

**CREDENTIAL REGISTRATION
MANAGEMENT SYSTEM**

C R M S

REGISTRATION ELIGIBILITY

APPLICATION AND

AUDIT PROCEDURES

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

TABLE OF CONTENTS

Updated: April 2012

Program Director Information For CP, DI, ISPP and DT Graduating Students

- Program Director Registration Eligibility Application On-Line Instructions
- Social Security Number Requirements
- Student Academic Record Log Sheet
- Program Director Check List For Student Instructions Regarding Eligibility Process
- Quick Reference Check List, Revised April 2012
- Program Director PDF Class Completion Submission Instructions – Revised April 2012
- Registration Eligibility Application – CDR Copy
- RDE Mis-Use Form – Program Director Copy
- DTRE Mis-Use Form – Program Director Copy
- Program Director Contact Form
- Transcript Degree/Confirmation Release Form
- Flow Chart: Registration Eligibility Application Processing

Graduating Student Information For CP, DI, ISPP and DT Programs

- Student Instructions
- Name Address Change Form – Student Form
- Co-Sign or Not To Co-Sign
- RDE Mis-Use – Student Copy
- DTRE Mis-Use – Student Copy

Audit Process

- Random Audit Process – Implemented January 2003 – Revised April 2012
- Social Security Number Requirements
- Sample Random Audit Notice via e-mail, if audited – Revised April 2012
- US Degree Transcript Verification Addendum
- Failed Random Audit Frequent Problem List

Note:

Please refer to the CDR website, www.cdrnet.org, under Program Directors on the left side and then under CP, DI, ISPP and DT Program Director Information for Graduating Students for instructions, forms and additional information.

The direct link is: <http://cdrnet.org/programdirector/GradInfo.cfm>

PROGRAM DIRECTOR

INFORMATION

FOR GRADUATING STUDENTS

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 1

CREDENTIALING REGISTRATION MANAGEMENT SYSTEMS (CRMS)
REGISTRATION ELIGIBILITY APPLICATION ON-LINE PROCESS

IMPLEMENTED: FEBRUARY 2004

REVISED: APRIL 2012

PROGRAM DIRECTOR ON-LINE INSTRUCTIONS

- The Program Director and Student Exit Packets are located on the CDR website at www.cdrmet.org. On the left side of the screen click on Program Directors and then in the center of the next screen click on CP, DI, ISPP and DT Program Director Information for Graduating Students, which is the Program Director Packet. Click on the Graduating Student Information for CP, DI, ISPP and DT, which is the Student Exit Packet. Please provide the student copies of the Student Exit Packet or you can direct the student to the CDR website <http://cdrmet.org/programdirector/dieteticsprogramstudents.cfm> for their graduating student information.

Program Director Information for Graduating Student
Program Director Packet

- Complete the *Student Academic Record Log Sheet* (optional) to further assist in the data entry process. The purpose of this form is to summarize the student(s) academic [degree and DPD] information throughout the Dietetic Internship or Dietetic Technician Program for convenience when entering the data into the on-line forms.
- Follow the instructions on the Program Director Student Instructions Checklist for the Registration Eligibility Process.
- The Program Director Contact Form should be completed and submitted to CDR with the class completion documents and with the audit documents, when audited.
- If you encounter problems using this process, for assistance contact Peggy Anderson or Joe LasCola at 800/877-1600, extension 4764 or 4781, or at panderson@eatright.org or jlascola@eatright.org.
- Print and distribute ***within the last two weeks*** of your program for each student, the following forms for completion and return to the program director, along with those forms from the Student Exit Packet.
 - The Registration Eligibility Application – CDR Copy ***NOTE: This must be signed and dated by the Student in colored ink other than black!***
 - RDE or DTRE Misuse Program Director Copy
 - Transcript Degree/Confirmation Release Form

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 2

Graduating Student Information
Student Exit Packet

- Distribute the following forms to each student within the Last Two Weeks of your program to ensure you have their most current data:
 - Student Instructions
 - To Cosign or not to Cosign
 - CBT Fact Sheet
 - Name Address Change Form for Registration Eligibility - Student Copy (for future name and/or address changes). **NOTE:** The student should retain this form and complete it **ONLY** if they have a name and/or address change after they have completed and submitted the CDR Copy [*eligibility application*] to you for forwarding to CDR. Legal documentation must accompany all name changes.
 - *Study Guide for the Registration Examinations* purchasing information. **NOTE:** Please ensure you have a current copy. The expiration date appears on the top right hand side of the form. Provide **ONLY** the Study Guide Order Form for your pathway.
- Request that students complete the Registration Eligibility Application Form - CDR Copy and return it to you within the last two weeks prior to leaving the program. Please submit these forms to CDR with the Candidate Submission Detail Form and the Class Submission Recap Form. All areas **must** be completed and dated to ensure prompt processing of the eligibility application(s).
- Instruct students to keep the Student Copy of the Name Address Change Form for Registration Eligibility in order to submit a name and/or address change after they leave the program (refer to student instructions). Legal documentation must accompany all name changes (i.e., marriage license, divorce decree, court order, etc.).

If the student has a name and/or address change prior to your submission to CDR and you would like to maintain it in your records, please have the student:

- Fax changes to you to be added/edited on the student record.
 - Provide the fax copy behind the student's original eligibility application, the CDR Copy, and forwarded to CDR in your packet.
 - If you have already submitted your class documentation to CDR at the time you receive the student changes, please fax the Student Copy changes to Peggy Anderson or Joe LasCola at 312/899-4772.
- On the CRMS On-Line System enter your Login ID and Password followed by your Program Access Code. [**Please note:** When there is a Program Director change, the new Program Director must contact Peggy Anderson or Joe LasCola at CDR to obtain a new Login ID and Password.]

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 3

- After creating an Eligibility Submission Group, proceed to the student screen and enter data from the Eligibility Application – CDR Copy and the *Student Academic Record Log Sheet*. Student entries should be in **Alpha By Last Name Order By Stud.**
- Print each candidate record, Candidate Submission Detail Form, in **Alpha By Last Name Order**, and place it on top of the Eligibility Application for each student.
- **Proofread each candidate record, Alpha By Last Name Order**, against the Eligibility Application – CDR Copy **and edit as required.**
- Once you have proofread the Candidate Submission Detail form(s) [candidate record(s)] to the Eligibility Application – CDR Copy and made edits as necessary, click on the “Submit to CDR” button. Place the Detail Form on top of the Eligibility Application for each student.
- For PDF Instructions, scanning and labeling, please refer to the Quick Reference Check List.
- Submit the following via pdf e-mail or Priority Mail to CDR, attention Peggy Anderson AND Joe LasCola:
 - Contact Form
 - Class Submission Recap Form [requires Program Director signature]
 - Candidate Submission Detail Form – **Alpha By Last Name** (Printed from candidate screen -- **please** carefully **proofread** against your original student application. This is very important because all examination communications will be sent to the e-mail address provided on the Candidate Submission Detail Form.)
 - Student’s Registration Eligibility Application Forms - CDR Copy - **Alpha By Last Name** (Place the Detail Form on top of the Application for each student.)
 - Follow the two previous steps above with the rest of the students in your class – **Alpha By Last Name**

Submit all required class completion documents via e-mail on a pdf file. The e-mail subject line **and** the pdf file should be the same and should read as follows: Class Completion {insert date} – CUP, DI, ISPP or DT {insert four-digit program code with alpha code, if applicable} – {enter #} Students. Retain the originals in your file. **(Do Not Type in the parentheses.)**

In the event you don’t have pdf access, you are required to submit the Class Completion Packet Via a **SECURE AND TRACEABLE ONE- OR TWO-DAY COURIER SERVICE** (i.e., **FEDERAL EXPRESS OR UPS**) TO ENSURE DELIVERY. Regular US Mail, Certified Mail or Registered Mail can take up to 7 – 15 days to reach CDR.

CDR will acknowledge receipt of your class support documentation within five to seven business days via e-mail. Should you not receive acknowledgment in that timeframe, please e-mail Peggy Anderson or Joe LasCola at panderson@eatright.org or jlascola@eatright.org for current update/status of your submission.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 4

SPECIAL REMINDERS:

- Do not submit transcripts and verification statements to CDR unless you are notified you are being audited.
- Review and share information included on the *Program Director Student Instruction Sheet* with students at their exit packet meeting.
- Remember to distribute the “*Student Instructions*” to your students.
- Remember to provide each student with a minimum of five (5) Verification Statements.
- Remember to distribute the “*Student Exit Packet*” to your students.
- Remember to review the *RDE* or *DTRE* Misuse form with students; obtain students signature; retain in student files for submission to CDR if audited.

Thank you for participating in the *On-Line Credentialing Registration Management Systems Eligibility Process (CRMS)*.

**Commission on Dietetic Registration
Registration Eligibility Processing Procedure
Social Security Number Requirements for
Verification Statements and the CRMS Online System**

April 2012

The following information is provided to dietetic educator program directors to provide clarification about the Commission on Dietetic Registration's registration eligibility requirement for all candidates to provide their full social security number (SSN) on their initial application. CDR understands that this requirement is in conflict with some educational institutions policies not to use, record or store the SSN in the student academic record. The following response is from CDR's legal Counsel regarding the Academy/CDR use of the SSN in application verification and processing.

