

CASE STUDY – NDTRs Providing Preventative Care Wellness and Lifestyle Coaching

Case: A nutrition and dietetics technician, registered (NDTR) is determining whether providing preventative care wellness and lifestyle coaching is within their individual scope of practice.

Statement

The Scope and Standards of Practice for the Nutrition and Dietetics Technician, Registered (NDTR) does not guarantee that a NDTR will be able to perform expanded practice skills, but it can guide the NDTR to the resources to evaluate whether they can safely and effectively provide an expanded practice skill and advance individual practice.

Explanation of Case

An experienced NDTR working under the clinical supervision of the outpatient RDN, provides outpatient individual and group nutrition education (eg, dietary guidelines, general nutrition, healthy lifestyle behaviors). The hospital has recently expanded its community education programming to offer wellness, exercise, and physical activity classes that will be led by credentialed exercise professionals, as well as other health professionals with a coaching certification. The NDTR is interested in incorporating coaching techniques into their current outpatient work and would also like to be considered for a Health and Wellness Coach position in Community Education Services. To enhance competency and expand their scope of practice in this area, the NDTR explores training opportunities aimed to improve coaching techniques, as well as certificate programs in preventative care, wellness, and lifestyle coaching.

In this example, the NDTR uses the [Scope and Standards of Practice for the NDTR](#)¹ to determine whether coaching is within their individual scope of practice. Although the NDTR may seek advice and direction from the RDN and other colleagues, the initial review is the NDTR's responsibility.

Case Study Resources

- Resources from the Commission on Dietetic Registration (CDR) and the Academy of Nutrition and Dietetics:
 - [Academy Dietetic Practice Groups \(DPGs\)](#) (*membership required*)
 - [Code of Ethics for the Nutrition and Dietetics Profession](#)
 - [2024 Scope and Standards of Practice for the NDTR](#)
 - [Academy Dietetic Practice Groups \(DPGs\)](#) (*membership required*).
 - Suggested areas of practice: Weight Management, Nutrition Entrepreneurs, and Cardiovascular Health and Well-being
 - [Practice Tips](#)
 - [Nutrition Care Process Terminology \(eNCPT online\)](#) (*subscription required*)
 - [Nutrition Care Process Terminology – Freely Available Terms](#)
 - [Essential Practice Competencies for CDR's Credentialed Nutrition and Dietetics Practitioners](#)
 - [CDR Telehealth Website](#)
 - [Academy Telehealth Quick Guide](#) (*membership required*)

NOTE: See additional resources below if practice includes providing nutrition/wellness education via telehealth or consultations with RDNs:

- Institutional, regulatory, and other resources:
 - [NDTR position description examples](#)
 - [State licensure laws and regulations](#)
 - Organization policies and procedures
 - Facility/program accreditation standards, if applicable

Using the Scope of Practice Decision Algorithm

The [Scope of Practice Decision Algorithm](#) is a resource that guides the NDTR through a series of questions to determine whether a particular activity is within their individual scope of practice. Questions are answered based on a critical evaluation of applicable laws, regulations, and standards, as well as their knowledge, skills, experience, judgment and demonstrated competence. The tool is intended to evaluate each activity separately.

PRACTITIONER QUESTIONS

Question 1: Does the [Scope and Standards of Practice](#) contain information that provides guidance on whether the practitioner can perform this activity?

The NDTR verifies consistency with the Scope and Standards of Practice for the NDTR, which states:

- “The NDTR and other professional, technical, and support staff work under the clinical supervision of the RDN when engaged in direct patient/client nutrition care activities in any setting. The RDN is responsible for nutrition care assigned to and completed by NDTRs and other staff, and is accountable to the patient/client, employer/organization, and regulator.”¹
- “Roles for qualified NDTRs include providing nutrition education and guidance related to population-based public health initiatives; and managing foodservice operations collaborating with the RDN for menu approval according to regulations.”¹
- “The NDTR actively participates in nutrition care by contributing information and observations, guiding patients/clients in menu and snack selections, monitoring meals/snacks/nutrition supplements for compliance to diet order and providing nutrition education on prescribed diets.”¹
- “NDTRs may be eligible to bill for self-pay services within their scope of practice (eg, supermarket-retail NDTR, private practice, menu analysis) or services that meet payer requirements (eg, coaching or corporate wellness).”¹
- Figure 5 in the Practice Areas for NDTRs identifies preventative care, wellness and lifestyle coaching as a practice area for NDTRs.

