

COLLEGE OF DIETITIANS OF BRITISH COLUMBIA

Interpretive Guide: Restricted Activities

Rc06/Policies/Ic-10 Int Gd - Restricted Activities final Nov 4 06

Purpose

Restricted Activities for Registered Dietitians are stated in the Dietitians Regulation. They are further defined in this Interpretive Guide to clarify registrants' practice and the need for registration with specific Restricted Activities.

Legislation

Dietitians Regulation: Sections 1 and 5:

Section 5 states:

"Subject to section 14 of the Act [Health Professions Act], no person other than a registrant who meets the additional qualifications set out in the bylaws of the College may:

- 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, or*
- c) administer a substance to a person by instillation through enteral or parenteral means".*

Section 1 includes the following definitions:

- *"compound" means to mix ingredients for enteral or parenteral nutrition.*
- *"design" means the selection of appropriate ingredients for enteral or parenteral nutrition.*
- *"dispense" means to fill a prescription for enteral nutrition*
- *"enteral" means administration of a nutritional substance to a patient by means of a feeding tube into the gastrointestinal tract*
- *"parenteral" means administration of a nutritional substance to a patient directly into the blood stream.*

Background Information

For registration purposes, the Registration Committee separated section 5(c) of the Dietitians Regulation into two Restricted Activities. Restricted Activities C and D are defined as:

- c) administer a substance to a person by instillation through enteral means
- d) administer a substance to a person by instillation through parenteral means.

"Administer" is not defined in the Dietitians Regulation. To assist registrants, the following definition has been approved by the Registration Committee and the Board:

- **"administer"** means to physically provide a nutritional or non-nutritional substance via an enteral or parenteral delivery device or system or provide instruction for same.

Practice setting: The Restricted Activities may be performed in all practice settings (for example: community, residential care, acute care, critical care) and in both the paediatric and adult population.

Registration and Competence: When the Registered Dietitian (RD) practices one or more of the aspects of any of the Restricted Activities, he/she is required to be registered with that Restricted Activity. A Registered Dietitian (RD) practicing a Restricted Activity is competent to perform each aspect of the Restricted Activity.

- o **Example:** An RD who designs and compounds enteral products but never supervises the dispensing of such products by non-registered staff members, must be registered with Restricted Activity A because they are practicing one aspect of Restricted Activity A.

Education/Instruction: An RD who instructs others to perform a Restricted Activity **is** required to be registered with the Restricted Activity.

Supervision: An RD who supervises a regulated health care professional who performs the Restricted Activity (for example another RD) is **not** required to be registered with the Restricted Activity. An RD who directly supervises a non-regulated health care provider (for example a food service worker) **is** required to be registered with the Restricted Activity and is responsible for that person’s practice.

- **Example:** An RD who does not design or compound enteral products, but who is responsible for the supervision of a non-registered staff member who dispenses enteral products, must be registered with Restricted Activity A.

Interpretive Guideline

Registered Dietitians registered with Restricted Activities A, B, C or D may legally perform the actions outlined below:

Restricted Activity A

Action	Interpretation and Practice Guidelines
"Design"	<p>If enteral nutrition is indicated, the RD selects or recommends:</p> <ul style="list-style-type: none"> • appropriate available commercial pre-packaged products • appropriate macro and micronutrient mix to provide for the client’s specific nutritional requirements (for example, recommend enteral products) • modular macronutrient components to add to available enteral products (for example, addition of protein powder or free water to enteral feeds) • mixing of enteral products (for example, taking a high protein feed and mixing it with a concentrated feed to modify the caloric and protein content to match the needs of the patient) <p>Example A: An individual with kidney disease and high blood potassium levels is not eating well. The client’s physician writes the following order: “enteral nutrition as per dietitian”. The RD:</p> <ul style="list-style-type: none"> • identifies the metabolic concerns that influences the macro and micronutrient mix, and selects the pre-packaged product that meets the client’s macronutrient (protein, carbohydrate, fat and water) needs and micronutrient (vitamins, minerals and trace elements) <p>or</p> <ul style="list-style-type: none"> • selects a pre-packaged product and determines modifications needed to meet the client’s specific macronutrient requirements (for example, addition of protein powder and/or water to the feeding regimen) <p>and/or</p> <ul style="list-style-type: none"> • recommends that the client’s needs be met through the mixing of 2 pre-packaged commercial products, and the appropriate ratio (for example, one can of product X to one can of product Y) <p>and/or</p> <ul style="list-style-type: none"> • identifies the need for a multi-vitamin mineral supplement. <p>Example B: The RD analyzes a family’s recipe to determine actual macro and micro nutrients and the total volume per 24 hours to meet the client’s enteral nutrient needs.</p>

