CASE STUDY – NDTRs and Health and Wellness Coaching

Case: A nutrition and dietetics technician, registered (NDTR) is determining if health and wellness coaching is within their individual scope of practice.

Statement: The Revised 2017 Scope of Practice for the Nutrition and Dietetics Technician, Registered (NDTR) does not guarantee that a NDTR will be able to perform expanded practice skills, but it can guide the NDTR to the resources and options that can be used to evaluate whether the NDTR can safely and effectively provide an expanded practice skill and advance individual practice.

Definitions:

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<th>Term</th>
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<tr>
<td>Certified Health Coach</td>
<td>A Certified Health Coach is a health professional with a diverse educational and professional background who uses evidence-based interventions to collaborate with individuals and/or groups to promote improved health choices, thereby improving their health, health risk and overall wellbeing. Certified Health Coaches guide clients to achieve their health goals through lifestyle and behavior choices aligned with their long-term goals and values. A Certified Health Coach should provide expert advice only in the areas where he/she has nationally recognized credentials and/or professional designation (e.g., RDN, physician, psychologist or other qualified health professional) and must adhere to their individual professional scope of practice and code of ethics.</td>
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| National Board Certified Health and Wellness Coach (NBC-HWC) | National Board Certified Health and Wellness Coaches (NBC-HWC) “partner with clients seeking self-directed, lasting changes, aligning with their values, which promote health and wellness and, thereby, enhance well-being.”

In the course of their work, health and wellness coaches display unconditional positive regard for their clients and a belief in their capacity for change, and honoring that each client is an expert on his or her life while ensuring that all interactions are respectful and non-judgmental”.

A NBC-HWC is a professional with a diverse educational and professional background who works with individuals and/or groups in a client-centered process to facilitate and empower the client to achieve self-determined goals related to health and wellness. NBC-HWCs support clients ranging from low to high health risk in mobilizing internal strengths and external resources, and in developing self-management strategies for making sustainable, healthy lifestyle, behavior changes.

NBC-HWCs must adhere to all code of ethics and standards of practice for his/her nationally recognized credential and/or professional designation (e.g., RDN, physician, psychologist or other qualified health professional) or his/her respective healthcare profession, including maintaining an active unencumbered license, registration or special certification to practice if required by law.

Definitions located in the Definition of Terms List: www.cdrnet.org/definitions
Explanation of Case:
An experienced NDTR, who works part-time with and under the supervision of the outpatient RDN, provides outpatient individual and group nutrition education (e.g., dietary guidelines, general nutrition, and healthy lifestyle). To enhance skills, the NDTR is looking to pursue training in coaching techniques and a health and wellness coaching certification, as this would expand practice opportunities. The hospital has recently expanded its community education programming to offer wellness, exercise, and physical activity services in collaboration with a local community-supported exercise facility. The hospital supported service will be using credentialed exercise professionals as well as health professionals with a health and wellness coaching certification. The NDTR is interested in incorporating coaching techniques into current work and would like to be considered for a health and wellness coach position in Community Education Services to supplement work in outpatient nutrition services.

In this example, the NDTR uses the Revised 2017 Scope of Practice for the NDTR¹, and the Revised 2017 Standards of Practice in Nutrition Care and Standards of Professional Performance for NDTRs² to determine whether coaching is within their individual scope of practice. Although the NDTR may seek advice and direction from the RDN and colleagues, the initial review is the NDTR’s responsibility.

Case Study Resources:
The resources listed below and throughout the case study are intended to provide additional knowledge, guidance, and tools related to telehealth. NOTE: Some of the resources require non-members to pay a fee to access.