In addition, the NDTR compares this activity to the Academy/CDR Code of Ethics². While coaching is not mentioned directly in the Code of Ethics, there are some principles and standards that apply to this topic (Note: may not be all inclusive, others may apply on a case-by-case basis):

- “Recognize and exercise professional judgment within the limits of individual qualifications and collaborate with others, seek counsel, and make referrals as appropriate.”²
- “Practice within the limits of their scope and collaborate with the inter-professional team.”²
- “Document, code and bill to most accurately reflect the character and extent of delivered services.”²

Question 2: Does this activity align with nutrition practice guidelines (eg, EAL); other national organization standards of practice and/or practice guidelines; accreditation standards; federal and state regulations; CMS conditions of participation or conditions for coverage; and facility/program accreditation standards applicable to the setting or population and good business practices (eg, Code of Ethics)?

The NDTR reviews published practice guidelines and researches coaching-specific certificates of training, credentials, and formal training suggested for health professionals performing coaching to develop and demonstrate the necessary competence. [Common Credentials Held by RDNs and NDTRs](#) highlights coaching credentials and certification that could be considered by NDTRs (not all inclusive).

Completing [CDR’s Assess and Learn: Health Promotion and Disease Prevention](#) helped confirm the NDTR’s intention to be a coach. The certificate of training increased the competence level for the present position and was a steppingstone in the process that piqued the NDTR’s interest in reviewing the various coaching certifications available.

The NDTR decides to pursue the National Board Certified Health and Wellness Coach credential (NBC-HWC).³ Holding both the NDTR and the NBC-HWC credential will strengthen the NDTR’s application and consideration for the hospital’s Health and Wellness Coach position, as well as illustrating to potential clients the NDTR’s qualifications to provide health and wellness coaching.

Question 3: If the state(s) where you work license RDNs and NDTRs, is there any language that prohibits the activity? Is there language in any other profession’s statute and regulations that would prohibit an RDN or NDTR performing the activity?

The NDTR understands that they must work under supervision of the outpatient RDN when providing direct patient/client care involving medical nutrition therapy (MNT) for acute and chronic health diseases or conditions. In addition, the RDN and NDTR must meet all applicable standards required by state or local laws and regulations, and if the NDTR provides any type of services via telehealth, they must also abide by any telehealth-specific laws and regulations. Since regulations and policies are regularly updated, the NDTR routinely monitors the applicable laws and regulations.

Question 4: Do you have the necessary knowledge, skills, training (including certificates of training or required certification[s]) ([Common Credentials for RDNs and NDTRs](#)) to perform the activity?

In reviewing their education and training, the NDTR determines additional knowledge and skills related to coaching would be required. The NDTR decided to investigate applicable Academy learning activities, CDR Certificates of Training (eg, Weight Management) and resources available through other preventative care, wellness, and lifestyle coaching certification websites. The NDTR reviews the following Academy/CDR Webinars/Resources:

- [CDR Certificate of Training in Obesity for Pediatrics and Adults](#)
- [CDR Assess and Learn - Health Promotion and Disease Prevention](#)
- [Weight Management DPG - Weight Management Matters Newsletters](#) (*membership required*)

Question 5: Have you demonstrated your ability to perform the activity competently to an individual with the knowledge and skills to appropriately assess your competence to perform the activity according to accepted standards including those for the required certification? Is that evaluation documented in your personnel record?

The NDTR reviews the [Scope and Standards of Practice for the NDTR](#) to better understand the practice expectations for NDTRs in the area of preventative care and wellness, as well as the minimum competent level of practice related to coaching activities and/or techniques. The NDTR uses the indicators to evaluate their level of practice relevant to preventative care, wellness and lifestyle coaching. Areas in which the NDTR does not meet the competent level are opportunities to strengthen knowledge and skills, and to strengthen their application for the Community Education Health and Wellness Coach position.

The NDTR completes the Assess and Learn in Health Promotion & Disease Prevention and reviews applicable resources listed above before recording completion of the education in their Professional Development Portfolio. Once the supervising outpatient RDN verifies and documents the NDTR competence, they store the necessary paperwork in the NDTR's personnel file following organization procedures.

