

May 22, 2017

To: Senator Bob Hackett, Chairman, and Members

Senate Finance Health and Medicaid Subcommittee

From: Kamini Lakhi, President and Chief Operating Officer

Dietary Solutions, Rite for You, and Alyfe Wellbeing Strategies

I am the owner and President of a central Ohio business that has been operating since 1994. We offer nutrition and dietary consulting services in long-term care (LTC), assisted living and group home settings. Additionally, I also own and operate and health and Wellbeing Company that provides services to many central Ohio organizations. We employ industry experts including licensed registered dietitians, dietetic technicians, nutrition associates, culinary experts, nurses, and licensed nursing administrators who serve more than 150 healthcare organizations. In addition to our consulting services, our sister companies provide comprehensive health and wellness services focused on nutrition counseling, fitness instruction, corporate wellness and well-being programs for an array of businesses and community members.

I am opposed to the proposal included in HB 49 that would abolish the efficient, effective, and accessible independent Ohio Board of Dietetics.

Long term care is a highly competitive and complex industry that operates on very tight margins. The industry depends on the services of many health professionals (including dietitians) and is increasingly negatively affected by employee turnover that averages over 40 %.

State and Federal laws and rules require continuous staffing in order to meet nutrition regulations and to provide high quality food and dietary services to Ohio's most vulnerable elderly and disabled citizens. The nutrition teams in facilities are led by dietitians who are responsible for clinical nutrition assessment, care planning and monitoring and who also oversee the activities of dietetic technicians, food service staff and personnel who assist in feeding residents. All dietitians must be licensed in Ohio in order to practice dietetics.

Many of the dietitians we employ are new graduates of dietetics programs entering the profession for the first time. They work under a limited permit license until passing the professional examination that qualifies them for a full license to practice. They are anxious to "get to work" quickly in order to put food on their own tables and to start paying off college loans. As employers we need staff to fill the vacancies that repeatedly occur and we need to do that in shortest time possible.

Experienced Dietitians who move to Ohio rely on the efficient transfer of licensure from their original jurisdictions to Ohio in order to practice and be eligible for our job vacancies.

The proposal in HB 49 will disrupt the efficient employment of licensed dietitians in Ohio. Under the current independent OBD the average number of days to issue a new license was between 4 - 8.3 days*. The OSMB's last published data (2015) show that it took between 38 and 85 days** to issue new licenses for the Allied Practitioners group. Such a delay would unnecessarily disrupt dietitians from gaining employment for a month or more while waiting for their limited permit license. This will also significantly impact my business as I will not be able to meet the needs of our clients.

Delays in licensing increase costs for businesses like mine, put vulnerable Ohio citizens at risk of not being able to receive timely nutrition care services that they desperately need, and make Ohio a less desirable place for highly trained dietitian professionals to pursue careers.

It does not make sense to move the regulation of dietitians from the current independent efficient Ohio Board of Dietetics to the Ohio State Medical Board which is significantly less efficient.

I respectfully request that the proposal to abolish the Ohio Board of Dietetics be removed from HB 49 and that the board be restored to independent status and full funding for the 2018-2019 biennium.

Thank you for your kind consideration.

Respectfully,

Kamini Lakhi, MS, RDN, LD

^{*2015-2016} as reported by the Ohio Board of Dietetics via public record request. Includes all applications.

^{**} Ohio State Medical Board 2015 Annual Report. Includes Allied Practitioners applications without complaints (38 days) and with resolved complaints (85 days).