# RESPONSES TO QUESTIONS RAISED DURING THE BRIEFING SESSION ON REGISTRATION OF ALLIED HEALTH PROFESSIONALS: NUTRITIONISTS

DATE OF SESSION: 23 JUNE 2022 VIA ZOOM AND FB LIVE

### A. Questions related to the Registration Process

Question	Response from MAHPC member
Is an examination required for registration as a nutritionist?	No, under most circumstances, there is no exam required for registration as a nutritionist
I understand that a person needs to register first and then apply for practising later. What is the maximum gap allowed between registering & applying to practice?	In accordance with the Act, a practising certificate must be renewed every 2 years. If a person does not renew their practising certificate within 4 years of the previous issuance, they will be subject to an assessment. If a person does not renew their practising certificate within 6 years of the previous issuance, their registration will be cancelled.
	There is currently no time limit for the initial registration and first application for a practising certificate. However, the Council may impose a time limit if it deems it necessary.

Question	Response from MAHPC member
Can you please elaborate more on the grace period of 1 July 2022 - 30 June 2025?	Grace period is the adjustment or transitional period, to provide opportunities for practitioners to take the initiative and gather evidence of practice to register. It provides opportunities for persons who use the word nutritionist, or do nutritionist-related activities to review their practice and be aligned with the legal requirements. Persons who do not have the required training should terminate their practice as a nutritionist. After the transition period ends, legal action will be taken against anyone who misuses the word nutritionist or works in this field without being registration
What is the expected date for us to start the registration process? Will it be carried out by institution/organisation?	Registration of allied health professionals under Act 774 has commenced in August 2022. To enable a smooth process of registration among all the professions covered by the Act 774, registration shall be implemented in phases, by professions, in accordance with a schedule available on the MAHPC website; refer to general section of this Q&A document.
What is the estimated time frame for approval of registration upon submitting application?	The approval time depends on the qualifications of the person and the completeness of the submitted documents required for the registration. For a straight forward case, application for registration should be completed in a few days
Hope the MAHPC can consider for 'Lifetime registration' for those who graduated with the nutrition degrees in the recognised list	Registration is only a one-off process. Perhaps the question is about the lifetime practitioner certificate. Practising certificate for all practitioners has to be renewed every 2 years.
How do we submit proof of on job training? It probably does not comes in the form of certificate.	These can be in the form of certified reports by the organisation or company where the training was undertaken

Question	Response from MAHPC member
How do we register to practise as a nutritionist?	The guideline for Allied Health Professionals on the MAHPC website contains the required information; refer to the general information section of this Q&A document
Is there a limit to the number of nutritionists that can be registered?	There is no limit to the number of persons that will be allowed to be registered. All persons with the appropriate qualification can be considered for registration
What is the difference between registered nutritionists vs practising nutritionists?	Registration and practising are necessary steps to enable a person to practise as a nutritionist. First, a person needs to register as a nutritionist; only then can he apply for a practising certificate.
What happens if a person does not continue practising 2 years after obtaining the practising certificate? Will he be permitted to renew his practising certificate? Or does he need to go through all the steps of registration and applying for practising certificate again?	If a practitioner does not renew the practicing certificate for 2 times in a row (ie 4 years), and if he intends to continue to practise, he will have to undergo an assessment to determine if he can apply for the practicing certificate. On the other hand, If a practitioner does not renew the practicing certificate for 3 times in a row (6 years), his name will be automatically removed from the Register. If that person wishes to appeal to be included in the Register again, he has to go through the system, repeating the application from step 1. He must also provide the reasons why he has not practised for the past 6 years. The MAHPC would decide if the reasons are acceptable

# B. Questions related to Requirements for Application for Registration and Practice

Question	Response from Panelists
I refer to the training or courses that may be considered, other than the list of the nutrition degrees recognised by the MAHPC. Does on the job training in pharmacy outlets be considered? How many years of working experience and what are the documents required from the employer (Pharmacy)?	There is no specific requirement for a minimum number of years of on the job training. On the job training in the pharmacy outlets can be taken into consideration, provided they are related to the job scope of a nutritionist. The type of documents required from the employer will not be restricted by the MAHPC. Documents can include logbook, employment letter, proof of on-the-job training, verified by superiors /departments etc. Also note that the applicant will have to submit a Practice Verification Form signed by the employer to certify that the applicant has been working as a nutritionist. The Form is available in the Guideline for Allied Health Professionals in the MAHPC website; refer to the general information section of this Q&A document to download the form.
I have a B.Sc. (Food Science and Nutrition) (UMS), as well as a MSc (Community Nutrition) (UPM) and PhD (Community Nutrition) (UPM). Can the MSc and PhD be used as supporting document to prove that I have been trained in Nutrition?	The BSc in Food Science and Nutrition forms the basic requirement, and these additional postgraduate degrees in nutrition can be used to support your application for registration
I am not a graduate of nutrition degree, but I have been working as a lecturer in nutrition programme. What are the requirements for me to register as a nutritionist?	You can apply for registration as a nutritionist and you will be considered based on the nature of your first degree and your job scope as a lecturer and other duties you perform. These taks must be inline with the definition and job scope of a nutritionist as specified by the MAHPC

#### Question

I obtained my B. Sc. (Hons) Food Science and Nutrition from UCSI University in 2016. I am currently working as a researcher on public health issue, including nutrition. For the proof of my previous practice, is it possible to submit payslip and photos taken during the health activities that i conduct? This is because I previously worked as nutritionist in Singapore from 2016-2018, then returned to Malaysia for postgraduate study. The payslips for my previous works did not clearly specify my scope of work but only the job titles (nutritionist, coach).

I am a graduate in Food Science and Nutrition. I have been working as a nutrition content creator in social media. Is the materials created sufficient to be included a documentation to support my registration?

#### **Response from Panelists**

Your BSc seems to be appropriate basic requirement. To provide proof your previous work in the area of nutrition-related activities, all types of documents can be submitted. Documents can include logbook, employment letter, verified by your employer. Also note that you will have to submit a Practice Verification Form signed by the employer to certify that the applicant has been working as a nutritionist. Refer to the general information section of this Q&A document to download the form.

