

CASE STUDY – Expanding RDN Practice

Statement: The <u>Scope and Standards of Practice for the Registered Dietitian Nutritionist (RDN)</u> and the <u>focus area Scope and Standards of Practice</u> do not guarantee that a RDN will be able to perform expanded practice skills, however they can guide the RDN to the resources and options to evaluate whether they can safely and effectively provide an expanded practice skill and advance individual practice.

Case Study Resources

- Resources from the Academy of Nutrition and Dietetics (Academy) and Commission on Dietetic Registration (CDR)
 - Academy Dietetic Practice Groups (DPGs) (membership required)
 - Academy Evidence Analysis Library (membership required)
 - Nutrition Care Process Terminology
 - ACEND Education Core Knowledge and Competencies for the RDN
 - Code of Ethics
 - Revised 2024 Scope and Standards of Practice for the RDN and NDTR
 - Essential Practice Competencies for CDR's Credentialed Nutrition and Dietetics
 Practitioners
 - Focus Area Standards for RDNs
 - CDR Certifications
 - Common Credentials Held by RDNs and NDTRs
 - CDR Definition of Terms List
- Institutional, regulatory, and other resources
 - RDN job description
 - Organization policies and procedures
 - Organization and medical staff procedures? for obtaining clinical privileges for therapeutic diet order writing or expanded role/nutrition-related services (eg, inserting nasogastric and nasoenteric feeding tubes)
 - Accreditation standards, if applicable (eg, TJC, DNV GL, ACHC, CoC)
 - State licensure laws and regulations
 - CDR Practice Tips
 - Centers for Medicare & Medicaid Services State Operations Manual
 - Professional organizations such as the <u>Association of Diabetes Care and Education</u>
 <u>Specialists (ADCES)</u> (membership required)
 - Clinical Guidelines (membership or fees may apply), such as:
 - American Society for Parenteral and Enteral Nutrition [ASPEN]
 - American Diabetes Association Standards of Care



Academy of Nutrition and Dietetics

The Scope of Practice Decision Algorithm is a resource that guides the NDTR through a series of questions to determine whether a particular activity is within their individual scope of practice. Questions are answered based on a critical evaluation of applicable laws, regulations, and standards, as well as their knowledge, skills, experience, judgment and demonstrated competence. The tool is intended to evaluate each activity separately.

Below is a chart of three examples of advanced practice activities with evidence that supports the RDN may be eligible to perform the activities.

Assessment Questions	RDNs Provide Physical Activity Guidance to Clients/Patients	RDNs Initiate Orders for Nutrition- Related Laboratory Test in Hospital, Ambulatory and/or Private Practice Settings *	RDNs Provide Diabetes Education and Care plan Management that Includes Medication Adjustments
Do the Scope and	"RDNs in clinical practice	"RDNs in clinical practice providing	"Assessing and managing individuals
Standards of Practice or	providing person-/population-	person-/population-centered nutrition	with complex diseases or conditions
applicable RDN focus	centered nutrition care and	care and MNT at various levels of	requires specific knowledge, skills,
area standards contain	medical nutrition therapy (MNT)	practice (competent, proficient, and	and specialized training beyond core
information that	at various levels of practice	expert) use the NCP and its	education and supervised practice.
provides guidance on	(competent, proficient, and	standardized terminologyto:	Examples include: Counseling for pre-
whether the	expert) use the nutrition care	Order, recommend, perform, and/or	diabetes, interpreting data and
practitioner can	process (NCP) and its	interpret test results related to	adjusting continuous glucose
perform this activity?	standardized terminologyto:	nutrition status: blood pressure,	monitoring [CGM] devices, insulin
	Provide nutrition counseling;	anthropometrics, indirect calorimetry,	pumps, and diabetes-related
*For brevity, these case	nutrition behavior therapy;	laboratory tests, and waived point-of-	technology" 1
studies do not	lactation counseling; health and	care laboratory testing (eg, blood	
reference specific	wellness coaching; and nutrition,	glucose, cholesterol)."1	"1.2.4: Recognizes advantages and
indicators from any	physical activity, lifestyle, and		accounts for disadvantages of
focus area scope and	health education and counseling	"4.3.5:with privileges or physician-	technology related to privacy,
standards documents.	as components of preventative,	delegated orders, RDN orders or	confidentiality, effectiveness, and
Applicable focus area	therapeutic, and restorative	recommends (but not limited to):	safety for clients and organization"
standards can be found	health care." ¹	Nutrition-related services (eg, bedside	
<u>here</u> .		swallow screening, inserting, and	"7.4.6: Orders, recommends,
	"7.2 Conducts nutrition	monitoring nasoenteric feeding tubes,	implements, and/or modifies orders
	assessment: 7.2.6 Evaluates:	indirect calorimetry measurements,	for diet and nutrition-related services
	physical activity habits and	radiology to interpret lean body mass	consistent with applicable specialized