The Privacy Act of 1974 that gave rise to the limitations regarding the collection and use of the SSNs. Specifically, that Act is applicable to federal, state and local government agencies, and also to school boards and school districts. All such entities are precluded from denying benefits or rights to individuals on account of their refusal to provide the SSN. The federal, state and local government agencies are also prohibited from requesting that an individual disclose his or her SSN unless the individual is advised whether the disclosure is mandatory or voluntary, by what statutory or other authority the disclosure is solicited, and the uses to which the SSN will be put.

Consequently, the federal law does not prohibit CDR or other private entities from requesting the SSN. However, various advocacy groups are advising citizens to refuse to disclose their SSNs to non-governmental agencies, and it may become somewhat problematic (practically more than legally) to deal with an applicant who refuses to disclose. It appears, therefore, that CDR can legally continue to require the disclosure of the SSN by its applicants.

CDR currently uses the social security number to prevent the creation of duplicate member and registry records, since CDR shares its demographic database with the Academy. Based on the legal input, CDR will continue to request the social security number for each applicant for registration eligibility.

The student is required to provide their **full** social security number on the CDR Registration Eligibility Application; however, only the last four digits are required for entry on the student record when the program director enters the SSN on the CRMS online system. Program directors submitting the class completion documents on a pdf file by e-mail should retain the original documents in the student's file. However, prior to filing the documents the program director can white out the first five (5) digits of the SSN that appear on the Registration Eligibility Application. Only the last four digits are required for entry on the ACEND Verification Statement.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 7

CREENTIALING REGISTRATION MANAGEMENT SYSTEM (CRMS)
REGISTRATION ELIGIBILITY APPLICATION ON-LINE PROCESS

IMPLEMENTED: FEBRUARY 2004 - REVISED: April 2012

**PROGRAM DIRECTOR CHECK LIST FOR STUDENT INSTRUCTIONS
REGARDING ELIGIBILITY PROCESS**

- Provide students with a copy of the “Student Instructions” in the “Information for Graduating Students” or “Student Exit Packet”. Please underscore the importance of following instructions.
- Provide students with the Registration Eligibility Application Form - CDR Copy, return to CDR by the Program Director and the Name Address Change Form for Registration Eligibility - Student Copy which is part of the “Student Exit Packet”.
- Provide students with a copy of the *Study Guide for the Registration Examination* purchasing information form, which is part of the “Student Exit Packet”.
- Direct students to contact the Program Director to confirm their *Registration Eligibility Application Process* submission to CDR. They will receive a letter confirming registration eligibility from CDR approximately seven to ten business days following CDR’s receipt of the class. However, should the class be randomly audited eligibility acknowledgement could take an additional one to two weeks during the audit process.
- Refer students to the February 1999 *JADA*, page 156, for an article entitled, “*Computer-based testing: A new experience in 4 easy steps*” and the October 1998 *JADA*, page 1102, for an article entitled, “*Computer-based certification tests integrate testing and scoring, increase convenience*” for a detailed description of the eligibility and examination processes, which is part of the “Student Exit Packet”. The CDR website for Graduating Student Information link is: <http://cdrnet.org/programdirector/graduatingstudent1.cfm>
- Provide students with at least five (5) original supervised practice Verification Statement forms. Original Verification Statements may be required for ADA Membership Associate to Active member transfer status, licensure and employment. Students should also retain a personal file copy for future use.
- Remember to review the RDE or DTRE Misuse form with students; obtain students signature; retain in student files in case of an audit or upon CDR’s request.

Should you have any questions please contact Peggy Anderson or Joe LasCola at 800/877-1600, extension 4764 or 4781, or e-mail Peggy at panderson@eatright.org Joe at jlascola@eatright.org.

Thank you.

Credentialing Registration Management Services (CRMS)

Eligibility Application Process

QUICK REFERENCE CHECK LIST

REVISED: April 2012

The Credential Registration Maintenance System (CRMS) is compatible with Internet Explorer and MAC. Should you encounter difficulties with MAC/Safari please contact your IT Department.

To minimize processing delays, please check off each step as you go through the registration eligibility application process.

It is essential that the information provided by each student is accurate and verified. The application is electronically downloaded; therefore, it is important that the program director proofread the data entered online on the Candidate record against the Registration Eligibility Application Form – CDR Copy (see Steps 4 and 5).

STEP 1:

Go to CDR's website located at www.cdrnet.org and click on Program Directors located on the left side of the screen.

STEP 2:

Scroll down to Program Director Information for Graduating Students located in the center of the screen.

On the next screen:

- Print the Program Director Information for Graduating Students located at the top half in the center of the screen. This is the Program Director Packet.
- Print the Graduating Student Information located at the bottom half in the center of the screen. This is the Student Exit Packet.

Please contact Peggy Anderson or Joe LasCola [800-877-1600, extension 4764 or 4781] should you have any questions or require assistance.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 9

STEP 3:

“The Registration Eligibility Application Form - CDR Copy” Form Must Be Submitted To CDR With Your Class Completion Submission.

- ❑ Provide each student with the “Registration Eligibility Application Form – CDR Copy” (Formerly the Name/Address Verification Form – CDR Copy) for her or his completion and return to the program director. NOTE: Only the current CDR Copy [For CRMS – Revised 4/12] will be accepted. Please destroy all old forms to ensure your class submission does not encounter processing delays.
- ❑ Provide each student with the “RDE or DTRE Mis-Use” form for their completion and return to the program director.
- ❑ Provide each student with the “Transcript Release/Degree Confirmation” form for their completion and return to the program director.
- ❑ Verify the student completed all areas, and signed and dated the “Registration Eligibility Application Form - CDR Copy (Revised 4/12)”.
- ❑ The Program Director needs to print their name, sign the form and document their institution’s four-digit program code on the “Registration Eligibility Application Form – CDR Copy (Revised 4/12)”.
- ❑ Place the “Registration Eligibility Application Form - CDR Copy (Revised 4/12)” in **alpha by last name order**.
- ❑ Verify the student completed all areas on the “RDE Mis-Use” form and place the form in the student’s file. This form is required for submission to CDR if your class is audited or upon request by CDR.
- ❑ Verify the student completed all areas on the “Transcript Release/Degree Confirmation” form and place the form in the student’s file. This form is required for submission to the Registrar’s Office, not to CDR, to obtain the student’s transcript should CDR audit your class.

STEP 4:

- ❑ Open the CRMS program located on the first line after clicking on Program Directors at the CDR website home page of www.cdrnet.org.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 10

- ❑ Enter your Login and Password. Please contact Peggy Anderson or Joe LasCola [800-877-1600, extension 4764 or 4781] if you require assistance or have misplaced these codes.
- ❑ The next screen will welcome you back. On the left side of the screen click on Grp. Submit [Group Submit].
- ❑ The next screen will provide your four-digit program code, the name of your institution, the current program director's name and an Action Column on the far right of the screen. Click on the icon under the Action Column to advance to the next screen.

Dietetic Technician Program Directors will notice that the on-line CRMS program code options are either an "A" or a "D". Upon submission, a regular dietetic technician class [Associate or Baccalaureate Degree] must be identified with the "A" program code. The "D" program code can only be used if the student has completed a Baccalaureate Degree and Didactic Program in Dietetics (DPD).

- ❑ On the top half of this screen in the center click on Add Completion Group.
- ❑ On the next screen enter the class completion date.
- ❑ On the next screen click on Add Candidate.
- ❑ On this screen enter the candidate information provided from the "Registration Eligibility Application Form – CDR Copy (Revised 4/12)" Form.
- ❑ Click on the "Save" button once all data provided by the student has been entered.

STEP 5:

Complete each field with the data provided on the "Registration Eligibility Application Form – CDR Copy (Revised 4/12)".

- ❑ Enter the student Member ID # (minimum of 6 digits) as it appears on their membership card. Obtain a photocopy of the membership card, profile page or receipt to verify entry of the member number is accurate. (Required for number verification and entry on CRMS for accuracy. It is not required for submission to CDR.) If the student is a non-member please enter six zeros enabling you to advance in the system.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 11

- Enter the student's name as it appears on their drivers' license; (last, first/first and middle name and/or middle initial) to ensure admittance at the test site. Students are unable to change their name on the exam application online.
- Enter the student's maiden name.
- Enter the student's prior name(s), if any (i.e., divorced or legal name change). (Not their maiden name.)
- Enter the last four digits of the student's social security number. Check the "Not Available" box ONLY if it is an international student who does not intend to remain and work in the US.
- Enter the student's current mailing address. The first line should be the apartment number, if applicable, followed by the street address on the second line. If the address is a house, complete the first line. However, it is very important the student provides an apartment number, if applicable, to avoid mail delivery and/or processing delays.
- Enter the home phone number on the first line number. Enter the cell phone number if the student does not have a land line (home) phone number.
- Enter the daytime / work phone number on the second line. If the student is not working enter their cell phone number. If no cell phone number, enter their home on the second line.
- Enter the cell phone number on the third line even if you have entered it on line one and/or line two. If no cell phone number, enter all zeros for the third line.
- Enter the student's current and permanent e-mail address. This is very important since the student receives their electronic notification about their examination application status from CDR and ACT via e-mail. (It is not recommended to use the university/college e-mail address since many of them expire following the student's completion of their program.)
- Enter the degree type.
- Enter the date the degree was conferred.
- Enter the DPD program code by clicking on the down arrow and scrolling to the four-digit code from the DPD Verification Statement. **(This field is not applicable for Coordinated and Dietetic Technician, Type A, program submissions.)**
- Enter the DPD completion date, if applicable.

