

Questions/Feedback and Answers to Proposed Training and Experience Requirements for Nutritionist Series

Q: If a person has a degree in Home Economics with the 12 credits in nutrition will that still qualify them as a Nutritionist I?

A: No. This revision will remove this method of qualification for Nutritionist I for future hires.

Q: The document with the proposed educational requirements along with the questions and answers are pretty straightforward and I feel like we could determine whether someone qualified for one of the Nutritionist positions. My concern is - will this affect those already on board with these classifications?

A: No. This revision will not affect employees in their current positions.

Q: I emailed you a couple of days ago about my concern for a Nutritionist III position having a Master's Degree & only one year experience. I was just viewing a Nutritionist III position in a particular County. In that position, I think the Master's & one year would be fine, since it is primarily dealing with counseling. In our County, we have a Nutritionist III posted & it is essentially for a Nutrition Director. That is what I have a problem with. As I said, there is NO way one year experience would cut this. So, I guess it depends on what the job description is.

A: Yes. The job description is the basis for the education and experience requirements for a position. If the classification of a Nutritionist III does not include the skills and education required for the WIC Director role in your agency, you may want to review the job description and request a reclassification. It should be noted that WIC Director is a working title and not a classification.

Q: The DTR should at least have a degree in a science or health related curriculum for the Nutritionist I position.

A: Science requirements of Associate's-level DTR curriculums meet or exceed those of four year bachelor nutrition programs. The primary difference between DTR and four year bachelor programs are the additional non-science requirements of bachelor-level programs. In addition, the DTR eligibility Pathway III, effective June 1, 2009, does not require a science-related bachelor's degree, rather that such degree has been obtained and didactic

dietetics competencies are met.

See <http://www.cdrnet.org/programdirector/NewPathwayIII.htm> for additional information.

Q: All the Nutritionists at the health departments may initially see patients who would qualify as "high-risk". They should have enough training to recognize these high risk conditions even though the employee may not be qualified to provide appropriate interventions or counseling. For instance, diabetics or pregnant women who need medical nutrition therapy may initially present to the Nutritionist I for evaluation and counseling. Without adequate training to identify these risks, the patient will likely receive inappropriate and inadequate counseling and care.

A: These proposed requirements recognize the issue brought up in these comments, therefore, the minimum standard for a Nutritionist I is being raised. Local Agencies are reminded that they are responsible for assuring that all staff are working within their defined job description and are either providing appropriate interventions or referring to higher level providers. The specification standards alone cannot assure that this happens.

Q: The Nutritionist II should not have the DTR as an option in our opinion. These Nutritionist II positions typically take on more complicated cases, program planning and additional administrative duties.

A: The areas mentioned in this comment are well within the scope of practice for a DTR at the Nutritionist II level. Please see the Scope of Dietetics Practice Framework, Section 3C, American Dietetics Association, 2005. DTRs have met nationally set competencies that include specific education, clinical experiences and have passed a national exam. This requirement is consistent with the DTR eligibility Pathway III, effective June 1, 2009. See: <http://www.cdrnet.org/programdirector/NewPathwayIII.htm> for additional information.

Q: The proposed specs we feel would diminish the quality of nutrition services in local health departments across the state.

A: These proposed standards strengthen the minimum requirements for nutritionist positions. This is achieved by:

1. Increasing the years experience required between classification levels, particularly when additional education or credentials have not been awarded

2. Removing "eligibility" as the minimum standard for dietetics registration and requiring that incumbents have passed the national examination (rather than being merely eligible to take the exam)
3. Using nationally recognized competency and scope of practice frameworks as the standard reference

Local Agencies are reminded that they are responsible for assuring that all staff are working within their defined job description and are either providing appropriate interventions or referring to higher level providers. The specification standards alone cannot assure that this happens.

Q: I think it would be good to require an RD for more jobs and there needs to be more consistency with how Nutritionists jobs are classified in different counties.

A: Local Agencies currently have the ability to require registration status for a position. Classification is based on locally-written job descriptions which the Office of State Personnel's Local Government Team then compare to the specification standards. Written job descriptions vary considerably. This may result in the perceived inconsistency in classification.

Q: From a local agency perspective, we lack in establishing salary ranges and job classifications within a pay hierarchy that achieves balance between internal and external equity. There are numerous variations between pay and titles throughout the state for Nutritionists. This is reflective in Nutritionists hopping from county to county, number of vacancies and etc. Due to lack of opportunity for advancement, it makes going to another agency more appealing to get a salary increase or a reduction in caseload for the same salary.

