How the College will Regulate Members Who Are Not Practising Dietetics



Mary Lou Gignac, MPA Registrar & Executive Director

If you have worked less than 500 hours in the past three years or have not practiced dietetics and would like to maintain your RD title, I would welcome your input.

Please give me a call or send me an email to discuss ideas about what you would be prepared to do to maintain your registration with the College.

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WHAT DOES IT MEAN TO BE A MEMBER OF A HEALTH PROFESSION COLLEGE?

The "RD" title is obtained after a long and challenging period of education and training. It lends credibility to practice in food and nutrition in a variety of work settings. Once achieved, the "dietitian" and "RD" designations become part of a member's identification, both personally and professionally. Successful RDs, wherever they work, bring honour to the profession.

For the public, being a member of the College means that RDs have the skills and indepth knowledge required to offer safe, competent and ethical dietetic services. The College has an obligation to the public to maintain the integrity of the title by making sure its members are always qualified to practice their profession. Regulation is about ensuring competence for public protection.

So, what happens when an RD holds the dietetic title but is not practising the profession or is on leave for several years? Are they still competent to practice? Do they have the necessary skills and knowledge? How can we be sure?

WHAT RDS THOUGHT ABOUT NON-PRACTISING MEMBERS

In 2009/10, the College consulted with members about proposed changes to its registration regulation. One proposed change was to create a class of "non-practising" RDs to identify those who maintained their designation but were not working in dietetics or were not practising because they had been on leave for a long period of time. The main reason for introducing this class was to make sure that anyone holding a General Certificate of Registration from the College would be qualified to practice dietetics in Ontario.

Through the consultation, we heard many different views: some RDs did not want to lose their RD title, they valued the professional designation even though they were not practising dietetics, many did not like the idea of a "non-practising" class of registration; some were clear in their view that all members of the College should be competent to practice dietetics; and others thought that not being ready to practice was a good reason not to be a member of the College. As a result of this feedback, the College dropped the idea of a provisional class and opted for an alternative approach to ensure competence.

IDENTIFYING RDS WHO PRACTICE < 500 HOURS IN 3 CONSECUTIVE YEARS

The proposed registration regulation includes the alternative approach, which is a referral to the Quality Assurance Committee of any RD who has practiced dietetics less than 500

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hours over the previous three years. These RDs will be assessed to determine whether they have maintained the knowledge and skills necessary to practice dietetics safely and competently.

The quality assurance assessment will consider both practice hours and what RDs have done to maintain or refresh their knowledge, skills and competence through professional development and other volunteer activities. RDs referred to the QA Committee will be asked to describe all of the activities that relate to the content and competencies of dietetic practice. Ultimately, the assessment must reasonably answer the question of whether the RD is competent to practice dietetics or not.

WHAT WILL HAPPEN WHEN RDS ARE DEEMED NOT COMPETENT FOR DIETETIC PRACTICE?

The inevitable situation is that some RDs will not be deemed competent for dietetic practice. What then? There are a number of possible directions permitted by the Regulated Health Professions Act::

- The College could require the RD to do a program of upgrading or continuing education as specified by the College. In such situations, the College would specify the time in which the upgrading must be complete.
 Failure to complete the upgrading would result in some conditions on the certificate of registration (see #3).
- 2. The RD could enter into a voluntary undertaking not to return to dietetics practice unless/until they had completed upgrading as approved by the College. This would be a transparent undertaking shown on the Register of Dietitians and include a statement that the reason for undertaking is the fact that the RD has not been working in dietetics.
- The College could place a term, condition or limitation (TCL) on a certificate of registration indicating that the RD cannot practice dietetics unless/until they had completed upgrading as directed

by the College. This TCL would also be on the Register of Dietitians. The difference between an undertaking in #2 and a TCL in #3 is that the TCL is directed by the College and the RD would not have to agree with it.

RDs who have not practiced for years and do not intend to return to dietetic practice, may find that the third option is a reasonable regulatory response. For the RD, it permits continued membership and continued use of the RD title. For the College, it provides public protection.

WHEN WILL THIS BE IMPLEMENTED?

RDs having less than 500 hours of practice in the last three years will be identified through the renewal process this year. The College intends to use this first administration of the new process as a key learning opportunity. We want to better understand all of the possible practice/non-practising situations and consider what RDs in these situations are prepared to consider to maintain their membership with the College.

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