



COLLEGE OF DIETITIANS OF BRITISH COLUMBIA

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SOLE AND PRIVATE PRACTITIONER

INTERPRETIVE GUIDE

1) Introduction

The College of Dietitians of British Columbia (CDBC) is the regulatory authority for Dietitians in BC under the BC Health Professions Act (HPA). In accordance with the HPA, the mandate of the CDBC is to protect the BC public by regulating Dietitians to practice safely, ethically and competently. As part of its public protection mandate, the CDBC registers qualified healthcare professionals who meet the requirements for registration.

The CDBC grants temporary registration to applicants for a period of up to one year (renewable once) who have not met Full Registration examination requirements but who have:

- a) proven to the satisfaction of the Registration Committee that they can be reasonably expected to successfully complete the Canadian Dietetic Registration Examination and the Jurisprudence Examination; and
- b) in the opinion of the Registration Committee, may practice without any risk to public health; and
- c) meet all other registration requirements

Temporary registrants may use the title “Dietitian with Temporary Registration” and initials “RD(T)”.

The Canadian Dietetic Registration Examination (CDRE) verifies that a Dietitian is competent to practice dietetics across Canada. Temporary registrants of the CDBC must pass the CDRE in order to satisfy the College that they fulfill all of the qualifications for full registration. Until the CDRE requirement is fulfilled, it is in the public’s interest for the CDBC to restrict temporary registrants from providing sole and private dietetic care, without mentorship.

Therefore, to ensure safe, ethical, competent practice, the [CDBC bylaws, section 43\(5\)](#) permit temporary registrants to practice dietetics under the following conditions:

“A temporary registrant may not: (a) supervise a full registrant; or (b) practice as a sole and private practitioner”.

With this in mind, the CDBC will permit temporary registrants to work as sole and private practitioners under the mentorship of CDBC full registrants only. This mentorship requirement is intended to provide guidance, direction and support to temporary registrants until they are granted full registration status by the College.

2) Definitions

- a) *Sole and Private Practitioner*
 - i) A registrant of the CDBC, working in any sector (i.e. private, public or not-for-profit sector), who is functioning independently, and in isolation, and without oversight by a CDBC full registrant.
- b) *Private sector*
 - i) The segment of the economy that is administered by individuals and companies, rather than government. Most private sector organizations are managed with the intention of making profit.
- c) *Public Sector*
 - i) The segment of the economy under control of government.
- d) *Not-for-profit Sector*

- i) The segment of the economy that is administered by charities and non-profit organizations. Note: Such organizations are more commonly considered part of the private sector.
- e) *Mentorship*
 - i) A process for the informal transmission of knowledge and the psychosocial support perceived by the recipient as relevant to work, career, or professional development. Mentoring entails informal communication, usually face-to-face and during a sustained period of time, between a person who is perceived to have greater relevant knowledge, wisdom, or experience and a person who is perceived to have less.
- f) *Supervision*
 - i) A situation in which a person's practice is overseen by a full registrant; the scope, the nature and form of that supervision is to be applied in accordance with relevant policies, standards or guidelines approved by the board (per CDBC Bylaws – Definitions).

3) Guidelines and Policies (per policy Rc-19 – Sole and Private Practitioner)

- a) At the discretion of the Registration Committee, the CDBC will permit a temporary registrant to work as a sole and private practitioner under the mentorship of a CDBC full registrant only.
- b) The CDBC's *Decision Map – Sole and Private Practitioner* offers a series of pathways to help determine the temporary registrant's need for mentorship and to identify appropriate sole and private practitioner situations (see Appendix 1).
 - i) Mentorship is a tool that enhances dietetic knowledge, skills, abilities and judgement. It is highly encouraged by the CDBC. Identifying that a mentor is not required should not preclude temporary registrants from seeking mentorship to strengthen dietetic practice.
- c) It is the responsibility of the temporary registrant to ensure that the appropriate mentorship is in place, prior to working as a sole and private practitioner.
- d) The temporary registrant is mentored according to the CDBC's bylaws, [Schedule A – Code of Ethics](#) and [Schedule B – Standards of Practice](#)
- e) At all times, it is the duty of the temporary registrant to recognize limitations of practice and to seek support and guidance from her/his mentor.
- f) Acceptable mentorship includes:
 - i) a private, public or not-for-profit sector employer who has an organizational structure in place where the temporary registrant is accountable to a full registrant of the CDBC; **or**
 - ii) the temporary registrant has a signed *Mentorship Agreement for Sole and Private Practitioners* (see appendix 2) between herself/himself and a CDBC full registrant.
- g) The mentor must be:
 - i) a current, full registrant, of the CDBC, in good standing; and
 - ii) actively working in a dietetics field that supports the temporary registrant's intended practice area, as a sole and private practitioner.
 - iii) licensed to practice the required restricted activities, if the temporary registrant's intended practice area includes enteral or parenteral nutrition support.
 - iv) free from conflict of interest, including personal relationships and family
- h) Mentorship must be in place for the entire duration that the temporary registrant is working as a sole and private practitioner.
- i) The mentor does not have to be in-person, or in close proximity to the temporary registrant. However, the mentor must be accessible when required.
- j) Under the *Mentorship Agreement for Sole and Private Practitioners*:

