

When Demand Doubles and the Workforce *Shrinks*

A National Compensation Framework for Clinical Dietetics in the MAHA Era

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Independent workforce analysis



FULL ANALYSIS
Methods, sensitivity table
& 95-reference memo

§1 Objective

Federal nutrition policy is scaling fast. The RDN training pipeline is contracting.

CMS Malnutrition Care Score → **all adults 18+** (Jan 2026): inpatient denominator **~13.5M → ~29M** discharges. Atop the MAHA Strategy + 2025–2030 Dietary Guidelines.

Purpose: the compensation floor that makes the mandatory master’s recoverable under post–OBBBA loans, and the federal lever to enforce it.

§2 Design, Methods & Instruments

Design. Cross-sectional synthesis of national data: BLS OEWS May 2025 + CE 2024, CDR, ACEND 2014–24, CMS NHE + Hospital IQR, CDC NHANES, OBBBA (P.L. 119–21) + ED loan rules; UK NHS pay bands.

Instrument. Financing model: \$161,000 illustrative graduate debt · federal \$71,000 after fee (\$71,750 borrowed: 3.5 yrs at the \$20,500/yr graduate limit) on RAP · private \$90,000 at 9%, 10 yrs · 2026 taxes · BLS CE 2024 living costs. Best case: assumes all 3.5 years, supervised practice included, are loan-eligible graduate study.

RAP at these wages doesn’t cover the interest (it is waived); balances run up to 30 yrs, then are forgiven as taxable income, or after 10 with PSLF. Full method + sensitivity table at the QR.

§3 Results: The Central Finding

\$87,300 → **\$77,130** | **–\$10,170**
Respiratory Therapist | **Dietitian Nutritionist**
Associate’s degree · entry credential | Master’s mandated since Jan 1, 2024

Same BLS release, national means. Holds in general hospitals (RT \$87,810 vs RDN \$78,710) and at *every credential tier*.

AT ENTRY PAY, THE CREDENTIAL DOES NOT CLEAR

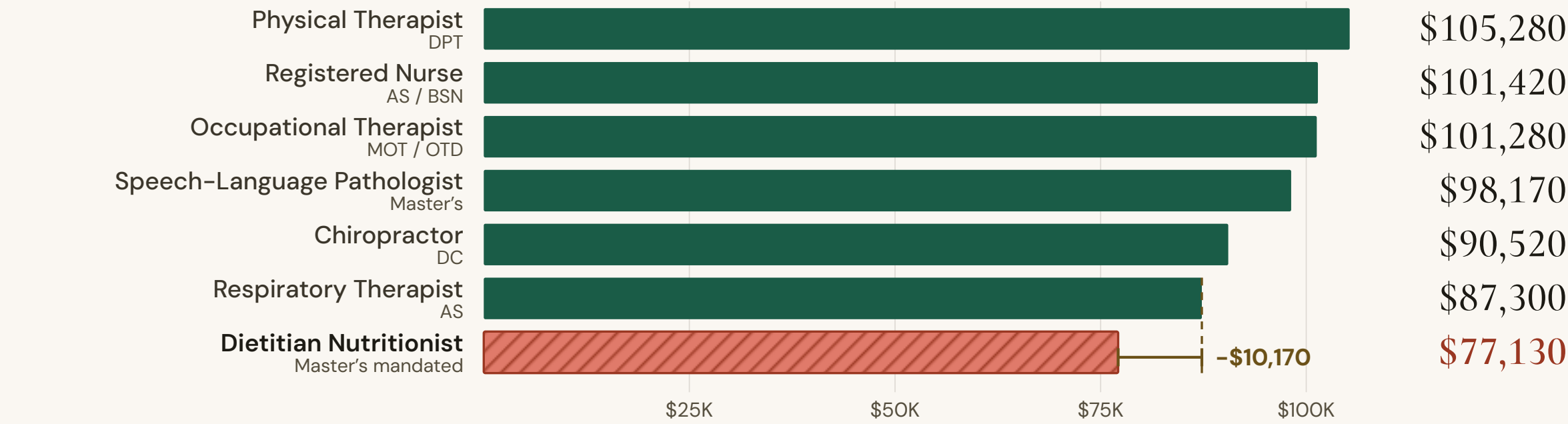
–\$7,801 / yr

New dietitian at the 25th-percentile wage (\$63,080), \$161,000 of graduate debt, large-metro budget, 2026 taxes.

At the mean wage (\$77,130): +\$811/yr. Updated since the abstract (May 2026), whose +\$688 and –\$6,312 assumed a 10-year payoff and placeholder budgets.

Also new: ED’s earnings rule (91 FR 40136, July 2026) ends Direct Loans for graduate programs that fail a bachelor’s-earnings benchmark in 2 of 3 years; earliest loss 2028.

PROOF 1 The U.S. Clinical Wage Ladder



National means wages: BLS OEWS May 2025. Real RDN wages 2015–2025: **–2.0%** (nominal +23% vs CDR +25.8%).

EXTERNAL VALIDITY
Not the NHS pattern. In the UK’s NHS, dietitians and nurses start on the **same pay band** (Agenda for Change Band 5). The floor below is recoverable, not radical.

