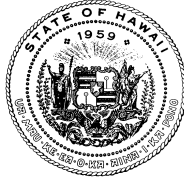


JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII'



KENNETH S. FINK, M.D., M.G.A, M.P.H
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. Box 3378
Honolulu, HI 96801-3378
doh.testimony@doh.hawaii.gov

**Testimony COMMENTING on SCR23
URGING THE DEPARTMENT OF HEALTH TO AMEND THE HAWAII ADMINISTRATIVE
RULES TO AUTHORIZE LICENSED DIETITIANS TO PRESCRIBE MODIFIED
DIETS AND PLAN THERAPEUTIC DIETS.**

REP. DELLA AU BELATTI, CHAIR
HOUSE COMMITTEE ON HEALTH AND HOMELESSNESS

Thursday, April 11, 2024

11:15 a.m.

Room 329

1 **Fiscal Implications:** None.

2 **Department Testimony:** The Department of Health (DOH) is open to amendments to Title 11,
3 Chapter 83, Hawaii Administrative Rules, regarding dietitian licensure from “qualified dietitian”
4 to “licensed dietitian,” essentially making licensure mandatory for dietitians who practice
5 dietetics in hospitals in the State of Hawaii, as proposed by SCR23.

6
7 DOH acknowledges the additional flexibility that the proposed amendments may provide to
8 dietitians in the hospital setting. Since almost all hospitals require their dietitians to be licensed
9 for insurance billing purposes, there should not be a significant influx of dietitian license
10 applications, and the extra burden on DOH is likely to be minimal. There are currently two
11 hundred and forty six (246) licensed registered dietitians in the State of Hawaii. Licensure, at
12 the moment, is required by some facilities in their policies, or could be required by insurance
13 companies for billing.

14

15 Thank you for the opportunity to testify.

April 10, 2024

Representative Takenouchi
Vice Chair, Committee on Health and Homelessness
Hawaii State House of Representatives
State Capitol 415 South Beretania Street
Honolulu, HI

Dear Representative Takenouchi ,

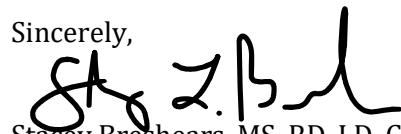
I am writing to share with you my support of the resolution you have introduced supporting SCR23 urging the department of health to amend the Hawaii administrative rules to authorize licensed dietitians to prescribe therapeutic diets.

As you know, the Centers for Medicare and Medicaid Services (CMS) ruled that “RDs [registered dietitians] are the professionals who are best qualified to assess a patient’s nutritional status and to design and implement a nutritional treatment plan in consultation with the patient’s interdisciplinary team.” As such, the CMS permits hospitals, at their discretion, to extend therapeutic diet orders privileges to RDs as of May 2014.

I enthusiastically support this resolution because of the positive impact changing the DOH administrative rules will have on patient care and efficiency of hospital operations. Currently RDs recommend or propose diet orders, but then need to contact a patients’ physician to complete the order. Often that physician is taking care of other patients or conducting procedures and can’t complete the order for some time, thereby delaying provision of the most appropriate diet. At worst, a patient may not receive adequate nutrition in a timely manner which could lead to further complications and increasing hospital stay time. Changing the DOH Administrative Rules to allow Registered/Licensed Dietitians to Order Therapeutic Diets will increase efficiency of patient care and patient safety.

Thank you for introducing this legislation. Please do not hesitate to reach out to me should you have questions regarding my support. I hope to be helpful to your office towards the passage of this legislation.

Sincerely,



Stacey Breshears, MS, RD, LD, CDCES
Hawai'i Academy of Nutrition and Dietetics, President 2023 – 2024
president@eatrighthawaii.org

SCR-23-SD-1

Submitted on: 4/10/2024 9:21:20 AM

Testimony for HLT on 4/11/2024 11:15:00 AM

Submitted By	Organization	Testifier Position	Testify
Elizabeth Rush	Individual	Support	Written Testimony Only

Comments:

I support this resolution.

April 10, 2024

Representative Takenouchi
Vice Chair, Committee on Health and Homelessness
Hawaii State House of Representatives
State Capitol 415 South Beretania Street
Honolulu, HI

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Thank you for introducing this legislation. Please do not hesitate to reach out to me should you have questions regarding my support. I hope to be helpful to your office towards the passage of this legislation.

Sincerely,

Penny Kaneshina, RD LD
808-250-0212
penny.kaneshina@gmail.com

Nutrition Unlimited...

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P.O. Box 1408
Kailua, HI 98734
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Fax (866) 824-4198
e-mail: a.tousman@hawaiiantel.net

4/10/2024

Representative Jenna Takenouchi
Vice Chair, Committee on Health and Homelessness
Hawaii State House of Representatives
State Capitol 415 South Beretania Street
Honolulu, HI

Dear Representative Takenouchi ,

I am a Registered Dietitian and am writing in support of the of the resolution you have introduced supporting SCR23 urging the Hawaii State Department of Health (DOH) to amend the Hawaii Hospital Administrative rules (HAR) §11-93-8(c) and §11-93-8(d) to authorize licensed dietitians to prescribe therapeutic diets.

As you know, the Centers for Medicare and Medicaid Services (CMS) ruled that “RDs [registered dietitians] are the professionals who are best qualified to assess a patient’s nutritional status and to design and implement a nutritional treatment plan in consultation with the patient’s interdisciplinary team.” As such, the CMS permits hospitals, at their discretion, to extend therapeutic diet orders privileges to RDs as of May 2014.

Some reasons why allowing RD's therapeutic diet ordering privileges is necessary.

Reduces unnecessary, burdensome procedures. The system, under current hospital rules, wastes time and resources, delaying the initiation of nutrition support (enteral tube-feedings, parenteral nutrition, oral nutritional supplements) and/or oral diet changes while RDs seek out physicians to write the orders. With the current shortage of physicians in Hawaii, this is an area where RDs can help reduce the workload of physicians and increase efficiency.

Increases flexibility for health care providers to improve care. RDs have the education and training to perform nutrition assessments, determine nutrition diagnoses, and provide therapeutic nutrition interventions. By allowing RDs to provide efficient nutrition care with order writing privileges, patients receive optimal and timely nutrition support thereby facilitating recovery and decreasing length of stay.

Reduces cost to the medical facility. RDs are paid substantially less than Physicians, Advanced Practice Registered Nurses (APRNs) and Physician Assistants (PAs). CMS estimates savings of up to \$459 million in annual hospital costs.

Frees up the physician’s time to care for patients, ultimately increasing patient’s overall satisfaction with their care.

Thank you for introducing this concurrent resolution. Please feel free to reach out to me at the number listed above if you have any questions.

Sincerely,



Amy Tousman, MPH, RD, CDE