- i) Permission is granted by the CDBC, to a temporary registrant, after review and approval of a submitted *Mentorship Agreement for Sole and Private Practitioners*.
- ii) A temporary registrant must not work as a sole and private practitioner until the CDBC has granted permission in writing.
- iii) Mentorship must include regular communication (in-person, telephone and/or internet) between the CDBC full registrant and the temporary registrant.
 - (1) Communication between the mentor and the temporary registrant may include, but is not limited to:
 - (a) reviewing dietetic practice, practice issues and activities that the temporary registrant had undertaken since the last communication
 - (b) discussing client charts
 - (c) reviewing and discussing client billing (if applicable)
 - (2) Communication should occur biweekly, at minimum. However, more frequent communication is highly encouraged in order to facilitate a meaningful mentorship experience.

4) Frequently Asked Questions

Q: I am exploring a job opportunity where the expectation is to be a “sole charge” Dietitian. Does this mean I cannot do this job as a Temporary Registrant?

A: “Sole charge” is a common employment term, within health authorities, that is not related to the CDBC bylaws.

If the employer has a formal organizational structure in place where the sole charge position is accountable to a CDBC full registrant, then a temporary registrant may fulfil this sole charge position.

Q: I am interested in a job with a not-for-profit organization. The role is the only position responsible for nutrition in the whole organization. Can I do this job as a temporary registrant?

A: Without mentorship by a CDBC full registrant, you are not permitted to take on this role as a temporary registrant. However, if you, as the temporary registrant, are able to secure a CDBC full registrant to act as your mentor while you are in this role, then you may do this job. Remember, the mentorship requirement for a sole and private practitioner only applies during temporary registration. Since CDBC bylaws require temporary registrants to take the first available CDRE, this requirement should not last very long; nor should it be barrier to employment.

Q: Can my mentor be off site?

A: Yes, mentorship provided from a distance, or remote mentorship, is appropriate. Mentors do not have to be present or in close proximity to the temporary registrants being mentored. However, mentors must be accessible when required.

Q: I would like to start my own private practice, but I am a temporary registrant. Would it be acceptable for me to arrange for a RD with full registration to mentor me?

A: If you have received permission from the CDBC to practice as a sole and private practitioner, you may operate your own business under the mentorship of a CDBC full registrant. To obtain permission, you must apply to the CDBC by submitting a completed *Mentorship Agreement for Sole and Private Practitioners*. The CDBC will review your submission and determine if your mentorship arrangements are appropriate. The CDBC will notify you in writing, if your submission has been approved. Note: you must not work as a sole and private practitioner until you have been granted permission to do so by the CDBC.

Q: What are some examples of Sole and Private Practitioners?

A: Examples include, but are not limited to:

- Dietitians who own and operate their own businesses;
- Self-employed Dietitians working under contract;
- Dietitians working in non-profit, prevention programs where they are the only nutrition experts within their organizations;
- Dietitians hired by privately owned, long term care facilities.

Q: Does my mentor need to be working as a sole and private practitioner in order to mentor me?

A: It is very important that your mentor is a full registrant of the CDBC and currently works in a dietetics field that supports you in your intended practice area. Therefore, it is possible that your mentor is not a sole and private practitioner. For example, a RD working in a health authority long term care facility, (meaning oversight exists within the organization), would be an acceptable mentor for a RD(T) working as a contractor in a private long term care facility.

Q: How can I check to be sure that I am not working as a sole and private practitioner?

