

Chair Nelson and Commission members, my name is Valerie Shurley, and I am the Licensed Dietitian at St. David's Georgetown Hospital. I was recently appointed to the Texas State Board of Examiners of Dietitians, but I am representing myself today.

As a dietitian who has been licensed in Texas for 7 years, I have a practitioner's familiarity with the workings--and need for--dietitian regulation and licensure.

In my opinion, elimination of the regulatory program for dietitians would be detrimental to the profession and to the public at large.

As others have stated, the Staff Report fails to capture the nuances of how dietitian regulation protects the public's health and safety. It also falls short in its depiction of the important work performed by our regulators.

It's an oversimplification to conclude that dietitian regulators' license-granting role is limited to verifying that national accreditation standards have been met. Instead, the state board must oversee and manage two distinct paths to licensure in Texas, including an important Provisional Licensing process for individuals who have met all academic requirements for licensure but have yet to complete the required supervised internship. The board must verify that the Provisional Licensee has the necessary internship hours and passed the required exam before upgrading his or her status to full Licensed Dietitian.

State regulators provide other valuable oversight roles that have also been overlooked. One of the aspects that distinguishes state licensure from national certification is the amount of **continuing education** that is required of practitioners—Licensed dietitians need to document 6 hours every year compared to a national requirement of 75 hours over 5 years, but that can be completed within one or two years, leaving up to 3 years with **OUT** additional C.E. The board also makes sure that applicants for licensure take a **Jurisprudence test** every two years to demonstrate knowledge of Texas rules and statutes.

Additionally, it is significant that the number of licenses issued by the board totals nearly 5,000--up nearly 30 percent in 10 years. These numbers are expected to continue growing at a steady pace with more than 500 students in dietitian degree programs in Texas colleges and out-of-state practitioners moving to Texas for better employment opportunities.

In closing, I would like to emphasize that all but four states have some form of dietitian licensure today. This is another compelling statistic--it tells us that there is not only widespread appreciation for the specialized expertise of Licensed Dietitiansbut also recognition of the need to protect consumers through the licensing process.

I would appreciate your support in ensuring Texas regulatory protections remain intact.