➢ Available from the Academy of Nutrition and Dietetics (Academy)/Commission on Dietetic Registration (CDR) (Dietetic Practice Groups [DPGs] require membership to access resources, listservs, and subunits)
  ▪ Code of Ethics for the Nutrition and Dietetics Profession: https://www.cdrnet.org/codeofethics
  ▪ Revised 2017 Scope of Practice for the NDTR: https://jandonline.org/content/core
  ▪ Revised 2017 Standards of Practice and Standards of Professional Performance for NDTRs: https://jandonline.org/content/core
  ▪ Weight Management DPG Weight and Wellness Coaching Subunit (membership required): https://www.wmdpg.org/member-benefits/subunits/wellness-coaching
  ▪ Nutrition Entrepreneurs DPG Coaches Specialty Group (membership required): https://www.nedpg.org/groups/coaches/
  ▪ Cardiovascular Health and Well-being DPG (membership required): https://www.cvwell.org/home
  ▪ If practice includes telehealth nutrition wellness education activities or consultations with RDN, refer to these Academy resources: Telehealth Webpages, includes: Telehealth Discussion Board, Medicare Telehealth Services and RDs, Telehealth Policy and Regulation, Telehealth and Payment (membership required): https://www.eatrightpro.org/career/career-resources/telehealth-quick-guide
  ▪ Practice Tips: NDTRs and Autonomy: www.cdrnet.org/tips
Practice Tips: What is Meant by “Under the Supervision of the RDN?”: www.cdrnet.org/tips
Practice Tips: The RDN/NDTR Team: Steps to Preserve: www.cdrnet.org/tips
Nutrition Care Process Terminology (eNCPT online) (membership required): https://www.ncpro.org/

Institutional, regulatory, and other resources include:
- NDTR job description examples: https://www.cdrnet.org/opportunities
- Organization policies and procedures
- Facility/program accreditation standards, if applicable
- State licensure laws and regulations: https://www.cdrnet.org/licensure

Using the Scope of Practice Decision Algorithm: https://www.cdrnet.org/scope

The Scope of Practice Decision Algorithm is a resource that guides a NDTR to answer a series of questions to determine whether a particular activity is within their individual scope of practice. The algorithm is designed to allow a NDTR to critically evaluate their knowledge, skills, experience, judgment and demonstrated competence using criteria resources. The algorithm is used by the NDTR to evaluate each separate activity.

PRACTITIONER QUESTIONS:

Question 1: Is this activity consistent with the Academy of Nutrition and Dietetics/Commission on Dietetic Registration (CDR) Code of Ethics, standards of practice and standards of professional performance, evidence-based nutrition practice guidelines, other national organization standards of practice and/or practice guidelines, accreditation standards, federal and state laws and regulations, and good business practices?

The NDTR verifies consistency with the 2017 Scope of Practice for the NDTR, which states:

- “NDTRs work under the supervision of an RDN when in direct patient/client nutrition care, and may work independently in providing general nutrition education to healthy populations, consulting to foodservice business and industry, conducting nutrient analysis, collecting data and conducting research, and managing food and nutrition services in a variety of settings.”¹
- “Roles for qualified NDTRs include providing nutrition education and guidance related to population-based public health initiatives; and managing foodservice operations collaborating with the RDN for menu approval according to regulations.”¹
• “Provide nutrition education, with approval of and under the supervision of the RDN, that addresses prescribed diet therapy, or nutrition guidelines for health maintenance or prevention or management of medical conditions.”¹

• “NDTRs may be eligible to bill for self-pay services within their scope of practice (eg, supermarket-retail NDTR, private practice, coach, menu analysis) or services that meet payer requirements (eg, coaching or corporate wellness).”¹

In addition, there is a segment in the Practice Areas, Services, and Activities section of the Scope of Practice article dedicated to coaching:

“NDTRs work as health and wellness coaches in health care facilities, private practice, nonprofit organizations, wellness businesses (eg, in-person or via telehealth), and corporate wellness. NDTRs:

• Educate and guide clients to achieve health goals through lifestyle and behavior adjustments, have knowledge and understanding of behavior change, culture, social determinants of health, knowledge of motivational interviewing techniques, and educate clients on general nutrition guidelines.

• Empower clients to achieve self-determined goals related to health and wellness.

