



Dietitians Regulation Q&A

The following Q&A provides answers to common questions about recent and upcoming amendments to the Dietitians Regulation.

On September 18, 2024, the Ministry of Health amended the Dietitians Regulation. This was done in two Schedules. Schedule 1 was in effect from September 19, 2024. Schedule 2 came into effect on January 1, 2025. You can view the existing Dietitians Regulation [here](#) and the amendments in force on January 1 [here](#).

Some documents related to dietetic practice currently published on the College of Health and Care Professionals (CHCPBC) website refer to the Dietitians Regulation. Where these instances occur, we are working on updating wording to reflect the amended Regulation. If you have questions about dietetic practice, please contact practicesupport@chcpbc.org.

General

Q1: Does the amended Regulation impact how I renew/register as a dietitian with the CHCPBC?

No, the amended Regulation does not affect the 2025 registration renewal process for current registrants. The annual Continuing Competence Program (CCP) requirement and renewal will occur as usual from March 1 to March 31, 2025.

Q2: How does the amended Dietitians Regulation impact the dietetic scope of practice?

The amended Regulation does not change the scope of practice of Registered Dietitians. More explicit definitions and descriptions of key aspects of dietetic practice have been added to bring clarity to activities that were already within scope. Interpretation on scope, Restricted Activities, delegation, and other authorizing mechanisms is available within the Ministry of Health's Interpretive Bulletin [here](#).

Q3: How does the amended Dietitians Regulation impact restricted activities?

Restricted Activities relating to designing, compounding, dispensing, or administering enteral nutrition (A, C) and designing parenteral nutrition (B) remain unchanged. However, administering parenteral nutrition has been removed as a restricted activity from the regulation; no dietitians in BC have ever performed this task.

The amended Regulation also establishes a new category of restricted activities that require certification (i.e., certified practice activities). The new language describes, for the purpose of enteral nutrition delivery, dietitians' ability to "*put an instrument... device,*

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hand, or finger... beyond the [narrowing point] in the nasal passages... beyond the pharynx, or into an artificial opening into the body.” Performing these activities does not require medical delegation, however, a registrant must be certified and acting on an order issued by a health professional.

The College is currently developing a certification program for these certified practice activities, and will provide additional information regarding the certification process when it becomes available.

SECTION 6	
Old regulation: Limits or conditions on services	Amended regulation: Restricted activities for certified practice registrants
Insertion of naso/oro-enteric tube by delegation from a physician.	Dietitians no longer have delegated acts. By MD, NP, ND order: <ul style="list-style-type: none">• Insertion and removal of a naso/oro-enteric tube,• Removal of and replacement of balloon-retained enterostomy tube,• Removal and replacement of water within the balloon of a balloon-retained enterostomy tube.

The remainder of this Q&A follows the layout of the sections in the new regulation, as outlined below.

- [Schedule 1 – in effect as of September 19, 2024](#)
 - [Definitions](#)
 - [Restricted Activities](#)
- [Schedule 2 – in effect as of January 1, 2025](#)
 - [Definitions](#)
 - [Restricted Activities for Certified Practice Registrants](#)

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Schedule 1 – in effect as of September 19, 2024

Definitions

Q4: What has changed about the definition of “dietetics”?

The definition of “dietetics” now provides clearer and more organized language regarding activities that are within a Registered Dietitian’s scope of practice. It does not change the existing scope.

DIETETICS	
Old regulation:	Amended regulation:
<i>“the assessment of nutritional needs, design, implementation and evaluation of nutritional care plans and therapeutic diets, the science of food and human nutrition, and dissemination of information about food and human nutrition to attain, maintain and promote the health of individuals, groups and the community”</i>	<i>“the health profession in which a person provides the following services: (a) assessing, maintaining, restoring and promoting health as it relates to nutrition; (b) planning, implementing and evaluating nutrition interventions; (c) providing information and counselling with respect to nutrition”</i>

“Nutrition Intervention”, as used in the new definition of dietetics has been added as a new defined term.

<i>“Nutrition intervention’ includes the delivery of nutrition by the following means: (a) orally; (b) enteral instillation; (c) parenteral instillation;”</i>

Q5: How does the new definition of “dietetics” impact the scope of practice of a dietitian vs the scope of a nutritionist?

The new definition of “dietetics” is not applicable to nutritionists. The title “dietitian” remains reserved for exclusive use by registrants, and only CHCPBC registrants may practice dietetics under the new regulation.