Do apply and upload the materials you have created for consideration of the MAHPC. The nature of the content will be reviewed. Also provide information on the organisations which used your creations. Since you are a self-employed practitioners, you will need one of the following to provide you with a Practice Verification Form to certify that you have been practising as a nutritionist: a) Registered Medical Practitioner; or b) Registered Dental Practitioner; or c) Qualified/Registered Allied Health Practitioner; or d) Professional Associations Registered with the Register Society of Malaysia eg Nutrition Society of Malaysia. The Practice Verification Form is available in the Guideline for Allied Health Professionals; refer to the general information section of this Q&A document to download the form.

Question	Response from Panelists
I am a graduate in BSC Food Science and have practised as nutritionist for many years. However there is no mentioned "nutritionist" in the position of the employee appointment letter. Will this enable me to fulfill the requirement to register as a nutritionist?	What is most important is not merely having the term "nutritionist" in your appointment letter. What is important is to submit a document endorsed by your employer describing the nature of your work. MAHPC will consider if the description fits the definition and job scope of a nutritionist and job scope.
For applicants possessing a degree that is not one of the recognised universities, can the job scope as proven by the employer be used to support the application for registration?	Yes, a description of the tasks, endorsed by the employer should be submitted during application for registration to support the application. The MAHPC will determine if the job description is in line with that for the nutritionist. Note that you will have to submit a Practice Verification Form signed by the employer to certify that the applicant has been working as a nutritionist. Refer to the general information section of this Q&A document to download the form.
It may be difficult to base on job training or practice in a particular company to prove that a person's job is related to nutritionist. Would the MAHPC consider conducting an exam for persons who do not meet the requirements of graduating from the list of recognised universities?	At this time, the MAHPC is not considering conducting an examination as one of the ways to evaluate the eligibility of applicants
What happens if I do not have any training certificates to act as supporting documents, especially in private sector?	Try to submit any form of proof or document. This can include participation in workshops, short courses or conferences

Question	Response from Panelists
I have a BSc in Dietetics and a MSc Human Nutrition, both from overseas universities, but I didn't go thru supervised dietetic trainings overseas. Hence, I have been practising in nutrition. If i want to register as a nutritionist, do I need to show proof of practising nutrition?	Yes, you will have to show proof, endorsed by your employer, that you have been practising in the field of nutrition. The description of your job scope will be reviewed by the MAHPC to determine if it is within that prescribed by the MAHPC; refer to general section of this Q&A section for this job scope
If I have the nutrition degree and currently employed in private sector and doing nutrition training. I will need to obtain letter from our HOD to prove that?	Yes, you would need to a document from your HOD to describe your role in the company. You will have to submit a Practice Verification Form signed by the employer to certify that you been working as a nutritionist. Refer to the general information section of this Q&A document to download the form.
Is there any set time frame that I should register to practise as a nutritionist after graduating? For example, if I wish to apply to register more than 3 years after graduation, will I be considered?	MAHPC has not set a specific time frame by which a graduate must register to practise as a nutritionist. For a person who has not registered for some years after graduation, he will be assessed on various criteria on a case-by-case basis, including his degree, his work after graduation
When submitting an application for registration, how do I prove that I have been working as a nutritionist in a company before this act was enforced?	During the application process, you will have to upload documents provided by your employer, that you have been practising in the field of nutrition and describing the nature of the work. The description of your job scope will be reviewed by the MAHPC. You will also have to submit a Practice Verification Form signed by the employer to certify that you been working as a nutritionist. Refer to the general information section of this Q&A document to download the form.

Question	Response from Panelists
At least how many years of working experience is needed before a person is eligible to register and apply for practitioner certificate? Can a fresh graduate with B.Sc. Nutrition apply for registration as a practitioner?	There is no minimum number of years a person must practise before being eligible to register as a practitioner. A fresh graduate with B.Sc nutrition from one of the degrees in nutrition in the list recognised by the MAHPC can apply for registration
A person with a degree that is not one of the nutrition degrees in the recognised list may be considered for registration under "grandfather's clause". Is there a requirement that he must prove that he has been practising in nutrition field for at least 10 years?	A person with a degree that is not one of the nutrition degrees in the recognised list may be considered for registration based on transitional provisions under section 46 of the Act. There is no requirement for a minimum number of years that a person must be practising in nutrition field before being eligible to apply for registration
I find the requirement for proof of working as nutritionist to be provided by an employer is rather unclear. Does it mean that the person is not required to have completed a nutrition degree course for 3-4 years? Is a person who has been working in nutrition field, eg as a sales man for nutrition products eligible to register to practise as a nutritionist?	It is clearly specified that a person who does not possess one of the recognised nutrition degrees must still possess a similar academic qualification. It means that he must still have a degree in a related field. In addition, this person must also have been practising in the field of nutrition as described in the definition and scope of practice under the implementation of the Act 774. Refer to the general section of this Q&A section for this description
For a person who is not a graduate from one of the recognised universities, what type of further courses are required to enable him to apply for registration as a nutritionist? How many of such courses are required?	There are no specific courses recommended. What is important is that these courses must be related to the practice of a nutritionist, in accordance with the defined scope of practice. Refer to the general section of this Q&A section for this description. There is no recommended minimum number of courses; its not the number that is important, but rather the relevance of the courses

Question	Response from Panelists
As a freelance nutritionist or self employed nutritionist with own practice, what are some official documents that I need to provide when applying for registration?	You can provide documents to show proof that you have been offering nutrition consultancy services, eg in the form of your services brochure, registration with Registrar of Companies, sample of your work for your clients. For self-employed practitioners, you will need one of the following to provide you with a Practice Verification Form to certify that you have been practising as a nutritionist: a) Registered Medical Practitioner; or b) Registered Dental Practitioner; or c) Qualified/Registered Allied Health Practitioner; or d) Professional Associations Registered with the Register Society of Malaysia eg Nutrition Society of Malaysia. The Practice Verification Form is available in the Guideline for Allied Health Professionals; refer to the general information section of this Q&A document to download the form.
How does a self-employed nutritionist provide Practice Verification Form since he does not have an employer to sign the verification form?	For a self-employed practitioner, he will need one of the following to provide you with a Practice Verification Form to certify that he has been practising as a nutritionist: a) Registered Medical Practitioner; or b) Registered Dental Practitioner; or c) Qualified/Registered Allied Health Practitioner; or d) Professional Associations Registered with the Register Society of Malaysia eg Nutrition Society of Malaysia. The Practice Verification Form is available in the Guideline for Allied Health Professionals; refer to the general information section of this Q&A document to download the form.