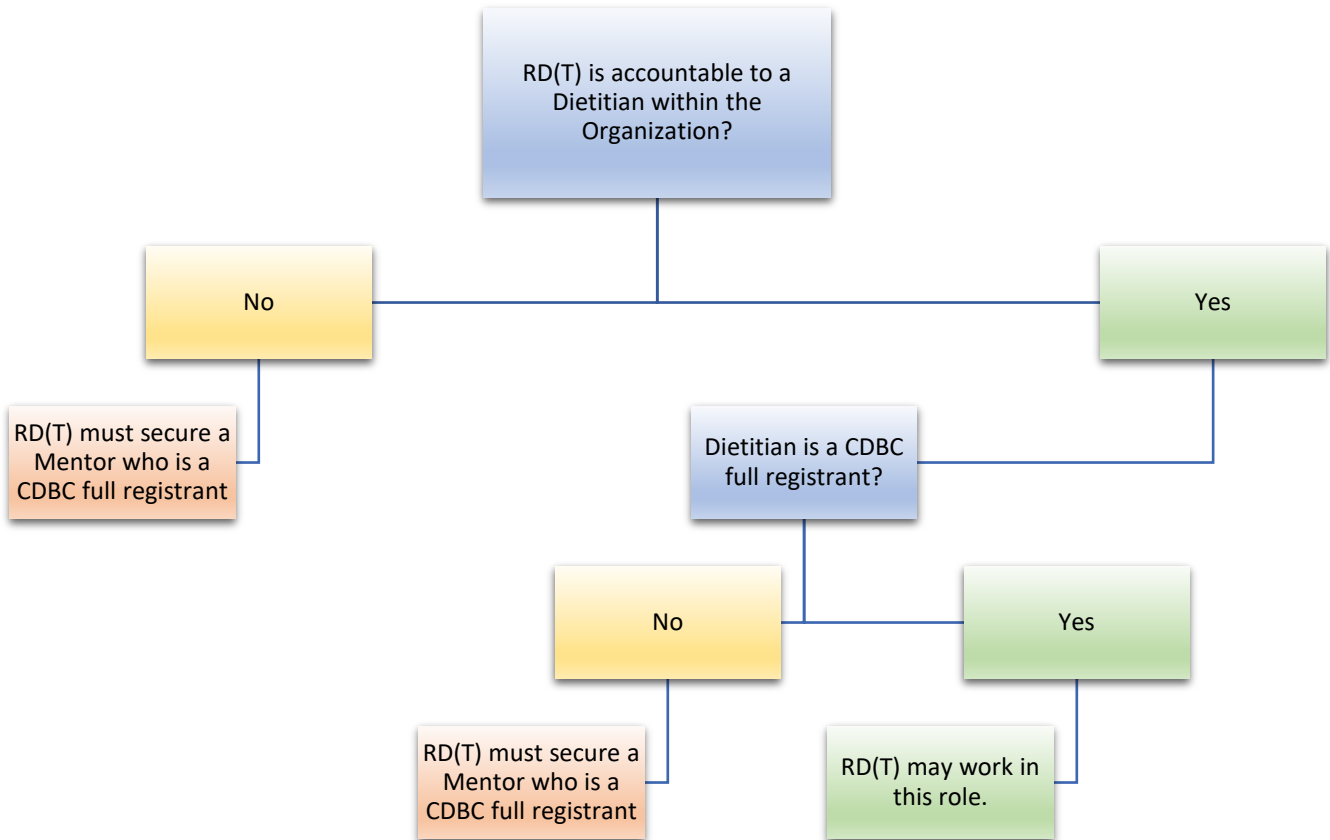
A: If you are a temporary registrant and your role as a dietitian does not require you to be accountable to a CDBC full registrant, you may be conducting unauthorized practice. Please refer to the CDBC's *Decision Map– Sole and Private Practitioner* to determine the need for mentorship (see appendix 1). If your situation is still unclear, please contact the CDBC for clarification and direction (604) 736-2016; 1-877-736-2016 (toll-free in BC); info@collegeofdietitiansbc.org

APPENDIX 1

DECISION MAP – SOLE AND PRIVATE PRACTITIONER

Purpose: to determine the need for Mentorship of Sole and Private Practitioners.

If you are a temporary registrant exploring employment opportunities that may be considered roles for sole and private practitioners, please review the decision map below to help decide whether or not a mentor is required.



