



February 4, 2025

The Honorable Joseph J. Solomon, Jr., Chair
House Committee on Corporations
State House
82 Smith St.
Providence, RI 02903

RE: H 5067 – An Act Relating to Businesses and Professions – Dietitian Licensure Compact

Dear Chair Solomon:

Please accept this letter regarding H 5067, that would allow for the enactment of the dietitian licensure compact permitting a licensed dietitian from another compact state to become licensed in Rhode Island, and permitting a dietitian licensed by the Rhode Island Department of Health (RIDOH) to become licensed in another compact state. RIDOH has concerns about the potential impacts of this legislation.

Please know that RIDOH is currently reviewing this proposal at the programmatic level to carefully analyze the impact joining this compact will have on both the initial licensure, disciplinary processes, and any changes they may make to current licensure requirements. This analysis will take some time.

The Committee should be aware that there is a cost to the State for operationalizing licensure compacts. Joining any multistate compact requires a configuration of data-sharing capability between RIDOH's licensing system, My License Office (MLO), and the respective compact infrastructure. In 2023, RIDOH financed the implementation of the Nurse Licensure Compact with a \$200,000 grant from the National Council of State Boards of Nursing. RIDOH needs more specific information on implementation costs and timeframe before committing to participation in the compact.

Concerns about implementation costs and sustained funding for annual participation costs is the reason that RIDOH has not been able to implement multistate licensing compacts for physicians, audiologists and speech language pathologists, physical therapists, professional counselors, and social workers enacted by the General Assembly in 2024. The annual fee for the dietitian compact is not yet established, but for reference, the Nurse Licensure Compact annual fee is \$6,000. RIDOH will not be able to implement this, or any other, compact without adequate funding.

Nationally, there must be seven member states to establish the compact, and currently the dietitian licensure compact has only four states that have agreed to enact the compact. In RIDOH's experience with previous compacts enacted by the General Assembly, there is significant lag, often years, between when a compact reaches the minimum number of participating states and accepts license applications. Furthermore, on a national level, all licensure compacts are struggling with how to operationalize the FBI background checks that are required by the compacts. Recent changes at the federal level may result in further uncertainty.

Finally, RIDOH believes that the general goal of this, and other compact-related legislation, is to increase the supply of, and access to, licensed healthcare professionals in Rhode Island. RIDOH shares this priority and applauds the intentions of this legislation. However, it remains to be seen whether participation in this compact will increase or decrease the supply of dietitians in Rhode Island. Based on

the most recent Bureau of Labor and Statistics (BLS) data, the median salary for dietitians and nutritionists in Rhode Island is lower than the national median and is the lowest of the New England region. Rhode Island's median salary is higher than the four states that have already entered the compact. Compensation is a critical driver of labor supply, so the net impact on the number of licensed dietitians in Rhode Island will likely be dependent on how Rhode Island salaries compare to other states who join the compact

RIDOH would need dedicated funding to enact the dietitian compact, and other, compacts. Thank you for the opportunity to comment on this proposed legislation.

Sincerely,



Jerome M. Larkin, MD
Director

CC: The Honorable Members of the House Committee on Corporations
The Honorable Joseph M. McNamara
Nicole McCarty, Chief Legal Counsel
Lynne Urbani, Director of House Policy
