

## Restricted Activity Oversight Change: Rationale and Consultation

### Background Information

The CDBC is the regulatory authority for Dietitians practicing in BC. Under the [Health Professions Act](#), the BC government mandates the CDBC to regulate Dietitians to practice safely, ethically and competently, for public protection.

Under BC legislation, Restricted Activities (RAs) are a narrowly defined list of invasive, higher risk, health care activities that may be practiced by multiple regulated health professions. Only regulated health professionals authorized by their regulatory colleges, or unregulated care providers delegated by authorized regulated health professionals may perform RAs.

Additionally, the [Dietitians Regulation](#) specifies the RAs that the CDBC may authorize Dietitians to perform. These include:

- “(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,*
- (c) administer a substance to a person by instillation through enteral means, or*
- (d) administer a substance to a person by instillation through parenteral means.”*

### Rationale for Shift and Consultation

In 2017, the CDBC completed a comprehensive review of RAs to identify areas for improvement and revision. Based on the results and recommendations of the review, the CDBC Board approved transferring RA oversight, from Registration to Quality Assurance. Key findings included:

- **The BC Ministry of Health recognizes that RAs can be performed by a College’s registrants upon registration, as part of entry-to-practice requirements, provided the College has not placed any limits or conditions on these [RAs](#).**
- **Enteral (EN) and parenteral nutrition (PN) are considered part of entry-level scope of practice for Dietitians in Canada.**

Both EN and PN are included in the [Integrated Competencies for Dietetic Education and Practice \(ICDEP\)](#), which define the minimum, entry-to-practice standard for Canadian Dietitians. The ICDEP are implemented and evaluated through accreditation of dietetic education programs and the Canadian Dietetic Registration Examination (CDRE). Successful completion of an approved, accredited dietetic education program and the CDRE are required for registration with the CDBC. Therefore, individuals registered with the CDBC meet the minimum, entry-to-practice standard for EN and PN.

The CDBC recognizes that employers may have different needs and set higher expectations for EN and PN practice by Dietitians. Although welcomed, the CDBC considers these needs and expectations to be employer-specific and do not translate into entry-to-practice requirements for EN and PN. Therefore, standards set by employers for EN and PN practice are not regulated or enforced by the CDBC.

- **Requesting and verifying annual proof of competence are non-essential tasks for practicing RAs.**

No new data was revealed by the CDBC's comprehensive review to support concerns with RA competence at entry-to-practice. Since its inception in 2002, the CDBC has received only one complaint involving competence issues related to the practice of RAs.

- **Transferring regulation of RAs to Quality Assurance aligns with EN and PN oversight by all other Canadian dietetic regulatory bodies.**

Dietetic regulators in other Canadian jurisdictions consider EN and PN part of entry-to-practice scope. Currently, the CDBC is the only Canadian dietetic regulatory body that requires registrants to submit annual proof of competence to practice RAs. Furthermore, most Canadian dietetic regulatory bodies conduct annual quality assurance reporting.

- **Removing proof of competence requirements for EN and PN aligns with other BC regulated health professions who practice the same RAs.**

No other BC regulated health professions, who share the same RAs as the CDBC (i.e. Physicians, Pharmacists, Registered Nurses, Nurse Practitioners, etc.), require submission of additional and annual proof of competence to practice EN, PN, or any other BC specific RAs. Moreover, most BC health regulatory bodies also require annual quality assurance reporting.

- **Annual CCP activities for RAs make Dietitians accountable to safe, ethical and competent RA practice.**

As part of the CDBC Code of Ethics, and Standards of Practice, all registrants are responsible and accountable to practice within their personal levels of competence and recognize situations where they need to obtain further knowledge and skills.

Quality assurance activities allow Dietitians to customize continuing education plans to meet individual professional development needs and to strengthen personal competence in EN and PN practice. Participation in the CDBC's CCP provides opportunities for Dietitians to demonstrate ongoing growth and development of their knowledge, skills, abilities and judgement, and to have a systematic way to document how learning activities maintain and enhance competence and safety of RA practice. A self-reflective continuing competence program encourages dietitians to continually improve, develop and revalidate the quality of care they provide, while aiding to improve wellbeing and deepening professional commitment.