



**STATE OF WASHINGTON**  
**DEPARTMENT OF SOCIAL AND HEALTH SERVICES**

Home and Community Living Administration  
4500 10<sup>th</sup> Avenue Southeast • Lacey, Washington 98503

June 11, 2025

**NH #2025-023**

**CLARIFICATION FROM THE CENTERS FOR MEDICARE & MEDICAID SERVICES (CMS)  
REGARDING GUIDANCE FOR F801 QUALIFIED DIETITIAN OR OTHER CLINICALLY  
QUALIFIED NUTRITION PROFESSIONAL**

Dear Nursing Facility/Home Administrator:

We are writing to inform providers about the recent clarification CMS has provided regarding a qualified dietitian or other clinically qualified nutrition professional in nursing homes (NHs).

In recent months, Residential Care Services (RCS) has received several inquiries from department staff and providers concerning the certification and licensing of qualified dietitians in NHs. To address these questions, RCS consulted with CMS, which clarified the state licensure requirements for qualified dietitians and other clinically qualified nutrition professionals in NHs.

NHs are required to employ adequate and competent staff with the necessary skills to manage food and nutrition services taking into consideration resident assessments, individual plans of care, and the number, acuity and diagnoses of the facility's resident population in accordance with the facility assessment required at 42 CFR §483.71.

Federal requirements at **F801** - [42 CFR §483.60\(a\)\(1\)](#), require NHs to employ a qualified dietitian or other clinically qualified nutrition professional either full-time, part-time, or on a consultant basis. A qualified dietitian or other clinically qualified nutrition professional is defined as one who:

- (i) **Holds a bachelor's or higher degree granted by a regionally accredited college or university** in the United States (or an equivalent foreign degree) with completion of the academic requirements of a program in nutrition or dietetics accredited by an appropriate national accreditation organization recognized for this purpose.
- (ii) **Has completed at least 900 hours of supervised dietetics practice** under the supervision of a registered dietitian or nutrition professional.
- (iii) **Is licensed or certified as a dietitian or nutrition professional by the State in which the services are performed.** In a State that does not provide for licensure or certification, the individual will be deemed to have met this requirement if he or she is recognized as a "registered dietitian" by the Commission on Dietetic Registration (CDR) or its successor organization or meets the requirements of paragraphs (a)(1)(i) and (ii) of this section.
- (iv) For **dietitians hired or contracted prior to November 28, 2016, meets these requirements no later than 5 years after November 28, 2016**, or as required by state law.

See [State Operations Manual Appendix PP](#) for information and guidance regarding additional pathways for individuals to meet the requirements for qualified dietitians and other clinically qualified nutrition professionals outlined in **F801**.

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**The guidance is as follows:**

Under federal regulations at [42 CFR §483.60\(a\)\(1\)\(iii\)](#), if a state has established its own licensure or certification criteria for dietitians or nutrition professionals, individuals ***must*** comply with those state-specific requirements to practice in that state.

As Washington (WA) State offers licensing and certification for dietitians or nutrition professionals, dietitians providing services in NHs must be licensed through the Department of Health (DOH) and hold a valid WA state-issued license. The certification and license criteria for dietitian and nutritionists is outlined in [Chapter 18.138 RCW](#).

If a licensed dietitian or other clinically qualified nutrition professional is not employed full-time, [42 CFR §483.60\(a\)\(2\)](#) requires the facility to designate a person to serve as the director of food and nutrition services; and provides qualification requirements for that individual.

It is important to note that the criteria for being recognized as a “registered dietitian” by the CDR alone does not apply in WA State, as distinct state certification and licensure requirements exist.

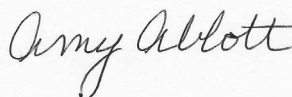
The [Qualified Dietitian, Other Clinically Qualified Nutrition Professional, and Director of Food and Nutrition Services Flow Chart for Nursing Homes](#) flowchart, designed to help surveyors and providers determine the qualifications needed for dietitians or other clinically qualified nutrition professionals, is available as a resource tool and can be accessed at on the [Nursing Home Professionals](#) page.

To verify dietitian licensure in WA State, use the DOH [Provider Credential Search](#).

Please visit the following link at [Dietitian And Nutritionist Licensing Information](#) for more information related to dietitian certification and licensure in WA State.

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Tiffany Meyers, Nursing Home Policy Program Manager, at [rcspolicy@dshs.wa.gov](mailto:rcspolicy@dshs.wa.gov) or (360) 464-0373.

Sincerely,



Amy Abbott, Director  
Residential Care Services

DSHS: “Partnering with People”

**Related References:** [42 CFR §483.71](#); [42 CFR §483.60\(a\)\(1\)](#); [State Operations Manual Appendix PP](#); [42 CFR §483.60\(a\)\(1\)\(iii\)](#); [Chapter 18.138 RCW](#); [42 CFR §483.60\(a\)\(2\)](#); [WAC 388-97-1160\(2\)\(3\)\(a\)\(b\)\(i\)\(ii\)](#)