



Right Sizing Your Clinical Nutrition Team

Understanding The Differences
Between Registered Dietitians And
Certified Dietary Managers

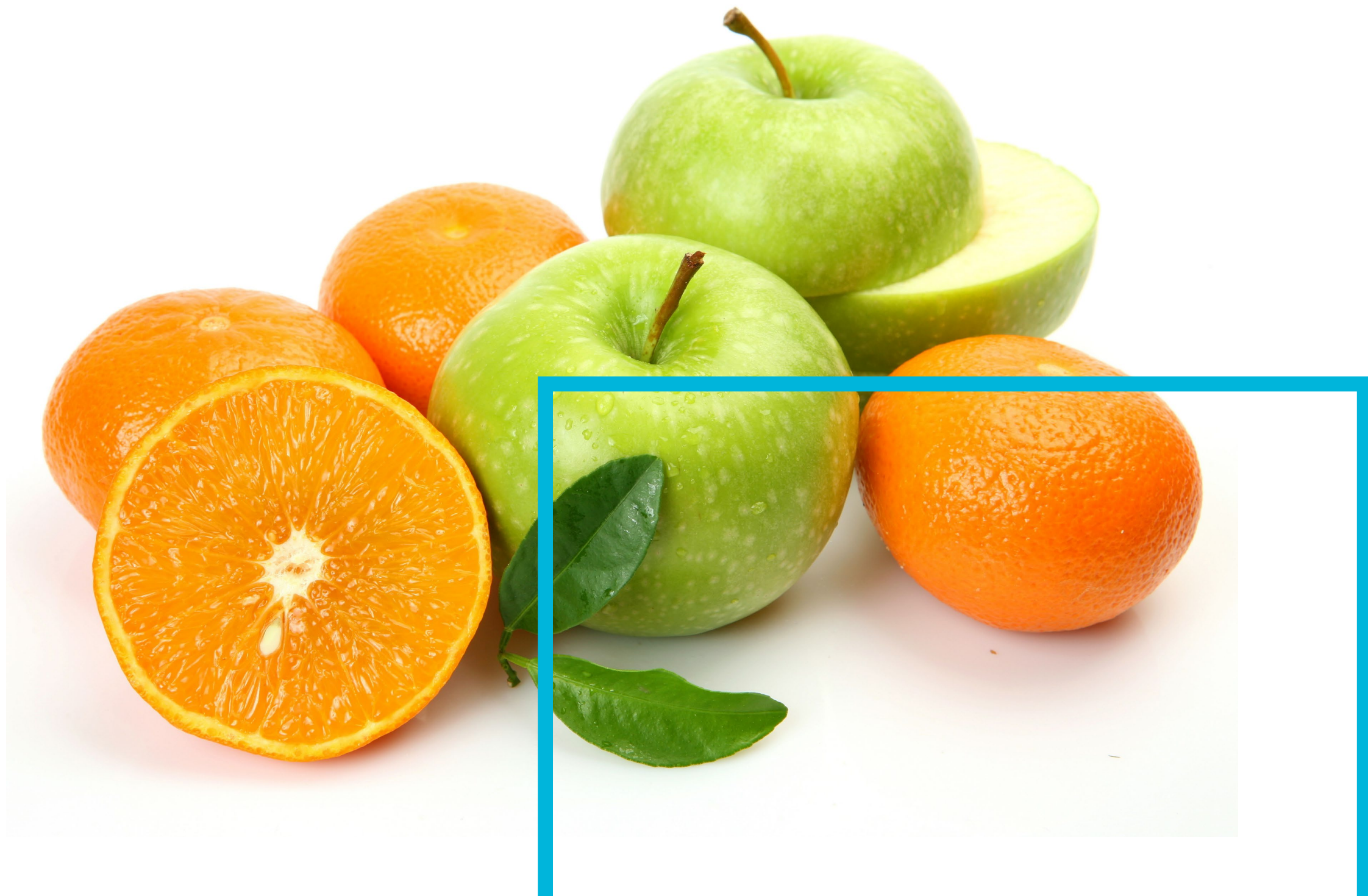
Right Sizing Your Clinical Nutrition Team

