September 20, 2021. The meeting on the September 14, 2021, was attended by 455 people. The meeting on September 20, 2021, was attended by 349 people. A third meeting targeted toward hospitals, but open to all stakeholders, was held on September 24, 2021, and was attended by 165 people. The Department presented the draft language and solicited stakeholder feedback at the recurring Residential Care Settings Strike Team Subject Matter Expert Session and Long-Term Care Facilities calls. Additionally, industry-specific calls were held with Home Care & Hospice and Hospital stakeholders and associations. As the Department is requesting the adoption of an additional emergency rule, it is committed to continuing the stakeholder engagement process to reach even more stakeholders and further refine the regulations. Meeting dates will be announced at a future date.

In order to facilitate the stakeholder engagement process, the Department created a dedicated email inbox to receive inquiries and feedback (cdphe.hregs@state.co.us). Additionally, information was sent to licensed healthcare facilities through the Colorado Health Facilities Interactive (COHFI) messaging system. These messages are also cross-posted on the Health Facilities and Emergency Medical Services Division Blog found here: <http://healthfacilitiescommunity.blogspot.com/>. An interested parties list sign-up was created and distributed and information on the stakeholder process was sent through this mechanism. This list is currently comprised of approximately 700 individuals.

The first table below represents the distribution of stakeholder participation across facility type as well as interested organization type. The second table, found in Appendix A, is a comprehensive list of all stakeholders who either signed up to receive updates or attended public stakeholder meetings. The total number of unique stakeholders reached during this process exceeds 1300.

Licensed Facility Type	Number of Participants in Category
Acute Treatment Units	6
Ambulatory Surgical Centers	31
Assisted Living Residences	247
Behavioral Health Entities	0
Birth Centers	4
Community Clinics	2

Community Mental Health Clinics	34
Crisis Stabilization Units	2
Dialysis Treatment Clinics	5
Facilities for Individuals with Intellectual and Developmental Disabilities	2
Freestanding Emergency Departments	0
Home Care Agencies (Type A and Type B)	446
Home Care Placement Agencies	0
Hospices	41
Hospitals	140
Nursing Homes	101
Organization Type	Number of Participants in Category
Adult Day	3
Advocacy Organizations	13
Community Integrated Healthcare Services	2
Community Centered Boards	1
County Government (General)	2
EMS Agencies	2
Federally Qualified Healthcare Center	5
Health System (Inclusive of multiple facility types)	94
Law Firm	8
Lobbyist	2
Local Public Health Agency	20
Management and Consulting Firms	20
Media	1
Ombudsman	2
Program of All-inclusive Care for the Elderly	3
Program Approved Service Agency (many PASA providers also hold a Home Care Agency license)	91
Pharmacy	1
Physician Group	2
Placement Agency	2
Staffing Agency	1
State Employees	39
State Office of Rural Health	1
Colorado State Representatives	3
Trade Associations	15
Training Entities	5
Union Representative	1
Unaffiliated Participants	108

Stakeholder Group Notification

The stakeholder group was provided notice of the rulemaking hearing and provided a copy of the proposed rules or the internet location where the rules may be viewed. Notice was provided prior to the date the notice of rulemaking was published in the Colorado Register (typically, the 10th of the month following the Request for Rulemaking).

Not applicable. This is an emergency rulemaking. Notification will occur if the Board of Health sets this matter for permanent rulemaking.

Yes.

Summarize Major Factual and Policy Issues Encountered and the Stakeholder Feedback Received. If there is a lack of consensus regarding the proposed rule, please also identify the Department's efforts to address stakeholder feedback or why the Department was unable to accommodate the request.

During the stakeholder engagement process, there were many areas of modification requested by stakeholders. While the Department has made revisions to accommodate many of those requests, some changes the Department was unable to accommodate. Each of these areas are discussed in detail below.

A) Testing in lieu of vaccination

Some stakeholders requested that the Department adopt a "vaccinate or test" regulation. While this is the approach that has been taken by other states, and even the Colorado Department of Personnel Administration, the Department did not feel this was an appropriate position to take for the healthcare system. Primarily, there was a great deal of stakeholder concern about the availability and cost of COVID-19 testing supplies. The State is unable to provide the resources or funding to subsidize a testing scheme across all 2400 licensed healthcare facilities, and as such, felt this would be overly burdensome on healthcare facilities. Because the state cannot provide these resources there is a concern of equity among healthcare facilities where well-funded providers who can afford testing supplies could attract staff looking to utilize the testing opt-out, whereas less-funded providers would lose staff based on their inability to provide the opt-out option. Finally, the Department notes that CMS explicitly rejected this approach for its recently announced vaccine mandate, which many licensed facilities are also bound to follow.

B) Signed releases from clients in lieu of vaccination requirement

There was a request from some stakeholder to enact a regulatory scheme where the facility or agency could inform the client that their provider was unvaccinated and have the client sign an acknowledgement or waiver to indicate their approval of that situation. However, there are many instances in healthcare facilities and agencies where the client may not have a choice in their provider, and would be forced to choose between demanding a vaccinated provider or receiving no healthcare. This is especially true in an Emergency setting where there is often little time to obtain a signature, but can also be true in rural areas of the state where there are few providers for even routine healthcare. The Department did not feel this was a fair or appropriate situation in which to place consumers, and as such did not adopt this approach.

C) Rescinding the state mandate in lieu of the federal CMS requirement

After President Biden announced that the CMS would issue a vaccine mandate for all healthcare facilities that receive federal dollars (which are those that are certified), some stakeholders approached the Department with a request to rescind the state

mandate. While it is true that a large number of licensed facilities and agencies are certified by CMS and subject to this mandate, many facilities/agencies are not covered by the mandate. The numbers and types of these facilities are set forth in the table below. In order to ensure parity across facility types, and funding sources, the Department must maintain a state licensure mandate. However, the Department recognizes the need to align the state and federal requirements where possible and has done so in these proposed emergency regulations.

Facility Type	Number of Non-Certified Facilities	Total Number of Facilities	% of Total Facilities Non-Certified
Acute Treatment Units	6	6	100%
Ambulatory Surgical Centers	13	137	9.5%
Assisted Living Residences	378	689	54.9%
Behavioral Health Entities (most currently licensed as other facility types)	1	1	100%
Birth Centers	7	7	100%
Community Clinics	58	58	100%
Community Mental Health Centers	0	25	0%
Crisis Stabilization Units	5	5	100%
Dialysis Centers	2	85	2.3%
Facilities for Individuals with Developmental Disabilities	0	129	0%
Freestanding Emergency Departments	2	2	100%
Home Care Agencies (Class A Agency)	113	323	34.9%
Home Care Agencies (Class B Agency)	154	467	32.9%
Home Care Placement Agencies	7	7	100%
Hospices	30	103	29.1%
Hospitals	9	118	7.6%
Nursing Homes	5	226	2.2%
TOTAL FACILITIES:	812	2410	33.7%

D) Considerations for alternative treatments and/or naturally acquired immunity.

There were a considerable number of requests from facilities and individuals for the Department to write consideration into the regulations for alternative treatments (e.g. Ivermectin) and naturally acquired immunity. However, the Department did not accommodate these concepts in the proposed regulations because research has indicated that the efficacy of natural immunity is lower than vaccination. According to the Centers for Disease Control (CDC), up to 34% of individuals contracting COVID-19 do not develop antibodies. (See Liu). Additionally, the CDC has found that after infection, unvaccinated individuals are 2.34 times more likely to become re-infected

than vaccinated individuals. (See Cavanaugh). However, the Department does recognize that there are extenuating circumstances to consider for individuals recently diagnosed with COVID-19, or who received certain treatments such as monoclonal antibodies, determining when vaccination is appropriate. As such, there are considerations for these individuals in the regulations.

Liu W, Russell RM, Bibollet-Ruche F, Skelly AN, Sherrill-Mix S, Freeman DA, et al. Predictors of Nonseroconversion after SARS-CoV-2 Infection. *Emerg Infect Dis.* 2021;27(9):2454-2458. <https://doi.org/10.3201/eid2709.211042>

Cavanaugh AM, Spicer KB, Thoroughman D, Glick C, Winter K. Reduced Risk of Reinfection with SARS-CoV-2 After COVID-19 Vaccination – Kentucky, May-June 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:1081-1083. DOI: [http://dx.doi.org/10.15585/mmwr.mm7032e1external icon](http://dx.doi.org/10.15585/mmwr.mm7032e1external%20icon)

E) Mandatory testing for all unvaccinated individuals

Stakeholders, especially those who work in residential care settings, expressed discomfort with the fact that testing would not be required for all unvaccinated individuals. Under the proposed revisions, testing of unvaccinated individuals will only be required of facilities/agencies that fall below the 90% threshold and request a waiver. However, residential care settings are subject to the requirements of Public Health Order 20-20, which does require testing of all unvaccinated staff. However, based on the concerns related to the cost and logistics of testing, especially in decentralized settings such as Home Care Agencies, the Department ultimately determined that this was the best course forward. However, facilities and agencies are encouraged to exercise business discretion and institute policies that exceed the minimum regulatory requirements if they feel that doing so is in the best interest of their clients, employees, and business.

Please identify the determinants of health or other health equity and environmental justice considerations, values or outcomes related to this rulemaking.

Overall, after considering the benefits, risks and costs, the proposed rule:

Select all that apply.

	Improves behavioral health and mental health; or, reduces substance abuse or suicide risk.	X	Reduces or eliminates health care costs, improves access to health care or the system of care; stabilizes individual participation; or, improves the quality of care for unserved or underserved populations.
	Improves housing, land use, neighborhoods, local infrastructure, community services, built environment, safe physical spaces or transportation.	X	Reduces occupational hazards; improves an individual’s ability to secure or maintain employment; or, increases stability in an employer’s workforce.
	Improves access to food and healthy food options.		Reduces exposure to toxins, pollutants, contaminants or hazardous substances; or ensures

			the safe application of radioactive material or chemicals.
X	Improves access to public and environmental health information; improves the readability of the rule; or, increases the shared understanding of roles and responsibilities, or what occurs under a rule.		Supports community partnerships; community planning efforts; community needs for data to inform decisions; community needs to evaluate the effectiveness of its efforts and outcomes.
	Increases a child’s ability to participate in early education and educational opportunities through prevention efforts that increase protective factors and decrease risk factors, or stabilizes individual participation in the opportunity.		Considers the value of different lived experiences and the increased opportunity to be effective when services are culturally responsive.
	Monitors, diagnoses and investigates health problems, and health or environmental hazards in the community.	X	Ensures a competent public and environmental health workforce or health care workforce.
X	Other: Accommodates anticipated changes in the federal conditions of participation governing facilities and agencies that receive public funds which shall mandate COVID-19 vaccination.		Other: _____ _____

1 **DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT**
 2 **Health Facilities and Emergency Medical Services Division**
 3 **STANDARDS FOR HOSPITALS AND HEALTH FACILITIES CHAPTER 2 – GENERAL LICENSURE**
 4 **STANDARDS**

5 **6 CCR 1011-1 Chapter 2**

6 *[Editor's Notes follow the text of the rules at the end of this CCR Document.]*

7

8 **Adopted by the Board of Health on ~~DECEMBER 15, 2021~~ August 30, 2021.**

9

10 ****

11

12 **INDEX**

13 **Part 1 – Definitions**

14 **Part 2 – Licensure Process**

15 **Part 3 – General Building and Fire Safety Provisions**

16 **Part 4 – Quality Management Program, Occurrence Reporting, Palliative Care**

17 **Part 5 – Waivers of Regulations for Facilities and Agencies**

18 **Part 6 – Access to Client Records**

19 **Part 7 – Client Rights**

20 **Part 8 – Protection of Clients from Involuntary Restraint or Seclusion**

21 **Part 9 – Medications, Medical Devices, and Medical Supplies**

22 **Part 10 – Healthcare-Associated Infection Reporting**

23 **Part 11 – Influenza Immunization of Employees and Direct Contractors**

24 **Part 12 – COVID-19 Immunization of Employees, Direct Contractors, and Support Staff**

25

26 ****

27 **Part 12. COVID-19 IMMUNIZATION OF EMPLOYEES, DIRECT CONTRACTORS, AND**
 28 **SUPPORT STAFF**

29

30 **12.1 Statutory Authority and Applicability**

31

32 12.1.1 The statutory authority for the promulgation of these rules is set forth in Sections 25-1.5-102, 25-
 33 1.5-103, and 25-3-103, C.R.S.

34

35 12.1.2 The requirements of this Part 12 shall be overseen and enforced by the Department in a manner
 36 consistent with Parts 2.10 and 2.11 of this Chapter 2 (for all facility and agency types), 6 CCR
 37 1011-1, Chapter 3, Part 2.1.7 (for behavioral health entities), 6 CCR 1011-1, Chapter 7, Part 3.14
 38 (for assisted living residences), and 6 CCR 1011-1, Chapter 26, Part 5.7 (for home care
 39 agencies).

40

41 **12.1.3 FACILITIES THAT ARE FEDERALLY CERTIFIED OR UNDERGOING FEDERAL CERTIFICATION SHALL FOLLOW**
 42 **ALL APPLICABLE STATE AND FEDERAL REGULATIONS REGARDING COVID-19 VACCINATION. IN THE EVENT**
 43 **OF A DISCREPANCY OR CONFLICT BETWEEN THE STATE AND FEDERAL REGULATIONS, THE MORE**
 44 **STRINGENT STANDARD SHALL APPLY.**

45

46 **12.1.4 LIVE-IN CAREGIVERS**

47

Commented [SA1]: This is standard procedure for HFEMSD's regulations where facilities are dual regulated.

Commented [SA2]: This proposed language matches a waiver for Live-In Caregivers, which was issued on Oct. 18, 2021. This exemption was added at the request of stakeholders and based on the unique circumstances of these caregivers.

- (A) A LIVE-IN CAREGIVER MEANS AN INDIVIDUAL WHO IS EMPLOYED BY A HOME CARE AGENCY, LICENSED UNDER 6 CCR 1011-1, CHAPTER 26, TO PROVIDE CARE TO ONE OR MORE CLIENTS RESIDING IN THE SAME HOUSEHOLD AS THE LIVE-IN CAREGIVER. A LIVE-IN CAREGIVER DOES NOT PROVIDE CARE TO CLIENTS OUTSIDE OF THE HOUSEHOLD.
- (B) LIVE-IN CAREGIVERS ARE ONLY SUBJECT TO THE REQUIREMENTS OF PART 12.1.4(C).
- (C) UNVACCINATED LIVE-IN CAREGIVERS SHALL WEAR PERSONAL PROTECTIVE EQUIPMENT (PPE), IN ACCORDANCE WITH STATE AND NATIONAL GUIDELINES, WHEN IN CONTACT WITH OTHER EMPLOYEES, DIRECT CONTRACTORS, AND SUPPORT STAFF OF THE HOME CARE AGENCY, EVEN WHEN SUCH CONTACT OCCURS IN THE HOUSEHOLD.

