The laws governing the practice of clinical nutrition vary widely from state to state. Some states may require state licensure, others may recommend or even require state certification, and some may require a national certification as part of their state licensure requirements. Some states do not license or regulate the practice of clinical nutrition at all. With this handout, in connection with the Career Development Center’s directory titled “State Requirements for Nutritionists”, we will explain the differences between certification & licensure and provide the most current & accurate information we have been able to obtain regarding the requirements for the practice of clinical nutrition in each state.

**What is a Certification?**
A professional certification is a designation earned by a person to indicate that he/she has met certain standards for practice in that profession. Certifications communicate to the public a professional’s expertise and the fact that certain criteria, such as advanced training or testing, needed for practice in that profession has been met. Certifications are earned from professional organizations and may need to be renewed periodically, generally upon proof of on-going education in the profession. Certification demonstrates a national standard set by professionals in that field (as opposed to legislators, who may set licensing requirements). As a national standard, certification is portable, travelling with the individual through changes in geographic location or employment. It is not a license to practice.

Typically certifications are from boards that are nationally recognized. The term is however also used by some states where there is no practicing restriction on nutrition. In lieu of a state licensure the state may recommend a state certification requirement for practice in that state. A certification or credential attained through a national certifying organization may often be a prerequisite for a state practice certification.

**What is Licensure?**
Issued by a state agency, licensure is authorization from that particular state granting legal approval for you to practice your profession in that state. This is done in order to regulate a profession to ensure that certain skill and knowledge levels are met in order for professionals to carry out their practice. Licensure is good only for the state in which it is issued, and requirements for licensure are often determined by a special board or governing body of practitioners for that profession that determine requirements and review applications to be sure they meet those requirements. Licensure requirements may be similar to certification.
requirements, but often will vary from state to state. Some states may require certification through one of the certifying clinical nutrition organizations as part of their licensure process, others may not.

Licensure requirements for Clinical Nutritionists vary widely by state although at this point in time most states do not have a practicing restriction on the field of nutrition and therefore do not require a licensure to practice in that state. For information on each state’s requirements for licensure of Clinical Nutrition, see the Career Development Center’s directory titled “State Requirements for Nutritionists”, available in the office or online through the CDC’s group page on NYCCOnline.

**Why should you obtain licensure and/or certification?**

Some states may require a license or certification in order for you to practice as a Licensed or Clinical Nutritionist. In a state that does not license or certify Clinical Nutritionists, it can still be beneficial to become nationally certified. National certifications attest to your expertise in Clinical Nutrition and can enhance your credentials as a professional practitioner. National certification by a professional organization in Clinical Nutrition can help keep you abreast of trends and issues affecting the profession. National certification can also be used as a referral tool to bring you clients, through membership rosters and referral databases. In addition, in states where licensure currently does not exist, national certification can be a pathway to licensure if and when that takes place.

In general, certifications give you credibility and may improve the chances of working in institutional settings and/or in collaboration with practicing physicians. They can also affect the fee scale that you can charge. Certifications do not guarantee financial reimbursement by insurance companies. Financial reimbursement possibilities must be explored by you, the practitioner, on a case by case basis with each insurance company with which you would like to participate. Credentials may increase the likelihood of getting financial reimbursement particularly when the patient is referred by a physician. If you are a practicing DC, MD, DO, ND, or clinical PhD and have completed NYCC’s MSACN program to add nutrition counseling to your practice, the nutrition training (even if you have nutrition credentials such as the CCN, DACBN, or CNS) does not supersede state licensure those professions. If you are, for example, a DC and you would like to give nutrition advice to a diabetic, for legal reasons, you cannot give this advice as a DC but must clarify that you are giving the advice as a nutrition counselor. In essence you must find a way to separate your practice, whether it is by verbal clarification, the use of separate clinic rooms, or separation of counseling sessions into separate visits from your DC practice. Keeping separate billable hours and appointment books are also recommended even if you have a patient come in for back to back appoints in another field along with your nutrition counseling.

