

PRACTICE TIPS: When to Cosign

Medical Legal Aspects of Medical Records¹, states that cosigning implies that the registered dietitian nutritionist (RDN) staff/instructor has approved the care given and assumes responsibility for it. The staff RDN is responsible for the nutrition care provided by a student/intern/employee including an unlicensed and/or unregistered dietitian, if the individual is providing nutrition care to patients/clients.

The individual works under the clinical supervision of an RDN and this assigned RDN is ultimately responsible and accountable to the patient/client, physician, employer/organization, and regulator for nutrition activities assigned to this individual.

If clinical supervision includes cosigning medical record entries, RDNs are obligated to review the organization's policies and process related to cosigning in electronic health records (EHR) and/or paper medical records. These procedures should cover:

- Procedure for cosigning notes for students/interns and nonregistered dietitians and/or non-licensed RDNs as processes differ by organization and the EHR system in use.
- Orientation and/or training for new staff, students/interns, and educators on when and how EHR entries are cosigned. For EHR entries, this may include -- use of flowsheets for data entries, when preceptor/supervising RDN reviews, process for editing flowsheet entries versus a progress note; use of "cosign required" step and how preceptor's/supervising RDN's signature is added; and how information can be added to the student's/intern's/employee's note.

Individual Competence

Before a student/intern/employee is allowed to make medical record entries, it is important to evaluate whether the individual has the necessary knowledge and skills related to the activity, i.e., nutrition assessment, nutrition counseling and/or education, and/or medical nutrition therapy.

Review and interpret Academy's/CDR's resources, CMS' guidelines for 'qualified dietitian' when applicable to the practice setting.

- Decide if the individual (student/intern/unregistered and/or unlicensed dietitian) has successfully met the minimum requirements for the RDN or NDTR credential, when applicable, as set by the Accreditation Council for Education in Nutrition and Dietetics (ACEND) and Commission on Dietetic Registration (CDR). Review RDN or NDTR education, eligibility, and verification of credential(s).
 - [2025-2030 Essential Practice Competencies \(CDR\)](#)
 - [2022 Standards and Templates \(ACEND\)](#)
- The individual not yet registered and/or licensed, as applicable, should always work under the [clinical supervision](#) of an RDN when providing direct nutrition care. The supervising RDN must be qualified to provide the clinical supervision of an employee assigned specific nutrition care activities.
- Follow the organization's policy to document employee orientation, training, and evaluation of competence to perform assigned duties. Review how surveyors determine if the "qualified dietitian" is meeting regulations in the [Applicable State Operations Manual](#).

The CDR [Definitions of Terms](#) define 'competence' and 'competency':

- Competence: Competence is a principle of professional practice, identifying the ability of the provider to administer safe and reliable services on a consistent basis.
- Competency(ies): A competency is a combination of observable and measurable knowledge, attitude, skills, abilities, behaviors, and other characteristics that an individual needs to perform work roles or occupational functions successfully. Competencies specify the "how" of performing job tasks, or what the person needs to do the job successfully

CMS Regulations

CMS develops Conditions of Participation (CoPs) and Conditions for Coverage (CfCs) that health care organizations must meet in order to begin and continue participating in the Medicare and Medicaid programs. These health and safety standards are the foundation for improving quality and protecting the health and safety of beneficiaries. CMS also ensures that the standards of accrediting organizations recognized by CMS (through a process called "deeming") meet or exceed the Medicare standards set forth in the CoPs / CfCs.

- <https://www.cms.gov/Regulations-and-Guidance/Legislation/CFCsAndCoPs>
- [Medicare States Operations Manual Appendix](#)

Ensure policies address timeline related to cosigning. CMS IOM (Internet-Only Manual) does not specify a timeframe for "as soon as practicable", though some Medicare fiscal intermediaries (FIs) have defined a reasonable time frame as 24-48 hours.

- [Complete and Timely Documentation of Medicare Services \(wpsgha.com\)](#); [Medical Record Documentation: Time is of the Essence | The Cooperative of American Physicians \(capphysicians.com\)](#); [Medical Record Entry Timeliness: What Is Reasonable? - AAPC Knowledge Center](#)

Revised October 2025

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Organization Policies/Standard Operating Procedures and Applicable Accreditation Organizations

Check the organization's policies and standards related to new hires awaiting full credentials, students, and interns. If no policy exists, one will need to be created.

- Determine the level of access the individual may have to medical records as well as RDN cosignatory and documentation requirements.
- Consult with and review policies of other disciplines, e.g., nursing, pharmacy, and physical, occupational and speech therapy to see how students/interns, and staff with pending credentials and/or licensure are allowed to work.
- Meet with appropriate individuals within the organization to ensure organization policies are being followed appropriately. Consider working with Human Resources, Medical Records, Risk Management, or Quality and Regulatory Compliance.
 - Review and analyze the accrediting organization's guidelines and requirements if your organization is accredited by an outside organization. Examples of accreditation organizations include, but not limited to, The Joint Commission, the Accreditation Commission for Health Care (ACHC), formerly Healthcare Facilities Accreditation Program of American Osteopathic Association (HFAP), DNV-National Integrated Accreditation for Healthcare Organizations, Public Health Accreditation Program and Commission on Cancer.

State Licensing and Local Regulations

Review applicable state and local rules and regulations including state licensure, registration, or certification laws.