Understanding the Differences Between Registered Dietitians and Certified Dietary Managers

In 2016, the Centers for Medicare & Medicaid Services (CMS) finalized new regulations regarding Registered Dietitian Nutritionists (RD, RDN) and Food Service Managers in long-term care settings. The new rules outlined what it considered sufficient staffing and the training needed to work in clinical nutrition services. Communities must either hire a full-time, qualified Registered Dietitian Nutritionist or a part-time qualified Registered Dietitian Nutritionist and a Food Service Director who has a Certified Dietary Manager, Certified Food Protection Professional (CDM, CFPP) credential, or similar qualifications.

While meant to provide clarity, the new rules have left many administrators asking, "Which is better?" It's a question we at Culinary Services Group hear often and there is no single right answer. Each community must make its own choices based largely on the acuity of the residents, the level of care needed, and the competency levels of the individual nutrition service providers you have in place.

Here's how to make the right call for your community.



Here's how to
make the right
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Food & Nutrition Services

Getting to Know §483.60.

The [Food and Nutrition Services §483.60 section](#) of the CMS guidelines requires communities to provide each resident with nourishing, palatable, well-balanced meals that meet a resident's dietary needs while considering their personal preferences.

Communities are also required to provide sufficient personnel with the appropriate competencies and skills to carry out the functions of food and nutrition services.



Competencies Included in Food And Nutrition Services §483.60

- Preparing menus in advance and following them.
- Preparing menus that reflect the community's religious and cultural needs.
- Having a qualified nutrition professional review menus periodically for nutritional adequacy.
- Preparing foods in a way that preserves their nutritional value, flavor, and appearance.
- Offering food at a safe and appetizing temperature.
- Offering food accommodations for allergies, intolerances, and preferences.
- Offering appealing food options of similar nutritive value for those who choose not to eat the food that is initially served.
- Offering water and other liquids consistent with resident needs and preferences.
- Following therapeutic diets prescribed by a physician.
- Having no more than 14 hours between an evening meal and breakfast the following day.
- Providing snacks and nourishing alternative meals to residents who wish to eat outside of scheduled mealtimes.
- Providing special eating equipment and appropriate assistance to residents.
- Procuring food from safe and approved sources.
- Properly storing, preparing, and distributing food in accordance with professional standards for food service safety.
- Properly disposing of garbage.



Education & Training For Clinical Nutrition Professionals In Long-Term Care

A large portion of Food and Nutrition Services §483.60 focuses on the education and training required for a person to be considered competent in their role. It allows for two clinical nutrition staffing models to remain compliant with this regulation, and each requires a defined level of education and training.

Model 1. Full-Time Registered Dietitian

Dietitian Requirements

- Must hold a bachelor's or higher degree in nutrition or dietetics from an accredited university. (As of January 1, 2024, a master's degree will be required for those taking the registration examination for the first time.)
- Must have completed a minimum of 1000 hours of supervised dietetics practice under the supervision of a registered dietitian.
- Must be licensed or certified by the state where they are performing services or be recognized as a Registered Dietitian by the Commission on Dietetic Registration if the state does not provide licensure.



Model 2. Part-time Dietitian + CDM, CFPP Certified Food Service Director

Dietitian Requirements

- Same as the full-time Registered Dietitian in Model 1.

CDM, CFPP Requirements

- Must be a certified dietary manager; or
- Must be a certified food service manager, or
- Must have a similar national certification for food service management and safety from a national certifying body, or
- Must have an associate's or higher degree in food service management or hospitality, if the course study includes food service or restaurant management, from an accredited institution of higher learning, or
- Must have 2 or more years of experience in the position of director of food and nutrition services in a nursing facility setting and have completed a course of study in food safety and management, by no later than October 1, 2023, that includes topics integral to managing dietary operations including, but not limited to, foodborne illness, sanitation procedures, and food purchasing/receiving.

