

COLLEGE OF DIETITIANS OF BRITISH COLUMBIA

Interpretive Guide: Restricted Activities

Purpose

Restricted Activities for Registered Dietitians are stated in the Dietitians Regulation. They are further defined in this Interpretive Guide to clarify registrants' practice and the need for registration with specific Restricted Activities.

Legislation

Dietitians Regulation: Sections 1 and 5:

Section 5 states:

"Subject to section 14 of the Act [Health Professions Act], no person other than a registrant who meets the additional qualifications set out in the bylaws of the College may:

- a) design, compound, or dispense therapeutic diets if nutrition is administered through enteral means,*
- b) design therapeutic diets if nutrition is administered through parenteral means, or*
- c) administer a substance to a person by instillation through enteral or parenteral means".*

Note: For registration purposes, the Registration Committee separated section 5(c) of the Dietitians Regulation into two Restricted Activities. Restricted Activities C and D are defined as:

- c) administer a substance to a person by instillation through enteral means.
- d) administer a substance to a person by instillation through parenteral means.

Section 1 includes the following definitions:

- *"compound" means to mix ingredients for enteral or parenteral nutrition.*
- *"design" means the selection of appropriate ingredients for enteral or parenteral nutrition.*
- *"dispense" means to fill a prescription for enteral nutrition.*
- *"enteral" means administration of a nutritional substance to a patient by means of a feeding tube into the gastrointestinal tract.*
- *"parenteral" means administration of a nutritional substance to a patient directly into the blood stream.*

Background Information

"Administer" is not defined in the Dietitians Regulation. To assist registrants, the following definition has been approved by the CDBC Registration Committee and Board:

- **"administer"** means to physically provide a nutritional or non-nutritional substance via an enteral or parenteral access device or system or provide instruction for same.

Practice setting: The Restricted Activities may be performed in all practice settings (for example: community, residential care, acute care, critical care) and in both the paediatric and adult population.

Registration and Competence: When the Registered Dietitian (RD) practices one or more of the aspects of any of the Restricted Activities, he/she is required to be registered with that Restricted Activity. A Registered Dietitian (RD) practicing a Restricted Activity is competent to perform each aspect of the Restricted Activity.

- **Example:** An RD who designs and compounds enteral products even though she/he never supervises the dispensing of such products by non-registered staff members, must be registered with Restricted Activity A.

Education/Instruction: An RD who instructs others to perform a Restricted Activity **is** required to be registered with the Restricted Activity.

Supervision: An RD who supervises a registered health care professional who performs the Restricted Activity (for example another RD who is registered with the Restricted Activity) is **not** required to be registered with the Restricted Activity. An RD who directly supervises a non-regulated health care worker (for example a food service worker) **is** required to be registered with the Restricted Activity and is responsible for that person's practice.

- o **Example:** An RD who does not design or compound enteral products, but who is responsible for the supervision of a non-registered staff member who dispenses enteral products, must be registered with Restricted Activity A.

Interpretive Guideline

Registered Dietitians registered with Restricted Activities A, B, C or D may legally perform the actions outlined below:

Restricted Activity A – Enteral Nutrition (EN)

Action	Interpretation and Practice Guidelines
"Design"	<p>If enteral nutrition is indicated, the RD selects or recommends:</p> <ul style="list-style-type: none"> • appropriate available commercially prepared formulations. • appropriate macro and micronutrient mix to provide for the client's specific nutritional requirements (for example, recommend enteral ingredients). • modular products to add to available enteral formulas (for example, addition of protein powder, MCT oil, fibre or specific amino acids). • mixing of enteral products (for example, taking a high protein formula and mixing it with a concentrated formula to modify the caloric and protein content to match the needs of the patient) or adding water to reconstitute a powdered formula. • appropriate EN feeding route and delivery method (for example, intermittent or continuous infusion, volume, rate). <p>The RD also:</p> <ul style="list-style-type: none"> • monitors tolerance and adjusts EN as required and, • communicates (verbally or in writing as appropriate) with the patient/caregiver and the interdisciplinary team. <p>Example A: An individual with high serum potassium levels is not eating well. The client's physician writes the following order: "enteral nutrition as per dietitian". The RD:</p> <ul style="list-style-type: none"> • identifies the metabolic concerns that influence the nutritional requirements • selects a commercially prepared formula that meets the client's energy, macronutrient (protein, carbohydrate, fat and fluid) and micronutrient (vitamins, minerals and trace elements) needs or • selects a commercially prepared formula and determines modifications needed to meet the client's specific macronutrient requirements (for example, addition of protein powder to the feeding regimen) or • recommends that the client's needs be met through the mixing of 2 commercially prepared formulas, and the appropriate ratio (for example, one container of product X to one container of product Y) and/or, • identifies the need for a multi-vitamin and mineral supplement. <p>Example B: The RD analyzes a patient's formula adequacy with respect to macro and micronutrients and the total volume per 24 hours to meet the client's nutrient needs.</p>