12.2 General Provisions

12.2.1 Each facility shall develop and implement a policy and procedure to ensure 100% of employees, direct contractors, and support staff have obtained OBTAIN AND MAINTAIN full COVID-19 vaccination status, OR ARE GRANTED A MEDICAL OR RELIGIOUS EXEMPTION PURSUANT TO FACILITY POLICY, in accordance with the schedule below.

12.2.2 EACH FACILITY SHALL ENSURE COMPLIANCE WITH PART 12.2.1, IN ACCORDANCE WITH THE FOLLOWING:

- (A) All employees, direct contractors, and support staff must have received their first dose of the COVID-19 vaccination no later than September 30, 2021.
- (B) All employees, direct contractors, and support staff must have received their second dose of the COVID-19 vaccination (if applicable) no later than October 31, 2021.
- ~~(C) All employees, direct contractors, and support staff must obtain a subsequent, or booster, dose of the COVID-19 vaccination should one be recommended by the Advisory Committee on Immunization Practices (ACIP), in accordance with the recommended timelines.~~
- (DC) An employee, direct contractor, and OR support staff member who was diagnosed with COVID-19, who received monoclonal antibody treatment, or convalescent plasma treatment shall obtain their vaccination in a timeframe that is in accordance with the recommendations of the Centers for Disease Control (CDC), ACIP, and the individual's licensed independent practitioner.
 - (1) THESE INDIVIDUALS SHALL OBTAIN A MEDICAL EXEMPTION FROM THEIR LICENSED INDEPENDENT PRACTITIONER THAT CLEARLY STATES THE TIMEFRAME OF THE MEDICAL EXEMPTION.
- (ED) On or after October 31, 2021, each facility shall ensure all newly hired employees, direct contractors, or support staff members have obtained full COVID-19 vaccination status, in accordance with this Part 12. ARE FULLY VACCINATED AT THE TIME OF HIRE, OR RECEIVE THEIR FIRST DOSE OF A TWO-DOSE PROTOCOL, OR A SINGLE-DOSE VACCINATION, PRIOR TO PROVIDING ANY CARE, TREATMENT, OR OTHER SERVICES FOR THE FACILITY AND/OR ITS CLIENTS.
 - (1) THE FACILITY SHALL VERIFY THAT THESE INDIVIDUALS HAVE PROOF OF A COVID-19 VACCINATION APPROVED FOR EMERGENCY USE, OR FULLY AUTHORIZED, BY THE WORLD HEALTH ORGANIZATION (WHO) OR FDA. ALTERNATIVELY, INDIVIDUALS MAY REQUEST A MEDICAL OR RELIGIOUS EXEMPTION, IN ACCORDANCE WITH FACILITY POLICY.
 - (2) THE FACILITY SHALL ENSURE INDIVIDUALS WHO HAVE RECEIVED THEIR FIRST DOSE OF A TWO-DOSE PROTOCOL SHALL COMPLETE THE SECOND DOSE OF THE PROTOCOL IN ACCORDANCE WITH THE FULL DOSING SCHEDULE OF THE VACCINE PRODUCT.

Commented [SA3]: With this language change religious exemptions follow the same process as medical exemptions. Compliance with the 100% standard will be calculated as follows:

100% = # of vaccinated individuals + # of medical exemptions + # of religious exemptions.

All unvaccinated individuals, regardless of exemption, must follow the mandatory mitigation measures specified in regulation and facility policy.

Commented [SA4]: This provision has been deleted and replaced with a policy requirement encouraging booster doses at 12.2.5(E).

The Department will revisit the idea of booster doses before the February hearing.

48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103

104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159

(3) THE FACILITY SHALL ENSURE INDIVIDUALS AWAITING THEIR SECOND DOSE OF A TWO-DOSE PROTOCOL, OR WHO HAVE NOT YET REACHED FOURTEEN (14) DAYS AFTER RECEIVING A ONE-DOSE PROTOCOL, AND ALL UNVACCINATED INDIVIDUALS SHALL COMPLY WITH THE REQUIREMENTS OF PART 12.2.6.

~~12.2.2 For purposes of this Part 12, an employee, direct contractor, and support staff subject to this Part 12 is defined as an individual who has the potential for exposure to clients of the facility or agency and/or to infectious materials, including bodily substances, contaminated medical supplies and equipment, contaminated environmental surfaces, or contaminated air.~~

~~(A) These individuals may include, but are not limited to: licensed independent practitioners; students and trainees; individuals who directly contract with the facility or agency to provide services, whether on a permanent or temporary basis; visiting nursing staff; individuals who are affiliated with the facility or agency, but do not receive wages or other remuneration from the facility or agency; and persons not directly involved in client care but are potentially exposed to infectious agents that can be transmitted to and from the individual providing services and clients of the facility or agency.~~

12.2.3 REGARDLESS OF JOB RESPONSIBILITY OR CLIENT CONTACT, THE FOLLOWING INDIVIDUALS ARE SUBJECT TO THE REQUIREMENTS OF THIS PART 12:

- (A) EMPLOYEES;
- (B) LICENSED INDEPENDENT PRACTITIONERS;
- (C) STUDENT, TRAINEES, AND VOLUNTEERS; AND
- (D) INDIVIDUALS WHO PROVIDE CARE, TREATMENT, OR OTHER SERVICES FOR THE FACILITY OR ITS CLIENTS, UNDER CONTRACT OR BY OTHER ARRANGEMENT.

Commented [SA5]: This language is proposed because it offers greater clarity as to which employees are covered by the mandate and which are exempted, as opposed to existing 12.2.2.

12.2.4 THE FOLLOWING INDIVIDUALS ARE NOT SUBJECT TO THE REQUIREMENTS OF THIS PART 12:

- (A) EMPLOYEES, DIRECT CONTRACTORS AND SUPPORT STAFF WHO EXCLUSIVELY PROVIDE TELEHEALTH OR TELEMEDICINE SERVICES OUTSIDE OF THE FACILITY AND WHO DO NOT HAVE ANY DIRECT CONTACT WITH CLIENTS AND OTHER EMPLOYEES, DIRECT CONTRACTORS, AND SUPPORT STAFF; AND
- (B) EMPLOYEES, DIRECT CONTRACTORS, AND SUPPORT STAFF WHO PROVIDE SUPPORT SERVICES FOR THE FACILITY THAT ARE PERFORMED EXCLUSIVELY OUTSIDE OF THE FACILITY AND WHO DO NOT HAVE ANY DIRECT CONTACT WITH CLIENTS AND OTHER EMPLOYEES, DIRECT CONTRACTORS, AND SUPPORT STAFF.

12.2.35 EACH FACILITY SHALL DEVELOP AND IMPLEMENT A POLICY AND PROCEDURE TO ENSURE COMPLIANCE WITH THIS PART 12. The policy and procedure shall address, at a minimum, the following topics:

- (A) A list of the categories or position descriptions of employees, direct contractors, and support staff exempt from the requirement at Part 12.2.1, including justification for that decision, IN ACCORDANCE WITH PARTS 12.2.3 AND 12.2.4.
- (B) The facility's criteria for accepting or rejecting medical or AND religious exemptions.
- (C) Measures taken by the facility to protect clients and members of the public from exposure by unvaccinated individuals, which shall be based on state and national standards and guidelines. The policy shall include, at a minimum, how the facility will implement testing and masking for unvaccinated individuals.

- 160
161 (D) MEASURES TAKEN BY THE FACILITY TO ENCOURAGE VACCINATION AMONG THE UNVACCINATED.
162
163 (E) MEASURES TAKEN BY THE FACILITY TO ENCOURAGE SUBSEQUENT, OR BOOSTER, DOSES OF THE
164 COVID-19 OF ELIGIBLE EMPLOYEES, DIRECT CONTRACTORS, AND SUPPORT STAFF.
165
166 12.2.6 EACH FACILITY SHALL INSTITUTE, AT A MINIMUM, THE FOLLOWING REQUIREMENTS FOR ALL UNVACCINATED
167 INDIVIDUALS.
168
169 (A) UNVACCINATED INDIVIDUALS SHALL WEAR PPE, IN ACCORDANCE WITH STATE AND NATIONAL
170 GUIDELINES, WHEN IN SPACES OCCUPIED BY CLIENTS, OTHER EMPLOYEES, DIRECT
171 CONTRACTORS, AND SUPPORT STAFF OF THE FACILITY, OR MEMBERS OF THE PUBLIC.
172
173 (B) UNVACCINATED INDIVIDUALS SHALL MAINTAIN PROPER SOCIAL DISTANCING, WHEN DOING SO
174 DOES NOT INTERFERE WITH OR PREVENT COMPLETION OF JOB DUTIES, IN ACCORDANCE WITH
175 STATE AND NATIONAL GUIDELINES.
176

177 12.2.47 Each facility shall maintain the following documentation that may be examined by the
178 Department, at any time, for purposes of verifying compliance with this Part 12.
179

- 180 (A) Proof of immunization, as defined at 6 CCR 1011-1, Chapter 2, Part 1.51; or
181
182 (B) A medical exemption signed by a physician, physician assistant, advanced practice
183 nurse, or certified nurse midwife licensed in the State of Colorado stating that the
184 COVID19 vaccination for the employee, direct contractor, or support staff is medically
185 contraindicated as described in the product labeling approved or authorized by the FDA
186 WITH DOCUMENTATION OF ANY TIMEFRAME OF THE MEDICAL EXEMPTION; or
187
188 (C) Documentation of a religious exemption, as defined by THE facility policy.
189

190 12.3 Waiver Requests

- 191
192 (A) ~~A facility may seek a waiver of the 100% vaccination requirement at Part 12.2.1 on the~~
193 ~~basis that one or more individuals have claimed a religious exemption, pursuant to facility~~
194 ~~policy.~~
195
196 (B) ~~All waiver applications shall be submitted in accordance with the process outlined at 6~~
197 ~~CCR 1011-1, Chapter 2, Part 5 – Waiver of Regulations for Facilities and Agencies.~~
198

199 12.43 Reporting Requirements

200
201 12.4.1 ~~Beginning October 1, 2021, each facility shall report its COVID-19 vaccination rate to the~~
202 ~~department on the 1st and the 15th day of the month.~~
203

204 12.3.1 EACH FACILITY SHALL REPORT ITS COVID-19 VACCINATION RATE TO THE DEPARTMENT TWO TIMES
205 DURING EACH CALENDAR MONTH.

- 206
207 (A) THE FIRST REPORT SHALL OCCUR DURING REPORTING PERIOD ONE, WHICH IS DEFINED AS THE
208 FIRST (1ST) DAY THROUGH THE FOURTEENTH (14TH) DAY OF THE MONTH.
209
210 (B) THE SECOND REPORT SHALL OCCUR DURING REPORTING PERIOD TWO, WHICH IS DEFINED AS
211 THE FIFTEENTH (15TH) DAY THROUGH THE LAST DAY OF THE MONTH.
212
213 (C) MULTIPLE REPORTS RECEIVED DURING A REPORTING PERIOD SHALL BE COUNTED FOR THAT
214 REPORTING PERIOD ONLY.
215

Commented [SA6]: The intent of this is to capture temporary medical exemptions for those recently diagnosed with COVID, or received other treatments (see 12.2.2(C)).

Commented [SA7]: This language is intended to clarify the reporting expectations. Each facility must report 2 times per month, and they may not report twice during the same period to count for both reports.

216 12.4.2 12.3.2 This information shall be reported in the form and manner specified by the Department.

217

218 12.4.3 Each facility shall report the following information to the department:

219

(A) ~~The total number of employees, direct contractors, and support staff, whether or not the individual is subject to the requirements of this part 12.~~

221

(B) ~~Total number of vaccinated employees, direct contractors, and support staff and the total number of employees, direct contractors, and support staff.~~

222

(C) ~~Number of medical exemptions claimed by employees, direct contractors, and support staff.~~

226

(D) ~~Number of religious exemptions claimed by employees, direct contractors, and support staff.~~

227

228

229

(E) ~~Number of employees, direct contractors, and support staff identified by the facility as exempt from the requirements of this part 12.~~

231

232

(F) ~~Number of employees, direct contractors, and support staff who have left employment with the facility or agency due to the requirements of this part 12, since the last reporting date.~~

233

234

235

236

12.4.4 12.3.3 Information reported to the Department under this Part 12 shall be made publicly available

237

on the Department's website.

238

Commented [SA8]: These specific data elements are proposed to be removed to allow the Department to be more responsive to stakeholder input and issues with the reporting process and refine requested data in order to capture the best information from facilities. To leave these elements in regulation will require a cumbersome process, which is not readily responsive to issues as they arise.