APPENDIX 2

MENTORSHIP AGREEMENT FOR SOLE AND PRIVATE PRACTITIONERS

Purpose:

The College of Dietitians of BC's (CDBC's) *Mentorship Agreement for Sole and Private Practitioners* establishes appropriate mentorship expectations between temporary registrants, who wish to pursue employment as sole and private practitioners, and full registrants of the CDBC.

Instructions:

1. Please complete Section 1 – Temporary Registrant and Section 2 – Dietitian Mentor.
2. Submit the completed agreement to the CDBC – info@collegeofdietitiansbc.org
3. The temporary registrant must not work as a sole and private practitioner until the CDBC has approved the agreement in writing.

Section 1 – Temporary Registrant:

Name: _____ CDBC Registration # _____

Anticipated Dates for Mentorship: Start: _____ End: _____

Primary area of sole and private practice: _____

Responsibilities of the Temporary Registrant

1. I am responsible for organizing my Mentorship Agreement for Sole and Private Practitioners.
2. My conduct as a sole and private practitioner is in accordance with the CDBC's bylaws, Schedule A – Code of Ethics and Schedule B – Standards of Practice.
3. I will provide the College with the name of a full registrant, working in a dietetics practice area that supports my work as a sole and private practitioner, who has agreed to mentor me.
4. I shall initiate a first meeting with my Dietitian Mentor to set mentorship expectations. At minimum, the mentorship expectations will include:
 - a. regular, biweekly contact with the CDBC full registrant
 - i. this may be increased at the discretion of the mentor
 - b. orientation to any applicable legislation, policies and procedures relevant to working as a sole and private practitioner (e.g. Personal Information Protection Act).
 - c. discussion of practice issues and challenges such as:
 - i. Client charting;
 - ii. Record keeping;
 - iii. Billing;
 - iv. Patient relations;
 - v. Evidence based decision making.
5. I will seek the advice from my Dietitian Mentor biweekly and as necessary and will follow her/his direction.
6. I will co-operate with my Dietitian Mentor and provide her/him with access to all billings that I render, if applicable, and I agree to review the billing for the services I provide.
7. If for any reason my Dietitian Mentor is not able to provide mentorship, I will notify the College immediately and provide the name of another CDBC full registrant who is willing to mentor me.
8. In the event that my dietitian mentor is away on vacation, because of illness, or for any other reason, for a period greater than three weeks, I will ensure that another full registrant of the College is available, in my mentor's place, to carry out the terms of this agreement. I will first obtain approval from the CDBC for another full registrant of the College to act as a mentor.
9. I am aware that this mentorship agreement must be in place until I am granted full registration by the CDBC, or I am no longer working as a sole and private practitioner.
10. I will register for the first available Canadian Dietetic Registration Examination after being granted registration with the CDBC.
11. I understand my responsibilities as the temporary registrant in this agreement.

Signature: _____

Date: _____

Section 2 – Dietitian Mentor:

Name: _____

CDBC Registration # _____

Primary area of private practice: _____

Responsibilities of the Dietitian Mentor

1. I will mentor the temporary registrant listed above in accordance with the CDBC’s Bylaws, Schedule A – Code of Ethics and Schedule B – Standards of Practice.
2. I will ensure that I will have proper liability insurance in place for the mentorship, including if it is to be provided outside of my work responsibilities.
3. I will notify the College immediately if the temporary registrant is not compliant with the mentorship requirements or any other conditions on her/his practice permit.
4. Before the temporary registrant begins private practice, I will orient her/him to any applicable legislation, policies and/or procedures relevant to working as a sole and private practitioner (e.g. Personal Information Protection Act).
5. I will discuss and advise her/him regarding relevant practice issues, client relations, proper charting and record keeping, billing, evidence based decision making, etc., in accordance with the CDBC’s Code of Ethics and Standards of Practice.
6. I will connect with the temporary registrant _____ (frequency) _____. When I am not physically present, I will be available for consultation and advice via telephone or internet.
7. I will provide reasonable notification to the temporary registrant if I am away on vacation, because of illness, or for any other reason, for a period of greater than three weeks.
8. In the event that I have concerns regarding the temporary registrant’s competency to practice dietetics in any respect, I will report my concerns immediately to the CDBC.
9. I understand the responsibilities of the Dietitian Mentor in this agreement.

Signature: _____

Date: _____

CDBC use only: Approved by: _____	Date: _____
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