Determining The Right Fit For Your Community – RDN's

Location, Location, Location

The Food and Nutrition Services §483.60 regulations require that every long-term care community has a qualified, licensed dietitian coverage on either a full-time, part-time, or consultant basis. Most states have their own licensing requirements, but a few states do not recognize dietitian or nutritionist licensure. In those states that do not recognize licensure, a dietitian working in long-term care would need to be credentialed through a nationally recognized organization. These organizations include the Commission on Dietetic Registration (CDR), the Board for Certification of Nutrition Specialists (BCNS), and the Clinical Nutrition Certification Board (CNCB).



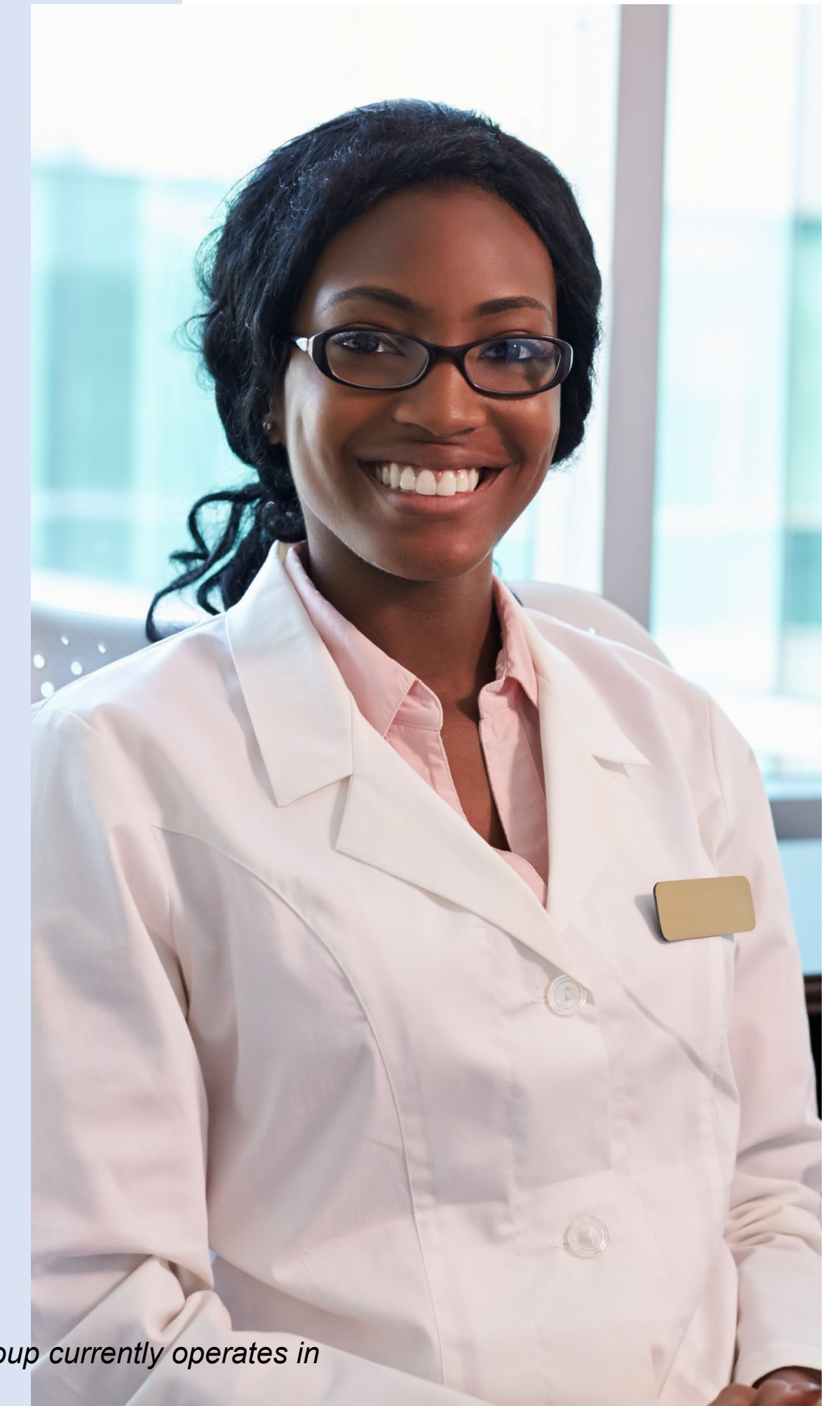
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Nutritionist, Licensed Nutritionist, and Registered Dietitian Requirements By State. (2020, October 27). nutritioned.org. Retrieved February 1, 2023, from <https://www.nutritioned.org/state-requirements/>