Name	Organization/Affiliation	Facility Type (1)	Facility Type (2)	Facility Type (3)
Helena Bagdasarova	Monaco Adult Day Care, Inc	Adult Day Care		
Lola German	Mountain Community Pathways	Adult Day Care		
Jamie Bouknight	Rocky Mountain Health Care Services	Adult Day Care		
Ada Gurzhiev	Alliance	Advocacy Organizations		
Beth Calix	Alzheimer's Association of Colorado	Advocacy Organizations		
Richard Quintanilla	Center for People With Disabilities	Advocacy Organizations		
Tseemee Carmody	Colorado Gerontological Society	Advocacy Organizations		
Sang Wilson	Colorado Gerontological Society	Advocacy Organizations		
Cate Baze	Colorado State University Center for Healthy Aging	Advocacy Organizations		
Marcy LeClaire	Disability Law Colorado	Advocacy Organizations		
ALEX Newcomb	DRCOG	Advocacy Organizations		
DeeAnna Powers	LeadingAge Colorado	Advocacy Organizations		
Jannelle Molina	Schultz Public Affairs, LLC	Advocacy Organizations		
Nick Meier	TEAM Public Choices	Advocacy Organizations		
Nicole Schiavone	The Kyle Group	Advocacy Organizations		
aacsp	Western Healthcare Alliance	Advocacy Organizations		
LOLA POSTON	Advanced Vision Surgery Center	Ambulatory Surgical Center		
JEANETTE Ortiz	Anderson Podiatry Center Surgery	Ambulatory Surgical Center		
Becky Gray	Ascent Surgery Center	Ambulatory Surgical Center		
Cortnee Davis	Atlas Healthcare Partners	Ambulatory Surgical Center		
Cymri VanOrsdale	Belmar Ambulatory Surgical Center	Ambulatory Surgical Center		

Michelle Bickford	Boulder Surgery Center	Ambulatory Surgical Center		
Patricia Payne	Colorado Center for Reproductive Medicine	Ambulatory Surgical Center		
Sharon Honeycutt	Endoscopy Center of Western Colorado	Ambulatory Surgical Center		
Tabitha LaCroix	HCA - Ambulatory Surgery Division	Ambulatory Surgical Center		
Renee Franklin	Highline South Ambulatory Surgical Center	Ambulatory Surgical Center		
Linda Bagby	Lone Tree Surgery Center	Ambulatory Surgical Center		
Jamie Carlsen	Lone Tree Surgery Center, LLC	Ambulatory Surgical Center		
christina kennedy	Milestone Surgcial Center	Ambulatory Surgical Center		
Olga Skuratovich	Northwest Surgery Center	Ambulatory Surgical Center		
irina ramirez	Park Meadows Outpatient Surgery	Ambulatory Surgical Center		
Kriss Prado	Pueblo Ambulatory Surgical Center	Ambulatory Surgical Center		
Matt Coffman	Pueblo Ambulatory Surgical Center	Ambulatory Surgical Center		
Mary Alice Bross-Evans	Rocky Mountain Laser and Surgery Center	Ambulatory Surgical Center		
Yanet Wrvs	Surgery Partners	Ambulatory Surgical Center		
Rhonda Grice	Surgery Partners	Ambulatory Surgical Center		
Heather Richardson	Surgery Partners	Ambulatory Surgical Center		
Lawson Essig	Surgery Partners	Ambulatory Surgical Center		
Jeannette Hall	The Orthopaedic and Spine Center of Southern Colorado, LLC	Ambulatory Surgical Center		
Ann Baida	US Surgical Partners	Ambulatory Surgical Center		
Autumn Rowland	US Surgical Partners	Ambulatory Surgical Center		

Durga Gunda	US Surgical Partners	Ambulatory Surgical Center		
Dr Rob Avila	US Surgical Partners	Ambulatory Surgical Center		
cheyenne garduno	US Surgical Partners	Ambulatory Surgical Center		
April Cordova	US Surgical Partners	Ambulatory Surgical Center		
Brandis Aragon	US Surgical Partners	Ambulatory Surgical Center		
Kellie Avila	A Loving Hand Assisted Living	Assisted Living Residence		
Tom Chavez	A Wildflower Assisted Living and Care Home	Assisted Living Residence		
Jim Lindsay	Abbey Road & Penny Lane,LLC	Assisted Living Residence		
Sandra Conner	Accolade Living Centers	Assisted Living Residence		
Lena Martinez	Accolade Living Centers	Assisted Living Residence		
Marci Miller	Aladdin	Assisted Living Residence		
Andrea Reitzel	AltaVita Senior Residences	Assisted Living Residence		
Holly Fast	AltaVita Senior Residences	Assisted Living Residence		
Todd Chambers	Anthem Memory Care	Assisted Living Residence		
Stephanie Farrell	Anthem Memory Care	Assisted Living Residence		
Josh Rael	Anthem Memory Care	Assisted Living Residence		
Joseph Shippee	Appleleaf Assisted Living	Assisted Living Residence		
Janis Brown	Applewood Our House Assisted Living	Assisted Living Residence		
Jeffrey Jaramillo	Ascent Living Communities	Assisted Living Residence		
Jessica Hunyadi	Ascent Living Communities	Assisted Living Residence		

Rosa Mann	Aspen Cares Assisted Living, LLC	Assisted Living Residence		
Jason Turner	Aspen Gardens Assisted Living	Assisted Living Residence		
Julie Cook	Aspen Glen	Assisted Living Residence		
Alik Kassner	Aspen House	Assisted Living Residence		
Anna Kassner	Aspen Meadows Assisted Living, LLC	Assisted Living Residence		
Suzanne Phillips	Atria Englewood	Assisted Living Residence		
Chuck Philipp	Aurora Residential Alternatives	Assisted Living Residence		
Mike Mooradian	Aurora Residential Alternatives	Assisted Living Residence		
Linda Berens	Balsam House	Assisted Living Residence		
Linda Betens	Balsam House	Assisted Living Residence		
Greg Rusch	Bee Hive Homes of Pagosa Springs	Assisted Living Residence		
Ashley Grant	BeeHive Homes at the Cortez Homestead	Assisted Living Residence		
Erin	Beehive Homes of Parker	Assisted Living Residence		
Maureen Mccabe	BeeWell Assisted Living LLC	Assisted Living Residence		
Coral Cosway	Belleview Heights Alzheimer's Special Care Center	Assisted Living Residence		
Daniel Jenson	Bethesda Senior Living Communities	Assisted Living Residence		
Lisa Olsen	Bethesda Senior Living Communities	Assisted Living Residence		
Katherine Mataev	Bonaventure of Colorado Springs	Assisted Living Residence		
Sonja Scott	Bookcliff Manor Assisted Living	Assisted Living Residence		
Ashley Olds	Bookcliff Manor Assisted Living	Assisted Living Residence		

James O'Connor	Bright Assisted Living	Assisted Living Residence		
KRIS BODE	Brookdale	Assisted Living Residence		
Lourdes Wiley	Brookdale	Assisted Living Residence		
Irina Gorovaya	Brookdale	Assisted Living Residence		
adriann anderson	Brookdale	Assisted Living Residence		
Danna Molleda	Brookdale	Assisted Living Residence		
Debi Rudd	Brookdale	Assisted Living Residence		
Amanda Ferigan	Brookdale	Assisted Living Residence		
Renee Worthington	Brookdale	Assisted Living Residence		
Joe Theine	Brookdale	Assisted Living Residence		
Phil Hotaling	Brookdale	Assisted Living Residence		
Danae Mierau	Brookdale	Assisted Living Residence		
James Altrichter	Brookdale	Assisted Living Residence		
Lisa Anderson	Brookdale	Assisted Living Residence		
Tyler Daniels	Brookdale	Assisted Living Residence		
james sevy	Brookdale	Assisted Living Residence		
Lisa Talent	Brookdale	Assisted Living Residence		
Boris Smoroda	C & G Health Care	Assisted Living Residence		
ANGELA HARRIS	Caley Ridge	Assisted Living Residence		
Angela Valdez	Cardan Manor	Assisted Living Residence		

Anthony Hurd	Casey's Pond Senior Living	Assisted Living Residence	Nursing Home	
Brion Neill	Cassia	Assisted Living Residence	Nursing Home	
Danny Manzanares	Cassia	Assisted Living Residence	Nursing Home	
Iva Lou Bailey	Cassia	Assisted Living Residence	Nursing Home	
lynnette Jones	Cassia	Assisted Living Residence		
MARILYN GRANBERG	Castle Country Assisted Living, Inc	Assisted Living Residence		
Patricia DeGeorge	Castle Rock Assisted Living	Assisted Living Residence		
rosalie garbiso	Century Park Associates	Assisted Living Residence		
Sandy Martin	Charleston Assisted Living	Assisted Living Residence		
Chrissie Valencia	Chateau at Rifle	Assisted Living Residence		
Amber Covington	Chateau at Rifle	Assisted Living Residence		
Cassie Elder	Chelsea Place Memory Care	Assisted Living Residence		
Kelsey Herman	Cherry Hills Assisted Living and Memory Care	Assisted Living Residence		
Leroy Fierro	CHI Living Communities	Assisted Living Residence		
Lynn Crowell	Christian Living Communities	Assisted Living Residence		
beth williams	Christian Living Communities	Assisted Living Residence		
Jana Johnson	Christian Living Communities	Assisted Living Residence		
Shawna Gray	Christian Living Communities	Assisted Living Residence		
LeeAnne Faulkner	Clermont Assisted Living	Assisted Living Residence		
David Freeman	Collinwood Assisted Living and Memory Care	Assisted Living Residence		

Valley Jean Williford	Collinwood Assisted Living and Memory Care	Assisted Living Residence		
Lenard MacLeod	Colorado Assisted Living Homes	Assisted Living Residence		
Michelle Billups	Colorado Springs Senior Homes	Assisted Living Residence		
Brendon Ravens	Columbine Health Systems	Assisted Living Residence	Nursing Home	
Dave Ressler	Columbine Health Systems	Assisted Living Residence	Home Care Agency	
Elaine Gerson	Columbine Health Systems	Assisted Living Residence	Nursing Home	
Ginette Sebenaler	Columbine Health Systems	Assisted Living Residence		
Tory Barcus	Columbine Health Systems	Assisted Living Residence		
Tim Bowdish	Columbine Health Systems	Assisted Living Residence	Home Care Agency	
Toya Brown	Columbine Health Systems	Assisted Living Residence	Home Care Agency	
Shane Brown	Continuum Health Management, LLC	Assisted Living Residence		
Tricia Carson-Pelis	Cottonwood Ridge Assisted Living	Assisted Living Residence		
Marni Waznik	Crestview Assisted Living	Assisted Living Residence		
Rocio Seise	Crossroads Senior Living	Assisted Living Residence		
Laurie Sperry	Crossroads Senior Living	Assisted Living Residence		
Jenny Webb	Crossroads Senior Living	Assisted Living Residence		
Lori Hicks	Crossroads Senior Living	Assisted Living Residence		
Amanda Wright	Crossroads Senior Living	Assisted Living Residence		
Chandra Burns	Delta House	Assisted Living Residence		
Chelby Jackson	Dorothy's Soft Touch	Assisted Living Residence		

Greg Abolofia	Eben Ezer Lutheran Care Center	Assisted Living Residence		
Liza Kowalczyk	Elk Run Assisted Living Facility	Assisted Living Residence		
Scott Oetting	Ensign Group	Assisted Living Residence	Nursing Home	
Selena Escalante	Ensign Group	Assisted Living Residence	Nursing Home	
stephanie schlenger	Ensign Group	Assisted Living Residence	Nursing Home	
Thomas Chisholm	Ensign Group	Assisted Living Residence	Nursing Home	
Victoria Stewart	Erickson Senior Living	Assisted Living Residence	Home Care Agency	
Lisa LaBriola	Erickson Senior Living	Assisted Living Residence	Nursing Home	
Jennifer Bearden	Erickson Senior Living	Assisted Living Residence		
Jessica Fucito	Evenings Porch	Assisted Living Residence		
Kimberlee Zenger	Florence Care Home	Assisted Living Residence		
Pam Wise Romero	Flourish Supportive Living	Assisted Living Residence		
Melissa shamblin	Flourish Supportive Living	Assisted Living Residence		
Peggy Caspari	Fox Meadows Assisted Living	Assisted Living Residence		
Deborah Calabrese	Fox Meadows Assisted Living	Assisted Living Residence		
Aarikha D'Souza	Friendship House at the Home	Assisted Living Residence		
Angela St John	Garden Ranch Assisted Living	Assisted Living Residence		
Cathy Harshbarger	Garden Square of Greeley	Assisted Living Residence		
Danielle May	Garden Square Westlake	Assisted Living Residence		
David Applewood	Gardens at St Elizabeth	Assisted Living Residence		

Jimmie Bailey	Gardens at St Elizabeth	Assisted Living Residence		
Joan Ivaska	Generations, LLC	Assisted Living Residence	Nursing Home	
John Hart	Golden Gate Manor, Inc.	Assisted Living Residence		
Julia Gentry	GrandView Care Lodge	Assisted Living Residence		
Kathryn Perkins	Gray Cara	Assisted Living Residence		
Laura Wagner	Heatherwood Village	Assisted Living Residence		
Margo Karsten	Heritage Healthcare Management Systems	Assisted Living Residence		
Toby Stults	Heritage Healthcare Management Systems	Assisted Living Residence		
Hope Engel	Highline Place	Assisted Living Residence		
Jaime Farmer	Hilltop Life Adjustment Program	Assisted Living Residence		
Paula Lopez	Inns of the Southwest	Assisted Living Residence		
Marina Gougoulian	Ivory Assisted Living	Assisted Living Residence		
Petra Torres	Joneses Assisted Living	Assisted Living Residence		
Jan Gardner	Just for Seniors Senior Living Center	Assisted Living Residence		
Evelyn Shultz	Karambi Assisted Living Home	Assisted Living Residence		
Brandon Gustafson	Kavod Senior life	Assisted Living Residence		
Katie Johnson	Kavod Senior Life	Assisted Living Residence		
Sarah Freese	Keystone Place at Legacy Ridge	Assisted Living Residence		
Caitlin McTague	Keystone Place at Legacy Ridge	Assisted Living Residence		
Amy Murphy	La Veta Village	Assisted Living Residence		

Scott O'Brien	Legacy at Lamar	Assisted Living Residence		
Brandon Jones	Legacy Center Assisted Living	Assisted Living Residence		
Chris Gurule	Legacy Village of Castle Pines	Assisted Living Residence		
Jake Benoit-Wiley	Legend Senior Living	Assisted Living Residence		
Jake Benoit-Wylie	Leisure Care Senior Living	Assisted Living Residence		
Maricella Davis	Libby Bortz Assisted Living Center	Assisted Living Residence		
Janet Morlan	Lighthouse Assisted Living	Assisted Living Residence		
Amanda Terwilliger	Lighthouse Assisted Living	Assisted Living Residence		
Tiffany Steggerda	Madison Creek Partners	Assisted Living Residence		
Marc Penner	Maplewood Homes	Assisted Living Residence		
Chad Wietrick	Melody Living of Colorado	Assisted Living Residence		
Bill Schwingen	Millbrook Homes Assisted Living.	Assisted Living Residence		
David McPhail	Monarch Greens Assisted Living	Assisted Living Residence		
Cynthia Espinoza	Monarch Manor	Assisted Living Residence		
Erin Lehman	Monarch Manor	Assisted Living Residence		
Socorro Herrera	Monument Assisted Living Care Center, LLC	Assisted Living Residence		
Chia Gingerich	Morningstar	Assisted Living Residence		
Bruce Burroughs	Morningstar	Assisted Living Residence		
Randall Burroughs	MorningStar at Bear Creek	Assisted Living Residence		
Jonna McClure	Morningstar of Boulder	Assisted Living Residence		

Ben Keidan	Morrison Manor	Assisted Living Residence		
Marilee O'Connor	Morrison Manor	Assisted Living Residence		
Colleen Kinlund	New Day Cottages	Assisted Living Residence		
Sherie Stewart	New Mercer Commons	Assisted Living Residence		
Tara Bogle	Pegasus Senior Living	Assisted Living Residence		
Shelley Chaney	Pine Grove Crossing	Assisted Living Residence		
Carolyn Clement	Point of the Pines	Assisted Living Residence		
Kelly Jepson	Prairie Creeks Living Center	Assisted Living Residence		
Josie Rhoades	Prairie Pines	Assisted Living Residence		
Angela Erdmann	Prairie View Village of Las Animas	Assisted Living Residence		
Daisy Dalegowski	Prestige Living, LLC	Assisted Living Residence		
Barbara Cook	Primrose Place Inc.	Assisted Living Residence		
Debbie Buchanan	Primrose Place Inc.	Assisted Living Residence		
jeanette dove	Primrose Retirement Community	Assisted Living Residence		
Sandy Kello	Primrose Retirement Community	Assisted Living Residence		
Lacie Lame	Primrose Retirement Community of Pueblo	Assisted Living Residence		
Alyssa Hobbs	Promedica	Assisted Living Residence	Nursing Home	
Amanda Adams	Ralston Creek Neighborhood	Assisted Living Residence		
Cholena Ferell	Recover-Care Healthcare	Assisted Living Residence		
Daryl Armijo	ReMed/Learning Services	Assisted Living Residence		

