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2020-2021**

July 29, 2020

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Dear Students, Interns, Practitioners, and Faculty,

Thank you for your July 2020 letter. The Accreditation Council for Education in Nutrition and Dietetics (ACEND), the accreditation agency of the Academy of Nutrition and Dietetics, appreciates your concerns about entry into the profession and the strategies proposed by the group to overcome the barriers for entry into the profession. We have read each of your concerns, and in this communication, we are providing you with information to detail the actions ACEND has already taken and to share plans in process.

ACEND is a programmatic accreditor and focuses on specific education programs within institutions. Part of ACEND's mission is to ensure the quality of nutrition and dietetics education programs. Following the United States Department of Education (USDE) regulations, ACEND is legally unable to impose requirements on institutions or impose on its programs requirements that are against their institutional mission and policies, nor against state or federal laws and regulations.

Recognizing that the pandemic has created challenges for students to complete supervised practice, ACEND has temporarily reduced the required number of supervised practice hours for programs accredited under the ACEND 2017 Accreditation Standards from 1200 hours to 1000 hours for registered dietitian nutritionists (RDN) programs (CP, DI, FDE, IDE, DPD with ISPP), and from 450 hours to 375 hours for nutrition and dietetics technician, registered (NDTR) programs, for the period starting January 1, 2020 and ending June 30, 2022. The length of time students spend in an internship beyond ACEND's minimum requirement is a program's choice made by the institution, the faculty/preceptors and the program director. ACEND encourages programs to limit this time to the minimum number of hours to minimize cost to students and time spent in training. Because of its recognition by USDE, ACEND is unable to prescribe program length beyond the hours specified, but we do ensure quality of programs through our rigorous review process.

The number of hours required for supervised practice is guided by state licensure laws, most of which are 900 – 1000 hours. Per USDE, ACEND must take state licensure laws into account and set the minimum number of hours to ensure that all RDNs are eligible for licensure and able to work anywhere in the US and its territories. Based on information from the Academy's legal counsel for the Consumer Protection and Licensure Sub-Committee (CPLS), ACEND is unable to reduce the required number of supervised practice hours beyond 1000 hours for RDN programs.

Additionally, ACEND is a Title IV gatekeeper: Free-standing postbaccalaureate dietetic internship programs may use accreditation by ACEND to establish eligibility to participate in the Federal Student Assistant Program. This allows students many options to complete their education in the field including completing a dietetic internship, an individualized supervised practice program (ISPP), or enrolling in a coordinated program (CP) or in a Future Education Model (FEM) Future Graduate (FG) program which combine the experiential learning with the didactic education allowing students to be eligible for federal financial aid.

The dietetic internship application requirements are a program's choice made by the institution, the faculty/preceptors and the program director. The ACEND standards do not specify the elements of an internship application, rather, ACEND encourages programs to revise their requirements, if needed, to ensure they are being inclusive of all students and their circumstances. Furthermore, ACEND accredits several programs with part-time, distance and/or remote track options, including ISPPs to ensure that students have the option to work while completing their nutrition and dietetics program. The decision not to offer these flexibilities are also a program's choice.

With regards to students finding their own preceptors, ACEND added the "student-identified supervised practice" option based on programs' and students' requests. Removing this option will further limit the diversity of students enrolled in nutrition and dietetics because it is intended to assist students enrolled in ACEND-accredited programs by removing the barrier of cost of relocating away from home. It allows students who live in remote, rural areas and other regions where no dietetic internships are available, such as parts of the Midwest, the South and the Northwest, to complete their supervised practice with minimal cost and while remaining close to their family. To assist these students in locating preceptors, The Academy's Find-a-Preceptor database which was developed in conjunction with ACEND, allows practitioners to register to potentially become preceptors and allows program directors and students to search for a preceptor within a certain geographical or specialty area. The database is located on the ACEND website here:

<https://www.eatrightpro.org/acend/training-and-volunteer-opportunities/preceptors-and-mentors>. Nevertheless, only a small proportion of dietetic internships require students to identify their supervised practice facilities and preceptors. Students have many other choices including dietetic internships, coordinated programs, Future Graduate programs and ISPPs that do not require students to identify their own preceptors.

