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## COMPARISON OF CLINICAL TASKS FOR CDM, CFPPS VS. NON-CDM, CFPPS FOR LONG-TERM CARE STAFFING REQUIREMENTS DIRECTOR OF FOOD & NUTRITION SERVICES §483.60

The CDM, CFPP credential indicates that an individual has the education and experience to competently perform the responsibilities of a foodservice manager in a non-commercial setting. The CDM, CFPP Scope of Practice outlines competencies and associated tasks in five domains, including but not limited to, Nutrition. This supports the intent of §483.21(b) (2)(ii) of the CMS final rule for LTC, allowing for participation in the Care Planning Process as a member of the Inter-Disciplinary Team.

The regulations governing Food and Nutrition Services in Long Term Care are found in the CMS State Operations Manual (SOM), Appendix PP, §483.60(a) Staffing. Effective in November 2017, the regulations provide guidance on employing a Director of Food and Nutrition Services in the absence of a full-time dietitian. The personnel options include:

- A) A certified dietary manager (**CDM**);
- B) A certified food service manager (**CFSM**);
- C) Has similar national certification for food service management and safety from a national certifying body;
- D) Has an associate's or higher degree (**AA/BA+**) in **Food Service Management** or in **Hospitality**, if the course of study includes food service or restaurant management from an accredited institution of higher learning

Certified Dietary Managers Clinical Tasks/Functions as related to the CDM, CFPP Scope of Practice	CDM, CFPP	CFSM	Hospitality/FSM AA or BA+
Document food preferences: likes, dislikes, food allergies	Yes	Yes	Yes
Nutrition screening - gather and document relevant nutrition related information (e.g., laboratory values, BMI)	Yes		
Nutrition Care Plans - Document nutritional interventions in place, review effectiveness of interventions and rationale for changes in care plan, identify sources to consult in implementing, documentation of progress toward care plan goals, ensure food and fluid-related interventions are included in care plan, document evidence of collaboration with RDN regarding care plan goals	Yes		
Nourishments/supplemental foods - Identify clients who benefit from additional nutrition, identify the appropriate menu alterations for additional nutrition, monitor the delivery of such additional nutrition, audit the acceptance of such additional nutrition	Yes		

Comparison chart continues on page 2

Certified Dietary Managers Clinical Tasks/Functions as related to the CDM, CFPP Scope of Practice	CDM, CFPP	CFSM	Hospitality/FSM AA or BA+
Family Request (refer to RDN if appropriate)	Yes	Yes	Yes
Progress Note to document communication with family/ resident	Yes	Yes	Yes
Skin/wound follow-up - acknowledge presence of new wound; acknowledge referral to RDN for follow-up	Yes		
Weight change acknowledgment - document acknowledgment of significant weight change along with acknowledgment of referral to RDN for documentation of intervention and care plan update.	Yes		
Participate on Interdisciplinary Team (IDT)	Yes		
Document residents' acceptance of prescribed medical nutrition therapy including Therapeutic diets, Tube Feedings, IV Fluids, parenteral feedings as what is stated by resident or what is discussed in IDT that resident stated, including changes to diet, refusals and any plans to accommodate refusals.	Yes	Yes	Yes
Discuss preferences for advanced nutritional support for end-of-life cares. Document preferences for advanced nutritional support for end-of-life cares as discussed in IDT and as they relate to the prescribed oral diet. Ex: offering favorite foods, comfort foods, food from home	Yes		
Complete MDS Section K for initial, annual, quarterly, or significant change	Yes	Yes	Yes
MDS Care Area Assessments (CAAs) per facility policy and consultation with RDN.	Yes		
Assist clients with food selection based on written diet order	Yes		
Identify clients who need additional nutrition and suggest additional nutrition options. Audit acceptance of nourishments/supplemental products.	Yes		
Participate in quality assurance and performance improvement (QAPI)	Yes	Yes	Yes