Question	Response from Panelists
Under what circumstances will a registered nutritionist be disqualified or discontinued as registered nutritionist?	It is important to note that the MAHPC may exercise disciplinary authority over any registered practitioner:  (a) who has had his qualification withdrawn or cancelled by the awarding authority; (b) who has since been prohibited from practising an Allied Health Profession in any place outside Malaysia; (c) who has been alleged to have committed serious professional misconduct as stipulated in the code of ethics and professional conduct and any other guidelines and directives issued by the Council; and (d) who has obtained registration under this Act by fraud or misrepresentation. For other conditions, as well as for details on the disciplinary proceedings, refer to Part V of the Act 774.  It is also to be noted that a Code of Ethics and Professional Conduct is being developed by MAHPC and will be shared with all; watch for this in the MAHPC or NSM website
What type of documents are required from current employer to prove that a person is currently working as nutritionist? Is there a certain format to follow?	There is no specific template or format to follow. The type of evidence will not be limited nor restricted by the MAHPC. The documents to be submitted as proof can be in the form of employment letter, proof of on-the-job training, verified by superiors / head of departments, etc. In addition, the applicant will have to submit a Practice Verification Form signed by the employyer to certify that the applicant has been working as a nutritionist. The form is available in the Guideline for Allied Health Professionals in the MAHPC website; refer to the general information section of this Q&A document to download the form.

Question	Response from Panelists
Are the criteria and supporting documents required for registration posted anywhere?	The guideline for Allied Health Professionals in the MAHPC website contains the required information; refer to the general information section of this Q&A document to download the form.
Can you share us the link to register under AHP?	The invitation to intending practitioners to register as a nutritionist shall be announced and a link will be provided at that time eg through the MAHPC website or the Nutrition Society of Malaysia website. The schedule prepared for registration of the various professionals under the Act is given in the MAHPC website; refer to the general section of this Q&A document
is it compulsory to join as a member of Nutrition Society of Malaysia in order to be eligible to register as a nutritionist under the Act?	To register as a nutritionist under Act 774, It is not compulsory to be a member of Nutrition Society of Malaysia. However, all practitioners of nutrition are encouraged to join NSM. All professions under Act 774 are encouraged to establish their respective professional society. Professional bodies would include members who are from all sectors of practice. Participating in professional society activities are great ways to network with other practitioners and be updated with nutrition science
For renewal of the registered practitioners (including nutritionists), is it required to obtain CPD points?	The MAHPC is still working out the development of a CPD point system.  If the MAHPC decides to introduce CPD points as a requirement, sufficient time will be given to all practitioners to be familiar with the system before making it mandatory.

# C. Questions related to Eligibility for Application

Question	Response from Panelists
If a person does not have a BSc in Nutrition, but instead has a BSc in Biology or Biochemistry, but also possess a Master in Nutrition. Will he be eligible to be registered as a nutrition?	Persons who do not possess a BSc from the list of recognised degrees in nutrition are eligible to apply for registration as a nutritionist if they have a relevant degree such as biology or biochemistry and have been working as a nutritionist (with the job scope of a nutritionist by MAHPC). The Master degree in nutrition is useful as supporting the application. They can apply based on transitional provisions under section 46 of the Act. The Guideline for Allied Health Professionals in the MAHPC website provides the required information; refer to the general information section of this Q&A document to download the form.
Can a Master degree in Nutrition be accepted for registration as a nutritionist?	A MSc in nutrition alone is not sufficient for registration as a nutritionist. A postgraduate degree, or other trainings undertaken are useful to serve as supporting qualifications. You will need to submit your first degree in a related field, together with your postgraduate degree, as well as any working experience within the scope of a nutritionist for consideration by MAHPC

Question	Response from Panelists
Are freelance nutritionists or self employed nutritionists with their own consultancies eligible to register under this act? Any other criteria should be followed?	Freelance nutritionists and self employed nutritionists with their own consultancies are eligible to apply for registration. They do not have to be affiliated to any institution. However, they must possess the required academic qualifications ie, they should have a Bachelor's Degree in Nutrition or other equivalent degrees. Also, they should be able to prove their practice as a nutritionist. The type of evidence will not be limited nor restricted by the MAHPC. As long as the applicant is able to prove his/her practice with documentation to support it, they will be eligible to register.
	For a self-employed practitioner, he will need one of the following to provide you with a Practice Verification Form to certify that he has been practising as a nutritionist: a) Registered Medical Practitioner; or b) Registered Dental Practitioner; or c) Qualified/Registered Allied Health Practitioner; or d) Professional Associations Registered with the Register Society of Malaysia eg Nutrition Society of Malaysia. The Practice Verification Form is available in the Guideline for Allied Health Professionals; refer to the general information section of this Q&A document to download the form.
If I am currently not practising as a nutritionist, but I plan to be a freelancer nutritionist. Can I register as a qualified nutritionist in this 3 years (tempoh peralihan ini)?	Yes, you can apply for registration. But you will need to collect your proof in this grace period (3 years) that you are practising as nutritionist. In addition, you must possess the needed academic qualification of a nutrition degree or equivalent recognised by the MAHPC

