

Testimony in Opposition of SB20-040

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Committee: Public Health Care and Human Services

Date: Mar 13, 2020

Colorado Academy of Nutrition and Dietetics opposes the bill as currently written and requests the following to resolve the opposition:

1. Add clarity to the exemptions language. Here is a sample statement adapted from the Genetic Counseling Licensing Act in New Mexico (Section 61-6A-5):

"Nothing in the Genetic Counseling Act is intended to limit, interfere with or prevent a licensed healthcare professional **or Registered Dietitian/Nutritionist registered by the Commission on Dietetic Registration** from practicing within **the scope of practice for that healthcare profession.**"

RDN Concerns about SB20-040

- RDNs have genetic competencies in their core training and in specialized practice, that cover the use of genetic data as part of a nutrition assessment to identify nutrition problems and develop and implement appropriate interventions
- Science supporting the use of genetic data to customize nutrition interventions is growing. As the research expands RDNs need to be able to procure and use relevant genetic data to provide appropriate nutrition interventions.
- The current bill doesn't appear to spell out flexibility for use of genetic information within professional scope of practice.
- Laws for genetic counseling licensing in other states make an exemption for use of genetic data within scope of practice for licensed healthcare professionals. Nutrition is not a licensed profession in Colorado and therefore RDN scope of practice needs to be spelled out specifically as part of that recognized exception.

About Registered Dietitian/Nutritionists (RDN)

Registered Dietitian/Nutritionists (RDN) are allied health professionals that provide evidence-based nutrition care in a wide variety of settings. There are over 3000 RDNs in Colorado.

RDNs are nationally registered by the Commission on Dietetic Registration (CDR), and have completed the following:

- At minimum a bachelor's degree meeting specific requirements from an accredited university
- 1200 hours of supervised professional practice
- a rigorous national registration exam
- 75 continuing professional education credits every 5 years.

Core RDN Scope of Practice - Summary (1)

Nutrition Assessment

Collection of information to complete a root cause analysis

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- Patient/client/population history
- Anthropometrics and nutrition focused physical exams
- Biochemical data/medical tests/procedures (**includes genetic data, when relevant**),
- Diet and lifestyle information

Nutrition Diagnosis

Identify and label specific nutrition problems that the RDN is responsible for treating

Nutrition Intervention/Plan of Care

Define the nutrition plan of care and design and deliver appropriate nutrition interventions that address the problems, behaviors, environmental conditions or aspects of health status related to nutrition. Includes referral to medical and other healthcare professionals if concerns have been identified.

Nutrition Monitoring and Evaluation

Track outcomes and adjust plan of care/interventions as necessary to meet targeted goals

Genetic Competency Requirements for RDN Education (2)

5.1 The program's curriculum must be designed to ensure the breadth and depth of requisite knowledge needed for entry to supervised practice to become a registered dietitian nutritionist.

13. Organic chemistry, biochemistry, anatomy, physiology, genetics, microbiology, pharmacology, statistics, logic, nutrient metabolism, integrative and functional nutrition and nutrition across the lifespan

Genetic Competencies in Specialized Practice: eg: RDN in Integrative and Functional Medicine (3)

1.2E: Assesses diagnostic tests, procedures and evaluations

1.2E2 Assesses functional laboratory tests related to nutrition (eg genomic biomarkers/SNPs)

References

1. The Academy Quality Management Committee. Academy of Nutrition and Dietetics: Revised 2017 Standards of Practice in Nutrition Care and Standards of Professional Performance for Registered Dietitian Nutritionists. J Acad Nutr Diet. 2018;118:132-140.
2. Accreditation Council for Education in Nutrition and Dietetics. ACEND accreditation standards for nutrition and dietetics didactic programs (DPDs). <https://www.eatrightpro.org/-/media/eatrightpro-files/acend/about-program-accreditation/accreditation-standards/2017-standardsfordpdprograms.pdf>. Published July 2016. Accessed March 4, 2020.
3. Ford D, Raj S, Kashi Batheja R, et al. American Dietetic Association: Standards of Practice and Standards of Professional Performance for Registered Dietitians (Competent, Proficient, and Expert) in Integrative and Functional Medicine. JADA. 2011;111(6):902-913.

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