STEP 6:

Forms Must Be Submitted To CDR

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 12

All forms should be in ascending **Alpha By Last Name** order as they appear on the Class Submission Recap Report.

- ❑ Click on the “Print Candidate Record” button to obtain the “Candidate Submission Detail” form. Please note that the forms print out in **Alpha By Last Name Order**. Contact Peggy Anderson or Joe LasCola at 800-877-1600, extension 4764 or 4781 should you encounter print problems.
- ❑ Click on the “Print Signature” button to obtain the “Class Submission Recap Report.” Contact Peggy Anderson or Joe LasCola at 800-877-1600, extension 4764 or 4781 should you encounter print problems.
- ❑ Place the “Candidate Submission Detail Form” on top of the “Registration Eligibility Application Form – CDR Copy” **Alpha By Last Name** by student.
- ❑ **Proofread** the student information on the “Candidate Submission Detail Form” using the “Registration Eligibility Application Form – CDR Copy (Revised 4/12),” to ensure all data has been entered accurately. [NOTE: Data entered on the “Candidate Submission Detail Form” must appear on the CDR Copy. The student needs to complete a new form if the information has changed prior for submission to CDR.]
- ❑ If any edits are noted during the **proofreading** process, click on the individual student record, make the correction(s), reprint the student’s “Candidate Submission Detail Form” and place it in **alpha order by last name**.
- ❑ Once all proofreading, edits and reprinting of the individual “Candidate Submission Detail Forms” have been completed, the program director must sign and date the “Class Submission Recap Report.” Place this form on top of each set of student records.
- ❑ Complete the “Contact Form” and place it on top of the “Class Submission Recap Report.” The “Contact Form” should be submitted to CDR in the event questions arise regarding the Class Completion Group submission. If the program director will not be available to be contacted at their institution, CDR must have an alternate telephone number or e-mail address in order to resolve problems or questions to minimize processing delays. (Please make sure CDR has contact information for up to six {6} weeks past class submission.)

STEP 7:

Class Completion documents to be submitted to CDR for registration eligibility application processing for students to take the Registration Examination for Dietitians or Dietetic Technicians.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 13

- Steps 3, 4, 5, 6 and 7 Check Lists – For verification only, retain in your files.

Submit the following documents in the same order as list below, the first placed on top.

- Contact Form
- Class Submission Recap Report
- 1st Candidate Submission Detail Form – **Alpha by Last Name Order**
- 1st Student Eligibility Application Form – CDR Copy, **Alpha by Last Name Order**
- 2nd Candidate Submission Detail Form – **Alpha by Last Name Order**
- 2nd Student Eligibility Application Form – CDR Copy, **Alpha by Last Name Order**
- Etc.

STEP 8:

Submit all required class completion documents listed in Step 7 via e-mail, using pdf format, to Peggy Anderson **AND** Joe LasCola at panderson@eatright.org and jlascola@eatright.org. This should be one pdf document. You may need to have your IT Department compress the file if it is too large.

The pdf document and the e-mail subject line should read the same per the sample below:

Class Completion 12-09-01 – CUP 1200 – 2 Students

In the event you are unable to convert these documents to a pdf format, you must then mail these required class completion documents (outlined in Step 7) to the following address:

Peggy Anderson and Joe LasCola
Commission on Dietetic Registration
120 S Riverside Plaza, Suite 2000
Chicago, IL 60606-6995

Please note that these documents must be sent via a secure courier (i.e., UPS, Federal Express or Priority Mail) to ensure student applications are processed in a timely manner. Do not use regular US Mail, Certified Mail or Registered Mail. These carriers can take up to 7 – 15 days to deliver the mail to CDR.

Thank you.

PROGRAM DIRECTOR PDF CLASS COMPLETION SUBMISSION INSTRUCTIONS

REVISED: APRIL 2012

The PDF Class Completion Submission process was implemented in 2008 to minimize the cost of overnight mailing by the program director. This process is outlined in Step 8 of the Quick Reference Check List, Updated April 2012.

The program directors first step is to process your class on the CRMS online system, remembering to click on the Submit to CDR button once you have printed and proofread the Candidate Submission Detail form for each student, making appropriate edits, if any. Then print and sign the Class Submission Recap Report.

The following documents to be submitted to CDR are listed below in their order of submission from top to bottom.

- Program Director Contact Form
- Class Submission Recap Report
- First Student's Candidate Submission Detail Form – Alpha By Last Name
- First Student's Registration Eligibility Application Form – CDR Copy – Alpha By Last Name
- Second Student's Candidate Submission Detail Form – Alpha By Last Name
- Second Student's Candidate Registration Eligibility Application Form – CDR Copy – Alpha By Last Name
- Etc, Etc, Etc

(Please note that the following documents are NOT required for submission with this process; the Verification Statement, RDE or DTRE Mis-Use Form, a copy of the Academy member number verification, Transcript Degree/Confirmation Release Form, Print screen of the View Candidate from the CRMS system, and Print screen of the Completion Group Summary from the CRMS system.)

Scan all documents to one pdf file as outlined in Step 7 of the Quick Reference Check List. The file needs to be compressed between 4.5 MB and 10 MB (4,096 KB – 10,240 KB) to ensure transmission through the system to CDR. You may need to obtain assistance from your IT Staff. Please remember to print and review the pdf document prior to submission to ensure there is no distortion and that each page is exactly the same size, including portrait style, as the documents you scanned.

If you have an old scanner that shrinks the CRMS documents you will need to page number the documents in the bottom center of each page and rescan to a new pdf document prior to submission to CDR.

Credentialing Registration Maintenance System (CRMS)
All Program Director Instructions
Registration Eligibility Application On-Line Process

Page 15

Open and right click on the pdf file and then click on the rename option. Then label and save your pdf document with your class information using the sample below as an example. The correct labeling, including spaces and dashes, of the pdf file **and** the subject line on your e-mail is:

Sample: Class Completion 12-08-96 - DPD 4806 T - 2 Students

Open an e-mail to Peggy Anderson at panderson@eatright.org **and** to Joe LasCola at jlascola@eatright.org and address the Subject Line with the same labeling on your pdf document.

Sample: Class Completion 12-8-96 - DPD 4806 T - 2 Students

Please note the wording, spaces and dashes in the labeling of the pdf file **and** the e-mail subject line so that when CDR does a quick scan we can locate the one we are searching for to avoid processing delays.

PDF Class Completion submission and labeling is very important when we are trying to locate a P D F class document. It is essential that everything be labeled correctly for filing, tracking and researching.

Attach the pdf file to your e-mail and submit it to Peggy Anderson **AND** Joe LasCola at CDR. CDR only recognizes program directors that are authorized by CADE. If the program director entrusts another individual to submit the class to CDR they must CC the program director. If this does not occur and CDR does not recognize the sender, for security reasons, the class will be Denied. The program director will be notified of this attempted submission in the event this was not an authorized submission by the program director.

Once the class completion has been submitted via a pdf file by e-mail, you would then retain the original documents in your files. CDR will send an acknowledgement e-mail to verify that your submission came through. If you do not receive an e-mail within 48 business hours, please resend the class and notify Peggy Anderson **AND** Joe LasCola. Don't forget to finish the CRMS On-Line process by clicking on the Submit To CDR button. The class cannot be processed without the CRMS electronic submission. As mentioned in Step 8 of the Quick Reference Check List – Revised April 2012, you can still submit the documents via a secure courier (Priority Mail, UPS, Fed X) should you not have access to scanning or encounter problems with the pdf document process. **Do Not Submit** via regular US Mail, Certified or Registered as it could take up to two weeks for delivery.

Upon completion of CDR processing the class, the CRMS system will automatically send you a confirmation e-mail. You can always verify if the class is pending or approved by clicking under the Submitted Completion Groups on the left icon, under the action button, for the class completion date.

Inquiries and class completion submissions should be directed to Peggy Anderson or Joe LasCola at 800-877-1600, extension 4764 or 4781, or by e-mail to Peggy at panderson@eatright.org **AND** Joe at jlascola@eatright.org.

Thank you.

COMMISSION ON DIETETIC REGISTRATION

120 South Riverside Plaza, Suite 2000 Chicago, Illinois 60606-6995
312/899-0040, extension 4764 or 4781

For CRMS --- Revised 4/12

Registration Eligibility Application Form -- **MUST USE BLUE INK**

- Applicant for Dietitian Registration Examination
 Applicant for Dietetic Technician Registration Examination

IMPORTANT NOTE: ALL AREAS ON THIS FORM MUST BE COMPLETED TO ASSIST IN PROMPT PROCESSING OF THE ELIGIBILITY APPLICATION. Failure to complete and sign areas will result in processing delays.

↑ Academy Member Number ↑ You must provide the number on a copy of your membership card, profile page or receipt.

Name/Address (Enter your name as it appears on your government-issued photo identification card.)

