

Members of the Federal Trade Commission:

It is a privilege to be able to voice my concerns regarding nationwide nutrition licensing. As you are aware, there are currently 16 states where non-RDs may be recognized as nutrition practitioners. I am in full agreement with the AND regarding the need to provide adequate consumer protection and therein stringent licensing standards for aspiring and practicing nutritionists. However to pursue a monopoly on the type of license required to practice nutrition nationwide is to stifle competition and severely restrict consumer opportunities. As an expression of the ANDs attempt to monopolize, there are currently proposals up in Michigan, New York, and New Jersey to severely restrict practitioner opportunities to RDs and RDNs licensed by the AND only.

In an America where 1 in 3 people are predicted by the CDC to have diabetes by 2050 and nearly 1 in 2 Americans' today are estimated to have at least one chronic disease it is clear that something is out of place. Perhaps then the simplest argument to be made for expanding licensure opportunities is that with 6000 current RD's nationwide and a US population of nearly 315 million, to only serve those with pathological diagnoses each RD would need to have a client base of approximately 26,250 individuals. This is the equivalent of seeing 5 new people every day for over 14 years. I hope you agree with me in saying that this is an untenable proposition.

As a recent graduate of the Maryland University of Integrative Health with a MS in Nutrition, I am completing my 1000 supervised hours while preparing to take the CBNS examination. I look forward to working in the state of MD where I will be legally recognized to do so. However as I continue to work with clients, it is highly limiting to have only 16 states recognize the prestigious CBNS license, therein creating concerns for practice portability as well as the ability to see people who may seek me out remotely for web-based consultations. Moreover, many of my colleagues are not so fortunate and several are considering moving to states where rigorous certifications such as the CBNS are accepted. This is part of a larger trend which is resulting in an inadequate practitioner population in numerous states where the public could largely benefit from such professional guidance.

In conclusion, there is a current dearth of nutrition practitioners in the United States. Coupled with the inability of various qualified practitioners such as those licensed via the CBNS to provide valuable guidance in all but 16 states, the American people are being underserved and limited in practitioner options. The United States is currently ranked as 37th worldwide in health care and number 1 in per capita spending. With disease affecting nearly half of Americans and science showing the ability for diet and lifestyle to positively affect disease prognosis, there is a clear and present need for nutritionists beyond the standardized RD in society.

I urge the members of the FTC to act with urgency in the best interest of the American people in working to provide access to qualified nutrition consulting including those licensed by the CBNS and, with respect, NDs as well in all states.

Thank you for your time and consideration.

Sincerely,

Joshua Nachman, MS Nutrition

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