

COMPARISON OF CLINICAL TASKS FOR CDM, CFPPS VS. NON-CDM, CFPPS FOR LONG-TERM CARE STAFFING REQUIREMENTS DIRECTOR OF FOOD & NUTRITION SERVICES §483.60

The CDM, CFPP credential indicates that an individual has the education and experience to competently perform the responsibilities of a foodservice manager in a non-commercial setting. The CDM, CFPP Scope of Practice outlines competencies and associated tasks in five domains, including but not limited to, Nutrition. This supports the intent of §483.21(b) (2)(ii) of the CMS final rule for LTC, allowing for participation in the Care Planning Process as a member of the Inter-Disciplinary Team.

The regulations governing Food and Nutrition Services in Long Term Care are found in the CMS State Operations Manual (SOM), Appendix PP, §483.60(a) Staffing. Effective in November 2017, the regulations provide guidance on employing a Director of Food and Nutrition Services in the absence of a full-time dietitian. The personnel options include:

- A) A certified dietary manager (**CDM**);
- B) A certified food service manager (**CFSM**);
- C) Has similar national certification for food service management and safety from a national certifying body;
- D) Has an associate's or higher degree (**AA/BA+**) in **Food Service Management** or in **Hospitality**, if the course of study includes food service or restaurant management from an accredited institution of higher learning

Certified Dietary Managers Clinical Tasks/Functions as related to the CDM, CFPP Scope of Practice	CDM, CFPP	CFSM	Hospitality/FSM AA or BA+
Document food preferences: likes, dislikes, food allergies	Yes	Yes	Yes
Nutrition screening - gather and document relevant nutrition related information (e.g., laboratory values, BMI)	Yes		
Nutrition Care Plans - Document nutritional interventions in place, review effectiveness of interventions and rationale for changes in care plan, identify sources to consult in implementing, documentation of progress toward care plan goals, ensure food and fluid-related interventions are included in care plan, document evidence of collaboration with RDN regarding care plan goals	Yes		
Nourishments/supplemental foods - Identify clients who benefit from additional nutrition, identify the appropriate menu alterations for additional nutrition, monitor the delivery of such additional nutrition, audit the acceptance of such additional nutrition	Yes		

Certified Dietary Managers Clinical Tasks/Functions as related to the CDM, CFPP Scope of Practice	CDM, CFPP	CFSM	Hospitality/FSM AA or BA+
Family Request (refer to RDN if appropriate)	Yes	Yes	Yes
Progress Note to document communication with family/ resident	Yes	Yes	Yes
Skin/wound follow-up - acknowledge presence of new wound; acknowledge referral to RDN for follow-up	Yes		
Weight change acknowledgment - document acknowledgment of significant weight change along with acknowledgment of referral to RDN for documentation of intervention and care plan update.	Yes		
Participate on Interdisciplinary Team (IDT)	Yes		
Document residents' acceptance of prescribed medical nutrition therapy including Therapeutic diets, Tube Feedings, IV Fluids, parenteral feedings as what is stated by resident or what is discussed in IDT that resident stated, including changes to diet, refusals and any plans to accommodate refusals.	Yes	Yes	Yes
Discuss preferences for advanced nutritional support for end-of-life cares. Document preferences for advanced nutritional support for end-of-life cares as discussed in IDT and as they relate to the prescribed oral diet. Ex: offering favorite foods, comfort foods, food from home	Yes		
Complete MDS Section K for initial, annual, quarterly, or significant change	Yes	Yes	Yes
MDS Care Area Assessments (CAAs) per facility policy and consultation with RDN.	Yes		
Assist clients with food selection based on written diet order	Yes		
Identify clients who need additional nutrition and suggest additional nutrition options. Audit acceptance of nourishments/supplemental products.	Yes		
Participate in quality assurance and performance improvement (QAPI)	Yes	Yes	Yes

This chart serves as a tool to help clarify distinctions in staffing qualifications for different activities and functions. It is not a definitive reiteration of regulatory laws.

REFERENCES:

CMS Long Term Care State Operations Manual (SOM), Appendix PP Food and Nutrition Services ¶484.60 November 2023
 CDM, CFPP Scope of Practice
 ANFP MDS 3.0 Nutrition Documentation in LTC Compliance
 CMS Long Term Care State Operations Manual §483.21(b)(2)(ii)