Last Name (Please Print) First Middle Initial Maiden Previous

Address City State Zip

Social Security Number E-Mail Address (Do not use an "edu" address)

(_____) (_____) (_____) _____
Home Phone Number Daytime - Work Phone Number Cell Phone Number

* * * **THIS WHOLE FORM MUST BE COMPLETED IN BLUE INK ONLY** * * *

After your Program Director submits the On-Line Registration Eligibility Application to the Commission on Dietetic Registration (CDR):

- the Commission will send confirmation of your registration eligibility status via e-mail, and
- ACT, Inc. will mail the examination application and *Candidate Handbook* to the address noted above. Please expect it within two to three weeks of CDR's receipt of the Registration Eligibility Application.

Agreement to abide to the Academy/CDR Code of Ethics.

Upon passing the registration examination, "As a registered dietitian or dietetic technician, registered, I agree to abide by the Code of Ethics for the Profession of Dietetics (<http://www.eatright.org/HealthProfessionals/content.aspx?id=6868>), and to hold harmless the Commission on Dietetic Registration, other RDs and DTRs, and CDR employees for their activities in enforcing them." **Must Use Blue Ink.**

SIGNATURE OF REGISTRATION CANDIDATE

Denotes all information is accurate and the candidates acceptance of the Code of Ethics

DATE (month/day/year)

Print or Type Program Director's Name

Original Signature of Program Director

4-Digit Program Code

PLEASE RETURN THIS FORM TO YOUR PROGRAM DIRECTOR AT THE CONCLUSION OF YOUR PROGRAM ON OR BEFORE YOUR LAST DAY OF THE SUPERVISED PRACTICE PROGRAM.

CDR COPY

(This form must be returned to the Program Director for their submission to CDR)

RDE Mis-Use

RETURN THIS COMPLETED FORM TO THE PROGRAM DIRECTOR

RDE Mis-Use:

Over the years, CDR has stated that RDE is not a credential and should not be used. This information is also located on the CDR website. For the past several years students completing their supervised practice program must sign a RDE Mis-Use form for their program director regarding this fabricated credential. In addition, each student is provided with a copy of the misuse document to retain in their file. Anyone can file a complaint with CDR on an individual using RDE, RD Eligible, Registered Dietitian Eligible or RD if they are not registered as an RD with CDR. This would include 'rd' in their e-mail address prior to passing the exam for dietitians.

RDE is the acronym and RD Eligible or Registered Dietitian Eligible is the same only spelled out.

Please Note: Do not use *RDE*, *RD Eligible*, *Registered Dietitian Eligible* and 'rd' in your e-mail.

Please refer to the CDR Web Site, www.cdrnet.org, to become familiar with terminology for registration eligible candidates. When the home page opens up click on Certifications and Licensure in the left hand column, then click on Registered Dietitian (RD), and then click on Registration Eligibility General Information for the following message. The CDR website direct link for this information is: <http://cdrnet.org/certifications/rddtr/eligibility.cfm>

What does the term *registration eligible* mean?

The term *registration eligible* is used by the Commission on Dietetic Registration to identify individuals who have met the didactic and supervised practice requirements to write the registration examination. The Commission will verify upon request that an individual has met registration eligibility requirements and the eligibility date. The term *RDE* is not a professional designation/credential. The commission has noted with concern an increase in the use of the term *RDE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Does the Commission recognize the professional designation *RDE*?

No. The term is not a professional designation/credential. The Commission has noted with concern an increase in the use of the term *RDE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

We ask that you please discontinue the use of the term *RDE*, *RD Eligible*, or *Registered Dietitian Eligible* and replace it with registration eligible. This includes using 'rd' in your e-mail address prior to passing the RD Exam.

Thank You.

MUST BE COMPLETED IN BLUE INK

SIGNATURE OF STUDENT/CANDIDATE

(Attesting to reading about the Misuse of *RDE* and its variations.)

TODAY'S DATE

PRINT FULL NAME OF STUDENT/CANDIDATE

(Attesting to reading about the Misuse of *RDE* and its variations.)

TODAY'S DATE

DTRE Mis-Use

RETURN THIS COMPLETED FORM TO THE PROGRAM DIRECTOR

Over the years, CDR has stated that DTRE is not a credential and should not be used. This information is also located on the CDR website. For the past several years students completing their supervised practice program must sign a DTRE Mis-Use form for their program director regarding this fabricated credential. In addition, each student is provided with a copy of the misuse document to retain in their file. Anyone can file a complaint with CDR on an individual using DTRE, DTR Eligible, Dietetic Technician, Registered Eligible or DTR if they are not registered as an DTR with CDR. This would include 'dtr' in their e-mail address prior to passing the exam for dietitians.

DTRE is the acronym and DTR Eligible or Dietetic Technician, Registered Eligible is the same only spelled out.

Please Note: Do not use *DTRE*, *DTR Eligible*, *Dietetic Technician*, *Registered Eligible* and 'dtr' in your e-mail.

We refer you to the CDR Web Site, www.cdrnet.org, to become familiar with terminology for registration eligible candidates. When the home page opens up click on Certifications and Licensure in the left hand column, then click on Registered Dietitian (RD), and then click on Registration Eligibility General Information for the following message. The CDR website direct link is: <http://cdrnet.org/certifications/rddtr/dteligible.cfm>

What does the term *registration eligible* mean?

The term *registration eligible* is used by the Commission on Dietetic Registration to identify individuals who have met the didactic and supervised practice requirements to write the registration examination. The Commission will verify upon request that an individual has met registration eligibility requirements and the eligibility date. The term *DTRE* is not a professional designation/credential. The commission has noted with concern an increase in the use of the term *DTRE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Does the Commission recognize the professional designation *DTRE*?

No. The term is not a professional designation/credential. The Commission has noted with concern an increase in the use of the term *DTRE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

We ask that you please discontinue the use of the term *DTRE*, *DTR Eligible*, or *Dietetic Technician, Registered Eligible* and replace it with registration eligible. This includes using 'dtr' in your e-mail address prior to passing the DT Exam.

Thank You.

MUST BE COMPLETED IN BLUE INK

SIGNATURE OF STUDENT/CANDIDATE

(Attesting to reading about the Misuse of *DTRE* and its variations.)

TODAY'S DATE

PRINT FULL NAME OF STUDENT/CANDIDATE

(Attesting to reading about the Misuse of *DTRE* and its variations.)

TODAY'S DATE

PROGRAM DIRECTOR CONTACT FORM

Should questions arise regarding my Class Completion Group submission to CDR, I can be contacted at the following telephone or e-mail address during my absence from the office. (Please make sure CDR has contact information for up to six {6} weeks past class submission.)

If you have multiple contact numbers, please submit additional forms.

Institution Name

Four-Digit Program Code

Program Director Name -- Please Print, then Sign

Date(s) you will be out of the office

Phone Numbers - First Choice

Alternate Choice

E-Mail Address(es)

Alternate Contact Name (An individual who will be able to reach me during my absence)

Phone Number and/or E-Mail Address

Additional Comments, if necessary

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 20

TRANSCRIPT DEGREE/CONFIRMATION RELEASE FORM

Each student should complete the Transcript Degree/Confirmation Release Form in the event your class is audited. This form should be presented to the Registrar's Office to obtain the student's official transcript.

I hereby authorize the _____

University/College/Institution Name

Registrar's Office to release my official transcript reflecting my degree and date conferred to my Program Director, _____,

for the sole purpose of the random audit for the Registration Eligibility Application process conducted by the Commission on Dietetic Registration.

The intent of the process is to assist in ensuring that applicants for registration eligibility have completed the minimum requirements of either an associate degree (dietetic technician applicants only), or a baccalaureate degree granted by a U. S. regionally accredited college/university, or foreign equivalent; a Didactic Program in Dietetics and supervised practice program; or a Coordinated Program in Dietetics.

These original documents must be submitted by the ACEND Program Director to the Commission on Dietetic Registration (CDR) within five business days of the audit notification. Following completion of the audit CDR will return all original documentation to the Program Director to be retained in their or the Registrar's files.

Program Type (Coordinated, Dietetic Internship, Dietetic Technician) Program Code

