

CDBC Position Statement on Dietitians' Authority to Order Nutritional Substances for Therapeutic Diets

This position statement is not meant to be used as a stand-alone document and should be interpreted within the context of the *Health Professions Act's* Dietitians Regulation (1), CDBC bylaws, and other relevant legislation, standards, policies, and guidelines. Dietitians should confirm any workplace policies, protocols, and guidelines that may further define scope limitations on this aspect of practice.

Position Statement

When a dietitian issues a client-specific order for an oral or enteral therapeutic diet, Unscheduled drugs and Natural Health Products (NHP) may be dispensed and administered by other authorized health professionals, such as pharmacists, registered nurses, and registered psychiatric nurses. Although not explicitly stated in legislation, this authority is implied in the Dietitians Regulation and has been jointly recognized and supported by the College of Pharmacists of BC and the former College of Registered Nurses, College of Registered Psychiatric Nurses, and College of Licensed Practical Nurses of BC (now known as the BC College of Nurses and Midwives) since 2013 (2).

Background

The Dietitians Regulation (1) authorizes dietitians to assess nutritional needs, and design, implement and evaluate nutritional care plans and therapeutic diets. Nurses and pharmacists collaborate with dietitians to understand and confirm nutrition care plans to support safe and effective care to clients.

Drug Schedules are regulated by the *Pharmacy Operations and Drug Scheduling Act* and Drug Schedules regulation (3, 4). Drugs are categorized in Schedules I, IA II, III, IV and Unscheduled.

CDBC registrants can issue **client-specific orders** that include Unscheduled drugs and Natural Health Products as part of a nutritional care plan or therapeutic diet.

Registrants who make **client-specific orders** that involve designing, dispensing, or compounding enteral nutrition must be registered with restricted activity A (1). Instructions must be made in accordance with evidence-based practice. Registrants may include Unscheduled drugs and Natural Health Products as described within the definition of a **nutritional substance** in their enteral nutrition design without an order by an authorized prescriber (3).

Definitions

Authorized prescriber includes “practitioner” and “healthcare professions prescribed as practitioners” in the *Pharmacy Operations and Drug Scheduling Act* and its general regulation (4, 5). Dietitians are not designated as “practitioner” and are not authorized to order drugs or devices that require a prescription.

Client-specific order is a list of instructions that are within dietetic scope of practice and signed by a dietitian for others to carry out (1). It may involve one or more restricted activities, and client-specific instructions. The implementation of a client-specific order may involve one or more types of regulated health professionals or unregulated care providers. In practice, a **client-specific order** may involve and is not limited to:

- Designing and dispensing specified types, amounts, and frequency of administration of nutritional substances for enteral nutrition (1). In this example, a dietitian must be registered with restricted activity A to “design, dispense, or compound” enteral nutrition.
- Discussing with regulated health professionals involved in client oral feeding and designing a nutrition care plan for oral intake of nutritional substances.
- Writing in the ordering section of the medical record, a nutritional substance that does not require or constitute an order by an authorized prescriber, for the purpose of requesting the substance to be released, distributed, and administered by regulated health professionals involved in client oral and enteral feeding.

Dispense means to fill a prescription for enteral nutrition in the Dietitians Regulation (1).

Health Professional, as defined in the *Health Professions Act’s Nurses (Licensed Practical) Regulation*, includes dentistry, medicine, midwifery, naturopathic medicine, nursing, podiatric medicine, psychiatric nursing, or the practice of pharmacy. Dietitians are not included in this definition. Licensed Practical Nurses (LPN) need a client-specific order from a “health professional” to administer a substance by enteral instillation (6).

Natural Health Product, as defined in the *Food and Drugs Act: [Natural Health Products Regulations](#)*. These products are defined as substances or a combination of substances that may include *herbal, algae, bacterial or fungal products or their extracts, natural or synthetic vitamins and minerals, amino acids, essential fatty acids, and probiotics, a homeopathic medicine or a traditional medicine, that is manufactured, sold or represented for use in:*

- *(a) the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state or its symptoms in humans;*
- *(b) restoring or correcting organic functions in humans; or*
- *(c) modifying organic functions in humans.” (7)*

Nutritional substance includes water and ingredients such as food, food texture substances, thickening agents, formulas and other nutritional supplements, macro-nutrients (polymers and monomers), and micronutrients (vitamins and minerals) that are considered Unscheduled drugs or Natural Health Products. Nutritional substances for the purpose of parenteral (intravenous) nutrition are considered Schedule I drugs and require a prescription from an authorized prescriber. Nutritional substances are

ingredients for the design of a nutrition care plan and therapeutic diet (1). Nutrition care plans and therapeutic diets involve feeding through oral, enteral, and parenteral means.

Order refers to a prescription as defined in the *Pharmacy Operations and Drug Scheduling Act* (5), except a prescription issued in respect of an animal.

Resources

CDBC [Ordering Scope of Practice Q&A](#)

CDBC [Restricted Activities page](#)

References

1. BC Laws. *Health Professions Act's Dietitians Regulation*. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/279_2008?msckid=e927cec6c59b11eca7c0dacacdef0f16; last accessed May 10, 2022.
2. College of Registered Nurses of British Columbia. March 2013. Joint Statement of the College of Dietitians, College of Licensed Practical Nurses, College of Pharmacists, College of Nurses, and College of Psychiatric Nurses of BC. Dietitian's Authority to Recommend Vitamins and Minerals for Therapeutic Diets. Pub No. 785 [Archived].
3. BC Laws. *Pharmacy Operations and Drug Scheduling Act's Drug Schedules Regulation*. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/9_98; last accessed May 10, 2022.
4. BC Laws. *Pharmacy Operations and Drug Scheduling Act*. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03077_01#section1; last accessed May 10, 2022.
5. BC Laws. *Pharmacy Operations and Drug Scheduling Act's Pharmacy Operations General Regulation*. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/43_2018; last accessed May 10, 2022.
6. BC Laws. *Health Professions Act's Nurses (Licensed Practical) Regulation*. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/224_2015; last accessed August 19, 2022.
7. Government of Canada. *Natural Health Product Regulation*. <https://laws-lois.justice.gc.ca/eng/regulations/sor-2003-196/>; last accessed December 20, 2022.