Restricted Activity A – EN (continued)

Action	Interpretation and Practice Guidelines
<p>“Compound”</p>	<p>The RD:</p> <ul style="list-style-type: none"> • physically mixes enteral ingredients to enhance one or more component of the nutrition formula. <p><u>Example A:</u> The RD physically adds protein powder to an enteral formula.</p> <p><u>Example B:</u> The RD physically adds water to a powdered formula.</p> <ul style="list-style-type: none"> • supervises food service staff who mix enteral ingredients (for example, addition of modular products or reconstitution of powdered formulas). <p><u>Example A:</u> The RD supervises a kitchen staff member who physically adds protein powder to an enteral formula or water to a powdered formula.</p> <p><u>Example B:</u> The RD advises kitchen staff to mix two commercial enteral products to create a new formula that best meets the patient’s needs.</p> <ul style="list-style-type: none"> • instructs clients who are being trained to mix ingredients. <p><u>Example:</u> The RD instructs a client to add protein powder to his or her enteral formula.</p>
<p>“Dispense”</p>	<p>The RD:</p> <ul style="list-style-type: none"> • physically fills a physician’s order (like a pharmacist dispensing a medication as per the physician’s prescription). • supervises staff who distribute or deliver the physician prescribed product to a client. <p><u>Example:</u> The release from a controlled distribution area (for example, kitchen or stores) of the enteral product (commercially packaged or RD modified specialty product) in the required amount for the required time frame, as ordered by the prescribing physician.</p>

Restricted Activity B – Parenteral Nutrition (PN)

Action	Interpretation and Practice Guidelines
<p>“Design”</p>	<p>If parenteral nutrition is indicated, the RD selects or recommends:</p> <ul style="list-style-type: none"> • appropriate available products/solutions. • appropriate macro and micronutrients to provide for the client’s specific nutritional requirements. • individual components to add to the available parenteral solution (for example, additional injection of multiple vitamins to a pre-mixed solution). • appropriate PN infusion site and delivery method (for example, cyclical or continuous infusion, volume, rate). <p>The RD also:</p> <ul style="list-style-type: none"> • monitors tolerance and adjusts PN as required. • communicates (verbally or in writing as appropriate) with the patient/ caregiver and the interdisciplinary team.

Restricted Activity B – PN (continued)

Action	Interpretation and Practice Guidelines
	<p><u>Example:</u> An individual with high serum potassium levels requires parenteral nutrition. The client's physician writes the following order: "dietitian to assess". The RD:</p> <ul style="list-style-type: none"> ○ identifies the metabolic concerns that influence the nutritional requirements and selects the appropriate energy, macronutrient (protein, carbohydrate, fat, and fluid) and micronutrient (vitamins, minerals, and trace elements) for the parenteral solution to meet the client's nutritional needs and/or, ○ recommends that the client's needs be best met through a modification of the vitamin, mineral and/or trace element components of the parenteral solution.

Restricted Activity C – Administration of Enteral Nutrition (EN)

Action	Interpretation and Practice Guidelines
"Administer"	<p>If a substance is being administered by instillation through enteral means, the RD:</p> <ul style="list-style-type: none"> • physically manipulates or adjusts the enteral delivery device or system. <p><u>Example:</u> An RD connects the feeding bag to the enteral delivery device and sets the appropriate volume and rate on the pump.</p> <ul style="list-style-type: none"> • physically changes an enteral feeding bag to infuse a nutritional or non-nutritional substance to a client. <p><u>Example A:</u> An RD flushes a feeding tube with water in order to prevent tube obstruction.</p> <p><u>Example B:</u> An RD instills pancreatic enzyme when the tube is obstructed.</p> <ul style="list-style-type: none"> • instructs clients, caregivers, RDs or other health care professionals to infuse a nutritional or non-nutritional substance to a client. <p><u>Example A:</u> The RD instructs the client and/or caregiver to connect the feeding bag to the enteral pump, adjust the delivery system as required and flush the enteral feeding tube with water or deliver other non-nutritional substances.</p> <p><u>Example B:</u> The RD demonstrates to the client and/or caregiver in simulation or directly how to clear a feeding tube occlusion.</p>

Restricted Activity D – Administration of Parenteral Nutrition (PN)

Action	Interpretation and Practice Guidelines
"Administer"	<p>If a substance is being administered by instillation through parenteral means, the RD:</p> <ul style="list-style-type: none"> • physically manipulates or adjusts the parenteral delivery device or system. • physically changes a parenteral feeding bag to infuse a nutritional substance or non-nutritional substance to a client. • instructs clients and/or caregivers, RDs or other health care professionals to infuse a nutritional or non-nutritional substance to a client. <p>Note: RDs do not administer a substance to a person by instillation through parenteral means unless they have had additional supervised education and practice. This procedure is generally performed by Registered Nurses.</p>