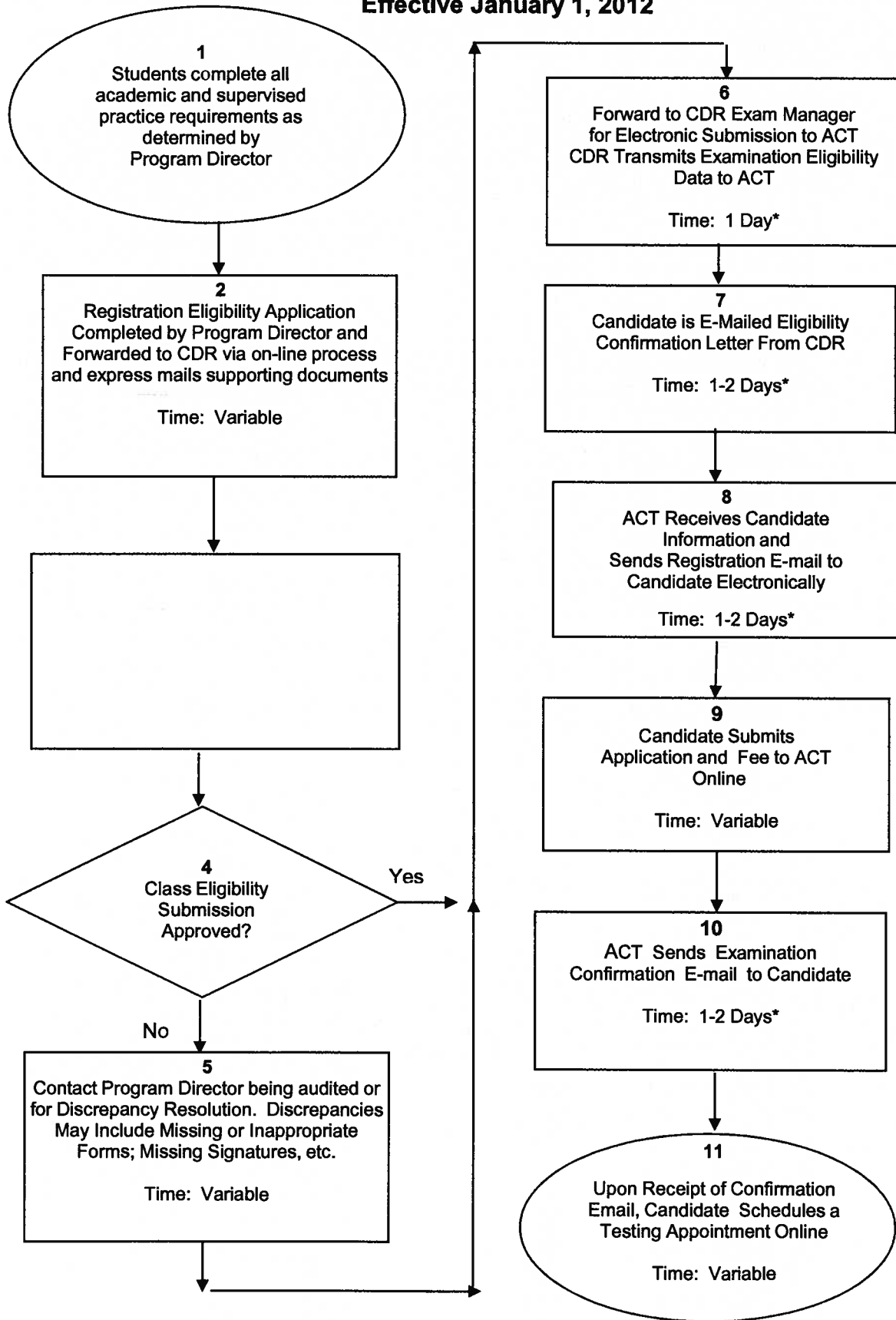
Student's Name (PLEASE PRINT)

Institution's Student ID #

Student's Name (PLEASE SIGN)

DATE

Flow Chart: Registration Eligibility Application Processing Effective January 1, 2012



Note: All notifications from CDR and ACT are sent via e-mail unless it is undeliverable. Then the mailing is sent via USPS 1st Class Mail, where delivery times are variable. This process requires the candidate to have an accurate and accessible e-mail address, preferably not affiliated with an academic institution (.edu).

* Business Days

GRADUATING STUDENT

INFORMATION FOR

CP, DI & DT PROGRAMS

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

CP, DI and DT STUDENT INSTRUCTIONS

Revised: April 2012

- Complete the Registration Eligibility Application Form – CDR Copy provided by your Program Director. This form must be completed in colored ink [but not Black] within the last one to two weeks prior to the completion of your program to ensure current data is submitted to CDR. The name, only, you provide must match the name on your government-issued photo identification (i.e., driver's license, passport, etc.) to gain access to the exam. To avoid processing delays, it is required that every area be completed, including maiden name and ALL phone numbers – even if they are repeated. You must provide a copy of your Academy membership card to your program director to ensure the Academy ID number is recorded correctly. Please Do Not Guess when entering your identification number. It is recommended that you do not use an “edu” e-mail address as they expire shortly after completing your program resulting in missing important e-mails related to the eligibility/examination process and once you pass the exam. Remember to sign and date the form.
- Return the CDR Copy to your Program Director on or before the deadline they have given you. The Program Director will submit this original form to CDR for eligibility application processing.
- Complete the RDE or DTRE MIS-USE form and return the signed/printed and dated document to your Program Director. This form states that individuals who are not credentialed by CDR as a RD or DTR will not use RDE, RD Eligible, Registered Dietitian Eligible, DTRE, DTR Eligible or RD/DTR in their e-mail address prior to passing the CDR Exam. We refer you to the CDR website for dietitians <http://www.cdrnet.org/PDFs/RDE%20%20Mis-Use%20%20-%20%20Updated%204-09.pdf> for Dietetic Technicians <http://www.cdrnet.org/PDFs/DTRE%20%20Mis-Use%20%20-%20%20Updated%204-09.pdf> .
- Retain the Name Address Change Form - Student Copy for your records and future use.
 - The “Student Copy” is to be used when you have a name, address, phone number and/or e-mail change after you have submitted the original CDR Copy, which is your eligibility application, to your Program Director.
 - Please mail the documents to CDR, attention Peggy Anderson or Joe LasCola to: 120 South Riverside Plaza Suite 2000 Chicago, IL 60606. Make sure you complete ALL areas of the Change Form, including previous address (the address you provided to your Program Director), new address, Program Director's name and four-digit program code that is found on your Verification Statement from your Program Director indicating completion of your supervised practice. Please Note that for ALL name changes a copy of the marriage license, divorce decree or court order must be included. When a name, address, phone number and/or e-mail change occurs, also notify your Program Director of the change(s) via mail so that they can update their records.
 - The RDE or DTRE MIS-USE Student Copy form is provided in your Student Exit Packet as a policy reminder. This form states that individuals who are not credentialed by CDR as

a RD or DTR will not use RDE, RD Eligible, Registered Dietitian Eligible, DTRE, DTR Eligible or RD/DTR in their e-mail address prior to passing the CDR Exam.

- Your Program Director will provide a copy of the 2006 ADA Journal article “Co-Sign or Not to Co-Sign”, helpful information while on the job and prior to passing the CDR exam.

Program Directors will forward the On-Line Computerized Registration Eligibility Application for each student to CDR. You will receive an e-mail confirming your registration eligibility from CDR approximately two to three weeks following Program Director submission to CDR. CDR does not encourage “edu” e-mail addresses as they often expire shortly after the student completes the supervised practice program.

Timelines and Procedures for the Eligibility / Examination Application Process

Within the last two weeks of the supervised practice program (Coordinated, Dietetic Internship, Dietetic Technician, Individualized Supervised Practice Pathway (ISPP) the program director will provide each student with some forms that are to be completed and returned to the program director so they can complete the eligibility application process for their submission to CDR. The program director will provide each student with the Student Exit Packet that is to include a minimum of five or six original Verification Statements (VS). These original VS forms are for you to provide, upon request, to prospective employers, the licensure board and to the Academy for membership. The VS form DOES NOT get submitted to or by CDR, nor is it to be included with the exam application to ACT.

The normal process time from start to finish can be from two to four weeks without any variables. Some variables could be that the documents don't arrive in order, being audited, documents aren't submitted within a week of class completion, Holiday(s), office closings, Holiday vacation and US Mail. If any of the variables come in to play, then the process time could be longer. However, if everything comes through right away from the program director via pdf or secure overnight courier and all is in order, candidates could possibly receive their exam packets from ACT within ten to twelve business days, or sooner, depending if it is peak processing time.

Once CDR receives both of the two-step class completion submissions from the program director, provided everything is in order and the class is not being audited, the eligibility process begins and then the class is forwarded to ACT for further processing.

Effective January 1, 2012 ACT went online through the new CDR/ACT Web Portal and will no longer mail out the exam application packets. As a result, it is imperative that the students provide an accurate e-mail address that they use. We don't encourage 'edu' addresses, unless the institution retains them following graduation long term. It is also encouraged that if the student changes their e-mail address that they keep CDR informed to ensure that they don't miss important information related to the exam and upon passing the exam miss information related to their maintenance fee and credential.

Candidates will receive an e-mail from ACT with their examination application, which will expire one year from the date of issuance, and a link to the Handbook for Candidates. Candidates will have one year to complete the application, pay online, schedule their test appointment and sit for the exam. The candidate should have their credit card on-hand when they log-in, as the system will shut down after 15 minutes due to non-completion. Upon completion, the candidate will receive a Scheduling Confirmation Email that they are required to bring with them to gain admittance at the test center.

Candidates will not be able to make any changes to their name and/or address on the CDR/ACT Web Portal. They must complete and submit the Name Address Change Form, along with a copy of their

marriage license, divorce decree or legal name change court document, to Peggy Anderson or Joe LasCola. Upon receipt, CDR will update the candidate's record and notify ACT. ACT will e-mail an updated Exam Application or Scheduling Confirmation Email to the candidate. Remember, the candidate's name on the Scheduling Confirmation Email and their US government-issued photo identification must match in order for them to be admitted to the Test Center for their examination.

Your Confirmation E-mail will contain a list of approximately 230 test centers, which includes a toll-free scheduling phone number. Should the candidate not complete the application, make their payment and test within the one year timeline, it will become invalid. The candidate would then need to contact CDR to re-establish their registration eligibility and go through the process again. Upon completion of this process CDR forwards the candidate's name to ACT, who will prepare and e-mail a new exam application packet. The candidate would then have one year to complete the exam application, along with the current application fee, before they can be authorized to test again. There is a 45-day wait window between testing; therefore, the candidate can retest on the 46th day from the previous exam date. This calculation would include weekends and is the only time that the weekend is used in any calculations. All other policies specify Business Days or Hours, Monday through Friday. Should you encounter any difficulties with the exam application process or at the test center, contact ACT at 319-337-1315 for assistance.