- State Licensure Agency List
 - <https://www.cdrnet.org/LicensureMap>

Use of Credentials and Titles when Signing/Cosigning

- The Commission on Dietetic Registration (CDR) recognizes and certifies the terms RDN or RD and NDTR or DTR.
 - If the term [RDE or RDNE](#); [DTRE or NDTRE](#) are being used, please discontinue use immediately and replace it with "registration eligible." Individuals who use the terms [RDE or RDNE](#); [DTRE or NDTRE](#) are frequently reported to CDR regarding their misuse and notified via a "cease and desist" order to discontinue use.
- If an instructor is supervising the student or intern, the instructor should cosign the student or intern note with their name, credential, and university name, or as specified by the organization.
- Cosigner may add to the notes entered by the student or intern but should not edit the notes. With a pending co-signature note in EHR, the preceptor may be able to have student/intern make a correction or include missing information if needed and then re-sign the note.
- It is best practice to use the student/intern status which best represents the individual, e.g., student dietitian or dietetic intern.
- Student/intern should cosign notes with first initial, last name, Student Dietitian or Dietetic Intern and university name (may be abbreviated) or as specified in procedure for EHR or paper chart. In EHR, it is common for student/intern to check "Cosign" button so that note is pending preceptor co-signature.

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- After reviewing and verifying the note, the preceptor/staff RDN signs note with first initial, last name and credentials¹, e.g., R. Doe, RDN. Both the student/intern and the RDN signatures will show.

CDR/Academy Resources

Foundational resources take a practitioner through a process for determining if an activity is within their individual scope of practice as an RDN or NDTR. Resources include:

- [Revised 2024 Scope and Standards of Practice for the RDN](#)
- [Revised 2024 Scope and Standards of Practice for the NDTR](#)
- [Scope of Practice Decision Algorithm](#)
- [Focus Area Standards of Practice and/or Standards of Professional Performance for RDNs](#)
- [CDR/Academy Code of Ethics](#)
- [Definition of Terms](#)
 - Supplemental Practice Resources:
 - [Accreditation and Regulation Links](#)
 - [Practice Tools](#)

In this Practice Tips, the CDR has chosen to use the term RDN to refer to both registered dietitians (RD) and registered dietitian nutritionists (RDN) and to use the term NDTR to refer to both dietetic technician, registered (DTR) and nutrition and dietetics technician, registered (NDTR).

Cosign Recommendations to Consider for Nutrition and Dietetics Practitioner Roles Providing Direct Patient Care

Role	Description	Coursework Status	Supervised Practice Completed?	CDR Exam Passed?	Cosign Required?	Keywords / Notes Example position titles
Dietetic Extern	Student enrolled in ACEND accredited DPD (Didactic Program in Dietetics) and is in process of completing coursework	In process	No	No, for RDN Exam	Yes	• Student Dietitian
Dietetic Intern	Individual enrolled in ACEND accredited DI (Dietetic Internship) and is in process of completing supervised practice	Completed	In process	No, for RDN Exam	Yes	• Dietetic Intern
ISPP Intern Individualized Supervised Practice Pathway	Individual who is enrolled in an ACEND accredited supervised practice program	Completed	In process	No, for RDN Exam	Yes	• Dietetic Intern
Baccalaureate Graduate, Master's Student	Individual who has completed a degree in an ACEND accredited program	Completed	No, with no plans for completing	No, for NDTR Exam	Yes	• Dietetic Technician • Food Service Manager • Dietary Manager • Dietetic Intern
Registration Eligible, to become an RDN*	Individuals who have met the didactic and supervised practice requirements to write the registration examination for dietitian nutritionist	Completed	Completed	No, for RDN Exam	Yes	• Dietitian • Nutritionist
Registration Eligible, to become an NDTR*	Individuals who have met the didactic and supervised practice requirements to write the registration examination for nutrition and dietetics technician	Completed Review requirements for NDTR	Completed Review requirements for NDTR	No, for NDTR Exam	Yes	• Dietetic Technician • Nutrition Associate • Food Service Manager • Dietary Manager
*The individual <u>not yet</u> registered and/or licensed, as applicable, should always work under the clinical supervision of the RDN.						

Revised July 2025

Role	Description	Coursework Status	Supervised Practice Completed?	CDR Exam Passed?	Cosign Required?	Keywords / Notes
Nutrition and Dietetics Technician, Registered (NDTR) or a Dietetic Technician, Registered (DTR)	Individuals who have met the didactic and supervised practice requirements, and passed the registration exam for nutrition and dietetics technician	Completed	Completed	Yes, for NDTR Exam	No, for NDTR performing assigned responsibilities who meets practice competencies Yes, for NDTR when competence assessment has determined need for further education to attain competence in assigned nutrition care responsibilities that involve charting in medical record	• NDTR • DTR • Nutrition and Dietetics Technician • Dietetic Technician • Food Service Manager • Dietary Manager • Nutrition Educator
Entry Level RDN RDN new to a focus area	Individuals who have met the didactic and supervised practice requirements, and passed the registration exam for dietitian nutritionist	Completed	Completed	Yes, for RDN Exam	No Yes, for RDN when practice competencies assessment has determined need for further education to attain competence in a focus area assigned to the RDN, or is new to a focus area of practice	• RDN in practice 3-6 months • Check organization's orientation which may specify cosigning for an on-the-job training time period • RDN is eligible to practice in areas where competence has been demonstrated

Cosigning notes: It is recommended that the RDN staff should only cosign activities of the individual if witnessed or verified personally¹.

Cosign implies that the RDN staff is ultimately responsible for the care given and recommended by the individual.

Reference:

1. Iyer, Patricia W., Levin Barbara J., Shea, Mary Ann. **Medical Legal Aspects of Medical Records**. Lawyers & Judges Publishing Company. January, 2006.

Revised July 2025