A: Salary grades and ranges are determined at the County level as provided for in the North Carolina Administrative Code, Subchapter 01I – Service to Local Government, specifically:

“Local jurisdictions shall establish and administer salary schedules which meet basic approval requirements of the State Personnel Commission as follows:

1. The schedule must consist of series of salary ranges with minimum, maximum, and intermediate rates of pay
2. There must be a vertical increase between consecutive salary ranges within the schedule.
(25 NCAC 01I.2102 – Establishment of Salary Schedule)

Even State Agencies and Universities who must adhere to the salary grades and ranges established by the Office of State Personnel still have a wide variation of actual employee salaries depending on where the position is located. It is quite possible (and common) to see a Nutritionist II at East Carolina University paid at the higher end of the salary range (\$51,446) compared to a Nutritionist II at the Department of Correction paid at the lower end (\$32,796).

Q: **Nutritionist I**: Only one track to qualify for this job class: A Bachelor's of Science degree in dietetics, public health nutrition or community nutrition from an accredited four-year college or university. **Reasons**: streamlines the qualification task; increase the outlook for career advancement; we already have a classification for Dietetic Technician; 27% of Registered Dietetic Technicians hold a Bachelor's degree or higher; save monies w/ advertising for ads that are based on the number of words. Agree w/ no need for trainee for the Nutritionist I; no need for equivalent education and experience allowance for a Nutritionist I.

A: Although currently a small number of DTRs have four year degrees, we believe that this group is very well qualified for Nutritionist I positions and should remain included. DTRs have met nationally set competencies that include specific education, clinical experiences and have passed a national exam. Science requirements of DTR curriculums meet or exceed those of four year bachelor-level nutrition programs. DTR eligibility Pathway III, effective June 1, 2009 now includes those with a four-year degree. See <http://www.cdrnet.org/programdirector/NewPathwayIII.htm> for additional information. Please also see the Scope of Dietetics Practice Framework, Section 3C, American Dietetics Association, 2005.

Q: **Nutritionist II**: Only Four Tracks: 1) A Bachelor's of Science degree in dietetics, public health nutrition or community nutrition from an accredited four year college or university and two years nutrition experience; 2) Master's degree in dietetics, public health nutrition; 3) Graduation from a Commission on Accreditation for Dietetics Education-approved Didactic Program in Dietetics with two years nutrition experience or 4) Registered Dietitian with the Commission on Accreditation for Dietetics Education. **Reasons**: Ability to reward and advance the Nutritionist I based on performance after two years of employment; ability to reward for education and/or credentials.

A: Changes in classification of a position are not based on performance or longevity of the employee working in that position. They are based on requirements for a particular position and its role in a Local Agency.

DTRs should be included in the Nutritionist I and II series because they have met nationally set competencies that include specific education, clinical experiences and have passed a national exam. Science requirements of associate's degree-level DTR curriculums meet or exceed those of four year bachelor-level nutrition programs. Full inclusion of DTRs also is consistent with the DTR eligibility Pathway III, effective June 1, 2009. See: <http://www.cdrnet.org/programdirector/NewPathwayIII.htm> for additional information.

Q: **Nutritionist III:** 1) Registered Dietitian with the Commission on Accreditation for Dietetics Education and five or more years nutrition experience or 2) Registered Dietitian with the Commission on Accreditation for Dietetics Education with a master's degree in dietetic, public health nutrition or nutrition and three or more years nutrition experience.

Reasons: This position should require more years of nutrition experience, otherwise this person could be hired as a Nutritionist II. This will give the RD working as a II five years to have the opportunity for career growth.

A: We believe that the suggested increase in experience would cause significant challenges in Local Agency recruitment efforts for Nutritionist III without a concomitant increase in skill level. Changes in classification of a position are not based on performance or longevity of the employee working in that position. They are based on requirements for a particular position and its role in a Local Health Agency.

Q: Will Nutritionists and WIC Directors who are currently in the roles within the WIC Program that do not have the education requirements that are being proposed, be grandfathered in?

A: This revision will not affect employees in their current positions. It should be noted that WIC Director is a working title and not a classification.

Q: I am in favor of increasing the guidelines for years of experience but not that the individual needs to be a Registered Dietician. If the case were that the person is dealing with high risk clients most of the time like in a hospital setting then a RD should be required. In most cases for the Nutritionist I and II the criteria seems to be pretty general depending on where the education status of the employee is to be applied.

A: Dietetic registration (RD) is required for Nutritionist III positions. It is not required for a Nutritionist II position unless a Local Agency has added this credential as a requirement of a

particular position. Many clients routinely seen by nutritionists in the Local Health Agencies have high-risk conditions and indicators.