Question	Response from Panelists
Are graduates with a BSc in Food Science & Nutrition or BSc in Food Science with nutrition be eligible to register as a nutritionist?	BSc Food Science & Nutrition from UCSI or UMS are not within the list of recognised degrees in nutrition. However, graduates of these degrees are eligible to apply for registration as a nutritionist if they have been working as a nutritionist (with the job scope of a nutritionist by MAHPC). They can apply based on transitional provisions under section 46 of the Act. The Guideline for Allied Health Professionals in the MAHPC website provides the required information; refer to the general information section of this Q&A document to download the form.
I do have a degree in nutrition but I have not been practising as a nutritionist for the past years, am I still eligible to register myself as a nutritionist?	You can apply and you will be assessed on various criteria, including further courses or training undertaken, and details of your work scope during the years after graduation
I am a graduate from Universiti Malaysia Sabah with a degree in food science and nutrition, major in food technology and bioprocess. I have been practising as nutritionist since 2015. What is the chances to get my self registered?	A great deal depends on the nature of your work as a "nutritionist" which you should submit the details for consideration. It should fit in the scope of a nutritionist as specified under the MAHP. Refer to general information section of this document on the scope of practice of a registered nutritionist
For fresh graduates (expected to graduate this year) who wanted to further their study in Master in Malaysia or oversea, are they still eligible to register under this Act? Or do they have to register after obtaining their master degree?	The basic requirement is a bachelor's degree in nutrition. If these graduates have a degree from one of the recognised degrees, they can proceed to apply for registration. There is no need to wait till obtaining the Master degree

Question	Response from Panelists
I have come across individuals involved in direct selling (eg in MLM), selling nutritional products and claiming themselves as product trainers and nutritionists. I believe they are not nutrition graduates. Would you approve them under the Act?	Persons without a degree in nutrition or related academic qualifications and not recognised as practising nutrition within the scope of the AHP shall not be approved for registration as a nutritionist. They will not be permitted to claim as nutritionists and are not permitted to be selling nutritional products without the supervision of a nutritionist
How about persons who are working as contract nutritionists? Can they register to practise as a nutritionist under the Act?	The employment status, whether contractual or permanent, is not the primary concern. Rather, the nature of the work must be consistent with the scope of practice for a nutritionist as defined by the MAHPC (refer to the general information section of this document for more details). Please submit detailed information regarding the job scope, and the MAHPC will subsequently review and make a decision.
I have a BSc Nutrition from one of the recognised universities in the list and obtained a masters in dietetic from a university abroad; am I eligible to register as a nutritionist?	Yes, you can apply to be registered as a nutritionist under the AHP, as the basic requirement is a recognised BSc degree by the MAHPC. The master's degree is an additional qualification. This is assuming that you wish to pursue your career as a nutritionist in this country
How about those who have registered in other countries and working there? Are they allowed to register as a nutritionist in Malaysia?	If that person is working in other countries, he does not have to register as a nutritionist in this country. On the other hand, if he intends to return to Malaysia and work as a nutritionist, he can apply to register under the AHP. Of course, he must meet the requirements set out by Act 774, as provided under the Guide for Allied Health Professionals in the MAHPC website; refer to the general information section of this Q&A document

Question	Response from Panelists
Can a graduate of B.Sc. (Nutrition and Community Health) (without honours) from UPM apply for registration?	The list of BSc nutrition recognised by the MAHPC does not include a UPM B.Sc. (Nutrition and Community Health) without honours. This degree will be treated as an appropriate related degree and can be considered. In addition, the person has to provide proof that he has been working in the field of nutrition. The Guideline for Allied Health Professionals in the MAHPC website provides the required information; refer to the general information section of this Q&A document
How about a foreigner who was born in Malaysia, lived here all her life, has a Malaysian PR, is the letter of good standing (from original) country required for her application?	If an individual holds Permanent Residency (PR), they will be treated equivalently to a Malaysian citizen for the purposes of employment or running a business. They are eligible to apply for registration in the standard way, provided they meet all the necessary criteria for registration as a nutritionist. The "Guideline for Allied Health Professionals" on the MAHPC website offers the requisite information; please refer to the general information section of this Q&A document for further details.  Therefore Letter of Good Standing not required.

Question	Response from Panelists
If my job is related to regulatory services for nutritional products, am I eligible to be registered as nutritionist?	It would be difficult to give an exact answer just based on this brief statement. We would need more detailed information on your job scope. Apply for registration and submit all relevant documents including your first degree and details of your job scope.  In addition, you will be required to submit a Practice Verification Form signed by the employer to certify your scope of practice. The form is available in the Guideline for Allied Health Professionals in the MAHPC website; refer to the general information section of this Q&A document to download the form.
Is there a list of recognised nutrition degrees from overseas universities which can be accepted for registration as a nutritionist? Do we know the number of persons with nutrition degrees from overseas?	There is currently no available list of nutrition degrees from overseas universities which have been recognised for registration as a nutritionist in Malaysia. The MAHPC is still working on a guideline for registration of such graduates. We also do not have a tally of the number of persons with nutrition degree from overseas universities. After the Register of practising nutritionist is established, we will have such information
I have a background in dietetics and clinical nutrition, and now teaching nutrition course. Am I eligible to register as a nutritionist?	It is not possible to give a direct answer as we need more detailed information. When you apply, provide detailed information of your basic degree, other further training or courses undertaken, and full details of your job scope

Question	Response from Panelists
May I know why graduates from University of Nottingham Malaysia Campus BSc Honours in Nutrition before 2022/2023 intake are not included in the list of recognised nutrition degrees?	Before the 2022/2023 intake, the graduates in the BSc Honours Nutrition course of the University of Nottingham Malaysia Campus did not undergo placement in a work place for nutrition related industrial training. Such industrial training is a part of the training of the graduates from the other universities in the list of recognized degrees. For the batch from 2022/3023 onwards, such an industrial training has been included in the BSc Honours in Nutrition course of the University of Nottingham Malaysia Campus
I have 4 years of experience working as nutritionist in Malaysia, but now I just started a Nutritionist job in Singapore. At the same time I have my own consultancy business registered in Malaysia, can I register under this act, if yes, how?	If you intend to practise as a Nutritionist in Malaysia, you must apply for registration as a nutritionist under the Act 774. The guideline for Allied Health Professionals in the MAHPC website provides details of the requirement for registration; refer to the general information section of this Q&A document.
If I have a BSc in Food Science and Nutrition, will it be helful for my application for registration if I obtain a Master in Nutrition in one of the recognised universities?	BSc in Food and Nutrition is not within the list of recognised nutrition degrees for registration as a nutritionist. However, this is one of the acceptable related degree that can be considered for registration. An important requirement is that you must have been working in the field of nutrition, within the scope as defined by MAHPC. Having a master degree and other related courses or training can further support your application. The guideline for Allied Health Professionals in the MAHPC website provides details of the requirement for registration; refer to the general information section of this Q&A document.