States That Require State Or National Licensure for RDN's

Alabama*
Alaska
Delaware*
District of Columbia
Florida*
Illinois
Kentucky*
Louisiana*
Maine
Maryland*
Massachusetts
Minnesota
Mississippi*
Missouri
Montana
Nebraska
New Mexico
New York
North Carolina*
North Dakota
Ohio*
Pennsylvania*
Rhode Island
Tennessee
Virginia*
Washington

**Indicates a state that Culinary Service Group currently operates in*



Determining The Right Fit For Your Community – CDM, CFPP

Location, Location, Location

When determining which model is the best fit for your community, know that only 21 states recognize the CDM, CFPP credentials as necessary to be a Food Service Director in long-term care. This doesn't mean you cannot pursue an RDN/CDM model. Remember, an associate's degree in food service management/hospitality or work experience combined with a course in food safety and management are also qualifying criteria for this model. However, it may be easier to recruit employees with these CDM/CFPP criteria if your state recognizes these credentials. Otherwise, you may be more successful looking for candidates with different certifications, education, or training to meet the Food Service Director criteria for Food and Nutrition Services §483.60.

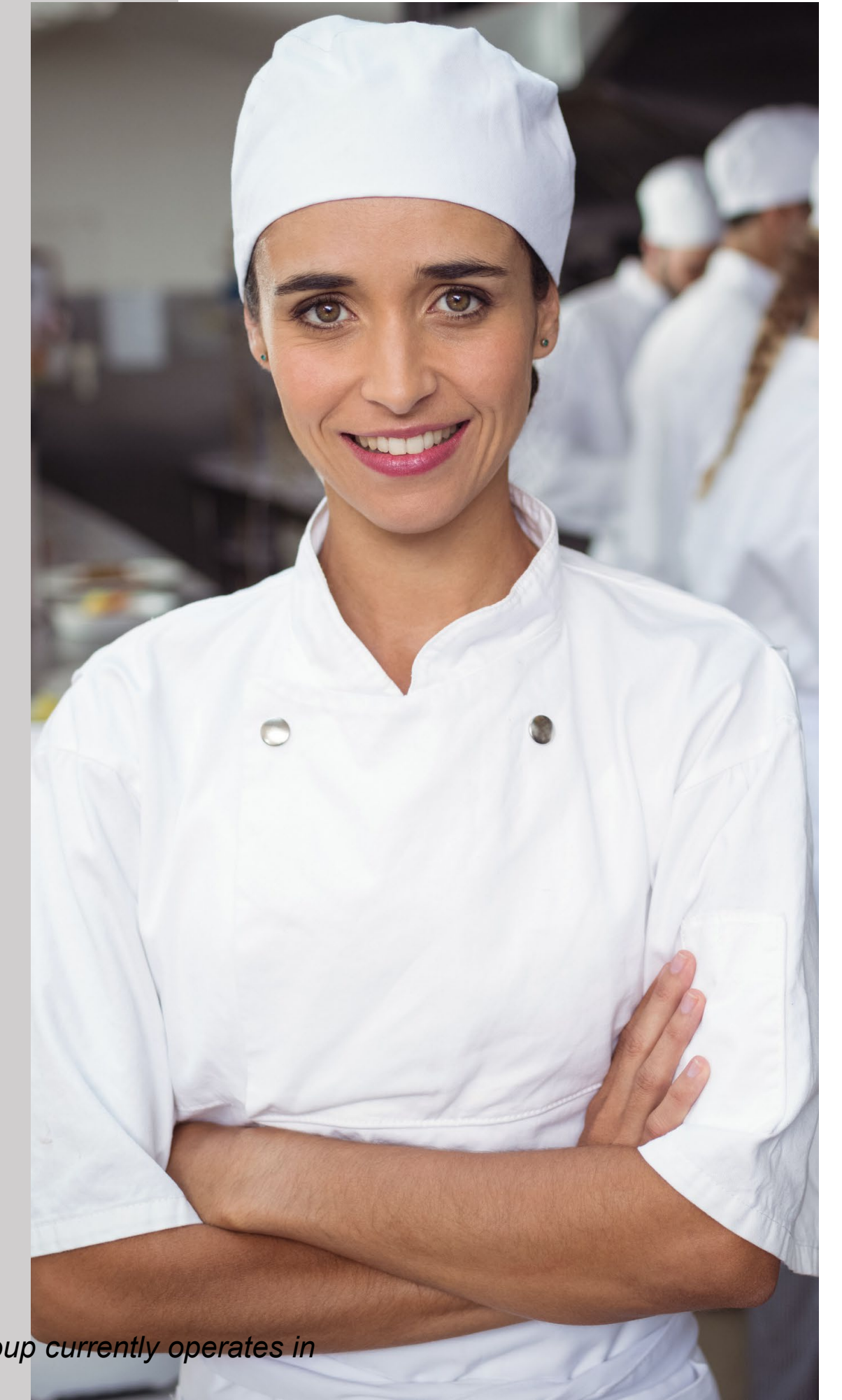


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CBDM. (2022, March). States Recognizing the CDM, CFPP Credential.

States That Recognize CDM,CFPP Credentials

Alaska
Arkansas
California
Delaware*
Florida*
Hawaii
Illinois
Iowa
Kansas
Kentucky*
Maine
Maryland*
Mississippi*
New Hampshire
North Dakota
Oklahoma
South Carolina*
South Dakota
Tennessee
Texas*
West Virginia*



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The Role Of An RD in Medical Nutrition Therapy

Medical Nutrition Therapy and Your Interdisciplinary Team

When determining which clinical model works best for your community consider the needs and acuity of the residents. One qualification unique to registered dietitians is the ability to provide Medical Nutrition Therapy (MNT). MNT is the evidence-based application of the Nutrition Care Process (NCP) which includes:

- Performing a comprehensive nutrition assessment
- Determining a nutrition diagnosis
- Planning and implementing a nutrition intervention using evidence-based nutrition practice guidelines