*This chart serves as a tool to help clarify distinctions in staffing qualifications for different activities and functions. It is not a definitive reiteration of regulatory laws.*

## REFERENCES:

- CMS Long Term Care State Operations Manual (SOM), Appendix PP Food and Nutrition Services ¶484.60 November 2023
- CDM, CFPP Scope of Practice
- ANFP MDS 3.0 Nutrition Documentation in LTC Compliance
- CMS Long Term Care State Operations Manual §483.21(b)(2)(ii)

# **ADVOCATING FOR YOURSELF**

## **TALKING POINTS**

A CDM, CFPP plays a crucial role in ensuring the quality of food and nutrition services in non-commercial settings. Below are some key talking points to consider when advocating for your profession to administrators, surveyors, or other stakeholders. Make sure you are prepared by reviewing the documents and resources referenced at the bottom of this list.

### **1. SCOPE OF PRACTICE AND COMPETENCIES:**

- Highlight the Scope of Practice and competencies required by a CDM, CFPP.
- Be ready to present the CDM, CFPP Scope of Practice to your employer, surveyor, or any other stakeholders.

### **2. CDM, CFPP PRACTICE STANDARDS:**

- Emphasize the significance of the CDM, CFPP Practice Standards in ensuring high standards of knowledge and skills in food service management and safety.

### **3. INTERDISCIPLINARY COLLABORATION:**

- Highlight your role on the IDT and working closely with healthcare teams to align nutrition services with individual resident needs and care plans.
- Emphasize the positive impact on overall resident health outcomes through collaborative efforts.

### **4. COMPLIANCE AND REGULATORY ADHERENCE:**

- Showcase how CDM, CFPPs contribute to regulatory compliance, particularly in meeting the requirements outlined in regulations such as §483.60.
- Demonstrate the role you play in implementing and maintaining food and nutrition services following industry standards and guidelines.

### **5. JOB DESCRIPTION:**

- Use the CDM, CFPP Sample Job Description to showcase the skills and competencies you bring to the table, including leadership skills.

### **6. COMPENSATION & BENEFITS SURVEY:**

- Research the ANFP 2022 Compensation & Benefits Survey to know what you are worth in your area.
- Take a deep dive and filter by your geographic area, facility type, number of beds, etc., to get the most accurate data.

## 7. RISK MANAGEMENT:

- Discuss how your expertise contributes to risk management by ensuring food safety, preventing foodborne illnesses, and addressing dietary concerns to minimize health risks.
- Share data\* to showcase the difference in facilities with CDM, CFPPs vs. those without:
  - Average overall star rating was 12.5% higher in skilled nursing facilities with a CDM, CFPP
  - Total dietary deficiencies per facility was 26% lower in skilled nursing facilities with a CDM, CFPP
  - Total deficiencies per facility was 19% lower in skilled nursing facilities with a CDM, CFPP

\*Data from 2022 CMS database

## 8. ANFP BENCHMARKING PROGRAM (IF APPLICABLE):

- Research the Skilled Nursing and/or Acute Care Benchmarking surveys.
- Consider participating to allow a better understanding of what makes your facility successful, leading directly to an action plan, improving productivity, and gaining strategic advantage.

## 9. PROFESSIONAL DEVELOPMENT:

- Showcase a commitment to ongoing professional development and staying current with industry trends, regulations, and best practices.
- Discuss how this continuous learning benefits both you, the organization, and those you serve.

## 10. RESIDENT AND FAMILY ENGAGEMENT:

- Emphasize the role CDM, CFPPs play in engaging residents and their families in menu planning, addressing dietary preferences, and ensuring a positive dining experience.
- Cite resident satisfaction surveys.

By effectively conveying these talking points, you can advocate for the value you bring to your facility and underscore the importance of your role in promoting client health and well-being.

**Access important resources including the Scope of Practice; CDM, CFPP Job Description; Competencies; and more at [www.CBDMonline.org/resources](http://www.CBDMonline.org/resources).**



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