FAQs for the Incident Reporting Tool (IRT)

Q. What is the Incident Reporting Tool?

A. The Academy developed the Incident Reporting Tool to assist its efforts to promote quality nutrition care services from registered dietitian nutritionists (RDNs) and nutrition and dietetic technicians, registered (NDTRs), protect the public from harm resulting from the unqualified or incompetent practice of nutrition care services, and promote self-regulation of the profession.

By enabling patients, members of the general public and health care practitioners to document incidents showing the value of qualified practitioners or to report incidents of harm or unethical practice, the Incident Reporting Tool fills a critical gap in the documentation of noteworthy incidents in the provision of nutrition care services across the country. Although states and the Academy have encouraged and strived to collect information to improve public safety, the various processes were inefficient and inconsistent.

Q. How does it work?

Simply go to the website and enter the data you feel comfortable submitting. The report can be completed in as little as ten to twenty minutes on your laptop or mobile device. Note that some fields are optional, while others are required. In any case, all data will be securely held and managed in confidence.

Q. What happens once a report is submitted?

A. Once a report is submitted, it will be available for assessment by a limited group of specifically-designated staff from the Academy's policy, quality management and web-teams with content shared as needed with the Commission on Dietetic Registration and the Academy's Ethics Committee. Including contact information when submitting stories of success or reports of harm is essential to ensuring an accurate and complete understanding of the reported incident.

The information collected will be used to facilitate stakeholders and policymakers' understanding of the value of qualified RDN care, including elected leaders, state agency officials, other healthcare providers and the public. Specifically, the Academy will provide compiled de-identified data to affiliates and regulators consistent with legal privacy restrictions. Thus, the IRT directly contributes to the Academy's strategic plan, mission and policy goals,

including to "leverage data to demonstrate effectiveness of dietetic and nutrition interventions."

Q. What about HIPAA rules?

A. The IRT is not intended to collect submissions of Protected Health Information (PHI) that would trigger federal HIPAA privacy protections. We developed the IRT to discourage submissions that include PHI. Instead, the goal is to collect relevant stories that demonstrate the importance of qualified practitioners when it comes to protecting consumers.

Even if you work in a sensitive position, the Academy has invested substantial time and resources to develop appropriate procedures to ensure all sensitive information is kept private. The Academy will securely maintain these incident reports and will only provide compiled deidentified data to states consistent with legal privacy restrictions.

Q. I work in clinical care. Why does this matter to me as a registered dietitian nutritionist?

A. While one purpose of the IRT is to protect the public through quality assurance and the collection of reports of harm, it is also intended to increase awareness of the value of quality RDN-provided services, which advances the profession and enables recognition of effective, superior practice. Ultimately, the public, facilities and other employers, and providers all benefit when quality of care is optimized. Additionally, the Code of Ethics imposes an obligation among all nutrition professionals to report violations "through established processes."

Q. Why should I use the IRT to report harm? Can't I just report to the state licensing board?

A. The IRT is not intended to replace reporting of valid complaints of harm to state licensing boards but will complement their work and provide a mechanism for reporting incidents of harm and stories of success that state regulators do not collect. The tool will allow the Academy to compile a collection of real-life stories and examples that can be used to advance policy goals, including advancing consumer protection and licensure legislation that allow RDNs to practice at the peak of their expertise.

Q. Would the IRT allow anonymous reports of ethical violations against RDNs?

A. No. The Academy's existing fair system for dealing with complaints about members and credentialed practitioners from peers or the public remains strong and unchanged. The Incident Reporting Tool does include a link for users who submitted a report of harm associated with an

RDN or NDTR credentialed by the Commission on Dietetic Registration to submit an ethics complaint as part of the Academy's commitment to maintaining high standards of practice through a strong system of self-regulation, consistent with the existing ethics system.

The existing system requires an ethics complaint to be notarized to assist in preventing frivolous or fraudulent ethics complaints, a critical step in that a complaint could lead to the suspension or revocation of a practitioner's Academy membership and/or their CDR credential. A Notary Public is a state-appointed official who has been authorized to notarize documents (usually) in person to verify the identity of the party(ies) involved in a Code of Ethics complaint by checking identification and witnessing the signing of the completed Complaint Form.

Q. According to the Academy <u>Licensure Map</u>, my state does not license the practice of dietetics or the provision of medical nutrition therapy. How would I use the IRT?

A. The Academy will use relevant information from compiled reports in our ongoing consumer protection initiatives, including efforts to enhance licensure laws to ensure a minimum level of qualifications for all providers of complex nutrition care services, such as MNT. Reports of harm and stories of success are essential to demonstrate the complexity and value of quality RDN care to elected leaders, regulators and the public.

Q. I am concerned about the nutrition practice of a provider (e.g., a registered dietitian nutritionist, health coach, nutritionist) in my workplace. Why should I use the IRT to report them? Should I just report to appropriate staff at my facility?

A. There are a variety of appropriate and valuable mechanisms and entities to which one may need to report, including facility staff. Reporting potentially dangerous or unethical practice through the IRT is one such mechanism but does not replace workplace (or facility-level) policies. According to the Code of Ethics, all nutrition and dietetics practitioners are responsible for the practice of colleagues with whom they work and shall "report inappropriate behavior or treatment." All sensitive information will be protected by established protocols and used discretely consistent with appropriate privacy rules.

In addition, the tool includes a link for users who submitted a report of harm associated with an RDN or NDTR credentialed by the Commission on Dietetic Registration to submit an ethics complaint as part of the Academy's commitment to maintaining high standards of practice through a strong system of self-regulation.