Question	Response from Panelists
I have graduated in Food Service and Nutrition. I do learn about nutrition but not in detail. But I do have work experience related to nutrition for 2-3 years. Am I eligible to register as a nutritionist?	It is not possible to give a direct answer as we need more detailed information. Apply and let the MAHPC look at your degree, including details of your job description, to make sure it is in line with the description of the scope of practice of a nutritionist; refer to the general information section of this Q&A document
I graduated with a BSc in nutrition but have not been working as a nutritionist. Can I still apply for registration under the Act?	If your nutrition degree is in the list of degrees recognised by MAHPC, you can apply for registration. That is provided you intend to practise as a nutritionist. On the other hand, if your degree is not within the recognised list, and you have not been practising as a nutritionist, you may not meet all the requirements
If I am not working as a full time nutritionist, but I do work part time as a freelance nutritionist who give consultation/nutrient analysis. Am I eligible to register as a nutritionist?	It would be difficult to give a definitive answer just based on this brief information you provided. We would need more detailed information including what basic degree you possess, and details of your part time work in nutrition. Apply for registration and submit all relevant documents including your degree, details of your job scope.
I am a nutritionist who previously worked in a medical center for 4 years but recently changed to a management job in a healthcare centre. However, but my appointment is not mentioned as a nutritionist. Am I still qualified to apply for registration as a nutritionist?	The title of the job is not the main factor in considering if you meet the requirement for registration. What is important is to determine if the scope of your job with the healthcare centre, and the medical centre are in line with the definition and job scope of a nutritionist as defined by the MAHPC (refer to the general information section of this Q&A document). When submitting your application, make sure full details of your work are provided

Question	Response from Panelists
if a person is a medical doctor and also a practising nutrition. Can the person register with MMC (as a medical doctor) and in Act 774 (as a nutritionist), ie 2 registrations.	Pursuant to Act 774, there is no express prohibition against practitioners retaining multiple professional registrations, provided that they meet the requisite qualifications and registration criteria for each profession and are subject to the approval of the Council. They must of course be able to demonstrate he is able to handle both practices. Practitioners must also comply with the distinct application processes for each profession. In providing their professional services, practitioners must provide care that is commensurate with the standards dictated by each respective profession. It is important to note that these regulations and procedures may vary. For the most accurate and up-to-date information, it is recommended that practitioners contact the Malaysian Medical Council (MMC) directly to inquire about their policies on dual- practice.
If I have a masters in nutrition but have not been practising as a nutritionist for many years, and still want to apply for registered nutritionist to become freelancer, will my application for registration be considered?	It would be difficult to give a definitive answer just based on this brief information you provided. We would need more detailed information including what basic degree you possess, which year was your first degree, when was your masters obtained, etc. Apply and provide all needed information in detail
I have a BSc. In Nutrition and Community Health from UPM, a MSc in Nutritional Science and recently obtained a PhD in Medical Biotechnology, a totally different field. Am I eligible to apply for registration as a nutritionist?	Yes, you can apply for registration because your basic degree can be considered an acceptable alternative nutrition degree. An important requirement is that you must have been working in the field of nutrition within the scope as defined by MAHPC. The postgraduate degrees can further support your application.

Question	Response from Panelists
Is Executive Master in Preventive Health from Open University Malaysia eligible for registration?	We would need to understand the details of this Executive Master in Preventive Health, eg the modules in this course, duration, etc. We would also need to have details of your first degree. Would also be useful to know your work experience and if you have attended other courses and relevance of these to nutrition practice
Is the product trainer considered a nutritionist and needs to be registered as AHP?	It would be difficult to give a definitive answer just based on this brief information you provided. We would need to have more details eg the nature of your job as a product trainer, who do you train, do you have any supervisors, the organisation you are working with
Just to confirm, can the Nottingham University students graduating by 2022/2023 with internship placement apply?	The full list of nutrition degrees recognised by the MAHPC for registration is available and may be updated from time to time. You can view this list in the Health Professionals tab of the official website of the Nutrition Society of Malaysia: https://nutriweb.org.my/index.php?briefing-session-for-registration-of-practitioners-for-the-profession-nutritionist-under-ahp-act-774
Can a wellness coach apply to register as a nutritionist under the Act?	It would not be possible to give a definitive answer just based on saying you are "wellness coach" as it is not what is a wellness coach. We would need more detailed information including what basic degree you possess, what other courses have you attended, what does your job as a wellness coach entail, etc. Apply and provide all needed information

Question	Response from Panelists
I have a B.Sc. (Hons) Food Science and Nutrition degree from UCSI UNIVERSITY instead of B.Sc. (Hons) Nutrition and Wellness which is listed in the list of recognised degrees. Does it mean that the only way for me to apply for registration as a nutritionist is through certification that i have been working as a nutritionist?	Since you do not possess a nutrition degree from the list of recognised degrees, you can be considered for registration based on transitional provisions under section 46 of the Act since you possess a nutrition degree wich may be accepted as a alternative degree. In addition, you will need to provide proof that you have been working in the field of nutrition. The Guideline for Allied Health Professionals in the MAHPC website provides the required information; refer to the general information section of this Q&A document
May I know if Bachelor of Food Science with Nutrition (Hons) from Universiti Malaysia Sabah is the same as mentioned as no. 8 in the list?	BSc Food Science with Nutrition (Hons) is not the same as BSc Nutrition from Universiti Malaysia Sabah. Only the latter is listed in the list of recognised degree
May I know if The University of Newcastle, Australia (credit transfer program collaborate with International Medical University) being recognised??	We do not know the details of the transfer programme.  However, if a person has BSc Honours in Nutrition degree from IMU, it is one of the degrees in the list recognised by the MAHPC. In your application for registration, with details of the course
May I know if a person obtains a certificate from direct sales company that organise nutrition course, and self claim as a nutritionist, then he practises health and nutrition counseling for more than 10 year. Is he eligible to register as a nutritionist under the Act?	The basic requirement is a bachelor's degree in nutrition or related degree recognised by the MAHPC. Having attended a course and obtaining a certificate is not an acceptable qualification. You will not likely to be able to register as a nutritionist.