For candidates passing the exam, on the bottom of your Score Report it states that you will receive your first piece of maintenance information in approximately two to three weeks. CDR receives the candidate test information (pass or fail) from ACT approximately seven to ten business days following the day of the exam. CDR processes this information in the database and then an e-mail is sent to the candidates acknowledging they passed the exam. Within 24 – 48 hours of the first e-mail, the new RD/DTR receives a second e-mail with their \$50 Maintenance Fee Notice attached. Some servers and Spam accounts don't recognize our attachment. If you don't see the second e-mail after 48 hours of your first e-mail you should check your Spam. The maintenance fee can be paid by mail, online or by phone. Once the fee is posted to the individual's record, their registration card is system generated and mailed within ten business days.

Being a member of the Academy, your membership number and password would be the same as your CDR registration number and password. You can monitor your status on the CDR website at www.cdrnet.org by clicking on the CDR Online Credentialing Verification Search located in the very center of the home page in a lavender rectangle box. Once you are in our database you will be able to go all the way through the Search process and print your RD/DTR Verification. If you are not in our database as a RD/DTR then the system will provide a pop-up statement directing you to contact CDR regarding this record. When this appears, please try the Search process in another couple of days. This system was developed to assist the credentialed dietitian, dietetic technician, employers and licensure boards that require verification prior to the registration card being issued. Please share this information with your employer.

Once you are in our database you can then pay online at www.cdrnet.org. Under the CDR **Online Credentialing Verification Search** option you will see three icons, click on the one that looks like a computer screen and says Online Services. This would be the first of the three icons starting from left to right located in the center of the screen. The next screen will request your Academy member/CDR RD/DTR identification number and password. The next screen will be your Profile Page and at the top of this screen you will click on CDR Credentialing, which will take you into your confidential CDR records. You will then see that you owe a \$50 Maintenance Fee and click on Pay Now to begin your payment process.

Inquiries regarding the eligibility process should be directed to Peggy Anderson at 312/899-0040, extension 4764 or e-mail Peggy at panderson@eatright.org. Or contact Joe LasCola at 312/899-0040, extension 4781 or e-mail Joe at jlascola@eatright.org.

Thank you

To Cosign or Not to Cosign: What Managers Need to Consider

Editor's note: This is the second article in a two-part series on government regulations as they apply to dietetics. The first, "An Introduction to Government Regulations and the Profession of Dietetics," appeared in the August issue of the Journal (2006;106:1156, 1158-1159).

Every day, clinical nutrition managers are asked to make decisions related to staff duties and responsibilities. Sometimes the answers, and even the sources of information needed to formulate answers, are not readily apparent. Questions often include: "Do dietetic interns need to have their clinical notes cosigned?", "How should registration eligible employees sign their name?", and "What level of nutrition care can dietetic technicians, registered [DTRs] perform?"

There is usually not one universal answer to these types of questions. That's because each clinical facility is unique due to its geographical location, the nature of its services and corporate culture, the size and expertise of the professional staff, and the availability and level of technical and staff support. In addition to applicable federal regulations, which apply equally across the country to facilities providing Medicare and Medicaid services, the answers may be found in state-specific and local regulations and in workplace-specific policies and procedures including medical staff bylaws.

*This article was written by Mary Hager, PhD, RD, senior manager, Regulatory Affairs, Policy Initiatives, and Advocacy, in ADA's Washington, DC office, and Maureen Otto, MS, RD, director, Quality Management, at ADA in Chicago, IL.
doi: 10.1016/j.jada.2006.07.034*

Therefore, the clinical nutrition manager first needs to review and know the federal regulations to the extent to which they may apply, then identify and understand the state occupational and health care facility licensing regulations and his or her facility's policies and procedures. In reviewing these, a broad understanding of more than just the regulations and policies that apply to the food and nutrition services department is gained, which is important because the department does not work in isolation.

If after studying these documents an answer is not obvious, a meeting with those individuals responsible for regulatory compliance within the facility may be necessary. Those persons may be working in the capacity of chief operating officer, compliance officer, or legal counsel. With ready access to the Internet, the answers can often be found online. Clinical nutrition managers can begin their investigation with the applicable federal and state regulations and the facility's procedures and policies. Additional resources for guidance include the facility's accreditation standards, if applicable, and American Dietetic Association (ADA) publications (1-3). If the answer is still not clear after a review of these materials, it may also be appropriate to pose the question to peers or to the ADA.

The purpose of this article is to review information that clinical nutrition managers need to consider when formulating answers to questions and policies for their department.

THE "QUALIFIED DIETITIAN"

There are several regulatory documents that define the qualifications that a dietitian must possess in order to provide nutrition care to patients, as well as the responsibilities of the qualified dietitian. These documents include federal regulations and state

occupational and health care facility licensing regulations. Workplace policies and procedures are developed to ensure safe and quality patient care and can demonstrate compliance with applicable regulations. In addition, along with job descriptions, they can also outline the facility's definition of a qualified dietitian and his or her associated responsibilities.

Some facilities may choose to pursue voluntary accreditation, in which case any additional standards needed for this accreditation will also be incorporated into the policies and procedures. For example, a hospital may seek voluntary accreditation by the Joint Commission on Accreditation of Healthcare Organizations or the Healthcare Facilities Accreditation Program of the American Osteopathic Association, both of which are the only two accrediting organizations with hospital "deeming authority." This means that hospitals accredited by these two organizations are deemed to have fulfilled Medicare's Hospital Conditions of Participation, regulations that must be met for payment. Accrediting organizations are not regulatory agencies or bodies, and as such cannot impose fines or take other legal actions when a facility is not in compliance with federal and or state regulations.

FEDERAL REGULATIONS

The Centers for Medicare & Medicaid Services (CMS) has defined "qualified dietitian" for five different types of health care facilities that provide care to beneficiaries: hospitals, long-term care facilities, end-stage renal disease facilities, hospices, and critical access hospitals. These definitions are published in the appendixes of the CMS State Operations Manual and apply to all facilities nationwide that receive CMS payment for beneficiary care through both the Medicare and Medicaid programs (4). These regula-

FOR YOUR INFORMATION

tions are what the CMS considers to be the minimum requirements for safe and quality patient care. No facility can provide less than the minimum requirements and still receive CMS payment.

The CMS has also published in the State Operations Manual the responsibilities that it expects of the qualified dietitian. For example, in hospitals:

"A qualified dietitian must supervise the nutritional aspects of patient care. Responsibilities of a hospital dietitian may include, but are not limited to:

- approving patient menus and nutritional supplements;
- patient, family, and caretaker dietary counseling;
- performing and documenting nutritional assessments and evaluating patient tolerance to therapeutic diets when appropriate;
- collaborating with other hospital services (eg, medical staff, nursing services, pharmacy service, social work service) to plan and implement patient care as necessary in meeting the nutritional needs of the patients; and
- maintaining pertinent patient data necessary to recommend, prescribe, or modify therapeutic diets as needed to meet the nutritional needs of the patients."

The CMS expects that the qualified dietitian, as defined by federal and state regulations and facility policies, is the individual who actually provides the direct patient nutrition care.

STATE REGULATIONS

State health care facility licensing regulations are not required to have exactly the same definitions as the CMS, but may consider the federal regulations as the minimum requirements upon which to develop their own regulations. Therefore, states' definitions of qualified dietitians in health care facilities can specify additional qualifications and responsibilities.

While most states have their own health care facility licensing regulations, some states choose to use the CMS regulations exclusively or in part rather than generating their own entire set. In the case of hospital licensing regulations, some states simply adopt CMS' regulations or incor-

porate sections by reference and make them part of a rule as if set out in full. Each state has the ability to restate or specify additional qualifications, such as that the qualified dietitian must be in good standing as a registered dietitian (RD) with the Commission on Dietetic Registration (CDR). In some states, hospital regulations mention only current state licensure, registration*, or certification as a qualification.

Some states include a definition for the qualified dietitian for other kinds of facilities and programs such as assisted living facilities or home health services if the RD's services are included in the regulations. For example, California's home health licensing regulations define the qualified dietitian as being an RD. Dietitians in every state need to investigate the kinds of facility licensing regulations that already exist and that are being proposed to determine whether RD services are included. These would include regulations for hospice, home health, assisted living and rehabilitation facilities and other health care facilities.

The CMS expects that the qualified dietitian meets the licensing, registration*, or certification requirements of the state(s) in which he or she practices. Therefore, only those individuals who comply with state occupational regulations may provide patient nutrition care in the context of Medicare and Medicaid services.

FACILITY POLICIES AND PROCEDURES

Health care facilities are required to have policies and procedures that demonstrate compliance with federal and state regulations. Beyond that, it is the facility's option to seek voluntary accreditation and/or to require additional qualifications of its staff. For example, a facility may require certain kinds of credentials, such as certifications and additional academic degrees, as well as a level of experience and competence beyond what federal and state regulations list as the minimum to perform certain clinical tasks. In some cases,

**In state occupational regulations, "registration" is terminology of the state and is not the same as registration with CDR.*

these additional requirements may be driven by private insurers.

Based on the above, a clinical nutrition manager can discern the meaning of qualified dietitian as it applies to his or her own workplace. The definition that is contained in his or her facility's policy should be based on state rules or accreditation standards, whichever are the highest. The definition contained in the facility's policy can also be higher than the highest of these, but not lower.