- Monitoring and evaluating an individual's process toward goals.

In long-term care, an RD plays an integral role in your interdisciplinary team. Working closely with Speech Language Pathologists, they can determine if a dysphagia diet (one comprised of texture-modified foods) is needed, and which one is appropriate. They will work with nurses to provide specialized nutrition interventions based on the stages of pressure ulcers and wounds. They will also work with gastroenterologists when feeding tubes are placed. This may involve prescribing tube feeding regimens as well as educating clients to monitor the tolerance and effectiveness of these feedings. A higher acuity population will benefit greatly from the knowledge and expertise of a dietitian. While a healthier population with fewer dysphagia diets and tube feedings may be able to function well utilizing a CDM.



Higher acuity populations will benefit greatly from the expertise of a dietitian.

Nutrition Care RD vs CDM/CFPP

Competencies by Governing Organizations

The roles and responsibilities of both Registered Dietitians and Certified Dietary Managers are not an apples-to-apples comparison. The qualifications for both are evaluated by different organizations. The Academy of Nutrition and Dietetics (AND) evaluates the professional performance of Registered Dietitians in Post Acute and Long-Term Care using a level of practice system that includes competent, proficient, and expert in 4 categories:

- Nutrition Assessment
- Nutrition Diagnosis
- Nutrition Intervention/Plan of Care
- Nutrition Monitoring and Evaluation

Meanwhile, the Association of Nutrition & Foodservice Professionals (ANFP) evaluates the competencies of those with CDM/CFPP credentials using a level of practice system that includes no knowledge/entry-level knowledge, basic/foundational knowledge, and thorough knowledge in 5 competency categories:

- Nutrition
- Foodservice
- Personnel & Communications
- Sanitation & Safety
- Business Operations



Qualifications are governed by different organizations

Nutrition Care RD vs CDM/CFPP

Level of nutrition care that can be provided by and RD vs a CDM

Let's review the level of nutritional care that can be provided by both a Registered Dietitian and a CDM/CFPP. Using the nutrition practice categories set forth by the Academy of Nutrition and Dietetics.