Gregory Brown	Renew	Assisted Living Residence		
Helen Stillwell	Renew Saddle Rock	Assisted Living Residence		
James Riggerbach	Residence at Oakridge	Assisted Living Residence		
Janet Taylor	Residence at Village Green	Assisted Living Residence		
Kelly Gonzalez	Rocky Mountain Assisted Living	Assisted Living Residence		
Lori cimoch	Rosemark at Mayfair Park	Assisted Living Residence		
Micah Herold	S&S Memory Care Assisted Living LLC	Assisted Living Residence		
Patricia Allen	Seneca House Assisted Living	Assisted Living Residence		
Shawna Evanger	Senior Housing Options	Assisted Living Residence		
Terry Stillwell	Senior Living at the Pinery	Assisted Living Residence		
Tracie Loranger- DiCesare	Serenity House Assisted Living	Assisted Living Residence		
Virginia Gregorio	Sky Walker Legacy, LLC	Assisted Living Residence		
Patti Von Riesen	Soaring House	Assisted Living Residence		
Sarah Schumann	Solera Senior Living	Assisted Living Residence		
Stacy Clasby	Spectrum Retirement Communities	Assisted Living Residence		
Deb Federspiel	Spectrum Retirement Communities	Assisted Living Residence		
Vickie Gallegos	Spring Ridge Park Assisted Living	Assisted Living Residence		
Joyce Humiston	Springs Ranch Memory Care	Assisted Living Residence		
Donna Axmacher	Springs Ranch Memory Care	Assisted Living Residence		
Tracy Russell	St Bernadette Assisted Living	Assisted Living Residence		

Meghan Pound	Stellar Senior Living	Assisted Living Residence	Nursing Home	
DANIEL ABAM	Stellar Senior Living	Assisted Living Residence	Nursing Home	
Patricia Mehnert	Stellar Senior Living	Assisted Living Residence	Nursing Home	
zohreh Aziz	Stellar Senior Living	Assisted Living Residence	Nursing Home	
Laura Cooley	Stellar Senior Living	Assisted Living Residence	Nursing Home	
Debi Smith	Sunrise at Flatirons	Assisted Living Residence		
Melissa Bray	Tender Care Assisted Living	Assisted Living Residence		
Dianne Johnson	Terry Lake Assisted Living	Assisted Living Residence		
renee Micaletti	The Aladdin at Brush	Assisted Living Residence		
Sharon Wilson	The Argyle	Assisted Living Residence		
Shelly Cornish	The Argyle Assisted Living	Assisted Living Residence		
Dennis Scott	The Aspen	Assisted Living Residence		
Gina Sepulveda	The Bridge at Alamosa	Assisted Living Residence		
Angie Felts	The Harmony Home	Assisted Living Residence		
Angela Green	The Legacy at Burlington	Assisted Living Residence		
Grant Reefer	The Lodge at Greeley	Assisted Living Residence		
Margaret Dominguez	The Lodge at Greeley	Assisted Living Residence		
Renee Marquardt	The Mezzanine Assisted Living at Golden West	Assisted Living Residence		
Tina Cullyford	The Myron Stratton Home	Assisted Living Residence		
Alexa Hansen	The Myron Stratton Home	Assisted Living Residence		

Alexandra Haas	The Oberon House	Assisted Living Residence		
Amanda Munsey	The Residence at Grand Mesa	Assisted Living Residence		
Anne Strawbridge	The Residence at Grand Mesa	Assisted Living Residence		
Betsy Acosta-Ojeda	The Retreat at Harbor Cove	Assisted Living Residence		
Brandi Tolle	The Retreat at Highlands	Assisted Living Residence		
Brooke McCain	The Retreat at Palisade	Assisted Living Residence		
Carolynn McCartney	The Retreats Memory Care	Assisted Living Residence		
chandni patel	The Villas at Sunny Acres	Assisted Living Residence	Nursing Home	
Chelsey Epperly	Triumph Properties, LLC & Wheatridge Assisted Living	Assisted Living Residence		
Christi Schertz	TRU Landmark Memory Care	Assisted Living Residence		
Christine McGroarty	Turnberry Place Assisted Living	Assisted Living Residence		
DEBORAH BRAYMAN	Turnberry Place Assisted Living	Assisted Living Residence		
Eileen B	Valley Assisted Living	Assisted Living Residence		
Eileen Hunt	Valley Assisted Living	Assisted Living Residence		
elaine sabyan	Valley Assisted Living	Assisted Living Residence		
Elizabeth Tenney	Vista Mesa Assisted Living Residence	Assisted Living Residence		
Eric France	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Jane Flournoy	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Jason Bohl	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Jeff Beckman	Vivage Senior Living	Assisted Living Residence	Nursing Home	

Julia Topoz	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Kara Johnson-Hufford	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Karen Daily	Vivage Senior Living	Assisted Living Residence	Nursing Home	
Karen Harvey	Vivage Senior Living	Assisted Living Residence	Nursing Home	
katie young	WellAge Senior Living	Assisted Living Residence		
Kimberly Fear	WellAge Senior Living	Assisted Living Residence		
Kimberly Goode	Windsong at Northridge	Assisted Living Residence		
Lindsey Kramer	Beginnings Birth Center, LLC	Birth Center		
Melissa Broudy	Seasons Midwifery & Birth Center	Birth Center		
Seth Davis	Tender Gifts Midwifery	Birth Center		
Shane Frank	Tender Gifts Midwifery	Birth Center		
Shannon St. Hilaire	West Metro Fire Rescue	CIHCS		
Steve Cox	West Metro Fire Rescue	CIHCS		
Christa Campbell	Eastern Colorado Services for the Developmentally Disabled	Community Centered Board		
Debbie Haueter	Colorado Health Network	Community Clinic		
Liz Hickman	Colorado Health Network	Community Clinic		
spencer Green	FreedomChoice	Community Mental Health Center		
Jason Folbigg	Allhealth Network	Community Mental Health Clinic	CSU	ATU
Maria Stepanyan	Aurora Mental Health Center	Community Mental Health Clinic		
Jennifer Perez	Axis Health System	Community Mental Health Clinic	ATU	FQHC
Larry Russell	Axis Health System	Community Mental Health Clinic	ATU	FQHC
Wendi Dammann	Axis Health System	Community Mental Health Clinic	ATU	FQHC
Aaron Smith	Axis Health System	Community Mental Health Clinic	ATU	FQHC
Abigail Tate	Centennial Mental Health Center, Inc.	Community Mental Health Clinic		

Andrew French	Centennial Mental Health Center, Inc.	Community Mental Health Clinic		
Bode, Heidi	Community Reach Center	Community Mental Health Clinic		
Brian Pritchard	Community Reach Center	Community Mental Health Clinic		
ceslie contreras	Community Reach Center	Community Mental Health Clinic		
Gary deAragon	Community Reach Center	Community Mental Health Clinic		
Haylie Dolan	Community Reach Center	Community Mental Health Clinic		
Kelly Gallant	Community Reach Center	Community Mental Health Clinic		
Michael Roshon	Diversus Health Services	Community Mental Health Clinic	ATU	
Nancy Bartkowiak	Golden Peak Recovery	Community Mental Health Clinic		
natalie sime	Golden Peak Recovery	Community Mental Health Clinic		
Nicole Milo	Health Solutions	Community Mental Health Clinic		
Patty Vertun	Health Solutions	Community Mental Health Clinic		
Sarah Broaden	Jefferson Center for Mental Health	Community Mental Health Clinic		
Steve Cobb	Jefferson Center for Mental Health	Community Mental Health Clinic		
Cassandra Pratt	Mental Health Center of Denver	Community Mental Health Clinic		
Luke Baker	Mental Health Center of Denver	Community Mental Health Clinic		
Kristie Ashby	Mental Health Center of Denver	Community Mental Health Clinic		
Chanda Hinton	Mental Health Center of Denver	Community Mental Health Clinic		
Lisa Foster	Mental Health Partners	Community Mental Health Clinic		
Stacey Hunt	Mental Health Partners	Community Mental Health Clinic		

Susan Lang	North Range Behavioral Health	Community Mental Health Clinic		
Howard Turley	San Luis Valley Community Mental Health Center	Community Mental Health Clinic		
Jonathon Cherne	Solvista Health	Community Mental Health Clinic		
Meera Riner	Solvista Health	Community Mental Health Clinic		
Jennifer Townsend	Southeast Health Group	Community Mental Health Clinic		
Doris Gibbs	Summitstone Health Partners	Community Mental Health Clinic	CSU	
Tara Gaynor	Amity Healthcare Group, LLC	Consulting Firm		
Barbara Kitchen	Amity Healthcare Group, LLC	Consulting Firm		
Shamieka Robinson	CEU / Consulting & Education Unlimited, LLC	Consulting Firm		
Ann-Christine Nyquist	Crag Business Group	Consulting Firm		
Brigitte French	Cypress Cares	Consulting Firm		
Linda Michael	Dakavia	Consulting Firm		
Lori Claussen	Greenbrier Senior Living	Consulting Firm		
Sarah Heifets	Greenbrier Senior Living	Consulting Firm		
Amanda Snowdon	LN Consulting	Consulting Firm		
Jayne Keller	Michael Best Strategies	Consulting Firm		
Jill Vitale-Aussem	Senex Foundation of Denver, Inc.	Consulting Firm		
Laura Roedema	Telligen	Consulting Firm		
Susan Grayson	Veritas Management Group	Consulting Firm		
Mohammed Igeh	Consumer	Consumer		
William Hensen	Teller County	County Government		
Angela Byrne	Washington County	County Government		
Mark Bedinger	Davita	Dialysis		
Amanda Shahan	Davita	Dialysis		
Holly Ditslear	DaVita	Dialysis		
Amanda Lagman	DaVita - Thornton Dialysis	Dialysis		
Cara Bradbury	Dialysis Clinic Inc.	Dialysis		
Kim Luedke	North Fork EMS	EMS Agency		
Doyle Forrestal	WestMetro Fire	EMS Agency		
Melissa Benjamin	Southern Teller County Health Services District	FQHC		
Deb Roth	Banner	Health System		
Marshall Horland	Banner Health	Health System		
Vanessa Velasquez	Banner Health	Health System		
Darryl Perkins	Banner Health	Health System		

Eileen Doherty	Banner Health	Health System		
pat cook	Banner Health	Health System		
Constance McWilliams	Banner Health	Health System		
Jenny Albertson	Banner Health	Health System		
Jamie Villalobos	Banner Health	Health System		
Lili Carrillo	Banner Health	Health System		
Beth Bates	Banner Health	Health System		
Benjamin Anderson	Banner Health	Health System		
Cara Welch	Banner Health	Health System		
Joshua Ewing	Banner Health	Health System		
Lyle Moore	Boulder Community Health	Health System		
Michael Scott	Centura	Health System		
Ryan Westrom	Centura	Health System		
Tom Rennell	Centura	Health System		
Mark Baisley	Centura	Health System		
Carolyn Omiteru	Centura	Health System		
Shannon Ord	Centura	Health System		
Vicky Masar	Centura	Health System		
Kelly Erb	Centura	Health System		
Leslie Eber	Centura	Health System		
Dilrabo Asimova	Centura	Health System		
Leslie Pollock	Centura	Health System		
Nicole Ehrhart	Centura	Health System		
Mindy Montague	Centura	Health System		
David Audino	Centura	Health System		
Angela Scarpello	Centura	Health System		
Clinton Dale	Centura	Health System		
Jackie King	Estes Park Health	Health System		
Jen Hall	Family Health West	Health System		
Joe La Mastra	Family Health West	Health System		
Rebecca Jackson	Family Health West	Health System		
Yvonne Myers	Family Health West	Health System		
Chris Wining	Gunnison Valley Health	Health System		
Brent Eggeman	Gunnison Valley Health	Health System		
Erin Youngblood	Gunnison Valley Health	Health System		
Hollie Contreas	Gunnison Valley Health	Health System		
Joe Giaouque	Gunnison Valley Health	Health System		
Katie Coleman	HCA	Health System		
Nathan Miller	HCA	Health System		
Trina Crow	HCA	Health System		

Julie Ferguson	HCA	Health System		
Amy Jordan	HCA	Health System		
Joe Gerardi	HealthOne	Health System		
Thomas Tobin	HealthOne	Health System		
Laura Olson	HealthOne	Health System		
John Vastag	HealthOne	Health System		
Stacy Clifford	HealthOne	Health System		
Steve Dahlman	HealthOne	Health System		
Jennifer Pelligra	Kaiser Permanente	Health System		
Amanda Felton	Kaiser Permanente	Health System		
Amanda Jones	Kaiser Permanente	Health System		
Christine Mecillas	Kaiser Permanente	Health System		
Diane Windemuller	Kaiser Permanente	Health System		
Melisa Teglas	Middle Park Health	Health System		
rock fritz	Middle Park Health	Health System		
Megan Hoyt	Sanford Health System	Health System		
Diane Whitt	SCL Health	Health System		
Amy Buzze	SCL Health	Health System		
Cathy Kaufman	SCL Health	Health System		
Erinbeth Crabtree	SCL Health	Health System		
Robyn Tharp	SCL Health	Health System		
Angela Ely	SCL Health	Health System		
Germaine Seufert	Sedgwick County Health Center	Health System		
Megan Swanson	Sedgwick County Health Center	Health System		
Stephanie Kimmen	Sedgwick County Health Center	Health System		
Andrea Rudowicz	Sedgwick County Health Center	Health System		
Keith Jackson	Sedgwick County Health Center	Health System		
Cindy Dutton	Sedgwick County Health Center	Health System		
Josabeth Way	Southeast Colorado Hospital District	Health System		
Leslie Schultz	Southeast Colorado Hospital District	Health System		
Rossana Castanon	Southeast Colorado Hospital District	Health System		
Shelly Wilson	Southeast Colorado Hospital District	Health System		
Theodore Tom	Southeast Colorado Hospital District	Health System		
jessica holt	Southeast Colorado Hospital District	Health System		
Amy Tanabe	Southeast Colorado Hospital District	Health System		
Joe Stanton	Southeast Colorado Hospital District	Health System		
Donna Floyd	Southeast Colorado Hospital District	Health System		
Ann Callahan	Southeast Colorado Hospital District	Health System		
Daniel Frank	Southern Teller County Health Services District	Health System		
diane reinhard	UC Health	Health System		

