Supervision of Members Who Have Failed the Registration Examination

Previously, members who failed the Canadian Dietetic Registration Examination (CDRE) had their Temporary Certificate of Registration cancelled immediately. The new registration regulation permits the Registrar & ED to extend a temporary certificate on the condition that the temporary member practices under the supervision of an RD who holds a General Certificate of Registration. The condition will appear in the online Register of Dietitians.

Why was this change made to the registration regulation?
Some organizational policies restrict hiring for certain positions to dietitians who hold a General Certificate of Registration. In organizations without this type of restriction, employers often contact the College looking for ways to continue to employ someone who has failed the exam and lost their temporary RD status. The College has supported continued employment for applicants who have failed the exam, as long as they do not use the RD title and the employer provides appropriate supervision and support to ensure that the public is not at risk. Many applicants have reported that being able to continue working after failing the exam on their first attempt was a significant factor in their success on their second attempt.

Among other Ontario regulatory colleges, it is not uncommon for professionals to be permitted to work under supervision while preparing to write their registration examination another time. It is the supervision of the applicant that ensures public protection.

Am I required to provide supervision for someone who has failed the CDRE?
No, RDs are not required to provide supervision for someone who has failed the exam.

However, in the College’s experience, many employers are willing to continue to employ someone who has failed the exam on the first attempt. Given that the member’s temporary certificate cannot be extended without supervision by a general member of the College, it is completely at the discretion of the employer to arrange it.

While the College would not require an RD to accept this responsibility, it is well within your employer’s rights to assign this type of function to you. Please also keep in mind that part of the professional culture of dietetics is supporting the training and education of future members of the profession. (https://www.collegeofdietitians.org/Resources/ProfessionalPractice/Standards-of-Practice/Code-Of-Ethics.aspx

Will supervising a temporary member be similar to supervising a dietetic intern or practicum student?
Supervising a temporary member who has failed the exam is different from supervising a dietetic intern or practicum student.

The internship is designed to provide the student the opportunity to develop and demonstrate all of the entry-level competencies. This supervision serves the purpose of both instruction and evaluation.

A temporary member has demonstrated entry level competencies (during practical training) and will have been practising independently while waiting for the results of the CDRE, presumably to the satisfaction of their employer. Failing the CDRE most likely means that the applicant has not demonstrated full competence in all areas of practice. It is also possible that there were other reasons why the member failed the exam. Supervision is about ensuring the safety of the member’s practice by identifying specific areas of risk or weakness and providing the necessary feedback, guidance and mentoring.

Does the supervision need to be direct/face-to-face?
In the initial phase, face-to-face supervision may be necessary to evaluate the temporary member’s strengths and weaknesses. Afterwards, other means of communication may be arranged, such as, phone, email, Skype, or video conference (e.g., Telemedicine). It is important, however, to have access to appropriate records for review, for example, in a clinical setting, the medical record, and in other settings, documents that would represent the product of the member’s work.
**What is expected from an RD who supervises a temporary member who has failed the exam?**

The supervision ensures public safety. However, it will vary depending on the area of practice and the strengths and limitations of the temporary member. The employer and/or supervising RD will submit a supervision plan to the Registrar & ED addressing four key components (see graph below):

1. **Analysis of Risk** – the supervisor and/or employer will do an analysis of the work setting and identify the activities that the temporary member will be responsible for that pose the greatest risk to the public if not performed competently. This analysis will help guide the planning of the supervisory arrangement.

2. **Direct Observation** – The supervision activity will be more intense at the beginning to enable the supervisor to:
   a. assess the temporary member’s strengths and weakness to ensure that oversight activities focus on areas where the member still needs development.
   b. develop a plan that addresses the appropriate areas of the temporary member’s practice, e.g.:
      i. identifying resources for the temporary member to help address the areas of weakness.
      ii. focusing oversight and assessment activities in the areas where the member still struggles or requires guidance.

3. **Ongoing Access for Mentoring**. The supervisor is available for the temporary member to contact if they encounter non-routine situations where they need guidance.

4. **Routine Review of the Product of the temporary member’s practice** (e.g., files, reports, client records). Depending on the area of practice and the higher risk activities that have been identified, the supervisor may randomly review the work that has been done by the member and provide feedback and guidance where appropriate.

The frequency of review will depend on the needs of the temporary member. You should expect that your supervision will decrease as your satisfaction with their competence increases.