• Are knowledgeable of and follow federal and state laws and regulations and appropriate coach certification accreditation organization standards and work within the Revised 2017 Scope of Practice for the NDTR.”¹

The NDTR compared this activity to the Academy/CDR Code of Ethics. While coaching is not mentioned directly in the Code of Ethics, there are some principles and standards that apply to this topic (Note: may not be all inclusive, others may apply on a case-by-case basis):

• “Recognize and exercise professional judgment within the limits of individual qualifications and collaborate with others, seek counsel, and make referrals as appropriate.”³

• “Practice within the limits of their scope and collaborate with the inter-professional team.”³

• “Document, code and bill to most accurately reflect the character and extent of delivered services.”³

The NDTR reviewed the Revised 2017 Standards of Practice (SOP) in Nutrition Care and Standards of Professional Performance (SOPP) for NDTRs. The Revised 2017 SOP in Nutrition Care and SOPP for NDTRs contains a role example for a ‘Telehealth practitioner, wellness organization’ for a NDTR with interest and expertise in health and wellness coaching.²

**Question 2: Do you have the necessary knowledge, skills, and demonstrated competence in practice to perform this activity?**

In reviewing their education and training, the NDTR determined additional knowledge and skills related to coaching would be required. The NDTR decided to investigate applicable Academy learning
activities, CDR Certificates of Training (eg, Weight Management) and resources available through other health and wellness coaching certification websites.

- The NDTR reviewed the following Academy/CDR Webinars/Resources:
  - CDR Certificates of Training in Obesity in Pediatrics and Adults: [https://www.cdrnet.org/obesity-pediatrics-adults](https://www.cdrnet.org/obesity-pediatrics-adults)
  - CDR Assess and Learn- The Role of Nutrition in Health Promotion and Disease Prevention: [https://www.pathlms.com/cdr/courses/26779](https://www.pathlms.com/cdr/courses/26779)
  - Weight Management DPG- Weight Management Matters Newsletters (membership required): [https://www.wmdpg.org/member-benefits/newsletters](https://www.wmdpg.org/member-benefits/newsletters)

**Question 3:** Did you use the Standards of Practice and Standards of Professional Performance to determine your competence? Did you demonstrate your competence to an individual with the knowledge and skills to appropriately assess your ability to perform the activity? Is your competence documented in your employee personnel record?

The NDTR reflects on the ‘core’ SOP and SOPP indicators² ([https://jandonline.org/action/showPdf?pii=S2212-2672%2817%2931627-1](https://jandonline.org/action/showPdf?pii=S2212-2672%2817%2931627-1)) to ensure meeting the minimum competent level of practice related to coaching activities and/or techniques. The following are examples of indicators from the Revised 2017 SOP in Nutrition Care and SOPP for NDTRs² that may be applicable depending on role and responsibilities, the below list is not all encompassing.

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<td>1.3A, 1.3B, 1.3D, 1.3E, 1.3G, 1.3H, 1.3I, 1.5</td>
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To strengthen knowledge and skills related to a NDTR in a coaching role, the NDTR evaluates their level of practice related to the Revised 2017 SOP in Nutrition Care and SOPP for NDTRs². The indicators relevant to health and wellness coaching where the NDTR does not meet the competent level are opportunities to strengthen knowledge and skills for quality practice and enhance application for the Community Education Health and Wellness Coach position.
After consulting with colleagues on best practices and reviewing the resources in Question 2 and applicable indicators, the NDTR decides to complete an Assess and Learn in Health Promotion & Disease Prevention and review the newsletters to become competent in incorporating coaching techniques into current role with outpatient nutrition services. The NDTR records completion of the webinars in their Professional Development Portfolio. Once the NDTR completes competence verification by the outpatient RDN, the RDN supervisor provides documentation of completion of certificate of training and competence evaluation for the NDTR’s personnel file following organization procedures.

**Question 4: If the state(s) where you work license RDNs, is there any language that prohibits this activity? Are there provisions within the scope of practice of any other professions that would limit performing this activity?**

The NDTR understands that they must work under supervision of the outpatient RDN when providing direct patient/client care involving medical nutrition therapy (MNT) for acute and chronic health diseases or conditions; and that the RDN and NDTR must meet the other applicable standards that are required by state or local laws and regulations. The NDTR learned that if their practice were to include telehealth to refer to the Practice Tips: Practicing Telehealth. Since regulations and policies are regularly updated, the NDTR routinely monitors the applicable laws and regulations.