“Compound”	<p>The RD:</p> <ul style="list-style-type: none"> • physically mixes enteral ingredients to enhance one or more component of the nutrition formulae <u>Example A:</u> The RD physically prepares and adds protein powder to an enteral formulae; <u>Example B:</u> The RD physically adds water to an enteral formulae • supervises food service staff who mix nutritional formulae (for example, modular or powdered products that require dilution with water) <u>Example A:</u> The RD supervises a kitchen staff member who physically adds protein powder or water to an enteral formula; <u>Example B:</u> The RD advises kitchen staff to mix two commercial enteral products to create a new product that best meets the patient’s needs. • instructs clients who are being trained to mix ingredients. <u>Example A:</u> The RD instructs a client to add protein powder to his or her enteral formulae; <u>Example B:</u> The RD instructs a client to add water to the enteral formulae.
“Dispense”	<p>The RD:</p> <ul style="list-style-type: none"> • physically fills a physician’s order (like a pharmacist dispensing a medication as per the physician’s prescription). • supervises staff who distribute or deliver the physician prescribed product to a client. <u>Example A:</u> The release from a controlled distribution area (for example, kitchen or stores) of the required enteral product (pre-packaged or RD modified specialty product) in the required amount for the required time frame, as ordered by the prescribing doctor.

Restricted Activity B

Action	Interpretation and Practice Guidelines
“Design”	<p>If parenteral nutrition is indicated, the RD selects or recommends:</p> <ul style="list-style-type: none"> • appropriate available commercial products/solutions • appropriate macro and micronutrient mix to provide for the client’s specific nutritional requirements • modular macronutrient components to add to the available parenteral product/solution (for example, the addition of additional protein or carbohydrate to the parenteral nutrition solution) <p><u>Example A:</u> An individual with kidney disease and high blood potassium levels requires parenteral nutrition. The client’s physician writes the following order: “dietitian to assess”. The RD:</p> <ul style="list-style-type: none"> • identifies the metabolic concerns that influences the macro and micronutrient mix and selects the parenteral nutrition solution that best meets the client’s macronutrient (protein, carbohydrate, fat, and water) and micronutrient (vitamins, minerals, and trace elements) needs or • selects the parenteral nutrition solution and determines how it can be modified to meet the client’s specific macronutrient requirements (for example, the addition of additional lipid) <p>and/or</p>

	<ul style="list-style-type: none"> recommends that the client's needs be best met through a modification of the vitamin, mineral and/or trace element components of the parenteral solution.
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Restricted Activity C

Action	Interpretation and Practice Guidelines
"Administer"	<p>If a substance is being administered by instillation through enteral means, the RD:</p> <ul style="list-style-type: none"> physically manipulates or adjusts the enteral delivery device or system, and/or physically changes an enteral feeding bag to provide a nutritional or non-nutritional substance to a client, and/or instructs clients, caregivers, RDs or other health care professionals to do so. <p><u>Example A:</u> The RD instructs the client and/or caregiver to connect the feeding bag to the enteral pump, adjust the delivery system as required and flush the enteral feeding tube with water or other non-nutritional substance.</p> <p><u>Example B:</u> The RD demonstrates to another RD how to flush a feeding tube with water in order to prevent tube occlusion and how to instill pancreatic enzyme if the tube is occluded.</p> <p><u>Example C:</u> The RD demonstrates to the client and/or caregiver in simulation or directly how to clear a feeding tube occlusion.</p>

Restricted Activity D

Action	Interpretation and Practice Guidelines
"Administer"	<p>If a substance is being administered by instillation through parenteral means, the RD:</p> <ul style="list-style-type: none"> physically manipulates or adjusts the parenteral delivery device or system, and/or physically changes a parenteral feeding bag to provide a nutritional substance to a client, and/or instructs clients and/or caregivers, RDs or other health care professionals to physically change a parenteral feeding bag to provide a nutritional substance to a client. <p>Note: RDs do <u>not</u> administer a substance to a person by instillation through parenteral means unless they have had additional supervised education and practice. This procedure is generally performed by Registered Nurses.</p>