



# Pennsylvania Dietetic Association

An Affiliate of the American Dietetic Association Your link to nutrition and health <sup>SM</sup>

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March 9, 2005

The Independent Regulatory Review Commission  
333 Market St, 14th Floor  
Harrisburg, PA 17101

Dear Members of the Committee:

On behalf of the 3075 members of The Pennsylvania Dietetic Association I am writing to provide comments on the proposed Licensure Regulations for Dietitian-Nutritionists. We are grateful for all the work that has been done on our behalf and for the progress that has been made in licensing nutrition professionals in Pennsylvania.

During the last few weeks many of our members have contacted us concerning the proposed regulations. The majority of the concerns expressed revolve around the continuing education criteria. Our members are worried that the criteria do not truly reflect the varied areas of practice of nutrition professionals today. For example, our members work in many areas of dietetics including clinical nutrition, wellness, long term care, education, private practice and food service. Although, we agree that continuing education courses should be "substantive learning experiences related to the field of nutrition and dietetics," we want to make sure the licensure board recognizes the diversified work of all our members. Ultimately, we do not want this process to be a hardship or struggle for our members who do not work in a clinical setting.

Our membership recognizes and agrees that the law requires certificates of attendance from continuing education programs. Also, we acknowledge that reputable groups like The American Dietetic Association; The American College of Nutrition and State Dietetic Associations should provide the programs. Will the board recognize reputable groups not mentioned in the regulations? The members are concerned that the board may not recognize all the organizations providing reputable programs that meet continuing education criteria. For example, organizations that typically provide continuing education for our members that are not listed are: Hershey Medical Center and many other medical centers across the state, Amerinet, Nutrition Dimension, private practitioners who do nutrition training and Renfrew Center for Eating Disorders. Thus, it is important to note that programs provided by reputable groups are all subject to strict approval guidelines. Therefore, we are not asking for a change in the type of continuing education programs accepted. Instead we want the board to recognize that there are other reputable groups that provide approved programs according to the proposed guidelines and allow for consideration of these programs when necessary. These programs are always reviewed, either by the Commission on Dietetic Registration of the American Dietetic Association, or by our Pennsylvania Dietetic Association Foundation using ADA's guidelines.

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In closing, the Board of the PA Dietetic Association wants to make sure the interests of all our members are represented. Thank you for reviewing the concerns expressed by the nutrition professionals of our association that have been expressed to us. We would be happy to answer any questions or assist you any way.

Sincerely,

*Ruth Anne McGinley, MS, RD, LDN*

Ruth Anne McGinley, MS, RD, LDN  
President PADA

cc: Hon. Thomas Gannon  
Hon. William Reiger  
Nursing Board