Clinical nutrition managers also may utilize job descriptions to incorporate additional qualifications and to formalize responsibilities and may propose higher standards of nutrition care. The clinical nutrition manager is the leader in the facility for determining the staffing requirements that are needed to provide safe, quality nutrition care. This means that the clinical nutrition manager can set minimum qualifications that may, when needed, exceed federal and state regulations. Understanding this role as part of the facility's leadership is as critical and important as understanding and complying with mandated minimum requirements.

THE AMERICAN DIETETIC ASSOCIATION

As a professional association, ADA is committed to providing its members with the resources that support them in delivery of quality nutrition care services (2,3). For example, ADA's Standards of Practice in Nutrition Care and Standards of Professional Performance for RDs and DTRs are important guidance resources (5). These documents provide explanation of the way in which the DTR (technical role) under the supervision of the RD (professional role) works within the nutrition care process (6). ADA is able to assist members with the regulatory process and point them in the right direction with contact information for state resources.

What Is the Role of Technical Staff?

Generally speaking, support staff (such as the DTR or a nonregistered, nonlicensed individual) can assist the qualified dietitian by conducting screens, gathering data, and performing other tasks that do not require clinical judgment. When the responsibilities of the qualified dietitian are

FOR YOUR INFORMATION

performed by others such as technical and other support staff, there are two concerns: 1) potential noncompliance with federal and state rules, and 2) misplaced accountability for safe and quality patient care.

The expectation is that direct patient care is provided by the qualified dietitian as defined by federal, state and facility rules and policies. Support staff may provide technical assistance to the qualified dietitian within the parameters of appropriate regulations and policies.

Who Can Chart?

The purpose of the medical record is to communicate patient progress and care interventions. The facility is responsible for ensuring that information is kept confidential, and is legibly entered and maintained. If something is not charted or documented correctly, this can raise concern that the care was never given or that an error in care may have occurred.

It is the professional who provides the care, including qualified consultants, who must document that care in the chart. Clinical nutrition managers need to investigate and strictly follow federal and state regulations, facility policies and procedures, and other requirements related to charting by students and other nonemployees. The facility expects that direct patient care is delivered by the qualified individual or under the supervision of the qualified individual. Facilities should have policies regarding charting by nonemployees such as volunteers, students, and faculty from outside institutions. Nonemployee errors can put a facility in jeopardy and can be viewed as a liability.

Regarding cosigning medical chart entries by dietetic interns, students, or other individuals who may not possess appropriate credentials or be privileged by the facility, it is also important to be aware of the details of the facility's contracts with third-party payers. Contracts may specify the qualifications of the person who must provide the nutrition care. In-

surers may require that the nutrition care is both provided and documented only by the individual with the qualifications specified in the contract. In these cases, cosignature for services provided and documented by an intern or student would not be adequate to receive payment.

How Should a Registration-Eligible-Employee Sign His or Her Name on the Chart?

The term *registration-eligible* applies only to individuals who have received from the Commission on Dietetics Registration a confirmation that they can take the exam. New graduates who have not received this confirmation are not considered registration-eligible. There is no official professional credential for individuals (outside of the DTR) who have not yet taken the dietetics registration exam. Therefore, non-RDs should use a title that accurately reflects their position in the facility and is not misleading. The Commission on Dietetics Registration advises that acronyms such as RDE (used to indicate registered dietitian eligible), which have the appearance of professional credentials and are potentially deceptive and confusing to the public, should not be used.

How Do I Determine Whether a Practice Is Allowed in My Facility? Or when RDs Must Cosign Clinical Notes? Or How Registration-Eligible Employees Should Sign Their Names at My Facility?

First, every clinical nutrition manager should review and know the facility's policies and procedures, the state's facility licensing and occupational regulations, and the federal regulations for the kind of facility in which he or she works. If uncertain as to how to find or interpret any of this information, a manager should consider a health care facility administrator as a good first contact.

If the issue is related to charting, the clinical nutrition manager should speak with the manager of medical records. If it's related to other tasks,

it is advisable that the dietitian meet with the individual(s) responsible for risk management, quality management, or regulatory compliance, but only after the regulations and policies have been reviewed and understood.

Another resource is the ADA's Scope of Dietetics Practice Framework along with supporting materials on the ADA member-only Web site, under a subnavigation tab called "Practice." The Practice tab is located on the left side of the home page and leads to the Scope of Dietetics Practice Framework and related materials mentioned in this article (3). Additional information can also be found under the "Advocacy and the Profession" tab.

References

1. Hager M, Otto M. An introduction to government regulations and the profession of dietetics. *J Am Diet Assoc.* 2006;106:1156, 1158-1159.
2. O'Sullivan-Maillet J, Skates J, Pritchett E. Scope of Dietetics Practice Framework. *J Am Diet Assoc.* 2005;105:634-640.
3. Visocan B. Understanding and using the Scope of Dietetics Practice Framework: A stepwise approach. *J Am Diet.* 2006;106:459-463.
4. Centers for Medicare & Medicare Services. State Survey Agency Directory. Available at: <http://www.cms.hhs.gov/Manuals/IOM/itemdetail.asp?filterType=none&filterByDID=-99&sortByDID=1&sortOrder=ascending&itemID=CMS019027>. Accessed June 19, 2006.
5. Kieselhorst K, Skates J, Pritchett E. American Dietetic Association's Standards of Practice in Nutrition Care and the updated Standards of Professional Performance. *J Am Diet Assoc.* 2005;105:641-645.
6. Lacey K, Pritchett E. Nutrition Care Process and Model: ADA Adopts road map to quality care and outcomes management. *J Am Diet Assoc.* 2003;103:1061-1072.

RDE MISUSE

STUDENT COPY

RETAIN this form for your records and future reference.

RDE Mis-Use:

Over the years, CDR has stated in newsletters, Courier, and the ADA Times that RDE is not a credential and should not be used. This information is also located on the CDR website. For the past several years students completing their supervised practice program must sign a RDE Mis-Use form for their program director regarding this fabricated credential. In addition, each student is provided with a copy of the misuse document to retain in their file. Anyone can file a complaint with CDR on an individual using RDE, RD Eligible, Registered Dietitian Eligible or RD if they are not registered as an RD with CDR. This would include 'rd' in their e-mail address prior to passing the exam for dietitians.

RDE is the acronym and RD Eligible or Registered Dietitian Eligible is the same only spelled out.

Please Note: Do not use *RDE*, *RD Eligible*, *Registered Dietitian Eligible* and 'rd' in your e-mail.

Please refer to the CDR Web Site, www.cdrnet.org, to become familiar with terminology for registration eligible candidates. When the home page opens up click on Certifications and Licensure in the left hand column, then click on Registered Dietitian (RD), and then click on Registration Eligibility General Information for the following message. The CDR website direct link for this information is: <http://cdrnet.org/certifications/rddtr/eligibility.cfm>

What does the term *registration eligible* mean?

The term *registration eligible* is used by the Commission on Dietetic Registration to identify individuals who have met the didactic and supervised practice requirements to write the registration examination. The Commission will verify upon request that an individual has met registration eligibility requirements and the eligibility date. The term *RDE* is not a professional designation/credential. The commission has noted with concern an increase in the use of the term *RDE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Does the Commission recognize the professional designation *RDE*?

No. The term is not a professional designation/credential. The Commission has noted with concern an increase in the use of the term *RDE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Should you be using the term *RDE*, please discontinue its use and replace it with "registration eligible. Individuals who use the term *RDE* are frequently reported to CDR regarding their mis-use, and must be told to discontinue its use via a "cease and desist" order.

Thank you in advance for your assistance regarding this issue.

DTRE MISUSE

STUDENT COPY

RETAIN this form for your records and future reference.

DTRE Mis-Use:

Over the years, CDR has stated that DTRE is not a credential and should not be used. This information is also located on the CDR website. For the past several years students completing their supervised practice program must sign a DTRE Mis-Use form for their program director regarding this fabricated credential. In addition, each student is provided with a copy of the misuse document to retain in their file. Anyone can file a complaint with CDR on an individual using DTRE, DTR Eligible, Dietetic Technician, Registered Eligible or DTR if they are not registered as an DTR with CDR. This would include 'dtr' in their e-mail address prior to passing the exam for dietitians.

DTRE is the acronym and DTR Eligible or Dietetic Technician, Registered Eligible is the same only spelled out.

Please Note: Do not use *DTRE*, *DTR Eligible*, *Dietetic Technician*, *Registered Eligible* and 'dtr' in your e-mail.

We refer you to the CDR Web Site, www.cdrnet.org, to become familiar with terminology for registration eligible candidates. When the home page opens up click on Certifications and Licensure in the left hand column, then click on Registered Dietitian (RD), and then click on Registration Eligibility General Information for the following message. The CDR website direct link is: <http://cdrnet.org/certifications/rddtr/dteligible.cfm>

What does the term *registration eligible* mean?

The term *registration eligible* is used by the Commission on Dietetic Registration to identify individuals who have met the didactic and supervised practice requirements to write the registration examination. The Commission will verify upon request that an individual has met registration eligibility requirements and the eligibility date. The term *DTRE* is not a professional designation/credential. The commission has noted with concern an increase in the use of the term *DTRE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Does the Commission recognize the professional designation *DTRE*?