Nutrition Assessment

Registered Dietitian

Conducts a comprehensive nutrition assessment that considers height, weight, BMI, nutrition-related laboratory values, medical reports, drug-nutrient interactions, energy intake, and supplement use.

Conducts a nutrition-focused physical exam that considers energy intake, interpretation of weight loss, and physical findings of fat loss, loss of muscle mass, fluid accumulation, and reduced grip strength to identify the degree of malnutrition.

Evaluates cognitive and physical ability to self-feed and the need for adaptive eating devices or assistance.

Uses evidence-based indicators to identify more complex nutrition issues and evaluates comorbidities related to the nutrition plan.

Reviews current and past food modifications and therapeutic diets.

Conduct a dietary-review of food preferences, meal and snack patterns, and a review of food allergies and intolerances

CDM/CFPP

Interviews patients to identify specific nutritional needs or problems

Completes malnutrition screening to trigger a Registered Dietitian consult for nutrition-focused physical exam.

Identifies food customs and nutrition preferences based on race, culture, religion, and food intolerances.

Reviews nutrition screening data and calculates nutrition intake.

Monitors tray accuracy and diet compliance specific to resident food preferences, meal/snack patterns, and food allergies/intolerances.

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Nutrition Diagnosis

Registered Dietitian

Diagnoses nutrition problems based on data, signs, and symptoms

Prioritizes nutrition problems based on severity, comorbidities, and evidence-based protocols

Communicate nutritional diagnosis to patients, family members, and other healthcare professionals involved in the patient's care plan

Documents the nutritional diagnosis using standard terminology and concise written statements

Re-evaluate and revises nutrition diagnosis when new data becomes available

Diagnoses nutrition problems based on data, signs, and symptoms

CDM/CFPP

Medical Nutrition Therapy (MNT) can only be completed by a licensed dietitian

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Nutrition Intervention/Plan of Care

Registered Dietitian

Develops nutrition prescription and establishes patient-focused goals

Implements, initiates or modifies orders for therapeutic diet, dietary supplements or food texture modifications

Manages nutrition support therapies such as formula selection, rate adjustments, and the addition of medication or supplements.

Performs nutrition-related services such as bedside swallow screening for SLP consult, and management of enteral nutrition-support and parenteral nutrition support.

Assigns activities to and supervises NDTR and other support personnel

Develops nutrition prescription and establishes patient-focused goals

CDM/CFPP

Implements the nutrition care plan and prescribed diet orders, special nourishments, and supplemental feedings

Modifies diet plan as needed, following standards of nutrition care and evidence-based guidelines

Nutrition Care RD vs CDM/CFPP

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Nutrition Monitoring & Evaluation

Registered Dietitian

Adjusts nutrition intervention and plan of care strategies in collaboration with interdisciplinary team

Documents results and measurable indicators in medical record and tracks outcomes

CDM/CFPP

Participates in care conferences to review the effectiveness of nutrition care

Documents information in medical record

The Scope of a Food Service Director

Nutrition, food safety standards, and business operations

While a dietitian's role is heavily focused on the nutritional care of residents, a qualified Food Service Director is only partially focused on nutrition. They are also focused on food safety and food service standards and the daily business operations of the food service department. It's their goal to ensure the kitchen is managed within a budget and ensure compliance with state and federal regulations. There are many qualified individuals who can manage food service operations who are not CDM/CFPP certified because there are many paths to becoming a qualified Food Service Director. An associate's degree from an accredited institution or a combination of work experience in a nursing facility and a course of study in food safety and management can also qualify a person to be a Food Service Director in long-term care. However, if the individual is expected to perform nutrition services, the CDM/CFPP credentials do offer a higher level of quality assurance.