Jandel Allen-Davis	UC Health	Health System		
Julie Negron	UC Health	Health System		
Kim Koerner	UC Health	Health System		
Stacy Abel	UC Health	Health System		
Tim Pierz	UC Health	Health System		
Rick Simpson	UC Health	Health System		
Jo Ann Kincaid	UC Health	Health System		
kellye nelson	UC Health	Health System		
Stephanie Henrich	UC Health	Health System		
Cory Strauch	UC Health	Health System		
MICHELE STRAUCH	# 1 Home Care Agency Corp	Home Care Agency		
Sarah Gasaway	101 Home Care, LLC.	Home Care Agency		
Sarah Gassaway	2nd Home Community	Home Care Agency		
Trista Garcia	303 Homecare LLC	Home Care Agency		
Lourdes Yun	5280 Elevated Home Care, LLC	Home Care Agency		
Cathy Ream	5280 Home Care & Attendant Services, Inc.	Home Care Agency		
Jennifer Villar	A Ariel Home Care	Home Care Agency		
Kelli Richardson	A Circle of Care Colorado	Home Care Agency		
Sara Tonso	A Little R & R Home Care	Home Care Agency		
James Hein	A Little R & R Home Care	Home Care Agency		
Jackie Colaiannia	A Physician's Home Care	Home Care Agency		
Kendra Wilson	AAC Specialists	Home Care Agency		
Brandi Vela	ABC Home Health Care	Home Care Agency		
Jody Roeber	About Kids Home Health Care	Home Care Agency		
Laura Gleason	About Kids Home Health Care	Home Care Agency		
Ramona Frazier	About Kids Home Health Care	Home Care Agency		
Vickie Schauster	About Kids Home Health Care	Home Care Agency		
Courtney Kopko	About Kids Home Health Care	Home Care Agency		
mandy davis	About Kids Home Health Care	Home Care Agency		
David Wyles	About Kids Home Health Care	Home Care Agency		
Emma Paras	Absolute Expert Care	Home Care Agency		
Enid Wade	Acaria, Inc.	Home Care Agency		
Jackie Zheleznyak	AccentCare	Home Care Agency	Hospice	
judy shlay	AccentCare Home Health of Mountain Valley	Home Care Agency	Hospice	
Lisa Ward	Access Home Care, LLC	Home Care Agency	PASA	
Paul MacFarland	Acclaimed Home Care	Home Care Agency		
Rachel Hirsch	Accredo Health Group, Inc.	Home Care Agency		
Alyssa Novak	Ace Home Healthcare	Home Care Agency		
Crystal McIntyre	Advanced Home Health and Hospice of Colorado	Home Care Agency		

Victor Mccarthy	Agape healthcare	Home Care Agency	Hospice	
Diana Smith-Patty	Aide To You Home Care	Home Care Agency		
Kristie Braaten	AIM Home Health, LLC	Home Care Agency		
Rob DeHerrera	Aime Management	Home Care Agency	Assisted Living Residence	
Kelly Waanders	AIMIGO Home Health	Home Care Agency		
Bambi Haney	AIMIGO Home Health	Home Care Agency		
Bonnie Wright	AIMIGO Home Health	Home Care Agency		
Kristin Chillemi	AIMIGO Home Health	Home Care Agency		
Lisa Weinhold, RN, BSN	AKOTA Home Care	Home Care Agency		
Toni Maldonado	Alfabest Home Care, LLC	Home Care Agency	PASA	
Saori Kimura	All For Kids Home Health	Home Care Agency		
Timea Kennedy	All For Kids Home Health	Home Care Agency		
Audriana Wesseln	All the Comfort of Home	Home Care Agency		
Cindi Pursley	Alliance Home Care Services	Home Care Agency		
Chinyere Hill Joiner	Alliant Home Health	Home Care Agency		
Jennifer Reeves	Alliant Home Health	Home Care Agency		
Caitlin Phillips	Alliant Home Health	Home Care Agency		
Shannon Gimbel	Alliant Home Health	Home Care Agency		
GINNY HALLAGIN	Alpha Omega Home Health Care	Home Care Agency		
Robin Stahley	Alpine Homecare	Home Care Agency		
Lisa Hawkins	Alpine Homecare	Home Care Agency		
Cheryl Storey	Alpine PT Home Care	Home Care Agency		
LESLIE MASON	Alpine PT Homecare	Home Care Agency		
Lynelle Phillips	Alpine PT Homecare	Home Care Agency		
Shelly Griffith	Altitude Home Care	Home Care Agency		
Michael Kidane-Gebre	Always Best Care Senior Service	Home Care Agency		
Cate Dyer	Always Best Care Senior Service	Home Care Agency		
Gabriel Beattie-Sergio	Always Best Care Senior Service	Home Care Agency		
Jennifer Kimmel	Amada Home Care	Home Care Agency		
Karin Greer	Amada Senior Care	Home Care Agency		
Tim McLemore	Amazing Care Home Health Services	Home Care Agency		
Kristin Lafata	Amazing Care Home Health Services	Home Care Agency		
Dawn Harkins	Amber Personal Care	Home Care Agency		
zack helenthal	Amber Personal Care	Home Care Agency		
Michelle Quihuiz	AMI - Wellness	Home Care Agency		
Ellen Caruso	Angels Advocate Home Care	Home Care Agency		
Liz Freudenberg	Angel's Advocate Home Care LLC	Home Care Agency		
Michael Durbin	Angels of Care Pediatric Home Health	Home Care Agency		
Stephanie Davis	Apex Caring Services	Home Care Agency		

Stephen Schaefer	April Home Care, LLC	Home Care Agency		
Heather Anderson	Argus of Colorado Home Health	Home Care Agency		
Apollonia Williams	Argus of Colorado Home Health	Home Care Agency		
Betsy Hardy	Argus of Colorado Home Health	Home Care Agency		
Jherylyn Lindsey	Argus of Colorado Home Health	Home Care Agency		
Julia Montoya	Argus of Colorado Home Health	Home Care Agency		
Chris Tomasetti	Argus of Colorado Home Health	Home Care Agency		
Tina Gonterman	Argus of Colorado Home Health	Home Care Agency		
Ashley Cable	Argus of Colorado Home Health	Home Care Agency		
Elizabeth Nelson-Hulse	Argus of Colorado Home Health	Home Care Agency		
Terri Dankelman	Argus of Colorado Home Health	Home Care Agency		
Pat Samples	Ark Valley Home Care	Home Care Agency		
Melissa Swanson	Aspen Compassion	Home Care Agency		
DORCAS OKHIHAN	Assisting Hands Home Care	Home Care Agency		
Britney Guccini	Aveanna Healthcare	Home Care Agency		
Jason Davis	Aveanna Healthcare	Home Care Agency		
Korrey Klein	Aveanna Healthcare	Home Care Agency		
Travis Dorr	Aveanna Healthcare	Home Care Agency		
Hiwot Lemma	Aveanna Healthcare	Home Care Agency		
Kaitlin Stanton	Aveanna Healthcare	Home Care Agency		
Krissy Kaplan	Aveanna Healthcare	Home Care Agency		
Brian Wilson	Aveanna Healthcare	Home Care Agency		
Donna Hayes	Aveanna Healthcare	Home Care Agency		
Jenna Fieser	Aveanna Healthcare	Home Care Agency		
John Williams	Bayada Home Health Care	Home Care Agency		
Kim Pumphrey	Bayada Home Health Care	Home Care Agency		
Kitty Vradenburg	Bayada Home Health Care	Home Care Agency		
Lacey Bean	Beacon Home Care	Home Care Agency		
Lori Henderson	Beo Personal Care	Home Care Agency		
Monica Wright-Tafoya	Bridges Community Homecare	Home Care Agency		
Nicole Green	Bridges Community Homecare	Home Care Agency		
Susan Dellinger	BrightSpring Health	Home Care Agency		
Anthony Stewart	Brightstar Care	Home Care Agency		
Cathy Tolly	Brightstar Care of Greeley	Home Care Agency		
Paula Padilla	Brightstar Care of Greeley	Home Care Agency		
Tara DeShano	BrightStar Loveland Fort Collins / DON	Home Care Agency		
Marisa Duran	Brookdale Home Health	Home Care Agency		
Angela Woodall	Canyon Home Care and Hospice	Home Care Agency		
Debbie Klein	Carebridge	Home Care Agency		
Erin Eulenfeld	Castle Rock Home Care	Home Care Agency		

Shauna Poquette	Center toward Self Reliance	Home Care Agency		
Diane Herndon	Centura Health at Home - Penrose St Francis Health Services	Home Care Agency		
jamie HUTCHINS	Chill LLC	Home Care Agency	PASA	
Stephanie Pallas	Citywide Home Health Care	Home Care Agency		
Tamra Meurer	Colorado Choice Care Services	Home Care Agency	PASA	
Tamra Meurer	Colorado Compassionate Care	Home Care Agency		
Chan Timmons	Colorado Family Caregivers	Home Care Agency	PASA	
Jeffrey Pilgrim	Colorado Home Care Services LLC	Home Care Agency		
Michelle Quinn	Colorado Plains Home Health, LLC	Home Care Agency		
TISHA DARNELL	Colorado Spirit Home Care	Home Care Agency		
Tim Thornton	Columbine Caregivers	Home Care Agency		
J. Lacy Hoyer-Helms	ComForCare	Home Care Agency		
Julie Herndon	Comfort Keepers	Home Care Agency		
Cassy Schilling	Comfort Keepers	Home Care Agency		
Charissa Richardson	Comfort Keepers	Home Care Agency		
Ashley Gonzalez	Comfort Keepers	Home Care Agency		
Tiffany Hettinger	Comfort Keepers	Home Care Agency		
Denise Lester	Comfort Keepers	Home Care Agency		
Jane Woloson	Comfort Keepers	Home Care Agency		
Rachel Kappler	Community Connections Inc	Home Care Agency	PASA	
Stacey Johnson	Compassionate Home Health and Hospice Care	Home Care Agency	Hospice	
Scott Miller	Compassionate Home Health Care	Home Care Agency		
Brianne Good	Complete Home Health Care, LLC.	Home Care Agency		
Sandra Shepherd	Complete Home Health Care, LLC.	Home Care Agency		
Carol Cook	Complete Home Health Care, LLC.	Home Care Agency		
Josephine Harriman	Consultants for Children Inc.	Home Care Agency		
Gloria Corvalan	Consultants for Children, Inc	Home Care Agency		
Jared Hirsch	Consultants for Children, Inc.	Home Care Agency	PASA	
Narine Gazarian	Consultants for Children, Inc.	Home Care Agency		
David Geras	Consultants for Children, Inc.	Home Care Agency		
Natalie Grace-Ertle	Continuum of Colorado	Home Care Agency	PASA	
Holly Turner	Continuum of Colorado	Home Care Agency	PASA	
Kerry MacFarlane	Continuum of Colorado	Home Care Agency	PASA	
Dannette Nelson	Continuum of Colorado	Home Care Agency	PASA	
Jennifer Mercado	Continuum of Colorado	Home Care Agency	PASA	
Melissa Obuhanick	Cornerstone	Home Care Agency	Hospice	
Ashley Thomas	Cornerstone Caregiving	Home Care Agency		
Diana Murray	Craft Health	Home Care Agency	Hospice	
James Coombs	Dedicated Home Services Corp.	Home Care Agency		

Peter McNally	Developmental Pathways Home Health Agency	Home Care Agency		
korene ewing	DignityFirst Health at Home	Home Care Agency		
Mark Gray	DignityFirst Health at Home	Home Care Agency		
Jennifer Little	Dominican Home Health Agency	Home Care Agency		
Jamie Troyer	Dominican Home Health Agency	Home Care Agency		
Page Ensor	Dynamic Dimensions, Inc.	Home Care Agency	PASA	
Anne Seglem	Eben Ezer Lutheran Care Center	Home Care Agency	Nursing Home	
Andrew Bertapelle	Eben Ezer Lutheran Care Center	Home Care Agency	Nursing Home	
Joelle Ashley	Elite Home Health Care, Inc.	Home Care Agency		
Michelle Robertson	Elite Home Health Care, Inc.	Home Care Agency		
Pamela Brunsell	Encompass Health Home Health	Home Care Agency		
Robert Santilli	Envida	Home Care Agency		
Mary Blattner	Envision Home Health and Hospice	Home Care Agency		
Michele Savini	Evergreen and Compassion Home Care, LLC	Home Care Agency		
Lindsay McManus	Family Home Health Care	Home Care Agency		
Mary Liffbrig	Family Home Health LLC	Home Care Agency		
Anthony Hanlon	Family Home Health LLC	Home Care Agency		
Shodi Hornish-Hensley	First Light Home Care	Home Care Agency		
Dewane Pace	First Light Home Care	Home Care Agency		
ANGELA FEARS	First Light Home Care	Home Care Agency		
David Ornelas	First Light Home Care	Home Care Agency		
Juliet Rogers	First Light Home Care	Home Care Agency		
Keith Chambers	First Light Home Care	Home Care Agency		
Laura Stephens	First Light Home Care	Home Care Agency		
Kate Randolph	First Light Home Care	Home Care Agency		
Marlene Magante	First Light Home Care	Home Care Agency		
Jason Chippeaux	First Light Home Care	Home Care Agency		
Justin Carbee	First Light Home Care	Home Care Agency		
Adam Klatskin	Flatirons Flexcare for Seniors	Home Care Agency		
Katie Cary	Flatirons Flexcare for Seniors	Home Care Agency		
Leslie Weeks	Foothills Gateway, Inc.	Home Care Agency		
Lindy Garvin	Foothills Gateway, Inc.	Home Care Agency	PASA	
Melissa Osse	Foothills Gateway, Inc.	Home Care Agency		
Tonzia Buor	Foothills Gateway, Inc.	Home Care Agency		
Allison Gergley	Fremont home care	Home Care Agency		
Christine Blaney Macmillan	Front Range Home Care Services	Home Care Agency		
Peter Edis	Front Range Home Health Care	Home Care Agency		
Robert Morasko	Front Range Pediatric Therapies	Home Care Agency		
Juanita Ward	Frontier Home Health	Home Care Agency		
Daniel Stringe	Gentle Shepherd Home Care, LLC	Home Care Agency		