Question	Response from Panelists
I have been practising in the health & nutrition industry for over 10 years but my job title is not a nutritionist but others eg: sales, marketing, product development; am I eligible to register to practise as a nutritionist?	The job title is not the main eligibility criterion for registration. It is more important to understand the job description or job scope. This should be in line with the description as accepted by the MAHPC (refer to the general information section of this Q&A document). Of course, the Council will also look into the academic qualification that you possess
Taking into consideration the Tempoh Peralihan (Transition Period) of the enforcement of the Act, will graduates of BSc Food Science and Nutrition (which is not in the list of recognised nutrition degrees) before 1 July 2022 or 30 June 2025 be eligible to register as a nutritionist?	The AHP Act 774 has been enforced since 1 July 2020, and registration has commenced since 1 July 2022. The transition period is to provide opportunities for practitioners with the required qualifications to take the initiative, gather the required documents and proceed to register. Persons who do not have the required training should terminate their practice as a nutritionist. After the transition period ends, legal action will be taken against anyone who misuses the word nutritionist or works in this field without being registered. Persons who graduate with a BSc in nutrition that is not in the list of recognised nutrition degrees will have to follow the requirements as stipulated in the Guidelines for Allied Health Professionals in the MAHPC website, which provides details of the requirement for registration; refer to the general information section of this Q&A document.

Question	Response from Panelists
I studied oversea and practised in an oversea hospital. Can I apply for registration as a dietitian or nutritionist?	If you had practised as a dietitian oversea and intend to apply to register as a nutritionist in Malaysia, you would not be able to prove your practice as a nutritionist to support your application. It would be wiser to apply according to what you have been practising overseas. Of course, it would also depend on the basic degree that you have, as this is an important basic requirement for registration
There are practitioners with BSc in other fields but not in nutrition, but working in Pharmacy outlets with the title Nutritionist. Are they qualified for the registration? If yes, what are the documents required?	For persons with Bachelor degree in other fields of science, the eligiblity to apply for registration for nutrition depends on various criteria, including the degree should be acceptable as alternative to nutrition; have been working in nutrition practices in line with the scope of practice of nutritionist as defined by MAHPC; having attended training or courses related to nutrition. The Guidelines for Allied Health Professionals in the MAHPC website provides details of the requirement for registration; refer to the general information section of this Q&A document.
There are available various courses on nutrition training or education, usually of short duration of a few days or weeks. Are participants of such courses eligible to be registered as nutritionists?	The requirement for applicants for registration as a nutritionist under Act 774 is a basic degree in nutrition or equivalent recognised by the MAHPC. Participants of short courses do not have the required qualification to apply for registration

Question	Response from Panelists
There are so many so called nutritionists online who claim that they have joined a course or obtained a certification in nutrition and promote products and educate public with the title of nutritionist. May I know what can we do if came across such practitioners? Are they eligible to claim as a nutritionist?	Persons who do not possess the minimum qualifications are not eligible to be registered as nutritionists and use the title, or carry out nutrition practises. Any member of the public or other practitioners can report such cases to the MAHPC. Action can be taken again such persons under Section 33 of the Act which provides for offenders to be fined up to an amount not exceeding fifty thousand ringgit or to imprisonment for a term not exceeding two years or to both.
I am a graduate of the University of Nottingham Malaysia Campus before 2022/2023 intake. What are the additional conditions to enable me to apply to register as a nutritionist?	After graduation from University of Nottingham Malaysia Campus, if you have been practising as a nutritionist, you may apply for registration. You will need to submit documents as proof of practice when applying. In addition, you will also have to submit a Practice Verification Form signed by your employer to certify that you have been working as a nutritionist. The form is available in the Guideline for Allied Health Professionals in the MAHPC website; refer to general information section of this Q&A document
Which nutrition degrees from both public and private universities in Malaysia are recognised for registration as a nutritionist under Act 774?	At this time, the MAHPC has recognised 9 nutrition degrees from local public and private universities as eligible for registration as nutritionists under Act 774. This list is contained in the slides presented during the briefing session and has been uploaded in the Health Professionals tab of the official website of the Nutrition Society of Malaysia: https://nutriweb.org.my/index.php?briefing-session-for-registration-of-practitioners-for-the-profession-nutritionist-under-ahp-act-774

# D. Questions related to Job Scopes of Nutritionist

Question	Response from Panelists
What about "community support groups"? Are they still permitted to assist in implementing nutrition activities in the community?	Members of the "community support group" can assist in implementing nutrition activities in the community, as long as they do not claim themselves as nutritionist. Such activities should preferably under the supervision of registered nutritionists.
I understand that several graduates with a degree in Food Science and Nutrition have been employed as Nutritionists in Ministry of Health Malaysia in the past. Can i enquire if these staff will be absorbed as permanent nutritionists in the Ministry?	These officers possess a BSc degree which can be accepted as equivalent academic qualification for registration. What is important is that they obtain Practice Verification from the departments in which they have been working, to prove that their scope of work is in line with the job scope of a nutritionist as defined by MAHPC.
Can nutritionists provide weight management services to the public? Or this is under the job scope of dietitians?	For persons who are obese, it would be advisable that nutritionists do not undertake weight management activities. It is best to leave such management efforts to treatment by dietitians, or even physicians. Refer to the scope of practice of nutritionists as accepted by the MAHPC; see the general information section of this Q&A document
For those who are not qualified as nutritionist under the Act, can they sell or promote nutritional products, eg supplements or special diet?	Persons who are not eligible to be registered as nutritionists under the Act will not be permitted to call themselves nutritionists and are not permitted to perform activities of a nutritionist, including providing dietary advice and promotion of nutritional products.