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For more information on the differences between a dietitian and nutritionist, please refer to this Dietitians of Canada [resource](#).

Q6: What has changed about the definition of “design”?

The definition of “design” was broadened to include determining the volume and proportion of ingredients in a therapeutic diet, and the method and frequency of delivering the ingredients. This change formalizes dietitians’ broad authority to make decisions regarding aspects of designing a therapeutic diet, which is not limited to only selecting ingredients.

DESIGN	
Old regulation:	Amended regulation
<i>“the selection of appropriate ingredients for parenteral or enteral nutrition”</i>	<i>“includes determining (a) the appropriate ingredients of a therapeutic diet and the volume and proportion of those ingredients, and (b) the method and frequency of delivering the ingredients of a therapeutic diet”</i>

Q7: How should I interpret the new defined term “substance”?

The definition of “substance” encompasses the nutritional substances that dietitians work with, **excluding** drugs but **including**:

- *“Water, and*
- *Ingredients such as*
 - *Food,*
 - *Food texture substances,*
 - *Thickening agents,*
 - *Formulas and other nutritional supplements,*
 - *Macro-nutrients (polymers and monomers), and*
 - *Micronutrients (vitamins and minerals) that are considered Unscheduled drugs or Natural Health Products.”*

“Substance” includes air and water but excludes a drug specified in Schedule I, IA or II of the Drug Schedules Regulation;”

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Q8: How should I interpret the new defined term “therapeutic diet”?

The definition of “therapeutic diet” is set out with respect to the “design” (see Q6) of therapeutic diets, specifically their purpose and contents. Therapeutic diets may include “substances” as well as drugs. For example, the design of parenteral nutrition (Restricted Activity B) includes IV components, which are deemed “drugs” in the Drug Schedule Regulation and require a prescription from an authorized prescriber.

Therapeutic diet:

“means a diet that:

- (a) includes drugs, substances or both, and*
- (b) is designed for the purpose of preventing or treating a disease.”*

Restricted Activities

Q9: Do the changes to section 5, Restricted Activities, remove Restricted Activities for dietitians?

No. The new Regulation removes the need for CHCPBC to specify in its bylaws “additional qualifications” that registrants need to meet to perform the Restricted Activities under section 5. These Restricted Activities are considered “entry-to-practice” for dietitians and are supported within education programs in the national Integrated Competencies for Education and Practice (ICDEP), which are met upon graduation. This does not diminish the level of risk of harm, responsibility, and requirement for clear and accurate clinical judgement involved in their practice.

Restricted Activities in section 5 are supported by the CHCPBC Dietetic Standards of Practice.

Q10: Does this change how I register/renew Restricted Activities? Does it change the requirements for the CCP?

No, the amended Regulation does not change registration nor CCP reporting requirements for existing Restricted Activities as set out in section 5.

Dietitians will still need to:

- Register with Restricted Activities annually,
- Legally declare upon registration and annual renewal, that they meet the competencies specific to each restricted activity and that they are ready to practice each one safely, and
- Report on each type (enteral and/or parenteral) of Restricted Activities they are registered to practice in their Continuing Competence Program annually.

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Q11: Do the changes to section 5, Restricted Activities, mean that I can now independently order parenteral nutrition?

No. Dietitians cannot write prescriptions. An authorized prescriber needs to sign off on a dietitian’s design for parenteral nutrition. Parenteral nutrition is considered a Schedule I drug. Dietitians cannot take a verbal order for PN prescription.

Schedule 2 – in effect January 1, 2025

Definitions

Q12: How should I interpret the new defined term “health professional”?

The term “health professional” is defined in the context of certified practice and includes all regulated health professionals authorized and qualified to order tube feeding insertions.

Health professional:

“a person who is authorized under the Act to practise the designated profession of medicine, nursing as a nurse practitioner, dentistry or naturopathic medicine”.

Q13: How should I interpret the new defined term “order”?

The term “order” is also defined in the context of certified practice. Previously, section 6 allowed registrants to insert a feeding tube if they were acting under **delegation** by a physician. Under the amended Regulation, section 6 will allow registrants to perform a broader range of activities associated with inserting, replacing, and removing feeding tubes under **order** by a health professional.