Greg Coopman	Given' Home Health	Home Care Agency		
JOANNA TRUJILLO	Given' Home Health PC	Home Care Agency		
Georgette Santistevan	Giving Home Health	Home Care Agency		
JUDY GOODWIN	Golden Time Personal Care	Home Care Agency		
Chrissy Carrera	GoldLeaf HomeHealth	Home Care Agency		
Traci Colvin	GoldLeaf HomeHealth	Home Care Agency		
Beverly Kirchner	Goodwill Colorado	Home Care Agency		
Candi Daily	Goodwill Colorado	Home Care Agency		
Kimberly Diodosio	Griswold Home Care	Home Care Agency		
Ginger Williams	Haven Home Health Care	Home Care Agency		
Catherine Lenhart	Heartfelt Care at Home	Home Care Agency		
Cathy Story	Heartfelt Care at Home	Home Care Agency		
Jed Balestrieri	High Point Home Care, LLC	Home Care Agency		
Angie Wickersham	Hildebrand Homecare	Home Care Agency		
Don Knox	Hilltop Community Resources	Home Care Agency		
Elisabeth Rosen	Hilltop Community Resources	Home Care Agency		
Alan Morse	Hilltop Community Resources	Home Care Agency		
Amy Lane	Home Care Assistance	Home Care Agency		
Dorothy Silvanic	Home Care Assistance	Home Care Agency		
Jonathan Wells	Home Care Assistance	Home Care Agency		
Carole Sells	Home Health Care Professionals	Home Care Agency		
Richard Cseak	Home Helpers	Home Care Agency		
Kate Ricke	Home Helpers Home Care	Home Care Agency		
Curt Foust	Home Instead	Home Care Agency		
Erica Wagner	Home Instead	Home Care Agency		
KRISTIN DAHLQUIST	Home Instead	Home Care Agency		
Rianne Matthews	Home Instead	Home Care Agency		
Arthur Sanchez	Homewatch Caregivers	Home Care Agency		
Chantel Goetz	Homewatch Caregivers	Home Care Agency		
Deanna Stewart	Homewatch Caregivers	Home Care Agency		
Margaret Coleman	Homewatch Caregivers	Home Care Agency		
Mary Park	Homewatch Caregivers	Home Care Agency		
Rick Grimes	Homewatch Caregivers	Home Care Agency		
Seija Nelson	Homewatch Caregivers	Home Care Agency		
Theresa Mitchel	Homewell Care Services of Colorado, LLC	Home Care Agency		
Thomas Mangas	Homewell Care Services of Colorado, LLC	Home Care Agency		
Terri Walter	Horizon Home Care	Home Care Agency		
Karista Peabody	Horizon Home Care	Home Care Agency		
Melissa Miller	Human Touch	Home Care Agency		
Jill McCormick	Human Touch	Home Care Agency		

Shannon Ashley	Human Touch Home Health Care Agency	Home Care Agency		
Madeline Landgren	Humble Horizon Home Health	Home Care Agency		
Yvonne Truelove	Humble Horizon Home Health	Home Care Agency		
Laura Lewis	Imagine!	Home Care Agency	PASA	
Carol Baumgartner	imagine! colorado	Home Care Agency	PASA	
Amanda Capobianco	Interim Healthcare	Home Care Agency	Hospice	
Tommy Paige	Interim Healthcare	Home Care Agency	Hospice	
Shawwna Rapp	Interim Healthcare	Home Care Agency	Hospice	
Artesia Alexander	Interim Healthcare	Home Care Agency	Hospice	
Terrelle Williams	Interim Healthcare	Home Care Agency	Hospice	
Jennifer Sallee	Interim Healthcare	Home Care Agency		
karen collins	Jet Health	Home Care Agency		
Teri Hulett	Kid Physical	Home Care Agency		
Pam Chretien	KidsCare Home Health	Home Care Agency		
Misty Martinez	KidsCare Home Health	Home Care Agency		
Shanda McClaren	Klarus Home Care	Home Care Agency		
Angela Larson	Klarus Home Care	Home Care Agency		
Cynthia Ringling	Klarus Home Care	Home Care Agency		
Danielle Weidner	Klarus Personal Care	Home Care Agency		
Dawn McNally	Legacy Home Health Care, LLC	Home Care Agency		
Jean Pollmiller	Lenka's Loving Home Care	Home Care Agency		
Monica Garzan	LHC Group	Home Care Agency		
SEUNGJU LEE	Liberty Home Care, LLC	Home Care Agency		
Lenya Robinson	Life Care, Inc.	Home Care Agency		
Sandie Coutts	Life Conversions Home Health	Home Care Agency		
Dawn Comstock	Lifespring Home Care	Home Care Agency		
Kara Craig	Lincoln Health Home Health	Home Care Agency		
Robin Neergaard	Lincoln Health Home Health	Home Care Agency		
wendy Mitchell	Lincoln Health Home Health	Home Care Agency		
Chaise Quintal	Lucky You Home Care Services, LLC	Home Care Agency		
Kristen O'Keefe	Maxim Healthcare Services	Home Care Agency		
Liz Reimann	Maxim Healthcare Services	Home Care Agency		
Sara Nelson	Maxim Healthcare Services	Home Care Agency		
Steven Kruse	Maxim Healthcare Services	Home Care Agency		
Francisca Richardson	Maxim Healthcare Services	Home Care Agency		
Christy Martinez	Mediguard Home Health Care, Inc.	Home Care Agency		
Michael Klein	Mercy Home Services	Home Care Agency		
Claressa Millsap	MGA Homecare	Home Care Agency		
Jasmine Shea	MGA Homecare	Home Care Agency		
Gail Loveland	MGA Homecare	Home Care Agency		

Melissa Ward	Mission Health Care Services	Home Care Agency	Hospice	
Kristy Miller	MLS Senior Care	Home Care Agency		
Erin Carter	Mount Evans Home Health Care & Hospice	Home Care Agency		
Micki Roget	Mountain Home Health Care	Home Care Agency		
DEIDRA BYRD	Mountain Valley Developmental Services, Inc.	Home Care Agency		
Janelle Kircher	Mountain View Home Care	Home Care Agency		
Lorene Perona	Mountain View Home Care	Home Care Agency		
Steve Albrecht	Next of Kin Home Care, Inc.	Home Care Agency		
Charlene Korrell	Nightingale's Home Care	Home Care Agency		
Ellen Lane	North Metro Community Services	Home Care Agency	PASA	
Shauna Richardson	North Metro Community Services	Home Care Agency	PASA	
Erin Mansbridge	Nursecore of Colorado Springs	Home Care Agency		
Faun Stoffer	Nursecore of Colorado Springs	Home Care Agency		
Nathan Underwood	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Angie DeVries	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Steve Johnson	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Toni Rohr	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Bob Davis	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Chris Lynch	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Crystal Klippert	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Auni Anderson	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Christa Little-Fawn	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Deborah Lively	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Barbara Long	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Krista Zeleznikar	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Nathan Johns	Nursing and Therapy Services of Colorado	Home Care Agency	PASA	
Rachel Davenport	Optimal Home Care	Home Care Agency	Hospice	
Bobbie Jo McCarley	Optimal Home Care	Home Care Agency	Hospice	
David Hill	Optimal Home Care	Home Care Agency	Hospice	
Lenka Lesmerises	Optum Infusion	Home Care Agency		
Lamija Quinonez	Optum Infusion	Home Care Agency		
Sarah Leon	Overture	Home Care Agency		
Leela Timsina	Paragon Infusion Care	Home Care Agency		
Ainsley Huber	Paragon Infusion Care	Home Care Agency		
Brittney Hatchett	Paragon Infusion Care	Home Care Agency		
Dan Gauger	Paragon Infusion Care	Home Care Agency		
Jay Beaudoin	Partners In Care Home Care LLC	Home Care Agency	PASA	
Jenna Laipple	Pasco Home Health	Home Care Agency		
Joshua Finger	Pasco Home Health	Home Care Agency		
Leslie Johnson	Pasco Home Health	Home Care Agency		

Mary Beth Bouhall	PeopleCare Health Services	Home Care Agency		
Melissa Peterson	PeopleCare Health Services	Home Care Agency		
Michelle Fraternali	Personal Touch Senior Services	Home Care Agency		
Robbin Daidone	Pikes Peak Respite Services	Home Care Agency	PASA	
sherry lawrence	Preferred Care at Home	Home Care Agency		
Savannah McIntosh	Premier Home Health Care, Inc.	Home Care Agency		
Lisa Tave	Pristine Care at Home	Home Care Agency		
Kevin Zachary	Pristine Care at Home	Home Care Agency		
Russell Palk	Professional Home Health Care	Home Care Agency		
Steve Womack	Professional Home Health Care	Home Care Agency		
Sue mergen	Professional Home Health Care	Home Care Agency		
Tom Littleton	Professional Home Health Care	Home Care Agency		
Troy Dunning	Professional Home Health Care	Home Care Agency		
Angela Kobel	Professional Home Health Care	Home Care Agency		
DeeAnne Kahler	Prowers Medical Center Home Health	Home Care Agency		
Erin Mellott	R & A Home Care	Home Care Agency	PASA	
David Gartenberg	Rehab for All	Home Care Agency		
Laura Neill	Respect Home Health	Home Care Agency		
Karla McGaffin	Rhythms Home Care	Home Care Agency		
Millie Langan	San Luis Valley Home Health	Home Care Agency		
SAYERA KAMILOVA	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Danielle Malm	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Jan Doner	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Ashleigh Biegel	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Brandi Campbell	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Brittany Legleiter	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Heather Alvarez	Sangre De Cristo Community Care	Home Care Agency	Hospice	
Jimmy Wade	SCL Home Health	Home Care Agency		
Medhanet Gelaw	Senior Helpers	Home Care Agency		
Jumoke Hillen	Senior Helpers	Home Care Agency		
Barbara Sohnen	Seniors Helping Seniors	Home Care Agency		
Camille Rand	Seniors Helping Seniors	Home Care Agency		
Kimberly ODay	Seniors Helping Seniors	Home Care Agency		
Lisa Aberle	Seniors Helping Seniors - Jeffco	Home Care Agency		
Per Schenck	Shifo Home Health, Inc.	Home Care Agency		
sadams Adams	Shining Star Caregivers	Home Care Agency		
Kate Gabler	SLV Home Services Corp.	Home Care Agency		
Jonathan Hutchinson	Solace Healthcare LLC	Home Care Agency		
Alexandra Koloskus	Spark Home Health	Home Care Agency		
Devin Myers	Spark Home Health	Home Care Agency		

Meghan Skovran	Steiner SILS, LLC	Home Care Agency	PASA	
Jennifer Goodrum	Steiner SILS, LLC	Home Care Agency	PASA	
Debra Plemmons	Stillwater Home Care Agency	Home Care Agency		
Kayla Ray	Strive	Home Care Agency	PASA	
Hayley Hyde	Strive	Home Care Agency	PASA	
Janet Cornell	Strive	Home Care Agency	PASA	
Feri Rahgozar	SummitWest Care	Home Care Agency		
Diana Reed	Summitwest Care	Home Care Agency		
Stella Grach	Summitwest Care	Home Care Agency		
Erin Ellis	Super Health Care	Home Care Agency		
Gary Sparks	Supreme Health Care, LLC	Home Care Agency		
maggie sparks	Synergy HomeCare	Home Care Agency		
Darlene Baca	Synergy HomeCare	Home Care Agency		
Robert Cushing	Talem Home Care	Home Care Agency		
Aniket Patole	Talem Home Care	Home Care Agency		
Erin Skees	Talem Home Care	Home Care Agency		
Jessie Neitzer	Talem Home Care	Home Care Agency		
Mary Rasmusson	Talem Home Care	Home Care Agency		
Cera Sweet	Talem Home Care	Home Care Agency		
Mary Coleman	Talem Home Care	Home Care Agency		
stacy shellenberger	Tandem Community Care	Home Care Agency		
Terry LaMantia	Team Select Home Care	Home Care Agency		
Jayna Sullivan	Team Select Home Care	Home Care Agency		
Ursla Martinez	Team Select Home Care	Home Care Agency		
Ursla Martinez	Team Select Home Care	Home Care Agency		
Keri Schroeder-Jaeger	Team Select Home Care	Home Care Agency		
Joan Wilson	Team Select Home Care	Home Care Agency		
OLGA GERMAN	Team Select Home Care	Home Care Agency		
Sara Sims	Tender Care Pediatric Services	Home Care Agency		
Alyssa Markle	Tender Care Pediatric Services	Home Care Agency		
Misha Ash	Tender Care Pediatric Services	Home Care Agency		
Carrie Escalante	Tender Care Pediatric Services	Home Care Agency		
John Tucker	Tender Hearts	Home Care Agency		
Kimberly Bryant	Tender Hearts	Home Care Agency		
Lisa Murphy	Tender Hearts	Home Care Agency		
Clayton Karr	Tender Hearts	Home Care Agency		
Steve Feldman	Tender Hearts	Home Care Agency		
Gina DiGiallonardo	The Coach Home Care	Home Care Agency		
Michael Neill	The Coach Home Care	Home Care Agency		
Martin Boyce	The Independence Center	Home Care Agency		

Tanya Applegate	The Independence Center	Home Care Agency		
Debbie Henkelman	The Independence Center	Home Care Agency		
Ryan Grygiel	The Tunland Corporation	Home Care Agency	PASA	
Jennifer Euler	The Tunland Corporation	Home Care Agency	PASA	
Brett Keiling	Thrive Skilled Pediatric Care	Home Care Agency		
Trish McClain	Thrive Skilled Pediatric Care	Home Care Agency		
Angela Johnston	Thrive Skilled Pediatric Care	Home Care Agency		
Becky Kosach	To The Rescue	Home Care Agency	PASA	
Brenda Simon	Touch of Care	Home Care Agency		
Stephanie Drobny	Touching Hearts at Home	Home Care Agency		
David Grushey	Touching Hearts at Home	Home Care Agency		
Cassandra Goldbach	Touching Hearts at Home	Home Care Agency		
Deborah Lollar	Transitions Home Health Care	Home Care Agency		
Aryana Waldron	Transitions Home Health Care	Home Care Agency		
Cory Arcarese	TRU Community Care	Home Care Agency	Hospice	Assisted Living Residence
Jackson Lambert	True Care LLC	Home Care Agency		
JENI ROARK	Trust and Dignity Home Care Agency	Home Care Agency		
Jennifer Martarano	Valley Care Providers, LLC	Home Care Agency		
Kim Ivy	Visiting Angels	Home Care Agency		
Kristin Waldrop	Visiting Angels	Home Care Agency		
Patti Kendall	Visiting Angels	Home Care Agency		
Richard Titmas	Visiting Angels	Home Care Agency		
Sharon Burt	Visiting Angels	Home Care Agency		
Shawn Brooks	Visiting Angels	Home Care Agency		
Shelley Martinez	Visiting Angels	Home Care Agency		
Traci Turchin	Visiting Angels	Home Care Agency		
Edwyn Vergeire	Visiting Angels	Home Care Agency		
Jason Upright	Visiting Angels of Southwest Colorado	Home Care Agency		
Ross Guillen	VitalCare Corporation	Home Care Agency		
Raquel Folph	VitalCare Corporation	Home Care Agency		
Raven Starr	VitalCare Corporation	Home Care Agency		
Janell Maier	Volunteers of America	Home Care Agency		
Alexandra Hopkins	Volunteers of America	Home Care Agency		
Anita Hooton	Voyager Home Health Care	Home Care Agency	PASA	
Ann Bruzzese	Western Slope In Home Care	Home Care Agency		
Joni Hyrick	White Horse Health And Wellness Centers	Home Care Agency		
Gail Belford	White Horse Health And Wellness Centers	Home Care Agency		
Maria SALAZAR	Williams World, LLC	Home Care Agency	PASA	
Pamela McIntyre	Windhorse Community Services	Home Care Agency		

