



November 8, 2017

Ministry of Health and Long Term Care

Re: Proposed Amendments to Regulations made under the Health Protection and Promotion Act

Ontario Society of Nutrition Professionals in Public Health (OSNPPH) commends the Ministry for its interest in modernizing qualifications for public health staff and in increasing the responsiveness of requirements to evolving needs and realities. We appreciate the opportunity to provide input to inform the proposed changes to the Health Protection and Promotion Act (HPPA), Regulation #566 on Qualification of Board of Health Staff.

[OSNPPH](http://www.osnpvh.on.ca) is the independent and official voice of Registered Dietitians working in public health in Ontario. OSNPPH brings together Registered Dietitians from across the province to collaborate, advocate for public health nutrition issues, create resources that support meaningful change in public health nutrition, and work to improve Ontarians' food environments, food literacy, and access to healthy food.

OSNPPH agrees that the qualifications for some of the staff currently listed in the Regulations are outdated and in need of revision but this should not be completed at the expense of protecting the public and ensuring qualified health professionals are providing effective public health services. We understand the Government will include a requirement for boards of health to employ qualified public health professionals in the organizational requirements of the new public health standards and will specify qualifications for public health professionals, imposed under the HPPA. However, the absence of definitions for accountability parameters raises concern about the specific staff requirements and criteria and may lead to inconsistencies and disparities amongst disciplines and across health units. Regardless of how these qualifications are mandated to boards of health, they need to be standardized, regulated, accountable, and enforceable.

OSNPPH strongly asserts that the organizational requirements stipulate that Registered Dietitians (RDs) are the qualified nutrition professionals for employment in Ontario public health units both as Public Health Nutritionist and Dietitian roles. RDs are the *only* health care professional qualified to translate the science of food and nutrition into evidence-informed solutions and programs for their communities. RDs are uniquely educated food and nutrition experts, and are licensed and registered with the College of Dietitians of Ontario (CDO). RDs are trained to meet core dietetic competencies in five broad areas: Professional Practice, Communication and Collaboration, Nutrition Care, Population and Public Health, and Management, which are all relevant to public health practice. CDO registration requirements must be met to demonstrate safe, competent, and ethical dietetic practice in the interest and protection of the public, and RDs must practice according to CDO standards and laws.

We understand that the qualifications for public health professionals are intended to be transferred from regulations to policy documents and referenced in Accountability Frameworks for boards of health. OSNPPH strongly recommends that the qualifications of Public Health Nutritionists are maintained and that Public Health Dietitians are added to the list of professionals in the organizational requirements of the new public health standards.

We are pleased that the requirements will specify the detailed qualifications for health professionals currently outlined in Regulation #566 including the Public Health Nutritionist. Public Health Nutritionists provide a leadership role in program and policy development, population health assessment, advocacy and research to improve the nutritional health of the population. Registered Dietitians working in the Public Health Nutritionist role should continue to meet advanced master's level public health nutrition educational requirements and qualifications to support a specialized role in population health assessment, promotion and evaluation. As the Government updates the list of professionals outlined in the organizational requirements in the new public health standards, the role of Dietitian must also be included. Public Health Dietitians offer frontline services, provide and support a variety of food and nutrition programs in the community, and work with schools, workplaces, child care centres and municipalities to create supportive nutrition environments. In some jurisdictions, Public Health Dietitians also perform many of the roles as the Public Health Nutritionist. Both roles are essential to public health and possess knowledge and skills in program planning, population health, and the importance and integration of the social determinants of health. Public Health Nutritionists and Public Health Dietitians fulfill complementary roles that enable the delivery of effective and efficient public health practice.

We appreciate that the Ministry is committed to work with the respective professions for the new organizational requirements. As the voice of Registered Dietitians working in public health in Ontario, it is imperative that OSNPPH be involved in the process of updating the requirements for both Public Health Nutritionist and establishing requirements for all nutrition professionals in public health roles. We are pleased to offer our support and provide guidance and direction to ensure Registered Dietitians are recognized as the nutrition experts in the public health system. Please feel free to contact us at executive@osnpph.on.ca. We look forward to hearing from you.

Regards,



Carolyn Doris RD
Co-Chair Year 1



Erinn Salewski RD
Co-Chair Year 2



Candice Einstoss RD
Past Chair

Copy:

Ms. Jennifer Buccino, MEd RD, Regional Executive Director, Dietitians of Canada (DC)
Ms. Pegeen Walsh, Executive Director, Ontario Public Health Association (OPHA)
Ms. Loretta Ryan, CAE RPP, Executive Director, Association of Local Public Health Agencies (alPHA)
Ms. Melisse L. Willems, MA LLB, Registrar and Executive Director, College of Dietitians of Ontario (CDO)