Eliminating internships that are not connected to an academic institution would be a great disservice to our students because it removes an affordable track to becoming a registered dietitian. About one-third of dietetic internships are free-standing (n=81 with 1,205 slots) with set tuition that is at a much lower rate than non-degree internships located in educational institutions and charging per credit hour. Eliminating these positions will severely limit the availability of internship slots for students and diminish the choice and affordability of supervised practice. Twenty-four (24) of the 81 free-standing internships provide free internship experiences with some offering a stipend, and an additional 36 cost less than \$10,000. As mentioned earlier in this letter, ACEND is

a Title IV gatekeeper: Free-standing dietetic internship programs may use accreditation by ACEND to establish eligibility to participate in the Federal Student Assistant Program. With these offerings, ACEND is ensuring that students have many options available to complete their education.

As indicated in your letter, scholarships help alleviate the financial burden faced by students. Unfortunately, providing scholarships to students is outside the scope and purview of ACEND. Through the Academy Foundation several scholarships ranging from \$500 to \$10,000 each, may be found with average scholarship being \$1,000 in value. The Commission on Dietetic Registration (CDR) offers the CDR Diversity Scholarships which are \$5,000 each. Other scholarships are reserved for diverse individuals and these are valued at \$3,000 and under. Dietetic interns qualify for most scholarships offered by the Academy. While the scholarships offered would not be enough to cover the entire cost of an internship, they can provide a substantial amount of funding to offset costs. The link may be found here: <https://www.eatrightpro.org/leadership/honors-and-awards/grants-and-scholarships>

Information on the professional development pathway in nutrition and dietetics is available on each ACEND-accredited nutrition and dietetics program's website, on the ACEND website and on CDR's website. Furthermore, the ACEND Accreditation Standards (Standard 9, Required Element 9.3d) require programs to post information to prospective students and the public at large on the requirements and process to become a registered dietitian nutritionist, including education, supervised practice, passage on the CDR credentialing exam and state certification/licensure, if applicable; and how the program fits into the process. ACEND's Standards may be found here: <https://www.eatrightpro.org/acend/accreditation-standards-fees-and-policies/2017-standards>. ACEND expects programs to ensure that their students are well informed of the process and receive the quality advising needed to help them navigate the multiple paths to becoming a registered dietitian. During an ACEND review which includes a site visit to the program and institution, the program evaluation team reviews documentation and confirms with students, alumni, faculty, administrators and other stakeholders that the students are well informed and all the information required by ACEND is readily available.

Nevertheless, ACEND acknowledges that the pathway to become a registered dietitian can be complicated and the availability of options, while it creates opportunities, may add to students' confusion. To assist programs in informing their students about CDR's January 1, 2024 graduate degree requirement for eligibility to take the RDN exam, ACEND developed sample language they can use to communicate this information which is posted on the ACEND website in the May 2020 ACEND Update found here: <https://www.eatrightpro.org/acend/public-notices-and-announcements/acend-update/acend-updates-2019-archives#2020> and was emailed to all program directors.

In addition, CDR released an information sheet about student options for meeting the master's degree requirement for taking the dietitian nutritionist registration exam after January 1, 2024 (see www.cdrnet.org). All of the options include graduation from ACEND accredited programs that provide the didactic and supervised practice preparation to become a registered dietitian nutritionist.

The Future Education Model (FEM) Accreditation Standards are in line with your suggestion that "*dietetic coursework should be included in the master's program along with practicum work*" (AND Letter, *The Professional Development Pathway*, page 4). The

FEM programs remove the two-step process of didactic education followed by supervised practice. Through FEM partnerships, dietetic internships are able to collaborate with educational institutions to provide all the education in a single program, such as a Future Graduate program, removing the need to obtain multiple credentials from multiple institutions and eliminating the cost and anxiety of the dietetic application matching process. Currently, ACEND has 87 programs that applied under the Future Education Model, of which 28 have completed the entire process, and are fully accredited as demonstration programs and enrolling students. These demonstration programs will assist ACEND in collecting data and advising the ACEND Board if this model should be considered for all programs in the future.

