

Thank you, Madam Chair and Commission members. For the record, I am Carol Bradley and I am a Licensed Dietitian. I have practiced in a variety of work settings, including as a university instructor preparing future dietitians. I was sought out by each employer over 26 years because of my credential as a licensed dietitian.

I, too, am strongly opposed to the proposal in the DSHS Sunset Staff Report to discontinue dietitian regulation and licensure. I would caution you against rushing to judgment on dietitian licensure without a more thorough understanding of how its elimination would impact public health and safety and other important state goals.

- **The Sunset Staff Report does not take into account that numerous agency regulations in Texas today specify the use of Licensed Dietitians in critical facilities in which fragile Texans must be protected.** For example, Licensed Dietitians are identified as valued team members in end-stage renal disease centers, psychiatric hospitals and crisis stabilization units, Texas Youth Commission facilities, state-licensed skilled nursing homes and special care facilities\*, just to name a few. In fact, many of DSHS' own rules specify the use of Licensed Dietitians. If dietitian licensure did not serve a meaningful public interest, why would our state's --and this agency's--rules call for Licensed Dietitians in essential settings?

- **The Report also fails to acknowledge the fact that Licensed Dietitians performing Medical Nutrition Therapy support important state goals of curbing health care costs and improving health care outcomes.** In almost every medical setting, having a Licensed Dietitian on the extended health care team can help shorten patient recovery time, prevent re-admissions and help manage chronic disease. State regulations allow hospitals to operate more efficiently by assigning privileges to Licensed Dietitians for such functions as ordering and placing feeding tubes, modifying patient diets and ordering lab work to assess nutrient levels--all of which saves money and frees up doctors and nurses to do other things. If dietitian licensure were to be abruptly ended, it would have a significant impact on health care providers who have come to depend on the added value that Licensed Dietitians bring to the process. It would also be disruptive to employment, as hiring practices and pay scales at many hospitals are determined by whether an individual is licensed in Texas.

- Finally, a major motivation of the Staff Report appears to be ridding DSHS of regulatory programs that distract from its core public health mission. **I would respectfully submit that the regulatory program for dietitians is actually compatible with some of the important work the agency is doing in the critical areas of disease control and prevention.** In particular, licensure supports agency programs designed to better manage chronic health conditions such as diabetes, heart disease, and obesity. As such, a valid case could be made that dietitian regulation complements, rather than distracts, from the core work of the agency.