CDM/CFPP
credentials offer a
high level of quality
assurance

The Scope of a Food Service Director

Food Service Director is responsible for the entire food service operation in your community. Their attention is often divided between day-to-day business operations, employee management, and ensuring the kitchen operates and produces food in a safe and compliant manner.

According to the ANFP here are the additional tasks a CDM/CFPP should be capable of in a long-term care setting.



Food Service

Competency

Task

Ensure Effectiveness of Standardized Recipes

- Implement elements of a standardized recipe including portion control, cooking procedures, HACCP guidelines, food preparation procedures, nutritional analysis, cost analysis and client's acceptance

Specify Standards/Procedures for Preparing Food

- Develop menus and implement procedures to monitor food quality, appearance and temperature, production, and food waste in accordance with established national guidelines

Supervise the Production and Distribution of Food

- Define and monitor food delivery procedures including special event preparation, production and menu forecasting, labor and scheduling
- Effectively manage efficiency (time, cost) of foodservice system

Monitor Meal Service Delivery

- Oversee meal service for diet accuracy, portion sizes, temperature, texture modifications, overall presentation, and quality
- Ensure accurate preparation and serving of therapeutic diets and nutritional supplements

Implement Continuous Quality Improvement Procedures for Foodservice Department (QAPI)

- Define and monitor foodservice standards
- Implement written protocols and tools to audit for effective quality indicators

Modify Standardized Menus

- Adhere to regulatory nutritional guidelines
- Utilize approved diet manuals to support menu development and modifications to honor client cultural preferences/intolerances

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Personal Management & Communications

Competency

Task

Define Personnel Needs and Job Functions

- Develop written job descriptions, personnel/task analysis
- Participate in marketing open positions and updating departmental organizational chart

Interview, Select, and Onboard Employees

- Conduct interviews, select and onboard new employees in accordance with organization policies and procedures
- Follow organization's protocols for selection and onboarding of new employees while complying with fair employment laws/practices for hiring and discharging of department staff

Provide Ongoing Education and Training

- Provide and keep record of education and in-service training for staff, including regulatory required trainings, i.e. sanitation, safety, customer service, ethics, disaster preparedness, infection control etc. as deemed appropriate per federal, state and organization policies

Develop and Maintain Employee Time Schedules and Assignments

- Identify and document overall staffing needs
- Prepare and maintain time schedules and work assignments to meet department needs

Manage Goals and Priorities for Department

- Establish short-term and long-term goals and expectations in the form of policies and procedures and prioritize appropriately
- Clearly communicate goals, within department and organization
- Establish contingency plan for department to meet priorities, utilizing available resources

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Sanitation & Safety

Competency

Task

Manage Personnel to Ensure Compliance with Safety and Sanitation Regulations	<ul style="list-style-type: none"> Comply with federal safety and sanitation regulations and guidelines Educate and train employees according to safety and sanitation policies and procedures for cleaning and equipment maintenance and enforce and audit compliance
Manage Purchasing, Receiving, Storage, and Distribution of Food and Supplies Following Established Sanitation and Quality Standards	<ul style="list-style-type: none"> Procure food, water and supplies as specified from approved purveyors and identify food quality and grading Protect food in all phases of handling to prevent foodborne illnesses from occurring due to improper handling Ensure proper safe food packaging, labeling, dating, and storage practices in delivery and food rotation process Purchase, store, and ensure safe use of chemicals and cleaning agents
Protect Food in All Phases of Preparation Following HACCP Guidelines	<ul style="list-style-type: none"> Recognize, identify, and monitor potentially hazardous foods to prevent the spread of pathogens and an outbreak of a foodborne illness Implement food production protocols that control time and temperature, cross contamination, and safe critical limits Establish an effective Emergency/Disaster Plan to ensure a safe food supply is on hand and a crisis management plan in place in the event of a foodborne illness outbreak or any other local or national emergency/disaster Ensure compliance through documentation and corrective action plans when critical limits are exceeded
Manage Physical Facilities to Ensure Compliance with Safety and Sanitation Guidelines	<ul style="list-style-type: none"> Manage a safe and sanitary foodservice environment Follow all federal and state environmental food safety and sanitation regulations Utilize written procedures/audit checklists for maintaining all equipment following manufacturers guidelines for safe use and sanitation Conduct workflow analysis/workflow simplification procedures to improve overall departmental layout
Manage Personnel to Ensure Compliance with Safety and Sanitation Regulations	<ul style="list-style-type: none"> Comply with federal safety and sanitation regulations and guidelines Educate and train employees according to safety and sanitation policies and procedures for cleaning and equipment maintenance and enforce and audit compliance