Question	Response from Panelists
If the person is a graduate in biomedical science or food science, and is involved in teaching nutrition students and doing research in nutrition, can he be considered as nutritionist?	Graduates in biomedical science, food science and other related degrees may apply for registration as a nutritionist, provided they have been practising nutrition activities, in line with the scope as defined by the MAHPC. Such graduates can be considered for registration based on transitional provisions under section 46 of the Act. Refer to the guideline for Allied Health Professionals in the MAHPC website for details of the required information; refer to general information section of this Q&A document.
If there is a dietitian as well as a nutritionist in a hospital, and if the dietitian is away or on leave, can nutritionist cover the job as a dietitian?	The dietitian and nutritionist have different job scopes, according to the MAHPC. Refer to the scope of practice of nutritionists as accepted by the MAHPC; see the general information section of this Q&A document
if I am a registered nutritionist and work in a pharmacy as a nutritionist, I will be promoting & selling a variety of nutritional products. Are such practices acceptable within the job scope of a nutritionist?	A registered nutritionist can work in a pharmacy and provide appropriate nutrition information to customers when promoting nutritional products. It is important for the nutritionist to provide relevant information to assist the consumer in making informed choices and purchasing the appropriate products that are really needed
For private companies who need to recruit nutritionists is it compulsory for them to only employ those who are registered nutritionists under the Act?	Yes, companies which need to recruit nutritionists should only employ persons who are registered nutritionist under Act 774. Any person who employs a person who is not registered under this Act to perform the duties and responsibilities of a practitioner of an Allied Health Profession, inclduing a nutritionist, commits an offence. The penalty for such offences are clearly spelt out in Section 36 of the Act.

Question	Response from Panelists
Under Act 774, can a practitioner register both as a nutritionist and a dietitian? Can they practise in both professions?	Pursuant to Act 774, there is no express prohibition against practitioners retaining multiple professional registrations, provided that they meet the requisite qualifications and registration criteria for each profession and are subject to the approval of the Council. Practitioners must also comply with the distinct application processes for each profession. In providing their professional services, practitioners must provide care that is commensurate with the standards dictated by each respective profession.  However, it would be advisable to register to practise only for one profession, either as a nutritionist or dietitian, depending on the person's interest. In this way, he can focus attention on the profession that he does best.
What are the specific job scope of a nutritionist? How is it different from that of a dietitian?	Information on description of a nutritionist's scope of practice can be viewed at the Health Professionals tab of the official website of the Nutrition Society of Malaysia: https://nutriweb.org.my/#. The scope of practice of a dietitian is also clearly spelt out in this document mentioned above. It is important to understand that both professions are equally important in the health care system of the country. Both have different roles to play, but bot professionals work together towards the common good of the public. Nutritionists are focused more on prevention, whereas dietetians main roles are more towards therapeutic.

## E. Legal aspects of AHP

Question	Response from Panelists
I have observed doctors providing nutrition advice to their patients and also promote the use of various supplements, including vitamins. Is this appropriate for doctors to be doing this? Is this permitted under the AHP Act 774?	Many patients listen to their doctors. It would be encouraged for doctors to provide nutrition information to their patients. We want more members of the public having appropriate food nutrition information. If doctors feel that some supplements may be helpful to their patients, based on their diagnosis, they will prescribe such supplements. Doctors do not claims themselves as nutritionists. There are no specific prohibitions in the Act 774 on this matter.
Please consider to establish more vacancies for posts of Nutritionists in the Ministry of Health Malaysia. Hopefully nutritionists can be placed in various important organisations to promote healthy nutrition, eg in schools in view of the rise in childhood obesity, in elderly homes to take care of the nutritional wellbeing of these people in the golden years. I believe we have many qualified Nutritionists in Malaysia, just not enough posts for them to carry out their tasks	The Ministry of Health does have long term plans to employ more nutritionists and place nutritionists in various strategic organisations and will continue to obtain approval for the creating the needed posts and filling these posts
What are the benefits or protection for being a registered nutritionist?	Primarily, an individual intending to practice nutrition is obligated to possess the necessary qualifications and is legally mandated to register as a nutritionist. One of the fundamental goals of Act 774 is to oversee and regulate the activities of allied health professionals in Malaysia, which encompasses the profession of nutritionists.
	Obtaining registration as a nutritionist offers several advantages and protections, which are as follows:

**Validation of Expertise**: Registration serves as a testament to your professional competency, reflecting the fact that you have met the set industry standards and adhere to a strict code of ethical practice.

**Framework for Professional Conduct**: As a registered professional, you're subject to a specific code of conduct or ethics, which not only sets clear guidelines for professional behavior but also provides a mechanism for the public to report any misconduct. This accountability framework safeguards both your interests and those of the public.

**Enhanced Career Prospects**: Registration is often a prerequisite for employment in certain organizations. It also enables membership in professional associations, opening doors to networking and professional development opportunities, access to industry-specific job postings, among other benefits.

**Legal Safeguard**: Being registered serves as a defense against allegations of unlicensed practice, thus offering a form of legal protection.

**Public Assurance**: Registration instills confidence in your clients and the general public regarding your qualifications and services. It assures them of your accountability to a regulatory body and your commitment to professional standards.

Question	Response from Panelists
The awareness among the public on the role of nutritionists is pretty low. This includes among corporate companies. Thus nutritionist face under employment issue. How can this Act improve this situation?	With the implementation of this Act, employers/companies will become more aware of the requirement to employ properly registered nutritionists in their organisation. The public too will become more aware of only seeking advice from registered nutritionists. The Ministry of Health and other responsible parties including the Nutrition Society of Malaysia, as well as all practitioners will have to do the necessary to spread awareness of the Act.
Will action be taken on those persons who are not registered as nutritionist under the Act, but they claim themselves as nutritionist?	Person who are not registered under this Act are not allowed to use the title of registered nutritionist and not allowed to practise as a registered nutritionist. Action can be taken again such persons under Section 33 of the Act which provides for offenders to be fined up to an amount not exceeding fifty thousand ringgit or to imprisonment for a term not exceeding two years or to both.
Is it mandatory for all registered nutritionists to display their registration number together with their names when performing their duties?	Upon registration, the practitioner will be known as "NUTRITIONIST or REGISTERED NUTRITIONIST" and will be provided a unique registration number. He will have to display this title and registration number with his name, eg NUTRITIONIST: MAHPC (NUTR) 00000.