Patrick Emrich	Windhorse Community Services	Home Care Agency		
Liza Patterson	Windhorse Elder Care	Home Care Agency		
Anne Bonn	Yuma District Hospital Home Health Care	Home Care Agency		
Lindsay Menough	Zion Home Care	Home Care Agency		
Amelia Vigil	Arkansas Valley Hospice	Hospice		
Darrin Smith	Arkansas Valley Hospice Inc	Hospice		
James Caldwell	Bristol Hospice	Hospice		
Terri Nordyke	Bristol Hospice	Hospice		
Adam Steinbrunner	Bristol Hospice	Hospice		
Andrea Rohman	CenterCare Hospice	Hospice		
Denise Hodgert	CenterCare Hospice	Hospice		
Gayle Osterberg	Elevation Hospice of Colorado	Hospice		
Christin Funkhouser	Fremont Regional Hospice	Hospice		
Diane Coonradt	Hopewest	Hospice	Home Care Agency	
diane crumb	Hopewest Hospice and Care Center	Hospice		
Gina Darnall	Hopewest Hospice and Care Center	Hospice		
Melissa Reynolds	Hospice del Valle	Hospice		
TALINE MEREDITH	Hospice of Montezuma	Hospice		
Kristine Mata	Pathways Hospice and Palliative Care	Hospice		
Lorin Chevalier	Sun Tree Hospice of Colorado LLC	Hospice		
Nancy Lederhos	Sun Tree Hospice of Colorado LLC	Hospice		
Rosemarie Romano	The Denver Hospice	Hospice		
Samantha Godges	Animas Surgical Hospital	Hospital		
Melissa Parkowski Helmer	Arkansas Valley Regional Medical Center	Hospital		
Tiffany Hutson	Arkansas Valley Regional Medical Center	Hospital		
Kazoua Lee	Arkansas Valley Regional Medical Center	Hospital		
Amy Peck	Aspen Valley Hospital	Hospital		
Kristen Eskelson	Aspen Valley Hospital	Hospital		
Liz Sellers	Aspen Valley Hospital	Hospital		
Mike Jansen	Children's Hospital Colorado	Hospital		
Margaret Cozza	Children's Hospital Colorado	Hospital		
Brandy Barnes	Children's Hospital Colorado	Hospital		
Anna Crespin	Children's Hospital Colorado	Hospital		
Christine McNail	Children's Hospital Colorado	Hospital		
Keith Lindgren	Community Hospital	Hospital		
Cathy Heckman	Community Hospital	Hospital		
Curtis Hart	Community Hospital	Hospital		
Megan Hart	Craig Hospital	Hospital		
Dawn Tiegs	Craig Hospital	Hospital		
Rochelle Kelly Wristen	Craig Hospital	Hospital		

Robyn Smith	Craig Hospital	Hospital		
Kodi Marley	Craig Hospital	Hospital		
Michael Marley	Craig Hospital	Hospital		
Amanda Vanstone	Craig Hospital	Hospital		
isabel ciaptacz	Delta County Memorial Hospital	Hospital		
Merrill Pilot	Delta County Memorial Hospital	Hospital		
Sheryl Bellinger	Delta County Memorial Hospital	Hospital		
Tammy Lopez	Delta County Memorial Hospital	Hospital		
Tyson Morgan	Delta County Memorial Hospital	Hospital		
Debra Carlton	Delta Health	Hospital		
Karen Bryant	Denver Health Medical Center	Hospital		
Micaela Aguilera	Denver Health Medical Center	Hospital		
Abigail Cordova	Denver Health Medical Center	Hospital		
Merle Smith	Denver Health Medical Center	Hospital		
Christina Hopewell	Denver Health Medical Center	Hospital		
Pamela Fricke	Denver Health Medical Center	Hospital		
charles gallegos	Denver Health Medical Center	Hospital		
Mary Besson	Denver Health Medical Center	Hospital		
James Dillon	Grand River Medical Center	Hospital		
Jodi Dillon	Grand River Medical Center	Hospital		
Kyle Wren	Grand River Medical Center	Hospital		
Kym Colvin	Grand River Medical Center	Hospital		
Makensie Boulger	Haxtun Hospital District	Hospital		
Paulo Fernandez	Heart of the Rockies Medical Center	Hospital		
Tammy Dunker	Heart of the Rockies Medical Center	Hospital		
Wendi Gillard	Heart of the Rockies Medical Center	Hospital		
Charlie Wohlberg	Heart of the Rockies Medical Center	Hospital		
Claudia Nassif	Heart of the Rockies Regional Medical Center	Hospital		
Elizabeth Medhin	Keefe Memorial Hospital	Hospital		
Andrea Brancati	Keefe Memorial Hospital	Hospital		
Karen Doll	Kindred Hospital	Hospital		
Verla Wright	Kindred Hospital	Hospital		
Susan Benavides	Kindred Hospital	Hospital		
Krystal Deloria	Kindred Hospital	Hospital		
Marissa Neathery	Kiowa County Hospital District	Hospital		
Faina Litvin	Kiowa County Hospital District	Hospital		
Janice Crowley	Kit Carson County Memorial Hospital	Hospital	Home Care Agency	
Beth Willey	Lifepoint Health	Hospital		
Karen Dinwiddie	Lifepoint Health	Hospital		
Candice Allen	Lifepoint Health	Hospital		

Arlene Harms	Montrose Memorial Hospital	Hospital	
Teddi Samuel	Montrose Memorial Hospital	Hospital	
David Lewis	Montrose Memorial Hospital	Hospital	
JACQUELINE Schlarb	Montrose Memorial Hospital	Hospital	
Chantel Clermont	Mt San Rafael Hospital	Hospital	
Hannah Roberts	National Jewish Health	Hospital	
Kimberly Mullins	North Suburban Medical Center	Hospital	
Richard Stull	Northern Colorado Long Term Acute Hospital/Rehabilitation Hospital	Hospital	
Dennis Veen	Northern Colorado Long Term Acute Hospital/Rehabilitation Hospital	Hospital	
Jodie Marquez	Northern Colorado Long Term Acute Hospital/Rehabilitation Hospital	Hospital	
Rae Salcedo	Northern Colorado Long Term Acute Hospital/Rehabilitation Hospital	Hospital	
Janet Beiriger	Pagosa Springs Medical Center	Hospital	
Christine Vittum	Pagosa Springs Medical Center	Hospital	
Jason Armstrong	Parkview Medical Center	Hospital	
Brandi Blakley	Parkview Medical Center	Hospital	
Victoria Romero	Parkview Medical Center	Hospital	
Daniel Quintana	Pioneers Medical Center	Hospital	
Konnie Martin	Pioneers Medical Center	Hospital	
Mandy Crockett	Pioneers Medical Center	Hospital	
Margaret White	Prowers Medical Center	Hospital	
Michelle Gay	Rangely District Hospital	Hospital	Home Care Agency
Zach Weiderspon	Rangely District Hospital	Hospital	Home Care Agency
Tammy Garcia	Rangely District Hospital	Hospital	Home Care Agency
Heather Snellgrove	Rangely District Hospital	Hospital	Home Care Agency
Matthew Kent	Rangely District Hospital	Hospital	Home Care Agency
Amy Rose	Rangely District Hospital	Hospital	Home Care Agency
Dan Gallegos	Rangely District Hospital	Hospital	Home Care Agency
James Hruby	Rangely District Hospital	Hospital	Home Care Agency
Janell Solomon	Rio Grande Hospital	Hospital	
Joni Milligan	Rio Grande Hospital	Hospital	
Kim Huffington	Saint Joseph Hospital	Hospital	
Rebecca Holder	San Luis Valley Health	Hospital	
Christy Bradley	San Luis Valley Health	Hospital	
Michelle Salstrand	San Luis Valley Health	Hospital	
shawn sharp-free	San Luis Valley Health	Hospital	
Eliza Schultz	San Luis Valley Health	Hospital	

Ashley Heller	San Luis Valley Health	Hospital		
Beth Hepola	Southwest Memorial Hospital	Hospital		
Bryan Johnson	Southwest Memorial Hospital	Hospital		
Jeani Frickey Saito	Southwest Memorial Hospital	Hospital		
Joyce Page	Southwest Memorial Hospital	Hospital		
Sean Rossetter	Spanish Peaks Regional Health Center	Hospital		
Sonya Neumann	Spanish Peaks Regional Health Center	Hospital		
Heather Prestridge	The Memorial Hospital	Hospital		
Deb Woltemath	The Memorial Hospital	Hospital		
Edward Goshe	The Memorial Hospital	Hospital		
Karla Dunker	The Memorial Hospital	Hospital		
Machelle Newth	Vail Health Hospital	Hospital		
Marcola Parker	Vail Health Hospital	Hospital		
MaryDee Daugherty	Valley View Hospital	Hospital		
Greg Baustert	Valley View Hospital	Hospital		
Jeremy Summers	Valley View Hospital	Hospital		
Danette Purdy	Valley View Hospital	Hospital		
John Lohmeier	Valley View Hospital	Hospital		
Erica Bonilla	Valley View Hospital	Hospital		
Keiley Masters	Vibra Hospital of Denver	Hospital		
Monica Londono	Vibra Hospital of Denver	Hospital		
Suzanne McGregor	Vibra Hospital of Denver	Hospital		
Tina Saldanha	Vibra Hospital of Denver	Hospital		
Jeffrey Roof	Vibra Hospital of Denver	Hospital		
Michael Zislis	Vibra Hospital of Denver	Hospital		
Rebecca Urbano Powell	Yuma District Hospital	Hospital		
Shahnoz Yusufbekova	Cheyenne Village Inc.	IDD - Group Home		
Brandon Tappan	Caplan and Earnest	Law Firm		
Lindsay Chavez	Cherne Law PC	Law Firm		
Maxine Newton	Greenberg Trauig	Law Firm		
Heather Dittmer	Hall Render Killian Heath & Lyman	Law Firm		
Sandy Samora	Hall Render Killian Heath & Lyman	Law Firm		
Thomas Staves	Kozak & Gayer, P.A.	Law Firm		
Lindsay Miller	Littler Mendelson P.C.	Law Firm		
Sheila Flaschberger	Spencer Fane	Law Firm		
Crystal Schillo	Axiom Politics	Lobbyist		
Shelby Hayes	Ellen Caruso Public Affairs	Lobbyist		
Cecelia Deen	Alamosa County Public Health Department	LPHA		
Charmaine Bishop	Bent County Public Health	LPHA		
Corey Castle	Boulder County Public Health	LPHA		

Dave Engel	Broomfield Public Health & Environment Department	LPHA		
Dorothy Burke	Colorado Association of Local Public Health Officials	LPHA		
Glenice Wade	Delta County Health Department	LPHA		
Heather Burdick	El Paso County	LPHA		
Karma G Wilson	El Paso County	LPHA		
Laura Wilson	El Paso County	LPHA		
Steve Sanchez	Garfield County Public Health	LPHA		
Joseph Carrica	Jefferson County Public Health	LPHA		
Katie Silvey	Northeast Colorado Health Department	LPHA		
Brenda Vance	Otero County Health Department	LPHA		
James Vance	Pueblo County Public Health Department	LPHA		
Bridgett Jabour	Pueblo County Public Health Department	LPHA		
Jeanette Filpi	Rio Blanco County Public Health	LPHA		
Madelyn Wright	Rio Blanco County Public Health	LPHA		
Travis Parker	Saguache County Health Department	LPHA		
Kay Whitley	San Juan Basin Public Health	LPHA		
Kelea Nardini	San Juan County Public Health	LPHA		
Jenny Vail-Stencel	Colavria Hospitality	Management and Consulting Firm		
Zach Mahaffey	Colavria Hospitality	Management and Consulting Firm		
James Robinson	Surgical Care Associates	Management and Consulting Firm		
Stephanie Haley-Andrews	Surgical Care Associates	Management and Consulting Firm		
Ellen Stewart	Surgical Care Associates	Management and Consulting Firm		
Stacie Naslund	Surgical Care Associates	Management and Consulting Firm		
Doris Wagner	Surgical Care Associates	Management and Consulting Firm		
Stacy DeWalt	The Pagosa Springs SUN	Media		
Lori Hawkes	Advanced Health Care	Nursing Home		
Lyle Campbell	Advanced Health Care of Colorado Springs	Nursing Home		
Bonnie Stumph	Advanced Health Care of Lakewood	Nursing Home		
Mary Beth Snyder	Arbor View	Nursing Home	Assisted Living Residence	
Richard Holtorf	Avamere Transitional Care and Rehab - Malley	Nursing Home		

Marc Snyder	Belmont Lodge Health Care Center	Nursing Home		
Katherine Mayhugh	Belmont Lodge Health Care Center	Nursing Home		
Marcella Nicolet	Belmont Lodge Health Care Center	Nursing Home		
Amanda McGee	Belmont Lodge Health Care Center	Nursing Home		
Lynn Drummond	Belmont Lodge Health Care Center	Nursing Home		
Marissa Branson	Bent County Healthcare Center	Nursing Home		
Rebecca Williams	Beth Israel at Shalom Park	Nursing Home		
Sara Clark	Broadview Health and Rehabilitation Center	Nursing Home		
Irina Gavrilov	Brookside Inn	Nursing Home		
Grant Jackson	Brookside Rehabilitation and Wellness	Nursing Home		
Khristina Kukus	Bruce McCandless Veterans Home	Nursing Home		
Mary Burdick	Cedarwood Health Care Center	Nursing Home		
Fran Keane-Foster	Center at Lowry	Nursing Home		
Charleen Raaum	Cherry Creek Nursing Center	Nursing Home		
Lani Mandeville	Cheyenne Manor	Nursing Home		
Shelley Thiel	Cheyenne Manor	Nursing Home		
Kimsey Gumm	Colorado Veterans Community Living Center at Homelake	Nursing Home		
MICHAEL WELDON	Creekside Village Health and Rehabilitation Center	Nursing Home		
Claudia Rodriguez	Cripple Creek Care Center	Nursing Home		
marina charara	Cripple Creek Care Center	Nursing Home		
Anar Badamkhand	Cripple Creek Care Center	Nursing Home		
Patricia Hannon	Eduro Healthcare	Nursing Home		
Phoebe Thriffiley	Forest Ridge	Nursing Home		
SANDRA VINCENT	Forest Ridge	Nursing Home		
Sarah Martin	Good Samaritan Society	Nursing Home		
Ezra Erb	Good Samaritan Society	Nursing Home		
Heidi Erickson	Grand River Health Care Center	Nursing Home		
Jennifer Jacobson	Gunnison Valley Health Senior Care Center	Nursing Home		
Melissa Murphy	Gunnison Valley Health Senior Care Center	Nursing Home		
Michelle Schmitt	Hanlon Bush Investments, LLC	Nursing Home		
Lori Walker	Health Center at Franklin Park	Nursing Home		
Shanna TOURTLOTTE	Hildebrand Care Center	Nursing Home		
Aldon Purdham	Hillcrest Care Center	Nursing Home		
Elliot Lekawa	La Villa Grande	Nursing Home		
Jake Rankin	Lakewood Villa Skilled Memory Care Community	Nursing Home		
Marcy Kowalski	Lamar Estates	Nursing Home		
Mariah Colangelo	Larchwood Inns	Nursing Home		