The following clinical nutrition certifying organizations have determined that New York Chiropractic College’s MSACN program meets the qualifications for graduates to be eligible to take their certification examinations. Successful completion of each examination enables you to be certified by that national organization, permitting you to use their certification credential to demonstrate your expertise as a practitioner in the field of clinical nutrition. The certification may help to qualify you for licensure, if the state you’re considering licenses Clinical
Nutritionists. Again, see the CDC’s directory “State Requirements for Nutritionists” for information on whether or not your state licenses Clinical Nutritionists.

New York Chiropractic College School of Applied Clinical Nutrition
Master of Science in Applied Clinical Nutrition: MSACN

<table>
<thead>
<tr>
<th>Organization</th>
<th>Educational Pre-requisite</th>
<th>Hours of practice needed to sit for the exam</th>
<th>Certification obtained</th>
<th>Cost of the exam</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clinical Nutrition Certification Board</td>
<td>BS or MSACN</td>
<td>900; supervised (waived for MSACN graduates)</td>
<td>Certified Clinical Nutritionist (CCN)</td>
<td>Exam: $450 Non-refundable credentials processing fee: $75 Free online study guide</td>
</tr>
<tr>
<td>American Clinical Nutrition Board</td>
<td>DC, MD, DO, ND, Clinical PhD</td>
<td>2 years of unsupervised clinical experience of which the MSACN program counts for 1 year</td>
<td>Diplomate of the American Clinical Board of Nutrition (DACBN)</td>
<td>Exam: $1500 Free candidate handbook. “How to Write a Case History for the ACBN Exam $79.95</td>
</tr>
<tr>
<td>Certified Board of Nutrition Specialists</td>
<td>Master’s degree in nutrition or higher</td>
<td>1000 supervised clinical hours; with documentation</td>
<td>Certified Nutrition Specialist (CNS)</td>
<td>Exam: $350</td>
</tr>
</tbody>
</table>

Special note for students in the Doctor of Chiropractic program who are also enrolled in the Applied Clinical Nutrition program

If you are one of this population of students, the difference between certification & licensure may have special relevance to you.

In 46 states, nutrition & nutritional counseling is included in the chiropractic scope of practice. In these states, an additional degree or license is not required in order to do nutritional counseling in your chiropractic practice as long as the focus of the nutrition advice is exclusively for general health issues and not as a therapeutic measure to address specific disease. If you are planning to specialize or focus your practice around nutrition, the ACN degree can add to your credentials, showing that you have completed advanced study in the field & have attained a level of expertise in it. It will also allow you to use nutrition as a therapeutic tool as long as you explicitly keep your two practices separate as stated above.

Note to DCs with respect to state licensure clarifications:

Arizona has not addressed whether or not Doctors of Chiropractic can include nutrition in their scope of practice. Currently, nutritionists are not a licensed profession but must be registered through the American Dietetic Association or the Commission on Dietetic Registration.

Illinois considers nutrition to be a separate profession requiring a separate licensure process. In this state, nutrition is not considered part of the DC scope of practice, & you must have an MSACN or equivalent graduate degree & meet other licensure requirements in order to do nutritional counseling.

New Jersey includes nutritional counseling in the new scope of practice, provided a course of study in human nutrition of “not less than 45 hours” has been completed.
Special note for students in the MSACN program who are **NOT** Doctors of Chiropractic or who are not enrolled in NYCC’s DC program:

The New York State Office of the Professions (of the New York State Education Department) does not place practice restrictions on professionals who wish to practice nutrition in this state. This means state “certification” is not necessary to practice nutrition. However, if you want to use the official title of “**clinical nutritionist**” or “**registered dietician**” in a formal capacity then you do need state certification. Adding some confusion to this is the fact that the titles from the national boards often have copyright/patent rights, such as Certified Clinical Nutritionist (CCN) of which there are many in NYS who are not state certified. The legal difference between “clinical Nutritionist” and the Certified Clinical Nutritionist (CCN) title highlights a very gray area that has not been addressed by the state legislators (and probably won’t be until and if there is an event that occurs that requires legal clarification).