ACEND is taking steps to enhance the diversity in nutrition and dietetics and to improve the preparation of students to become well-informed dietetic professionals able to work with all cultures and treat every client, patient, student and colleague with dignity and respect. Be assured that upon hearing stories of microaggression and discrimination faced by our students and interns, ACEND took action. ACEND's Accreditation Standards set the expectations for performance of our education programs. Programs that do not meet the standards are out of compliance. Adding requirements that address diversity, equity and inclusion in the ACEND standards is one of the strongest messages that ACEND can send to its stakeholders. ACEND would like to share with you the recent actions that we have taken to affirm our strong position that we will not tolerate any instances of inequity nor any form of racial or other discrimination in our nutrition and dietetics education programs.


1. The Board added several required elements to the Draft 2022 Standards that will be available for public comment Fall 2020. The intent of these statements is to strengthen ACEND's stance on anti-racism, diversity, equity and inclusion:
 - Re-examined the cultural competency curriculum in nutrition and dietetics: Several Core Knowledge and Competency statements were revised, and new ones were added to ensure students and interns receive training on diversity, equity and inclusion. These statements extend beyond the concepts of diversity, equity and inclusion, to address cultural humility, self-reflection of biases, social justice, racism and oppression.
 - Added a requirement to ensure that program faculty receive the training needed to eliminate any instances of microaggression and discrimination in their program.
 - Added a requirement to ensure that preceptors receive the training needed to eliminate any instances of microaggression and discrimination in supervised practice.
 - Added a requirement for fair recruitment and admission practices to enhance diversity of the student body.
 - Added a requirement to ensure program policies protect students and interns against inequity, racism, microaggressions and discrimination.
2. ACEND created a webpage to provide resources (e.g., webinars, recorded lectures, workshops, data and trends) for programs to train their students, faculty and preceptors. The *Diversity, Equity and Inclusion* page is found at www.eatrightpro.org/ACENDforDEI will also include noteworthy practices to recognize programs who have successful diversity-related recruitment initiatives and quality educational activities and share these practices with the ACEND community.
3. ACEND will continue to engage in activities to ensure we are properly addressing this pressing issue, including providing resources for black, indigenous and people of color

(BIPOC) students and interns to help them navigate the field of nutrition and dietetics and guidance for faculty to assist and counsel BIPOC students and help them succeed in the field.

ACEND tracks diversity statistics for students and interns on a yearly basis and reports the trends to better understand change in diversity over time. This information may be found at: <https://www.eatrightpro.org/acend/about-acend/enrollment-statistics> and shows that the overall proportion of under-represented minorities (URM) is steadily increasing in nutrition and dietetics education programs. In 2019, 31.0% of students and interns were reported to be URM (5,512 of 17,805; 1,113 were unreported and not counted) whereas only 26.7% of students/interns were reported to be URM in 2015 (5,512 of 22,315; 1,279 were unreported and not counted). CDR also tracks and reports diversity statistics for registered dietitian nutritionists (RDN) and for nutrition and dietetics technician, registered (NDTR). This information may be found on the CDR website at www.cdrnet.org under Registry Statistics.

Thank you for taking the time to provide your feedback along with concrete suggestions for implementation. ACEND will continue to engage in conversations with our stakeholders and with the Academy of Nutrition and Dietetics' Diversity and Inclusion Committee to ensure ACEND is properly addressing these pressing concerns. We value our stakeholders' input to assist us in driving the profession forward. If you have any questions or comments, please do not hesitate to contact Rayane AbuSabha, ACEND Executive Director, at rabusabha@eatright.org.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Hopkins".

Barbara Hopkins, MMSc, RD, LD, Chair