Question 6: Does your employer/organization in its governing documents, policies and procedures, or other documents (eg, medical staff bylaws, rules, and regulations; medical director-approved policy or protocol) recognize the credential (eg, RDN, NDTR, or specialist credential[s]) held as authorized to perform the activity?

The NDTR, with the assistance of the nutrition service manager, reviews the organization's governing document (eg, medical staff bylaws, rules and regulations, policies and procedures) and determined there are no barriers to the NDTR applying for the Health and Wellness Coach position.

The NDTR plans to incorporate coaching knowledge and skills gained during qualification for the coaching certification toward work in outpatient nutrition services. In working with the outpatient RDN with clients referred for nutrition care and services, the NDTR demonstrates use of coaching

techniques so the RDN can evaluate competency in the current role. The NDTR and the nutrition services manager update the NDTR's current job description to include use of coaching techniques in nutrition education and MNT-related activities supervised by the outpatient RDN.

NOTE: Providing preventative care, general wellness, and lifestyle coaching involves guiding and motivating clients to meet their health goals, which may include following a nutrition plan developed with an RDN. Therefore, if the NDTR is hired for the Health and Wellness Coaching position and it becomes apparent that a client would benefit from working with an RDN, the NDTR would be required to refer the client to an RDN for MNT-related care and education. The NDTR could continue to work with the client in a health and wellness coach role, which may include supporting the client to incorporate the skills and behaviors in the MNT care plan that was developed by the RDN. The RDN's consultation for MNT may be covered by insurance, while the health and wellness coaching provided by the NDTR is considered fee-for-service unless this service is covered in the client's employer health plan.

Question 7: Have you worked with your supervisor and/or organization representative to ensure organization-required steps and necessary documents (eg, organization and department/services policies and procedures, billing procedures, personal job description) are completed and approved by committees, when applicable, to allow the RDN or NDTR to perform the activity?

Before performing any new activities, the NDTR meets with their supervisor to review the hospital's process and steps below:

- Ensure that the activity is included in the position description.
- Confirm that their personnel file contains primary source verification of education, training, credentials, if applicable, continuing education for maintenance of certification(s), and competence in performing the activity.
- Investigate organization's liability coverage and need for personal professional liability insurance or additional coverage to include preventative care, wellness, and lifestyle coaching.
- For billable MNT and nutrition education-related services, investigate whether this activity (could include use of coaching skills), as performed by a NDTR and under the direction and supervision of an RDN (charge would be submitted under the RDN's National Provider Identifier [NPI] Number), will be reimbursed by health plan insurers, including Medicare.
- For preventative care, wellness, and lifestyle coaching services (not MNT), investigate whether this activity, as performed by a NDTR with a coaching certification, will be reimbursed by health plan insurers or will need to be a self-pay service.

Disclaimer: *The Case Studies are intended solely as models to help practitioners determine their individual scope of practice with guidance from the Scope and Standards of Practice and the Scope of Practice Decision Algorithm. Case Studies should not be used to determine a particular inquiry or outcome, as the results of an actual inquiry may differ according to the specific factual circumstances, state laws applicable to the specific situation, and organization policies and procedures.*

In this Case Study, the CDR has chosen to use the term RDN to refer to both registered dietitians (RD) and registered dietitian nutritionists (RDN) and to use the term NDTR to refer to both dietetic technician, registered (DTR) and nutrition and dietetics technician, registered (NDTR).

REFERENCES

1. Revised 2024 Scope and Standards of Practice for the Nutrition and Dietetics Technician, Registered. Commission on Dietetic Registration Scope and Standards of Practice Task Force. Accessed September 24, 2024. www.cdrnet.org/scope
2. 2018 Code of Ethics for the Nutrition and Dietetics Profession. Academy of Nutrition and Dietetics (Academy)/Commission on Dietetic Registration (CDR). Accessed September 24, 2024. <https://www.cdrnet.org/codeofethics>
3. Become a National Board Certified Health and Wellness Coach (NBC-HWC). National Board for Health & Wellness Coaching. Accessed September 24, 2024. <https://nbhwc.org/become-a-board-certified-coach/>
4. NBHWC health & wellness coach scope of practice. Accessed September 24, 2024. <https://nbhwc.org/scope-of-practice/>