Rachel Wilson	Larchwood Inns	Nursing Home		
Samantha Ruth	Life Care Centers of America	Nursing Home		
Katherine Groat	Life Care Centers of America	Nursing Home		
David Bolin	Life Care Centers of America	Nursing Home		
Amy Fife-Bauman	Life Care Centers of America	Nursing Home		
Colby Kostur	Life Care Centers of America	Nursing Home		
Eugenia Chicken	Life Care Centers of America	Nursing Home		
Fred Johnson	Life Care Centers of America	Nursing Home		
Heather Hale	Life Care Centers of America	Nursing Home		
Meghan Willson	Life Care Centers of America	Nursing Home		
melissa dionne	Life Care Centers of America	Nursing Home		
Martha Hubbard	Life Care Centers of America	Nursing Home		
Christine LaRocca	Life Care Centers of America	Nursing Home		
JOE BRADSHAW	Mesa Manor Center	Nursing Home		
Aecian Pendleton	Montage Ridge	Nursing Home		
Cierra Tracy	Montage Ridge	Nursing Home	Assisted Living	
Heidi Dailey	Mountain Vista Senior Living	Nursing Home		
Sarah Reinman	Namaste Alzheimer's Center	Nursing Home		
Althea Hrdlichka	NeuroRestorative	Nursing Home		
Chrystal Boulden	Park Forest Care Center, Inc.	Nursing Home		
Allen Geist	Sandrock Ridge Care and Rehab	Nursing Home		
Angela Howell	Sava Senior Care	Nursing Home		
Callie Blake	Sava Senior Care	Nursing Home		
Heather Robles	Sava Senior Care	Nursing Home		
Heather Robles	Springs Village Care Center	Nursing Home		
Todd Robbins	The Center at Centerplace	Nursing Home		
Courtney Conner	The Suites Parker	Nursing Home		
DeAnn Vickles	Walsh Healthcare Center	Nursing Home		
Chazzi Nielsen	Walsh Healthcare Center	Nursing Home		
Ron Weitner	Wide Horizon, Inc.	Nursing Home		
Carol Riggerbach	DRCOG-Long Term Care Ombudsman Program	Ombudsman		
Lucas Carroll	DRCOG-Long Term Care Ombudsman Program	Ombudsman		
Dayna Acosta	Rocky Mountain PACE	PACE		
Dusti Hunt	Rocky Mountain PACE	PACE		
Teresa Barnett	TRU PACE - Lafayette, CO	PACE		
Bobbi Tadwalt	A Better Life Experience	PASA		
Kendall Rubottom	A Clean Team, LLC	PASA		
Indy Frazee	Alpine Autism Center	PASA		
June Johnston	Angels Service, LLC	PASA	Home Care Agency	
Tracy Hiester	Autism Services and Programs	PASA		

Corky Kyle	Autism West Behavioral Partners, Inc.	PASA		
Kristy Frihauf	Belk Model, LLC	PASA		
CRYSTAL GOODMAN	Bethesda Lutheran Communities	PASA		
Kristina Herndon	Blue Peaks Developmental Services, Inc.	PASA		
Andrew Daniels	Blue Peaks Developmental Services, Inc.	PASA		
Annette Saylor	Blue Peaks Developmental Services, Inc.	PASA		
Jennifer Riley	Boone Guest Home	PASA		
Steve Hilley	Bridging Family	PASA		
Jennifer Giovanetto	Chanda Center for Health	PASA		
Cassandra Evans	Colorado Autism Consultants	PASA		
Margaret Hunter	Community Link	PASA		
Ellie Furuta	Community Options Inc.	PASA		
Stacy Hayes	Community Options Inc.	PASA		
Melony Dixon	Community Options Inc.	PASA		
Randi Pierce	Community Options, Inc.	PASA		
Lynna Radeck	Developmental Disabilities Resource Center	PASA		
Michelle Barnes	Developmental Disabilities Resource Center	PASA		
Laura Thomas	Developmental Disabilities Resource Center	PASA		
Samantha Winter	Devereux Advanced Behavioral Health	PASA		
Sara Haines	Devereux Advanced Behavioral Health	PASA		
MICHELLE VIGIL	Eden Care Facility	PASA		
Priscilla Sanchez	Elderhaus Adult Day Program	PASA		
Elizabeth Hodges	Foundation for Successful Living	PASA		
Tracy Waite	Horizons Specialized Services	PASA		
Brett Ottley	Horizons Specialized Services	PASA		
Kristine	Innovative Services of Colorado	PASA		
Suzie Polakova	Integrated Life Choices	PASA		
Beth Beckloff	Parker Personal Care Homes	PASA	Home Care Agency	
Ann Martin	Peak Family Care	PASA		
Greg Mazick	Persons in Progress, LLC	PASA		
Roberta Verville	Rehoboth Home Support	PASA		
Kelly Mullins	Resonate Music Therapy, LLC	PASA		
Tyler Martinez	Roundup Fellowship	PASA	IDD-Group Home	
Rosie Masterson	Seven Dimensions Behavioral Health	PASA		
Ryan Fensler	Shiva Enterprises	PASA		
Stacey Tabor	Southern Colorado Developmental Disabilities Services	PASA		
Alaina Page	Starpoint	PASA		
Paige Pier	Starpoint in Canon City	PASA		
Connie Parenteau	The Otero Corporation	PASA		

Suzanne Harp	The Resource Exchange	PASA		
Heather Bowie	The Resource Exchange	PASA		
Samantha Black	The Resource Exchange	PASA		
Hang Duong	PDC Pharmacy	Pharmacy		
Donna Porter	CarePoint Health	Physician Group		
Rachel Robertson	Rocky Mountain Senior Care	Physician Group		
Rachel Robertson	Answers for Senior Care	Placement Agency		
Cathy O'Brien	CarePatrol	Placement Agency		
Chantell Leann Taylor	Cedar Springs Hospital	Psychiatric Hospital		
Danielle Andrade	Colorado Mental Health Institute at Ft. Logan	Psychiatric Hospital		
Janiece McNichols	Denver Springs	Psychiatric Hospital		
Karen Flynn	Denver Springs	Psychiatric Hospital		
Kelly Alexander	Denver Springs	Psychiatric Hospital		
Kelly Watson	Eating Recovery Center	Psychiatric Hospital		
Larissa Thorniley	Peak View Behavioral Health	Psychiatric Hospital		
Margaret Reidy	Peak View Behavioral Health	Psychiatric Hospital		
Sheryl Bardell	Peak View Behavioral Health	Psychiatric Hospital		
Soniya Fidler	Peak View Behavioral Health	Psychiatric Hospital		
Erika Donnellan	Universal Health Services, Inc.	Psychiatric Hospital		
James Lavin	Universal Health Services, Inc.	Psychiatric Hospital		
Jodi Mattson	Universal Health Services, Inc.	Psychiatric Hospital		
Mason McDonald	Universal Health Services, Inc.	Psychiatric Hospital		
Regina Moore	Universal Health Services, Inc.	Psychiatric Hospital		
alicia roessel	West Springs Hospital	Psychiatric Hospital		
Amanda Peeks	Encompass Health Rehabilitation Hospital of COS	Rehabilitation Hospital		
Autumn Pierce	Encompass Health Rehabilitation Hospital of COS	Rehabilitation Hospital		
Bridgit Davalt	Encompass Health Rehabilitation Hospital of COS	Rehabilitation Hospital		
Jami Follett	Vibra Hospital of Denver	Rehabilitation Hospital		
Jim Flinn	Shiftkey	Staffing Agency		
Tamala Norris	CDHS	State Employee		
Chris Lindley	CDHS	State Employee		
Lisa Herota	CDHS	State Employee		
Elizabeth Green	CDHS	State Employee		
Mary Ellen Lesage	CDOC	State Employee		
Maryanne Hammond	CDPHE	State Employee		
Mary Kingsbury	CDPHE	State Employee		

Aimee Johnson	CDPHE	State Employee		
Daniel Biggs	CDPHE	State Employee		
David Brooks	CDPHE	State Employee		
Dawn Sculco	CDPHE	State Employee		
josh anderson	CDPHE	State Employee		
Julie Ashinhurst	CDPHE	State Employee		
Bob Esmas	CDPHE	State Employee		
Christina Joder	CDPHE	State Employee		
Julia Cowan	CDPHE	State Employee		
Kris McCoy	CDPHE	State Employee		
Kristie Mccoy	CDPHE	State Employee		
Lamar McBride	CDPHE	State Employee		
Lisa Ashbaugh	CDPHE	State Employee		
Sean Stubblefield	CDPHE	State Employee		
Amy Ahrens	CDPHE	State Employee		
Brian Arant	CDPHE	State Employee		
Debbie Harrison	CDPHE	State Employee		
Greg Elliott	CDPHE	State Employee		
JUDSON HAIMS	CDPHE	State Employee		
Katy Gregory	CDPHE	State Employee		
Maggie Blake	CDPHE	State Employee		
Michele Wiginton	CDPHE	State Employee		
Tandi Dawson	CDPHE	State Employee		
Michelle Johnson	CDPHE	State Employee		
Raven Downs	CDPHE	State Employee		
Heidi Lacey	CDPHE	State Employee		
Karin Dolph	CDPHE	State Employee		
Matthew Dolph	CDPHE	State Employee		
Frances Holliday	CDPHE	State Employee		
Greg Gahm, MD	CDPHE	State Employee		
Jay Moskowitz	CDPHE	State Employee		
Jennifer Noble	CDPHE	State Employee		
Karen Cook	Colorado Rural Health Center	State Office of Rural Health		
Karyn Wilson	Colorado House of Representatives	State Representative		
Marie Stern	State Representative HD 64	State Representative		
Maritza Straub	State Representative-HD 18	State Representative		
Brian Dickerson	Assisted Living Locators	Trade Association		
Pamela Shilts	Care Synergy	Trade Association		
Jordan Jaquin	Colorado Behavioral Healthcare Council	Trade Association		

Meagan Gress	Colorado Health Care Association	Trade Association		
Julie Arana	Colorado Hospital Association	Trade Association		
Rita Hetrick	Colorado Hospital Association	Trade Association		
Misty Peterson	Colorado Hospital Association	Trade Association		
Dana Andreski	Colorado Hospital Association	Trade Association		
Michael Luciano	Colorado Hospital Association	Trade Association		
Marshea Freant-Vitt	Colorado Hospital Association	Trade Association		
Steve Asetline	Colorado Hospital Association	Trade Association		
Todd Heintl	Colorado Society for Post-Acute and Long-Term Care Medicine	Trade Association		
Traci Harris	Home Care & Hospice Association of Colorado	Trade Association		
Jennifer Pepper	Home Care & Hospice Association of Colorado	Trade Association		
Dehlia Dodd	Home Care & Hospice Association of Colorado	Trade Association		
Clint Fey	Colorado Health Care	Training Entity		
Amy Rodriguez	Colorado Medical Health Training	Training Entity		
Sharla Norris	Infection Prevention Strategies, LLC	Training Entity		
Brian Boettiger	The Business of Senior Care	Training Entity		
Jazmine Gnat	Voyager Nurse Aide Program	Training Entity		
Judy Halloran	Colorado Care Workers Unite	Union		
Polly Banerjee Gallagher	Beken Holdings			
Stephanie Kindberg	Eating Disorder Solutions			
Tamara Yost	Pain Centers of America			
Maria Lozinsky	Pikes Peak OS			
Beth Saxton	RMCC			
Christopher Horton	WellCare Pediatric Therapy Specialists			
Sage Fritz	Your Chance, Ltd.			
Grace Kim	Yuma District Hospital			
Aimee Whittaker				
Angela Magoon				
Angela Waggoner				
Anita Nein				
Artem Matevosynats				
ASHLEY NICKELL				
Aubrey Johns				
Brenda Valdez				
Brier Van Valin				
Brittani Deuth				
Brittannie Lechman				
Bruce Poe				
C S				

Caitlin McNeal				
Carla Allmon				
Casey Wolfington				
Cherilyn Wittler				
Chirag Shah				
cindy				
Cynthia Garcia				
Daisy Marshall				
Datir Marini				
David Lenderts				
Dawn Martin				
Dorene Rinn				
Doug Brown				
Emily Snell				
Erick Saupe				
Gabrielle Zietlow				
Gary Ruvins				
Hari Timsina				
Hayley O'Byrne				
Hero Abriansyah				
Irene Fischer				
Jackie Hlner				
jai elsell				
James Zietlow				
Jamie Stefanski				
Jason Pickerill				
Jennifer Nelson				
Jim Ruwwe				
JK Taylor				
Julia Kraft				
Katherine Waterman				
Kathy Mills				
Katie Dobler				
Katrina Zeller				
Kelly Nixon				
Kendra Redmond				
Keri Streno				
Khursheda Saidova				
Kimberly Phillips				
Kristen Vasquez				

Kristin M Stokke				
LaTrish Wright				
lauren Preston				
Lawrence Cowan				
Linda Murray				
LORETHA ROLF				
Loretta Rhoades				
lynda cheney				
Lynn Hayes				
Margaret Kemble				
Maria Lares				
Mary Davis				
Maryjane Myrsiades				
MARZIEH GHAVIPANJEH				
Matt Southard				
Meg Kendal				
Meg W				
Megan Bowser				
megan McGregor				
Melanie Damian				
Michael Goldman				
Michelle Damico				
Michelle Lavigne				
Misty Barnes				
Misty Prater				
Mohigul Akramova				
Monica Johnson				
Neana Fellows				
peggy Johnson				
Phyllis White				
Quinton Perkins				
Renee Varys				
Rita Walker				
Roda Rosenbach				
RUTH REYES				
Sabe Kemer				
Sarah Aguilera				
Shauna Young				
Shawna Reker				
Shayl Salazar				

Sherrie Williams				
Sheryl Wachter				
Silvia Junker				
stefanie harris				
STEVE GILGEN				
Steven				
Susan Root				
Svetlana Beylina				
Tanja Stefano				
Theresa A Jordan				
Tonya Winkler				
Trish Slater				
Tyler Roberts				
WENDELL GATES				
Zoe Broughton				

--