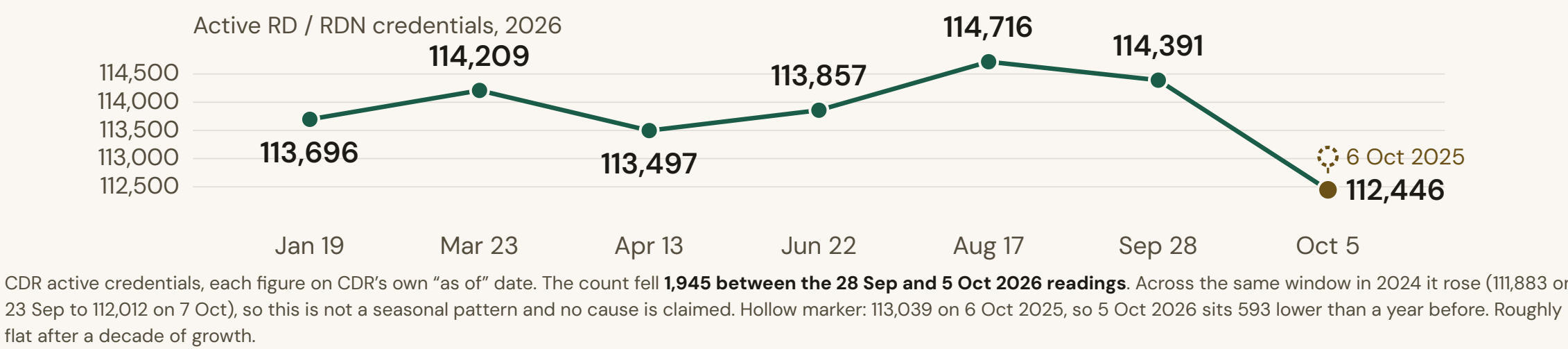
PROOF 2 The Debt Math

Entry wage, 25th percentile	\$63,080
Federal + payroll tax, 2026	–\$10,215
Net	\$52,865
Federal \$71,000 on RAP (6% of income)	–\$3,785
Private \$90,000 at 9%, 10 yrs	–\$13,681
Available for living costs	\$35,399

–\$43,200 LARGE-METRO LIVING	PROFESSIONAL-DEGREE LOAN LIMIT
–\$7,801	+\$5,880
per year: the credential does not clear	per year: same debt, all federal

Dietetics is not on ED’s interim professional-degree list (Oct 2026); PT, OT, SLP, nursing, PA and athletic training are. No-degree internships (80 of 232, ACEND 2026) often can’t use federal loans; financed privately, entry pay: –\$10,886 to –\$16,051/yr.

PROOF 3 The Pipeline Contraction



ACEND TOTAL –42% 24,423 → 14,170 enrolled, 2014–24 · all ACEND program types.	UNFILLED DI 2,405 2023 matches: first year unfilled > filled in ACEND’s series (since 1993).	INPATIENT SHARE 39→42% 2021–24 · largest RDN practice area, and rising.
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§4 Conclusions: The Four-Pillar Reform Framework

Compensation is the upstream policy variable: \$100,000 is the floor that makes every other piece of the 2026 federal nutrition agenda deliverable.

i PAY

\$48.08/hr · \$100,000/yr national clinical minimum.

Pay parity: PT, RN and OT means already exceed it. Enforcing it through Medicare Conditions of Participation would need new legislation (structural precedent: 42 CFR §482.23, §482.25).

ii BILL

Pass the Medical Nutrition Therapy Act.

H.R. 6199 / S. 3934, 119th Congress. Expands Medicare MNT beyond diabetes and kidney disease to ~a dozen conditions, including obesity, hypertension, CVD and cancer.

iii BUILD

Credential-anchored workforce investment.

Professional-degree loan status for dietetics (\$200,000 federal limit: +\$13,681/yr at entry pay). Paid supervised practice. HRSA Title VII (CoE §736, HCOP §739, FLRP §738) at HBCUs, HSIs, tribal colleges.

iv PROTECT

Scope protection and portable licensure.

Federal MNT scope protection + Dietitian Licensure Compact (19 member states, CSG, Sept 2026; privileges not yet issued), on the Nurse / PT Compact model.

DISCLOSURES

Independent analysis; no funding was received for it. The author is a hospital-employed registered dietitian nutritionist who would benefit personally from the pay floor proposed here; his employer is paying for his FNCE attendance, and he has precepted its dietetic interns. He owns a private nutrition practice (counseling, consulting, workforce data tools, guides and books), earns book income, and has briefed Academy leadership on its task force on the dietetics pipeline and compensation. Views are the author’s own, not any employer’s. No brand, product or program is promoted. Chiropractors are excluded from the debt comparators (a different loan cap). **AI USE:** prepared with software, including an AI model; every figure was checked against its source.

SELECTED SOURCES: FULL 95-REFERENCE LIST AT THE QR

BLS Occupational Employment & Wage Statistics, May 2025 (rel. 5/15/2026) · CDR Registry Statistics, Oct 2025 and Jan–Oct 2026 · ACEND program enrollment 2014–2024 · Academy Compensation & Benefits Survey of the Dietetics Profession, 2021 and 2024 · CMS Hospital IQR Final Rule, Malnutrition Care Score eQOM CMS986v5 (eff. Jan 1, 2026) · HCUP Nationwide Inpatient Sample · CDC NHANES 2021–2023 · White House MAHA Strategy (Sept 9, 2025) · Dietary Guidelines for Americans 2025–2030 (Jan 7, 2026) · One Big Beautiful Bill Act, P.L. 119–21 · H.R. 6199 / S. 3934, 119th Congress · 42 CFR §482.23, §482.25 · HRSA Title VII, 42 U.S.C. §5292 et seq. · NHS Health Careers, Agenda for Change pay bands.

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