



TO: Members of the Wisconsin Legislature  
FROM: Wisconsin Academy of Nutrition and Dietetics  
RE: Assembly Bill 135 and Senate Bill 135  
DATE: May 30, 2023

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The Wisconsin Academy of Nutrition and Dietetics (WAND) would like to submit the following comments on the benefits of professional regulation for the purposes of inter-state reciprocity from the perspective of a credentialed healthcare provider currently regulated by the state Department of Safety and Professional Services (DSPS). WAND is a statewide organization of over 1,500 registered dietitian nutritionists (RDNs) and dietetic technicians, registered (DTRs).

Credentialed nutritionists, or dietitians, are qualified to provide Medical Nutrition Therapy (MNT) and in many states are the sole provider of the nutrition care process, which includes MNT. This therapy entails a detailed nutrition, social and medical history and a nutrition-related physical exam. These data are used to craft an individualized therapeutic diet that is prescriptive in calories, protein, vitamins, minerals and fluids. RDNs and DTRs work alongside physicians, nurses, and other allied healthcare professionals on multidisciplinary healthcare teams in a variety of settings from farm to fork.

To obtain the RDN credential, an individual must earn a B.S. degree and complete a minimum of 1200 hours of supervised dietetic practice before being eligible to sit for the National Credentialing Exam through the Commission on Dietetic Registration. In 2024, the profession will require a graduate degree before eligibility is granted for the board exam. Once credentialed, RDNs must maintain 75 hours of continuing education every 5 years.

These academic and professional qualifications define credentialed nutritionists, or dietitians, and are not prohibitive to individuals entering the nutrition workforce; there are over 25 jobs and opportunities for non-credentialed nutritionists in the field of food and nutrition including health and wellness coaching, nutrition consulting which supports general nutrition programming or nutrient analyses, as well as dietary aides in more acute healthcare settings.

Dietitians and nutrition professionals within WAND are continually striving to promote the health and safety of the public we support with medical nutrition therapies. Credentialing is essential to ensuring consumer safety and protection.

Professional regulation elevates a profession and provides a mechanism for oversight to ensure safe, evidence-based practice that promotes health and wellbeing and reduces the risk of harm. We'd like to take a brief moment to share two accounts where non-RDNs provided MNT that resulted in harm.

One such story is about a patient who was pursuing a kidney transplant and thus was following a complicated diet restricted in salt, potassium and phosphorus. He had recently joined a gym and a trainer was encouraging him to follow a Paleo diet, which is quite high in restricted nutrients. The patient consulted his RDN before making the change and likely saved his own life.

Another story involves a young girl with type I diabetes - her body doesn't make insulin on its own. She was experiencing significant digestive distress and consulted a nutritionist who was not credentialed in

the area under the supervision of her mother. This provider encouraged her to follow a very low carbohydrate diet as a remedy for her GI issues. After 2 weeks on this plan, she had lost a significant amount of weight and presented in the emergency department with diabetes ketoacidosis, as a result of inadequate energy, carbohydrate and insulin. After her blood sugars were stabilized and she was rehydrated, she was referred to the credentialed nutritionists at a digestive health center and has now restored her weight, energy and is free from the digestive ailments, too.

These stories highlight the necessity for evidence-informed training and practice, as well as supervision in the field of nutrition.

The COVID-19 pandemic ushered in a wide array of telehealth opportunities that were swiftly adopted by members of the healthcare community to continue care for our patients. Prior to the pandemic, patients would travel to receive care within Wisconsin. This was brought to a strict halt with the issuance of safer at home orders. In order to maintain care and connection with patients, dietitians within Wisconsin had to obtain licensure from neighboring states in order to engage in inter-state practice. This process would have been simplified if RDNs in Wisconsin were licensed. All surrounding states including North and South Dakota, Minnesota, Iowa, Illinois and Indiana all maintain professional licensure for dietitians within their state. Wisconsin is the sole Midwestern state that credentials RDNs as “certified” versus “licensed”.

As proponents of good stewardship, we at WAND advocate for appropriate analysis of the costs associated with professional regulation. We want to be able to provide high quality and cost-effective nutrition care possible and keep monies within our state. We can do this by supporting reciprocal credentials and professional licensing in Wisconsin for RDNs.

RDNs are focused on providing high quality care and continued improvement.

If you have any questions, please contact WAND’s government affairs team - Nathan Butzlaff, [nathan@hovenconsulting.com](mailto:nathan@hovenconsulting.com), 608-310-8833) or Tim Hoven ([tim@hovenconsulting.com](mailto:tim@hovenconsulting.com), 414-305-2011).