The Scope of a Food Service Director

Food Service Director is responsible for the entire food service operation in your community. Their attention is often divided between day-to-day business operations, employee management, and ensuring the kitchen operates and produces food in a safe and compliant manner.

According to the ANFP here are the additional tasks a CDM/CFPP should be capable of in a long-term care setting.



Business Operations

Competency

Task

Manage a Budget

- Develop annual budget and operate within budget parameters
- Manage actual costs to budget in calculating costs for daily PPD, equipment, supplies and labor for the food service department
- Evaluate capital equipment needs, existing condition and future requirements
- Develop justification and prepare specifications for replacement as needed for new capital equipment
- Conduct and evaluate departmental workflow needs, research current design concepts
- Prepare proposals for construction or renovation in layouts and designs

Assist in the Purchasing Process

- Implement purchasing processes including group purchasing, bidding, returns, recalls and inventory management practices
- Adhere to budget restrictions, purchasing policies and maintain inventory records

Manage Revenue Generating Services

- Supervise business operations of foodservice department, implementing cost effective procedures and managing revenue-generating services

Implement Cost Effective Procedures

- Implement cost-saving measures for inventory control, purchasing and operation of foodservice department
- Report actual costs vs. budget variances

Salary and Cost Savings

Which model is more cost efficient?

Many administrators favor the part-time dietitian and CDM model because of potential cost savings. Full-time Food Service Directors and Registered Dietitians earn similar salaries according to [salary.com](https://www.salary.com) and a 2021 survey by The Academy of Nutrition & Dietetics. Among all dietitians the median salary wage was \$33.65 per hour, although this can vary greatly based on education, additional certifications, and the number of years in the profession. While the cost savings on salaries, taxes and benefits are appealing, it can be challenging in many areas to find qualified CDM/CFPP professionals.

2022 Average Salary in the US

**Full-time Long-Term Care
Dietitian**

\$69,992

Full-time CDM/CFPP

\$61,900

**Part-time Long-Term Care
Dietitian**

\$34,996



**Food Service
Directors and
Registered
Dietitians earn
similar salaries.**



The Importance of a Gap Analysis

For those communities who are able to utilize a part-time RD and CDM model it's important that both the dietitian and CDM understand their roles and responsibilities clearly. A CDM/CFPP cannot provide Medical Nutrition Therapy and is limited in the level of nutrition care they are able to provide. While they can implement a nutrition care plan and discuss patient preferences, they cannot conduct a nutrition assessment or create a plan of care.

Like any training program, those who have received the CDM/CFPP credential may need additional training on the competencies that are important in your community and may require additional on-site training for them to be effective in their role. If a community uses a CDM/CFPP credentialed food service professional, the ANFP offers a [comprehensive guide](#) for assessing and addressing knowledge gaps, so you can be sure your Food Service Director is able to fully function at the level needed for this model to be effective.

ASK FOR HELP!

We hope you have a clearer understanding of the differences between a full-time dietitian and a part-time dietitian/CDM/CFPP model for nutrition services in a long-term care setting. But if you still need help making the right decision for your community, we're happy to help. We can assess your current staffing pattern and the level of care needed in your community and offer guidance as part of a contract management agreement with Culinary Services Group. [Contact us today](#) and learn more about our food service solutions.



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