Delegation allows a health professional to authorize another type of health professional to perform an activity that they are otherwise not authorized to perform under their own regulation. Since dietitians were previously not permitted to insert feeding tubes, a physician was required to delegate that authority. The amended section 6 will permit dietitians to insert feeding tubes as a certified restricted activity, so delegation is no longer required.

This definition sets out which health professionals may issue an order for a dietitian to provide a service that involves a certified restricted activity under section 6. It also gives dietitians broad discretion as to when they can initiate that service, and how they provide it.

Order:

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“an instruction or authorization, issued by a health professional, for a registrant to provide a service that includes the performance of an activity described in section 6 to or for a named individual whom the health professional has assessed, whether or not the instruction or authorization,

- (a) makes provision for the time or times at which the service is to be initiated by a registrant, or*
- (b) incorporates by reference, in whole or in part and with any changes the health professional considers necessary or appropriate, a guideline, protocol or other recorded description of a course of action or decision-making process to be used by a registrant in providing the service to or for a specified class or individuals.”*

Restricted Activities for Certified Practice Registrants

Q14: What are the new certified practices?

Under section 6 of the amended Regulation, certified registrants may provide services that include the following activities while implementing an order from a health professional:

- Removal and replacement of water in a balloon-retained tube
 - Includes both balloon-retained gastrostomy and jejunostomy tubes
- Removal and replacement of a balloon-retained enterostomy tube
 - Includes both balloon-retained gastrostomy and jejunostomy tubes
- Removal and insertion of a naso/oro-enteric tube (gastric or post pyloric)
 - Includes nasogastric and nasoduodenal feeding tubes

The CHCPBC is developing and will communicate practice standards and competencies regarding each of these certified practices. For clarity, section 6 does not permit:

- Application or removal of nasal bridles
- Removal and/or replacement of enterostomy tubes retained with internal (non-balloon) bumper or sutures
- Ordering tasks associated with the certified restricted activities
- Performing tasks associated with the certified restricted without an order from a health professional

Q15: How does the amended Regulation impact the current registration process for performing insertion of naso/oro-enteric tubes (gastric and post pyloric)?

Dietitians registered to perform insertions of naso/oro-enteric feeding tubes under delegation are presently required to, on an annual basis:

- Register with Restricted Activities A and C,
- Report on continuing education for Restricted Activities A and C,

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- Fulfill the Standards for Insertion of Nasal/oral Feeding Tubes and
- Submit a form signed by the delegating physician and the registrant's employer on the type of insertions they are qualified to perform (gastric or post-pyloric).

No dietitians are currently registered to perform insertions of naso/oro-enteric feeding tubes.

Moving forward and until further notice from CHCPBC, registrants will not be permitted to register to perform insertions of naso/oro-enteric feeding tubes until an appropriate program of study is available for certification pursuant to section 6.

Q16: When can I start performing certified practices?

Unlike Restricted Activities under section 5, certified restricted activities under section 6 are not considered entry-to-practice. These activities require a program of study and certification with the CHCPBC prior to undertaking tasks associated with them.

The College is currently working to update and develop certification programs and licensure processes to facilitate certification and will provide timely updates when such programs become available.

Q17: What are the requirements for certification to perform certified practices?

Prior to application, registrants must fulfill the following requirements:

- Be a Full registrant in good standing.
- Register with restricted activities A and C.
- Complete a CHCPBC-approved program of study and satisfy any additional College requirements¹.
- Pay a certification application fee.

Following application, a registrant who is granted certification must:

- Renew their certificate on an ongoing annual basis; and
- Report on Restricted Activities annually in the Continuing Competence Program (CCP), as outlined [here](#) under the CCP: Assessment Guidelines.

Workplaces may further restrict a dietitian's scope of practice. Here are some considerations:

- Does your workplace have any policies related to certified practices?
- Does your workplace require additional training or orientation prior to performing certified practices?
- Do you have any interprofessional support for certified practices in your workplace?

¹ In development. More information will be provided to registrants, as it becomes available.

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Beyond meeting the registration and workplace requirements, it is important to assess your personal readiness to perform certified practices. For example:

- Do you have the knowledge, skills and judgement to take on certified practices?
- What resources do you have to guide your practice?

Refer to the **Decision Tool for New Aspects of Dietetic Practice** for more guiding questions and considerations.

Q18: Will I be able to take a verbal order for any of these certifications?

Consideration of whether a registrant may take a verbal order is set out in the [Dietetic Ordering Q&A 2025](#).

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