**Question 5: Are there any additional credentials (i.e., NBC-HWC, Wellcoaches Certified Health & Wellness Coach) or training (i.e., internship/supervised practice experience, CDR Certificates of Training in Obesity in Pediatrics and Adults) described in published practice guidelines that would be expected of a health professional performing this activity?**

The NDTR researched published practice guidelines and reviewed coaching-specific certificates of training, credentials, and formal training suggested for health professionals performing coaching to develop and demonstrate the necessary competence. The Scope of Practice for the NDTR’s Figure 4: Coach credential or certification options for NDTRs (not all inclusive) highlights coaching credentials and certification that could be considered by NDTRs.
Completing CDR’s Assess and Learn helped confirm the NDTR’s intention to be a coach. The certificate of training increased the competence level for the present position and was a steppingstone in the process that piqued the NDTR’s interest in reviewing the various coaching certifications available. The NDTR decides to pursue the National Board Certified Health and Wellness Coach credential (NBC-HWC) that requires taking a NBC-HWC-approved health and wellness training program and completing other requirements for the certification to qualify and sit for the exam. Holding a certified health and wellness coach credential, in addition to the NDTR credential, would indicate qualifications to provide health and wellness coaching services to potential clients. Certification as a Health and Wellness Coach also would support the NDTR’s application and consideration for the hospital’s Community Education Services, Health and Wellness Coach position.

**Question 6: Does your employer/organization, in its policies and procedures or medical staff bylaws, rules and regulations, if applicable, recognize the NDTR as qualified to perform the activity?**

The NDTR, with the assistance of the nutrition service manager, reviews the organization’s governing body documents, such as medical staff bylaws, rules and regulations, and policies and procedures and determined there are no barriers to the NDTR applying for the Health and Wellness Coach position in Community Education Services.

The NDTR plans to incorporate coaching knowledge and skills gained during qualification for the coaching certification toward work in outpatient nutrition services. In working with the outpatient RDN with clients referred for nutrition care and services, the NDTR demonstrates use of coaching techniques so the RDN can evaluate competency in the current role. The NDTR and the nutrition services manager update the NDTR’s current job description to include use of coaching techniques in nutrition education and MNT-related activities supervised by the outpatient RDN.
Note: Health and wellness coaching does not involve MNT. Coaching involves guiding and motivating the client at their request on follow through with their health goals which could include following a nutrition plan developed with an RDN. If the NDTR is accepted for the Health and Wellness Coaching position, the NDTR’s supervisor would be a staff member in Community Education Services. In working with a client, if it becomes apparent to the NDTR that the client would benefit from working with an RDN, the NDTR needs to facilitate referral to an RDN for MNT services. The NDTR could continue working with the client in a health and wellness coach role in Community Education Services. If the client does work with an RDN to develop a MNT care plan, the NDTR can support the client with encouragement and follow through with the client’s permission (any needed MNT-related nutrition education would be provided by the RDN). The RDN’s consultation for MNT may be covered by insurance while the health and wellness coaching provided by the NDTR is fee-for-service unless included in the client’s employer health plan.

The case example provides information on what things need to be considered before beginning to deliver health and wellness coaching services. Before performing this new activity, the NDTR should also consider the following:

- Ensure that the activity is included in the job description.
- Ensure that their personnel file contains primary source verification of education, training, credentials, if applicable, continuing education for maintenance of certification(s), and competence in performing the activity.
- Investigate organization’s liability coverage and need for personal professional liability insurance or additional coverage to include health and wellness coaching.
- For billable MNT and nutrition education-related services, investigate whether this activity (could include use of coaching skills), as performed by a NDTR and under the direction and supervision of an RDN (charge would be submitted under the RDN’s National Provider Identifier [NPI] Number), will be reimbursed by health plan insurers, including Medicare.
- For health and wellness coaching services (not MNT), investigate whether this activity, as performed by a NDTR with a coaching certification will be reimbursed by health plan insurers or will need to be a self-pay service.

Disclaimer: The Case Studies are intended solely as models to assist practitioners in using the Scope of Practice, Standards of Practice in Nutrition Care, Standards of Professional Performance, and the Scope of Practice Decision Algorithm and suggested resources, and in determining their individual scope of practice. They should not be viewed as determinative of any particular inquiry or outcome. The results of an actual inquiry may differ according to the specific factual circumstances, state laws applicable to the specific situation, and organization policies and procedures.

In this Case Study, the CDR has chosen to use the term RDN to refer to both registered dietitians (RD) and registered dietitian nutritionists (RDN) and to use the term NDTR to refer to both dietetic technician, registered (DTR) and nutrition and dietetics technician, registered (NDTR).
REFERENCES