No. The term is not a professional designation/credential. The Commission has noted with concern an increase in the use of the term *DTRE* to designate registration eligibility. Both employers and the public find the use of the term confusing.

Should you be using the term *DTRE*, please discontinue its use and replace it with "registration eligible. Individuals who use the term *DTRE* are frequently reported to CDR regarding their mis-use, and must be told to discontinue its use via a "cease and desist" order.

Thank you in advance for your assistance regarding this issue.

AUDIT PROCESS

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 31

PROGRAM DIRECTOR RANDOM AUDIT SYSTEM

IMPLEMENTED: JANUARY 2003

REVISED: April 2012

The intent of this new process is to assist in ensuring that applicants for registration eligibility have completed the minimum of either an associate degree (dietetic technician applicants only) or a baccalaureate degree granted by a U. S. regionally accredited college/university, or foreign equivalent; a Didactic Program in Dietetics, and supervised practice program.

1. Randomly system select 10% each of the total Coordinated, Dietetic Internship and Dietetic Technician programs to be audited during a calendar year. Initiated after the Program Director submits to CDR the CRMS on-line Registration Eligibility Application process.
2. CDR will send standard e-mail to the Coordinated, Dietetic Internship and Dietetic Technician Program Director advising that they have been selected to participate in a mandatory random audit and that their recent class submission to CDR is in pending awaiting audit finalization prior to processing and submission to ACT. CDR will advise the Program Director that the requested documentation received after the required deadline will result in processing delays of the current class and future Class List submissions until the current audit is concluded.

The following documentation for each student/candidate must be received in CDR within five business days for review.

- a) Original transcript confirming degree and date of conferral, official letter from the Registrar or Dean of the Graduating School, or Original Foreign Degree Equivalency Report confirming the degree equivalent.
 - b) Original Didactic Program in Dietetics Verification Statement, if applicable.
 - c) Original Coordinated, Dietetic Internship or Dietetic Technician Verification Statement.
 - d) Original RDE or DTRE MisUse Form signed by each student.
3. Verification process of documents received in CDR
 - a) Review and verify the documents submitted for the audit.
 - b) Inconsistencies that can occur with the document verification
 1. If the Program Director fails the audit, send e-mail to Program Director advising disposition of the audit, stating the problems with the class that occurred during the audit.
 2. Program Director must submit, within five business days and in writing, the appropriate information or an explanation about the inconsistencies discovered during the initial audit.
 3. CDR reviews the additional information/documentation to determine audit status.
 4. If Program Director fails the audit and remains in non-compliance, the Registration Eligibility Services Manager meets with the CDR Directors to discuss the next step(s).
 5. Upon passing the audit, return audit documents to the Program Director.
 6. Remove the Class Completion documents from pending and process for the exam.
 7. Enter audit status [pass/fail] on the Random Audit Report for CDR and CADE.

COMMISSION ON DIETETIC REGISTRATION
REGISTRATION ELIGIBILITY APPLICATION
ON-LINE PROCESS

Page 33

PROGRAM DIRECTOR RANDOM AUDIT

SAMPLE RANDOM AUDIT NOTICE

REVISED: APRIL 2012

The following statement you will receive via e-mail should your recent class completion submission be selected in the Random Audit. The e-mail will identify which class is being audited and allow you five to seven business days to submit the documents.

This is notification that your recent class submission of program graduates has been computer selected for the random audit.

Please send the following additional documentation for each student/candidate along with your required support documentation to complete the eligibility application process to CDR.

- Original transcript confirming degree and date of conferral *, official letter from the Registrar or Dean of the Graduating School, or Original Foreign Degree Equivalency Report confirming the degree equivalent.
- Original Didactic Program in Dietetics Verification Statement, if applicable
- Original Dietetic Internship, Coordinated or Dietetic Technician Verification Statement

Please Note: The DICAS online verification statement for the supervised practice match process is separate and distinct from the traditional CADE Verification Statement that verifies program completion of the DPD, CP, DI and DT programs. The DICAS verification statement is not an acceptable verification document and cannot be used as part of the CDR CRMS and Audit process.

- Original *RDE* or *DTRE* Mis-Use Student Signature Forms

The audit documents must be sent directly from the program director only to Peggy Anderson at CDR via a secure and traceable one- or two-day courier service (i.e., Priority Mail, UPS, Federal Ex, DHL, etc). Please **Do Not** send via regular U.S. Mail, Certified and/Registered as they can take up to two to four weeks for delivery.

All original documentation will be returned to the Program Director upon completion of the audit via secure mail.

Please don't hesitate to contact Peggy Anderson or Joe LasCola at panderson@eatright.org or jlascola@eatright.org via phone at 800/877-1600, extension 4764 or 4781, should you have any questions or require assistance during this process.

* Please refer to the US Degree Transcript Verification Addendum.

PROGRAM DIRECTOR RANDOM AUDIT

SAMPLE RANDOM AUDIT NOTICE

REVISED: APRIL 2012

US DEGREE TRANSCRIPT VERIFICATION ADDENDUM

- Program directors can accept an electronic transcript from the Registrar's Office for a US Degree only with the following provisions:
 - The transcript is sent directly to the program director via e-mail from the Registrar's Office where the degree was obtained.
 - The Subject Line on the e-mail states: XYZ University Official Transcript
 - In the body of the e-mail it states: Jane/John Doe has ordered an official transcript for you.
 - In the body of the e-mail it states: In order to view the official, electronic transcript, please go to the web site detailed below and enter the Secure Access Code.
 - In the body of the e-mail the Institution's web direct link is provided to obtain the official transcript on the Institution's letterhead.
 - In the body of the e-mail the Institution's secure Access Code is provided.
- You must include the e-mail from the Registrar's Office addressed to the program director stating how access the electronic transcript.
- You must include the printed page from the Office of the Registrar with the institution's name stating Secure Access Code Verification, or certifying that the program director was the intended recipient of the electronic transcript.
- You must include the electronic official transcript stating the degree and date of conferral, awarded or graduation.

PROGRAM DIRECTOR RANDOM AUDIT

FAILED RANDOM AUDIT FREQUENT PROBLEM LIST

REVISED: APRIL 2012

Below is a list of frequent problems in the Random Audit Class Completion Submissions that result in a failed audit.

- Original documents are missing
- Photocopies are submitted
- Transcript is missing the degree and date of conferral
- Foreign degree evaluation report is from a CDR unapproved agency listed on the website: <http://www.eatright.org/CADE/content.aspx?id=5966>
- Declaration of Intent was submitted instead of the official transcript
- Verification Statement for the DPD, DI, CUP or DT is missing
- Verification Statement is missing the full program completion date
- Verification Statement is missing the social security number *
- Verification Statement is missing the program director's signature
- Verification Statement is missing the program director's verification date
- Verification Statement is signed in black ink
- Verification Statement is pre-dated
- Verification Statement has been altered
- Verification Statement verifies a Plan IV completion instead of the DPD

It is important for the Coordinated, Dietetic Internship and Dietetic Technician program director to verify all legal documents to ensure they are an original and that all required information is provided on each form. This is a requirement for the Dietetic Internship program director to review the transcript and DPD Verification Statement when the student is admitted into the program. We recommend obtaining two official transcripts, one for the student's file, if the Registrar's Office retains the original. This will ensure there are no unnecessary delays during the audit process.

**Commission on Dietetic Registration
Registration Eligibility Processing Procedure
Social Security Number Requirements for
Verification Statements and the CRMS Online System**

April 2012

The following information is provided to dietetic educator program directors to provide clarification about the Commission on Dietetic Registration's registration eligibility requirement for all candidates to provide their full social security number (SSN) on their initial application. CDR understands that this requirement is in conflict with some educational institutions policies not to use, record or store the SSN in the student academic record. The following response is from CDR's legal Counsel regarding the Academy/CDR use of the SSN in application verification and processing.

The Privacy Act of 1974 that gave rise to the limitations regarding the collection and use of the SSNs. Specifically, that Act is applicable to federal, state and local government agencies, and also to school boards and school districts. All such entities are precluded from denying benefits or rights to individuals on account of their refusal to provide the SSN. The federal, state and local government agencies are also prohibited from requesting that an individual disclose his or her SSN unless the individual is advised whether the disclosure is mandatory or voluntary, by what statutory or other authority the disclosure is solicited, and the uses to which the SSN will be put.

*Consequently, the federal law does not prohibit CDR or other private entities from requesting the SSN. However, various advocacy groups are advising citizens to refuse to disclose their SSNs to non-governmental agencies, and it may become somewhat problematic (practically more than legally) to deal with an applicant who refuses to disclose. **It appears, therefore, that CDR can legally continue to require the disclosure of the SSN by its applicants.***

CDR currently uses the social security number to prevent the creation of duplicate member and registry records, since CDR shares its demographic database with the Academy. Based on the legal input, CDR will continue to request the social security number for each applicant for registration eligibility.

The student is required to provide their **full** social security number on the CDR Registration Eligibility Application; however, only the last four digits are required for entry on the student record when the program director enters the SSN on the CRMS online system. Program directors submitting the class completion documents on a pdf file by e-mail should retain the original documents in the student's file. However, prior to filing the documents the program director can white out the first five (5) digits of the SSN that appear on the Registration Eligibility Application. Only the last four digits are required for entry on the ACEND Verification Statement.