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restrictions, cognitive and physical ability to engage in developmentally appropriate nutrition-related tasks"¹ Suggested focus area RDN Standard: Academy of Nutrition and Dietetics: Revised 2021 Standards of Professional Performance for Registered Dietitian Nutritionists (Competent, Proficient, and Expert) in Sports and Human Performance Nutrition Expert) in Sports and Human Performance Nutrition and Organization standards of practice guidelines; accreditation standards of practice guidelines; accreditation standards of practice and state regulations; CMS conditions of participation or coorditions for coverage; and facility/program accreditation standards are restrictions, cognitive and physical activity of practice guidelines; accreditation standards of force and state regulations for coverage; and facility/program accreditation standards organization or coverage; and facility/program accreditation standards organization		1	1	right₁ and Dietetics
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conditions for coverage; and facility/program other diagnostic services in the list of scope of care services granted to individual RDNs first requires Outpatient Settings 2024, Vol 2, Issue 2: - The Seismic	conditions of		organization policies. The option to	Top of Our Scope: Complex Diabetes
coverage; and scope of care services granted to facility/program scope of care services granted to individual RDNs first requires 2024, Vol 2, Issue 2: - The Seismic	participation or		include nutrition-related laboratory or	Management in the Inpatient and
facility/program individual RDNs first requires 2024, Vol 2, Issue 2: - The Seismic	conditions for		other diagnostic services in the list of	Outpatient Settings
	coverage; and		scope of care services granted to	
accreditation standards investigation of relevant state law as Shift: Registered Dietitian	facility/program		individual RDNs first requires	2024, Vol 2, Issue 2: - The Seismic
	accreditation standards		investigation of relevant state law as	Shift: Registered Dietitian

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		right₁ and Dietetics
·	well as any other requirements and/or	Nutritionists and Diabetes Care and
	incentives that CMS or other insurers	Education Specialist Role in Primary
	might have. This investigation should	Care
	also include hospital policies for	
	Medicare payment requirements as	Leveraging Registered Dietitian
	well as Electronic Health Record	Nutritionists and Registered Nurses in
	incentives, and reimbursement	Medication Management to Reduce
	requirements from Medicare,	Therapeutic Inertiae
	Medicaid, or private payers (i.e., may	
	require a physician's order). ²	2021, Vol 42, Number 4: New
		Frontiers in Diabetes Care
Examples include:	Examples include:	Examples include:
 Certified Specialist in Sport 	CDR Board Certified Specialist	 Certified Diabetes Care and
Dietetics (CSSD)	Advanced Practice RDN	Education Specialist (CDCES)
 International Olympic 		Board-Certified in Advanced
committee (IOC) Diploma in		Diabetes Management (BC-ADM)
Sport Nutrition		Advanced Practice RDN
• Common Credentials Help by		
RDNs and NDTRs		
	 Certified Specialist in Sport Dietetics (CSSD) International Olympic committee (IOC) Diploma in Sport Nutrition 	incentives that CMS or other insurers might have. This investigation should also include hospital policies for Medicare payment requirements as well as Electronic Health Record incentives, and reimbursement requirements from Medicare, Medicaid, or private payers (i.e., may require a physician's order).² Examples include: • Certified Specialist in Sport Dietetics (CSSD) • International Olympic committee (IOC) Diploma in Sport Nutrition • Common Credentials Help by

^{*} Practitioners must be licensed to order labs in hospital outpatient settings per CMS SOM Hospitals: §482.54(c) Standard: Orders for Outpatient Services. Further investigation may be necessary if practice setting is not a hospital, e.g., free standing dialysis center, skilled or long-term care facility, medical clinic, private practice.

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Before performing the activity, the RDN meets with their supervisor to review appropriate organizational process and procedures, as well as completing the following tasks:

- If the state(s) where you work or your client/patient is located in when receiving your care licenses RDNs, review laws/regulations to ensure this activity is not prohibited? Also review other professions' scopes of practice that may limit the ability of an RDN to perform the activity.
- Complete steps to obtain desired clinical privileges and receive approval from organization medical staff. For hospitals without RDN privileging or in non-hospital settings, refer to practice tips on privileging (www.cdrnet.org/tips).
- Confirm that the activity is included in your job description and in applicable policies and procedures.
- Ensure that your personnel file contains documentation (initially and annually) of appropriate education, training, credentials, and competence necessary to perform the activity.
- Investigate your organization's liability coverage, as well as the need to obtain personal
 professional liability insurance. Due to possible risks associated with independent order writing
 and/or performing procedures, such as tasks within the realm of a medical level of care (ie,
 inserting feeding tubes), the RDN is advised to carry professional liability insurance appropriate
 to that role.
- For billable services (eg, laboratory orders) investigate whether granted privileging activities, as
 performed by an RDN, will be reimbursed by health plan insurers, including Medicare
 (practitioners must be licensed to order outpatient laboratory tests per CMS regulations).
- Determine with supervisor if a plan for coverage for days off or vacations will be needed for any
 assigned patients receiving care if expected nutrition care activities are not universal among
 RDNs, (eg, enteral nutrition orders for patient with diabetes or situations in which an RDN is
 privileged to adjust diabetes medication based on monitoring of blood sugars).

Disclaimer: The Case Studies are intended solely as models to help practitioners determine their individual scope of practice with guidance from the Scope and Standards of Practice and the Scope of Practice Decision Algorithm. Case Studies should not be used to determine a particular inquiry or outcome, as 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.

Reference

- Revised 2024 Scope and Standards of Practice for the Registered Dietitian Nutritionist. Commission on Dietetic Registration Scope and Standards of Practice Task Force. www.cdrnet.org/scope. Accessed September 24, 2024.
- State Operations Manuals: Appendix A Survey protocol, regulations and interpretive guidelines for hospitals (Rev. 220, 04-19-24); §482.12(a)(1) Medical Staff, non-physician practitioners; §482. 23(c)(3)(i) Verbal Orders; §482.24(c)(2) Orders; §482.28(b)(2) Ordering Diet. US Department of Health and Human Services, Centers for Medicare and Medicaid Services. Accessed September 24, 2024. https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap a hospitals.pdf