Question	Response from Panelists
How can the public verify the status of a person who claims to be a registered nutritionist? Is there a platform to check?	Section 15 of the Act provides for the set up of a Register of registered practitioners under this Act and that would include registered nutritionists. Any person may request to insect the Register. This will be announced at a later date by the MAHPC
If someone claims to be a nutritionist in Chinese eg 营养师, is that permitted under Act 774?	Section 33 of the Act clearly indicates that a person who is not a registered nutritionist shall not use the title registered nutritionist or any title in any language which may be reasonably construed to imply that he is a registered practitioner under the Act.
Instead of the term "nutritionist", some practitioners call themselves as "Nutrition Consultant", "Nutrition Advisor", "Product Advisor" etc. Is it acceptable?	The official title after registration under the Act is NUTRITIONIST. Each registered practitioner will also be given a unique registration number assigned to him: eg MAHPC(NUTR)00000. Within his organisation, he may also be known by other titles, eg nutrition consultant, nutrition advisor, etc.
Some companies employ sales associates or promoters to promote supplement or nutrition products. Is this permitted under Act 774? They do not call themselves nutritionist but other names, however some aspects of their job scope are that of a nutritionist.	Companies engaged in the promotion of nutritional products, or similar activities, are legally obligated not to designate such employees as "nutritionists" if they lack the requisite qualifications for registration under Act 774. Moreover, the execution of these activities must be suitably overseen by registered nutritionists within the same company. Consequently, these registered nutritionists bear the responsibility for the actions undertaken by these personnel.

Question	Response from Panelists
Those who are not registered but still call themselves as a nutritionist, can we report them? And what action will be taken towards this group of people?	Yes, you can report those who claim to be a nutritionist but are not registered as a nutritionist under the AHP Act. If a person is working as a nutritionist without registering, the practitioiner is committing an offence. Action can be taken again such persons under Section 33 of the Act which provides for offenders to be fined up to an amount not exceeding fifty thousand ringgit or to imprisonment for a term not exceeding two years or to both. employer
Would the corporate companies / employers that may be employing nutritionists be notified and briefed on the enforcement of the AHP Act so that they are made aware of the Act and the implication of violation?	All stakeholders in the country have been invited to attend engagement sessions organised by BSKB regarding implementation of the Act some time ago. For the briefing session that was organised on 22 June 2022, invitations were sent out to stakeholders in different sectors, including private sector to attend the session. Would be good to undertake more awareness campaigns among all stakeholders.
Would the MAHPC carry out inspections to check on practitioners to ensure they are registered practitioners?	Yes, enforcement officers appointed under the Act will carry out regular inspections and act upon public complaints or concerns raised by other practitioners to verify the registration status of practitioners. During the transition phase, the focus will be predominantly on education and guidance. Practitioners discovered to be unregistered will be advised to initiate the registration process, provided they meet the eligibility criteria. Conversely, those lacking the necessary qualifications will be directed to cease their practice.

## F. Registration fee for AHP

Question	Response from Panelists
As an expatriate, serving as a Nutritionist in Malaysia, close to 2 decades, the practising fees of RM 300/ year is very expensive. Is it possible to consider revising the fees of expatriates?	The fee has been fixed after various considerations. It has been gazetted as Allied Health Professions Regulations (Fee) 2020.
Is a staff in a statutory body considered a government servant? In the medical assistant board, they regard the statutory body as private sector. Therefore, it is necessary to pay for the certificate renewal application	At the moment, all appointments made based on an Act of Parliament will be considered public servants. Any changes to this policy will be communicated in a timely manner.
For practitioners who have been confirmed as government officers, do they still need to renew their practising certificates?	Pursuant to the Allied Health Professions Act 2016 (Act 774), all practitioners who intend to practice as a nutritionist, regardless of the sector in which they work in Malaysia, are required to register with the Malaysian Allied Health Professions Council (MAHPC) and apply for a practising certificate. This practising certificate must be renewed every two years.
For confirmed nutritionists working in the Ministry of Health or State Health Departments, can they seek reimbursement for all the fees that they pay for registration and practicing certificate as well as biennial practicing renewal fees ?	Approval for reimbursement from the Ministry of Finance has been obtained. The necessary information on this matter will be provided to the PTJ at a later date.
Where is all the fee collection channelled to ?	At the present time, all fees collected are channelled to government revenue.

Question	Response from Panelists
How much is the total fee required, from start of registration to obtaining a practicing certification? How long does the practising certificate last and how much is renewal fee?	Total fee required is RM 400, from start of registration to obtaining a practicing certificate. The breakdown is as follows:  Application for registration: RM 50 Issuance of certificate of registration: RM 100 Application for practising certificate: RM 50 Issuance of practising certificate: RM 200 Total: RM 400  The practising certificate is valid for a period of 2 years, and to be renewed every 2 years, with a fee of RM200

#### **General Information Section**

The briefing deck presented during the briefing sessions is available in the official website of the Nutrition Society of Malaysia: <a href="https://nutriweb.org.my/index.php?briefing-session-for-registration-of-practitioners-for-the-profession-nutritionist-under-ahp-act-774">https://nutriweb.org.my/index.php?briefing-session-for-registration-of-practitioners-for-the-profession-nutritionist-under-ahp-act-774</a>

Schedule for registration of allied health professsionals under Act 774 is available on the MAHPC website: <a href="https://alliedhealth.moh.gov.my/Mahpc/2022/06/28/registration-schedule-for-allied-health-practitioners/">https://alliedhealth.moh.gov.my/Mahpc/2022/06/28/registration-schedule-for-allied-health-practitioners/</a>

Link to download Guideline for Allied Health Professionals in the MAHPC website:

https://alliedhealth.moh.gov.my/Mahpc/wp-content/uploads/2022/08/GARIS-PANDUAN-PENDAFTARAN-PENGAMAL-PROFESION-KESIHATAN-BERSEKUTU.pdf

Link to download definition and scope of practice of nutritionist: Check for the documents under the Health Professional tab of Nutrition Society of Malaysia website: <a href="https://nutriweb.org.my">https://nutriweb.org.my</a>

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Disclaimer: The responses are the views of the above panelists of the briefing session. All decisions on the implementation of the AHP are under the purview of the MAHPC

7 July 2023