

Board of Licensed Dietitians

Diet 300, Notice #2024-149

Summary of Comments on Initial Proposal with Board Responses October 11, 2024

Background

The public hearing was held on October 11, 2024 at 9:15 a.m. No members of the public were present to provide testimony.

Public Comments

Verbal Comments:

Jennifer Messer, MS, RDN, LD, President, NH Academy of Nutrition and Dietetics

Diet 301.01 Definition:

Comment: No opposition to the repeal of the definition of “Commission on Dietetic Registration (CDR” as it is defined in Diet 102.01.

Response: The Board appreciates the feedback.

Diet 301.02 Application Forms:

Comment: In support of the use of the Universal application for Initial Licensure and the use of the addendum asking questions specific to licensed dietitians.

Response: The Board appreciates the feedback.

Diet 302.02(b) Application Forms:

Comment:

- (1) – Suggest clarifying what credential is intended as CDR issues multiple credentials;
- (2) – Remove “and” from the end of line one;
- (3) – (4) has a reference to (4) above and there is a comma inserted after “affirmation”

Response:

- (1) The Board clarified the credential required by adding “registered dietitian number” issued by the CDR;
- (2) The Board removed (3) as the question is on the universal application and (4) because the Board felt this was unnecessary.

Diet 302.03 Required Supporting Materials:

Comment: Consider not requiring the applicant to submit a letter verifying the applicant’s registration with the CDR and require the applicant provide their registration number and have staff of OPLC verify through the CDR’s online credential verification system that they are registered with the CDR. If OPLC staff is unable to verify using the on-line system, then they would be required to submit a letter verifying their registration.

Response: The Board has declined to remove the requirement and have OPLC staff use the online system due and if registration is unable to be verified require a letter from the CDR due to burdens on the OPLC staff at the present time. The Board does not require a letter for each renewal from a current licensee and does not verify the continued registration status relying on the attestation on the renewal form. As these licensees are already licensed an subject to the Board’s disciplinary authority.

Diet 303.01 – Educational and Examination Qualifications:

Comment: We support the readoption the rules is consistent with licensing statute.

Response: The Board appreciates the feedback.

Diet 303.02 Additional Qualifications:

Comment: We do not oppose the repeal of Diet 303.02 as most of the provisions are inconsistent with modern approaches to rehabilitation and current practices for assessing whether an applicant poses a present safety risk. However, considering the RSA 326-H:12 requires the applicant to be of “good character” we seek clarification on what specific actions may lead to denial of a license based on a determination that an applicant does not meet the “good character” standard.

Response: The Board has amended this section to added, criteria is used to deny a registration and the criteria used to determine if an applicant is of good character, back so that it is clear on denial and what good character is.

Diet 303.03 previously Diet 303.02 Standards for Board Approval of College or University:

Comment: We support this change.

Response: The Board appreciates the feedback.